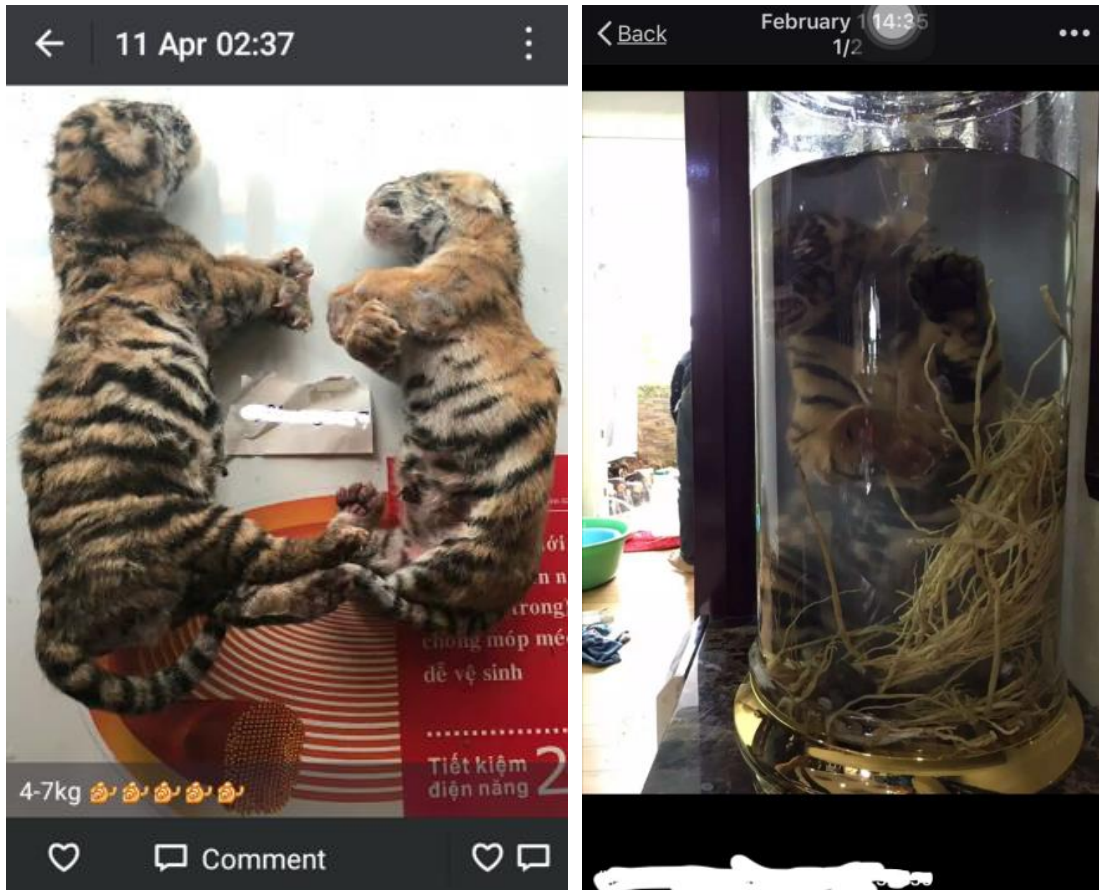


After over five years of Article XIII proceedings, the CITES Standing Committee should consider finally suspending trade with Lao PDR

15 August 2019



Above: Examples of how dead tiger cubs are offered for sale on WeChat by Vietnamese traders, and the end product, tiger cub wine

From revelations in 2013 that the Lao PDR Government (hereafter referred to as Laos) was issuing paperwork for the import and export of wildlife in contravention of CITES, through over five years of non-compliance proceedings, there has been very little progress in Laos in relation to tiger farms.

At CoP17 in 2016, Laos' announcement that they intended to phase out tiger farms was welcomed by CITES Parties, particularly since all tiger farms in Laos have been linked to illegal trade. Instead of investigating the facilities implicated in illegal activities however, in 2018 the Government of Laos issued an order allowing the conversion of existing tiger farms to safaris and zoos for "conservation, tourism and scientific purposes".

