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BRIEFING

EIA RECOMMENDATIONS FOR THE 81st MEETING OF THE CITES STANDING COMMITTEE

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DOC. 33.9 APPLICATION OF ARTICLE XIII IN THE LAO PEOPLE'S DEMOCRATIC REPUBLIC

EIA encourages the Standing Committee to reject the Secretariat's recommendation in paragraph 78 of the document to withdraw the recommendation to suspend trade in specimens of CITES-listed fauna species with Lao PDR.

EIA encourages the Standing Committee to adopt the recommendations in paragraphs 79 and 80 of the document and further:

a) request Lao PDR to clarify how rhino horn is included as an acceptable ingredient in traditional medicine by its Ministry of Health in the absence of legal supplies of rhino horn; and

b) request Lao PDR to provide evidence of the application of the existing DNA profile database and stripe pattern profiles of individual tigers audited in 2019 and 2020 and to demonstrate enforcement actions to address illegal trade of tiger specimens suspected to be originating from tiger farms in the country.

Submitted by the Secretariat, this document reports on Lao PDR's implementation of Standing Committee recommendations as part of the Article XIII compliance process. The Standing Committee recommended a suspension of all commercial trade in CITES-listed species with Lao PDR at SC77 in 2023 for a number of reasons including inadequate legislation, inadequate enforcement and international cooperation to combat rampant illegal trade of CITES-listed species that is occurring in the country often with the involvement of organised crime and inadequate monitoring and regulation of wildlife farms, including tiger and macaque farms.

The Secretariat reports that Lao PDR has made substantial progress in implementing the Standing Committee's recommendations and has invited the Committee to withdraw the recommendation to suspend trade in CITES-listed fauna with the country. However, as per the Secretariat's own assessment, Lao PDR has not provided sufficient information to show investigation of the organised and transboundary wildlife crime-networks operating in the country and the recommendations on tiger farms have not been fully implemented. EIA believes that it is premature to withdraw the recommendation to suspend trade in CITES-listed fauna with Lao PDR and draws the attention of the Standing Committee and the Parties to the following issues:

Licensed trade in rhino horn: Prior to SC79 in November 2025, EIA reported on the open sale of pills advertised to contain rhino horn and bear bile in Lao PDR.[1] One of the companies marketing these pills claimed to be licensed by the Lao PDR government and posted images of the permits on their social media account. At SC79, the Secretariat stated that it had been provided with a decree from the Ministry of Health of Lao PDR confirming that rhino horn is an acceptable ingredient in traditional medicine in Lao PDR.[2] Lao PDR is not a range state for rhinos and the international trade in rhino horn for commercial purposes has been prohibited since 1977. There is very little possibility that pills containing rhino horn can be manufactured in Lao PDR using legally sourced rhino horn. It is therefore likely that the Ministry of Health's Decree allowing for such use is contributing to violations of the Convention as demonstrated by the large-scale illegal trade in rhino horn documented in and linked to the country. No action appears to have been taken against the company in question and as recently as 6 September 2026, the company continued to openly advertise its product on WeChat, clearly stating rhino horn as an ingredient.

Illegal trade from tiger farms: On 12 September 2025, the carcass of a tiger was seized from a vehicle in Champasak province, Lao PDR. The court judgment from the prosecution of this case clearly identifies that this tiger had been acquired from a tiger farm in Tha Bok Village, Thaphabat District, Bolikhamsai Province, Lao PDR with associated persons named in the judgement.[3] Yet no action appears to have been taken by the Lao PDR authorities against the owner of the tiger farm identified by the court. This is the clearest example and just one of multiple instances in which tiger specimens seized in Lao PDR and neighbouring countries have been suspected to originate from tiger farms in Lao PDR, while no action has been taken by the government against the owners of any of these farms. Recent video evidence captured by investigative journalists and seen by EIA shows the offer for sale of a big cat skeleton from a farm housing lions and tigers in Pak Ngum district of Lao PDR and other credible evidence shared with the CITES Secretariat shows the butchering of a tiger at another farm likely to be located in Thaphabath district, Bolikhamxai province, Lao PDR. As part of the Article XIII compliance process, the Lao PDR government conducted an audit of tiger farms in 2019 and 2020, collecting DNA samples and stripe pattern profile images of just over 300 tigers. With the cooperation of Malaysia, Thailand, TRACE Wildlife Forensics and WCS, the analysis of the samples was enabled[4] and a collaborative, validated, peer-reviewed registry of individual tiger DNA profiles was established, *TigerBase*.[5] This provides a mechanism for monitoring individual tigers in captive facilities and supporting investigations into the source of specimens seized in trade, including specimens seized in other countries where the source was known or suspected

