

NGO suggestions on the implementation of CITES Decision 18.108

Recognizing implementation of Decision 18.108 has been impeded by Covid restrictions our organizations propose the following approach to help fulfil this Decision. The Secretariat, in consultation with the Standing Committee, should:

(1) Develop a Terms of Reference (ToR) through a consultative process led by enforcement experts, including those with prior experience conducting inspections of captive big cat facilities, as well as experts in running not-for-profit sanctuaries / rescue centers and international scientific conservation breeding studbook programs, IUCN Cat Specialist Group members and other stakeholders with expertise in tiger and other Asian big cat conservation and trade issues.

(2) Ensure those Terms of Reference (ToR) / Guidance for the Missions under Dec 18.108 will enable the missions / Secretariat to:

a. Assess the outcome / impact of legal proceedings or other actions against facilities of concern previously identified as being implicated in domestic and international trade in Asian big cats, their parts and derivatives.

b. Develop and apply a series of trade opportunity and risk indicators relating to facilities of concern and their:

i) business practices including, for example: a clear articulation of what the primary purpose of the facility is/ registered as; whether it is open to the public or private; cases of retrospective issuance of licences ; information needed to determine the economic and financial feasibility of the stated purpose (standard operating procedures, location of facility, ticket sales, infrastructure for catering for visitors); onsite sale of products which may be produced using captive Asian big cats (i.e. “special bone wine”, “tiger bone glue”, teeth, claws, skins); affiliated businesses (other facilities keeping tigers / Asian big cats, wineries, taxidermists, bone glue processing, restaurants, supply of tiger / Asian big cat parts and products to retail / wholesale /hospitals etc); other species kept, bred and sold; and other financial accounting

ii) environment, security and husbandry practices including, for example: greater detail on how records are kept, data management and reporting done; greater detail in terms of how the stock/inventory system is run and how it is audited; security in terms of transport, storage and disposal; the photographic, marking/tagging, DNA forensics and other identification systems used to monitor individual specimens during their lifetime (birth, death, transfer, sale, disposal); whether the tigers are part of a regional / international scientific accredited studbook breeding programme for conservation (maintaining genetic diversity, protecting natural behaviour traits); whether the facility is a bona fide sanctuary (prohibiting breeding, buying, selling, handling of tigers / Asian big cats by visitors); how many cubbing dens present; are sexes separated or sterilized; are tigers / Asian big cats managed in such a way as to indicate they are not being kept or bred for conservation purposes (e.g. kept in unnatural groups or exhibiting unnatural behaviours; habituated to people, handled by visitors, handled unnecessarily by staff, inadequate veterinary care and welfare standards)

c. Assess the national legal frameworks, information management techniques and inspection protocols currently in place, including, for example: whether legislation restricts who can keep and breed tigers and other Asian big cats to conservation purposes, how that is defined and monitored; whether legislation enables domestic trade in parts and derivatives and/or if any existing trade bans are clear and unequivocal; whether legislation is sufficient to prohibit domestic trade in derivatives that are claimed to be or marketed as containing tiger and other Asian big cats; status of national centralized systems for recording individual identifier information (e.g. DNA, photographic, tag number), births, deaths, transfers, sales, disposal and how that information is used during audit processes; how is this information used to support national or international enforcement efforts; which agencies have authority to conduct scheduled and unannounced inspections; is there a time-bound action plan for phasing out captive tiger facilities that run counter to Decision 14.69 and 17.226;

(3) The missions should be conducted at the earliest opportunity allowed by COVID-19 restrictions and include appropriate experts. In the event a lack of funding or COVID-19 travel restrictions persist, the Secretariat in

consultation with the Standing Committee should develop and disseminate a comprehensive questionnaire for countries with facilities of concern, adapted from the ToR for the missions, as an interim measure to inform interim SC recommendations until such time as missions can be completed.

(4) Following the missions, or the questionnaire, in order to determine if additional interim approaches are required, the Secretariat should:

a. Provide a report / compiled responses from the questionnaire, for review and input from the membership of the IUCN SSC Cat Specialist Group, CITES Animals and Standing Committees, other Parties, NGOs and IGOs with expertise on tigers, enforcement experts and individuals with experience inspecting tiger farms and keeping captive Asian big cats for rescue and conservation purposes;

b. consult with experts as above to:

i) prepare a report for the next Standing Committee meeting¹ with any time-bound, country-specific recommendations required to implement Dec 14.69, 17.226 and para 1 (h) of Res Conf 12.5 (Rev CoP18), for the Committee to consider;

ii) prepare guidance for Parties to assist the phase-out of captive facilities in compliance with Dec 14.69 and assist law enforcement and other authorities in monitoring captive facilities to prevent trade during the phase-out.

Animals Asia Foundation
Animal Defenders International
Animal Welfare Institute
Aaranyak
Bagh Aap Aur Van (including Dr Raghu Chundawat, member of the IUCN SSC Cat Specialist Group)
Big Cat Rescue
Born Free Foundation
Born Free USA
Cat Action Treasury (including Kristin Nowell, member of the IUCN SSC Cat Specialist Group)
Center for Biological Diversity
Centre for Wildlife Studies, Bangalore (including Dr Ullas Karanth, member of the IUCN SSC Cat Specialist Group)
China Biodiversity Conservation and Green Development Foundation (Biological and Scientific Ethics Committee, BASE)
David Shepherd Wildlife Foundation
Ecojust
Education for Nature Vietnam
EMS Foundation
Environmental Investigation Agency
Fauna and Flora International
Fondation Brigitte Bardot
Fondation Franz Weber
Four Paws
Freeland Foundation
Humane Society International
International Fund for Animal Welfare
Japan Tiger and Elephant Fund
Japan Wildlife Conservation Society

Monitor Conservation Research Society (including Dr Chris Shepherd, member of the IUCN SSC Cat Specialist Group)
Pan African Sanctuary Alliance
Panthera (including Dr John Goodrich, member of the IUCN SSC Cat Specialist Group)
Performing Animal Welfare Society
Pro Wildlife
Re:wild
Robin des Bois
Sanctuary Nature Foundation
Satpuda Foundation
Save Wild Tigers
Species Survival Network
The Corbett Foundation
Tiger Watch
WildAid
WildCrime
WildTiger
Wildlife Conservation Society
Wildlife Conservation Trust
Wildlife Friends Foundation Thailand
Wildlife Friends International
Wildlife Justice Commission
Wildlife Protection Society of India (including Belinda Wright, member of the IUCN SSC Cat Specialist Group)
Wildlife Society of Orissa
Wildlife Trust of India
World Animal Protection
WWF

¹ In the original letter to the CITES Secretariat in August 2021, this was CITES SC74