Since then, the number of tiger farms has increased (clearly contradicting Laos' 2016 commitment to close tiger facilities), and existing operations have expanded. The tiger farm audit required under the CITES Article XIII proceedings has not been completed. There are now six captive tiger facilities and they offer no educational or conservation value. On the

contrary, they have been linked to illegal trade in tigers¹ and other wildlife. All captive tiger facilities in Laos are run by companies that have been implicated in serious illegal activity:

- The U.S. Department of the Treasury has sanctioned the Zhao Wei transnational criminal organisation, responsible for the Kings Romans Casino and growing tiger facility in Laos' Golden Triangle Special Economic Zone, for involvement in drug trafficking, human trafficking, money laundering, bribery, and wildlife trafficking²
- Vannaseng Trading Company has been implicated in a case of illegal ivory trade and money laundering out of Uganda and has two tiger farms³
- Over 300 tigers have disappeared from the Vinasakhone tiger farm, by the tiger farm owners' own account, and have likely entered the illegal trade^{4, 5}
- The captive tiger facility at the Say Nam Theun Resort, opened in 2018, has been exposed for breeding, killing and selling tigers prior to and during the official tiger farm audit⁶

As documented by the Washington Post in May 2019, illegal trade in tigers from Laos' new tiger farm (Say Nam Theun Facility) illustrates how the assertion that it is a tourist attraction is a smokescreen for illegal activity. On 25 July 2019, seven dead tiger cubs were seized in Hanoi from a known tiger trader connected to one of the Laos farms.

Table 1:

Facility	Province	2016	2017	2018	2019
Vannaseng Fulrange Facility	Bolikhamxay (nr. Thailand border)	102	235	89-111	
Vannaseng's Laksao facility	Bolikhamxay (nr. Vietnam border)	50-60	At least 13 (capacity for 100-130)	86-106 (including cubs)	
Vinasakhone Facility / Muang Thong or Thakek Tiger Farm	Khammouane (nr. Thailand border)	400	97	69	54
Facility at the Golden Triangle Special Economic Zone	Bokeo (nr. Myanmar/ China border)	35 (casino facility)	~35 (casino facility)	23-35 (casino facility)	70-75 (total, including at new tiger and bear farm)
Samlem Kham Facility at the southern boundary of the Golden Triangle Special Economic Zone	Bokeo (nr. Myanmar/ China border)	Previously undocumented	Previously undocumented	25-26 (24 juveniles, 2 cubs)	Facility dismantled; location of tigers unknown
Say Nam Theun Facility at Ban Tha Bak	Bolikhamxay (nr. Vietnam border)	Construction started	Construction ongoing	17-40	53

¹ EIA, ENV, WFFT (2017), *Cultivating Demand: The Growing Threat of Tiger Farms*, <https://eia-international.org/report/cultivating-demand-growing-threat-tiger-farms/>.

² <https://home.treasury.gov/news/press-releases/sm0272>.

³ <http://www.monitor.co.ug/News/National/Foreigners-sent-for-trial-over-ivory/688334-4011216-ijtwsnz/index.html>.

⁴ EIA, ENV, WFFT (2017), *Cultivating Demand: The Growing Threat of Tiger Farms*.

⁵ SC69 Doc. 29.2.1. <https://cites.org/sites/default/files/eng/com/sc/69/E-SC69-29-02-01.pdf>

⁶ https://www.washingtonpost.com/graphics/2019/investigations/tiger-farms-poaching-laos/?utm_term=.ce9702fdda69

Tiger farming is a threat to wild tiger population recovery

Trade in captive bred tiger parts stimulates demand and undermines enforcement, as both wild and captive bred tiger parts enter the same trade chains at the point of processing and retail. Some traders have multiple supply chains that include both wild and captive tiger parts. Between 2002 and 2015, the Laos Government has licensed companies to breed, trade and export parts and derivatives of tiger.

In this culture and environment of treating the tiger as a commodity, and with no record of effective enforcement, it comes as no surprise that Laos' wild tiger population is functionally extinct, poached to the edge of extinction for their body parts. Tiger farms have clearly not relieved pressure on wild tigers. The Say Nam Theun Resort captive tiger facility is clearly not a centre for conservation. Illegal trade in tiger parts from this farm opened in 2018 was exposed in a [Washington Post](#) investigation earlier this year.