to be Lao PDR and the prosecution of the facilities concerned. Despite the availability of this robust resource of DNA profiles of the tigers audited in 2019 and 2020, Lao PDR is initiating a new registry with a new audit baseline. It is not clear from SC81 Doc 33.9 how Lao PDR is making use of *TigerBase* in this process. Failure to do so would not only be a waste of resources involved in the first audit, but it would also allow the government and the tiger farm businesses to avoid accountability for illegal trade since the audit. Moreover, Lao PDR does not appear to have made use of the stripe pattern profiles obtained from the original tiger audit. Irrespective of the application of the DNA profiling, failure to use the stripe pattern profiles represents a missed opportunity to investigate the source of specimens seized in trade in Lao PDR and neighbouring countries.

Persistent and open illegal trade in Appendix-I species: EIA acknowledges recent enforcement effort targeting exclusive-access retail outlets catering to tour groups, predominantly from China at some but not all locations. Inspections, confiscations, fines and retail staff arrests have been reported but the actual businesses do not appear to have been impacted. This includes businesses that EIA reported to authorities as early as 2019 and 2020, which have continued to engage in illegal wildlife trade. EIA believes it would be prudent to wait until there is evidence of investigation into the supply chains, the financial flows and punitive measures against the businesses involved before withdrawing trade suspensions. In addition to these exclusive-access retail outlets, other open illegal trade in CITES Appendix-I listed species has been documented, including restaurants and markets where pangolins and other wildlife are sold to Chinese tourists for consumption.[6] EIA and others have also documented a company prolifically marketing a brand of tiger bone wine online as well as in a physical outlet in Vientiane. EIA reported the company to authorities in Lao PDR and China and the CITES Secretariat in August 2023. This company continues to operate and advertise its tiger bone wine, tiger body parts, pangolin scales and other illegal wildlife for sale online.



DOC. 33.12 TOTOABAS (*Totoaba macdonaldi*)

EIA encourages the Standing Committee to reject Mexico's request to conclude the Article XIII process and instead determine that Mexico has not fulfilled Decision 20.54(a), which requires full achievement of all Compliance Action Plan milestones by SC81. It is essential to:

- **Implement trade suspension with immediate effect, until Mexico fully complies with the Compliance Action Plan (CAP) on totoaba that was approved in April 2023.**

The first version of the CAP was rejected by the Secretariat and sanctions were briefly imposed on Mexico until it approved a revised CAP in April 2023. At SC79 the Standing Committee agreed, among other things, to consider at SC81 if Mexico fully implemented its CAP by achieving all milestones of targets in the CAP or if any further measures or compliance actions are needed. Decision 20.54(a), adopted at CoP20, required Mexico to fully achieve all CAP milestones no later than SC81. The Secretariat concludes in document SC81 Doc. 33.12 that Mexico has not met all of the terms of the CAP, with nine milestones within the CAP having not been achieved.

Despite progress made, Mexico continues to fail to fully implement effective measures to prevent the illegal fishing and transnational trade in totoaba swim-bladders and end the bycatch of Appendix-I listed critically endangered vaquitas – of which only about 10 individuals remain. Rampant illegal fishing for totoaba continues in the vaquita refuge or larger gillnet prohibition area.

EIA notes that the United States reported seizures of 87 totoaba swim bladders in April 2026 and China reported a seizure of more than 148kg of fresh totoaba swim bladders in Hong Kong SAR in June 2026, enroute from Mexico to Vietnam. As the Secretariat identifies, these seizures demonstrate that illegal trade in totoaba specimens continues.

Further, the Secretariat continues to conclude that improvements are required regarding intelligence gathering on organised crime syndicates operating within Mexico. The Secretariat encourages Mexico to further enhance and strengthen information exchange among national authorities regarding organised crime groups involved in the trafficking of totoaba specimens and to consider if activities are delivering the desired results, and that the inter-institutional intelligence work related to organised crime groups linked to the illegal trafficking of totoaba are well coordinated.

As a result, delaying further enforcement action for another year, until SC82 in 2027 – more than four years after CAP implementation – would further threaten the future of vaquitas, already on the brink of extinction. It is important to implement trade sanctions with immediate effect, not as a penalty for inaction but to compel more urgent and decisive action to stop illegal fishing of totoaba and trafficking of swim-bladders to save the vaquita.

The suspension should remain in effect until the Secretariat verifies that Mexico has fulfilled the outstanding CAP milestones and that the measures essential to vaquita protection and recovery are fully functioning.

A full briefing on this agenda item is available here.

DOC. 34. NATIONAL IVORY ACTION PLAN PROCESS

DOC. 34.1 IMPLEMENTATION OF THE NATIONAL IVORY ACTION PLAN PROCESS [(RESOLUTION CONF. 10.10 (Rev. COP20), ANNEX 3), STEP 4

Please see EIA's standalone briefing on National Ivory Action Plan for more details.

EIA encourages the Standing Commitee to support recommendations in paragraph 34 of the document with an additional proposed recommendation 34 (c)(iii) directed to Nigeria and further amendments to recommendations 34(f)(ii) directed to Angola; 34(h)(ii) directed to Cameroon; 34(i)(iii) directed to the Republic of Congo; and 34(j)(ii) directed to Lao PDR, as follows (additions are underlined and deletions are in ~~strikethrough~~):

NIGERIA

c) The Standing Committee is invited to:

iii) urge Nigeria to submit information on seizures of elephant ivory to the Elephant Trade Information System (ETIS) in advance of the next assessment.

ANGOLA

f) The Standing Committee is invited to:

ii) agree that Angola should remain in the NIAP process at present and request the Party to revise and update its NIAP into a National Ivory and Rhino Action Plan (NIRAP), ~~incorporating actions~~, in accordance with Step 5, paragraph b), subparagraph i) of the Guidelines, to address current and emerging illegal trade risks concerning ivory, ~~including, if appropriate, actions concerning~~ and specimens of rhinoceros, while continuing the implementation of outstanding NIAP actions; and

CAMEROON

h) The Standing Committee is invited to:

iii) request Cameroon to revise and update its NIAP in accordance with Step 2) paragraph a) subparagraph ii) of the Guidelines and urge Casmeroon to accelerate implementation of the outstanding actions in its NIAP and to provide clear, updated and action-specific information against the actions' milestones and indicators in its progress report to be submitted to the next regular meeting of the Standing Committee; and

CONGO

i) The Standing Committee is invited to:

iii) request Congo to revise and update its NIAP in accordance with Step 2) paragraph a) subparagraph ii) of the Guidelines and urge Congo to accelerate implementation of the outstanding actions in its NIAP;

LAO PDR

j) The Standing Committee is invited to:

ii) agree that the Lao People's Democratic Republic should remain in the NIAP process at present due to significant levels of illegal trade in ivory and request the Party to revise and update its NIAP into a National Ivory and Rhino Action Plan (NIRAP); and

EIA welcomes the timely submission of progress reports by all 12 current NIAP Parties to SC81, demonstrating continued engagement with the process. In line with Step 4(c) of the NIAP Guidelines contained in Annex 3 of Resolution Conf. 10.10 (Rev. CoP20), EIA reiterates its willingness to support the Secretariat in its assessment of progress reports and notes the value of consulting experts as part of this process.

We support the Secretariat's recommendation that Qatar exits the process in accordance with Step 5 of the Guidelines.

Regarding Angola and Lao PDR, EIA supports the Secretariat's recommendation that both Parties remain in the NIAP process, given continued concerns regarding their involvement in the illegal ivory trade despite meeting the required threshold for exit. In particular, EIA agrees with the Secretariat's suggestion that Angola's current plan may no longer fully address the current nature and scale of its involvement in ivory and rhino horn trafficking and that Angola should update its NIAP into a National Ivory and Rhino Horn Action Plan (NIRAP).

We also share the Secretariat's concerns regarding insufficient progress in NIAP implementation by Mozambique and Togo as Category A Parties, and Cameroon and Congo as Category C Parties and suggest an additional recommendation directing Nigeria to report ivory seizures to ETIS.

ANGOLA

Angola has played a significant role in both ivory and rhino horn trafficking in recent years. Its involvement in the illegal ivory trade was recognised in the ETIS report to CoP20, which reclassified Angola from Category C to Category B. Since 2023, Angola has also emerged as an exit point for illegal rhino horn trafficked from Africa to Asia. Trafficking routes linking Angola and Vietnam have been exploited by organised criminal networks to move rhino horn across continents, with evidence of this trafficking continuing in recent years.

The Secretariat explicitly recognises these risks and concludes that Angola's current NIAP may no longer fully address the nature and scale of the country's illegal wildlife trade risks, an assessment with which EIA agrees. The Secretariat further acknowledges that Angola's evolving trafficking profile may warrant develop of a NIRAP; however, it leaves this decision to Angola's discretion rather than making a targeted recommendation to this effect. Given the evidence of Angola's involvement in both ivory and rhino horn trafficking, EIA considers that a NIRAP would be beneficial and should be directed by the Standing Committee rather than presented as an optional measure.