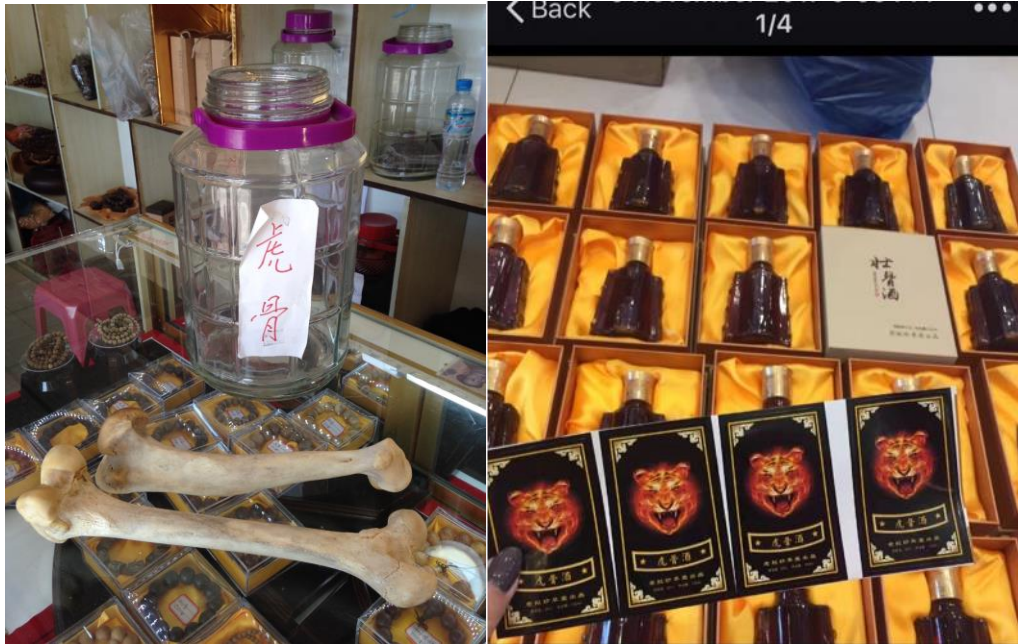


Above: tigers at the Say Nam Theun Resort, clearly not a centre for conservation

Retail and online trade in tiger parts and derivatives by Chinese and Vietnamese traders in Laos

Chinese-run businesses in Laos continue to manufacture and sell tiger bone wine, tiger canines and raw bones to visiting and resident Chinese nationals. Meanwhile, Chinese tourists' desire for tiger and other wildlife is catered for by Chinese-run tour groups arranging for private viewing and purchase of tiger parts, ivory and other wildlife.

Vietnamese traders, some based in Laos or with contacts in the country, conduct a prolific trade in dead tiger cubs, tiger skins and other tiger parts via WeChat. Unregulated breeding has led to huge numbers of cubs being born. Whether they have died due to inbreeding, poor conditions or have been deliberately killed, this appears to be a supply that has created a market.



Examples of tiger parts and products in retail outlets and online in Laos. Above left: Tiger bones for sale in Vientiane. Above right: Tiger bone wine manufactured in Laos. EIA has briefed authorities on persistent Chinese retailers and WeChat traders operating out of Vientiane several times, but trade continues.

71st Meeting of the CITES Standing Committee Draft Recommendations

The CITES Secretariat has proposed that Lao PDR shall undertake, *inter alia*, the following actions and report on progress to the CITES Secretariat at SC73, whereupon the Standing Committee can determine if further compliance measures are required:

- i) investigate and prosecute mid- to high-profile cases involving organized or transboundary illegal trade activities, such as those identified by various international partners; and provide to the Secretariat the results (arrests and prosecutions) of any investigations conducted by competent national authorities to determine the origin of specimens in illegal trade, the identities of individuals involved in smuggling, and the results of any legal proceedings against alleged perpetrators for the period February - December 2019 in the illegal trade report format;*
- l) disseminate and effectively implement Ministerial Decision No. 0188/MAF, dated 8 February 2019 on the Establishment and Management of zoos, wildlife farms, centers for rehabilitation and breeding of wildlife and wild flora farms;*
- m) finalize the full audit of the tigers kept in captivity, combined with a marking scheme and genetic analysis of the animals to establish their origin in collaboration with relevant international organizations to comply with paragraph 1 g) of Resolution Conf. 12.5 (Rev. CoP17) on Conservation of and trade in tigers and other Appendix-I Asian big cat species and Decision 14.69; and*
- n) establish an appropriate advisory committee with involvement of the CITES Secretariat and other relevant organizations and partners to provide advice on the transformation of commercial tiger farms.*

EIA recommends that SC71 and/or CoP18 adopt a recommendation to immediately suspend commercial trade in all CITES specimens which should remain in force until Laos demonstrates significant implementation of the Secretariat's recommendations as well as additional recommendations as follows:

Urge Laos to prioritise implementation of recommendation (i) as a matter of urgency, including investigating individuals and businesses implicated in illegal trade from and through captive tiger facilities in Laos.

Given the links between captive tiger facilities in Laos and wildlife trafficking and other serious crimes, urge Laos to ensure that any captive tiger facility suspected to be implicated in illegal wildlife trade should not be allowed to continue to keep tigers and other wildlife for any purpose.

Urge Laos to strengthen Decision No. 0188 to ensure compliance with CITES Decision 14.69, as outlined in Annex 1.

In relation to recommendation (m), urge Laos to ensure that the captive tiger audit provides an explanation for discrepancies in tiger numbers and that Laos' next report to Standing Committee includes an explanation and evidence (such as documents related to exchange / sale / export), for the movement of tigers from and through these facilities.

Upon completion of the audit, consult with the advisory committee of experts regarding a plan to close down the farms, including a means to ensure that there is close monitoring of captive tiger facilities in Laos to ensure that there is no trade/transfer of tigers from or through these facilities; and that no new tiger cubs are born in these facilities.

In relation to recommendation (n), urge Laos to ensure that those with expertise in looking after tigers in captivity and running wildlife sanctuaries where there is no breeding, buying, selling, or handling by visitors are consulted.

Annex 1

Concerns regarding Laos' Wildlife Farming Guidelines

EIA welcomes the May 2018 Prime Minister's Order No. 05/2018 on '*Strengthening Strictness of the Management and Inspection of Prohibited Wild Fauna and Flora*' and Laos efforts to develop '*Guidelines for the systematic management of wildlife farming*' as per Ministerial Decision No. 0188/MAF. However, we are concerned that provisions in the Order and the Guidelines support the "transformation" of existing commercial wildlife farms into safari parks or zoos. As described above, all facilities with captive tigers are run by businesses and individuals that have been implicated in illegal wildlife trade and therefore should not be converted or transformed into safari parks or zoos. If these facilities are allowed to continue to operate in any form, it is likely that their operations will continue to serve as a front for illegal wildlife trade.

The Guidelines and the ongoing wildlife trade legislation reform in Laos provides a critical opportunity for Laos to address major gaps in legislation and policy that facilitate wildlife trafficking. **EIA recommends that the Guidelines incorporate the following measures:**

- a) expressly prohibit possession and breeding of tigers and all trade in tiger parts and products and phase out existing captive tiger operations. Laos should expeditiously implement CITES Decision 14.69 which calls on all CITES Parties to restrict captive tiger

populations to a level required only for conservation and to adopt measures to ensure that tigers are not bred for trade. There is no conservation value in the captive breeding of tigers in Laos; it is a purely commercial venture.

- b) require routine and secure disposal of animal carcasses. This will prevent stockpiling of wildlife parts and products, and leakage into trade. Further, it will also reduce the risks to public health due to keeping of animal body parts.
- c) require that the disposal of tiger and other big cat carcasses take place under the supervision of a designated authority. The CITES Standing Committee has recommended that all CITES Parties should consider implementing similar measures as contained in India's legislation and policy in relation to preventing Asian big cat parts and derivatives from entering illegal trade.¹ Under applicable Indian law and policy, the carcasses of leopards, lions and tigers are required to be disposed by burning in the presence of the Director of the zoo to ensure that these specimens do not enter trade. Further, India does not have any stockpiles of Asian big cat specimens. The National Tiger Conservation Authority of India has issued a *Standard Operating Procedure for Disposing Tiger/Leopard Carcass/Body Parts* which requires that seized tiger and leopard specimens which are not required for court purposes must be destroyed in the presence of relevant authorities.
- d) require regular reporting on births, deaths, exchanges/additions and any other changes in the number of individual animals kept at the facility whilst a phase out takes place. Laos should strictly monitor wildlife farms to ensure that there is no illegal wildlife trade from or through such facilities. Any illegal activities taking place at such facilities should be thoroughly investigated resulting in prosecutions and appropriate deterrent penalties.

¹ Summary Record of the 66th Meeting of the CITES Standing Committee. 2016.