According to EIA's seizure database, at least eight of the 12 rhino horn seizures linked to Angola since 2023 also involved Vietnam. At SC78 in 2024, Angola and Vietnam were encouraged to strengthen their engagement to address illegal trade affecting both countries. However, limited publicly available evidence demonstrates the extent to which this cooperation has been implemented.

EIA therefore recommends that the Standing Committee request Angola to revise and update its NIAP into a National Ivory and Rhino Action Plan (NIRAP), incorporating time-bound actions to address both ivory and rhino horn trafficking, while continuing to implement outstanding NIAP actions.

Precedent for this exists: Mozambique, Vietnam and, most recently, the United Arab Emirates (UAE) were previously requested to develop NIRAPs in recognition of their involvement in both ivory and rhino horn trafficking and to facilitate a more integrated response to the criminal networks, trafficking routes and governance challenges driving these trades. Recommending Angola to develop a NIRAP would therefore ensure that its compliance framework reflects its evolving trafficking profile and provides a more effective and coordinated response to the interconnected threats of ivory and rhino horn trafficking.

LAO PDR

Lao PDR continues to be implicated in significant ivory and rhino trafficking. In 2026 alone, Lao PDR has been implicated in ivory seizures totalling more than two tonnes. These include the seizure of approximately 1.8 tonnes of ivory in Bolikhamsai province in August 2026. In early 2026, approximately 300kg of ivory originating from Lao PDR was seized in Thailand, highlighting the country's continued role in regional ivory trafficking.

In addition, a July 2025 investigation by Mongabay and the Global Initiative Against Transnational Organized Crime identified more than 20 locations in Lao PDR selling illegal wildlife products, including ivory and rhino horn, to Chinese tourists, highlighting ongoing concerns about the domestic trade in illegal wildlife products.[7] Despite its recurring involvement in large-scale seizures, the Secretariat notes Lao PDR's reports inconsistently to ETIS. Furthermore, emerging evidence suggests that Lao PDR is being exploited as a transit point for rhino horn trafficking in Asia. Since 2024, at least 11 cases have implicated Lao PDR, including a seizure made in South Africa in 2025 of more than 55kg of rhino horn destined for the country. In June 2026, Laotian authorities made multiple seizures of significant amounts of wildlife products including more than 500 hundred pieces of raw, semi-worked, and worked rhino horn.[8] EIA has also documented the open sale of medicinal products purporting to contain rhino horn on store shelves in Vientiane as recently as last year.

Lao PDR's recent significant role in rhino horn trafficking is not recognised in Annex 3 to CoP20 Doc. 84 as the analysis was based on seizure data made available to TRAFFIC for 2021-23. However, the Standing Committee now has access to much more recent evidence, including increasing number of rhino horn seizures implicating Lao PDR and widespread reporting by many NGOs and local media outlets indicating the significant scale of rhino horn trafficking affecting Lao PDR. This emerging evidence warrants closer scrutiny of Lao PDR's role in regional rhino horn trafficking and raises questions as to whether its current NIAP framework adequately addresses its evolving trafficking profile.

EIA therefore supports the Secretariat's recommendation that Lao PDR remain in the NIAP process, and further proposes an additional recommendation directing Lao PDR to revise and update its NIAP into a NIRAP and to report further progress to SC82. Precedent for this exists: Mozambique, Vietnam and, most recently, the UAE were previously requested to develop NIRAPs in recognition of their involvement in both ivory and rhino horn trafficking.

Given the increasing evidence of Lao PDR's role in rhino horn trafficking, a NIRAP would provide a more appropriate and integrated framework to address the conditions enabling both trades. In particular, Lao PDR should demonstrate tangible enforcement outcomes arising from recent seizures, including investigations, prosecutions and, where applicable, convictions to enable assessment of whether enforcement action is effectively disrupting the trafficking networks involved.

EIA agrees with the Secretariat's assessment that this is the first reporting cycle in which such substantial progress has been reported by Lao PDR and that the concentration of reported progress within a single reporting cycle is not, on its own, sufficient evidence of durable institutional reform or sustained disruption of trafficking networks, especially in light of recent large-scale seizures. This is particularly relevant in light of parallel discussions under Article XIII (SC81 Doc. 33.9) concerning the possible lifting of trade suspensions affecting Lao PDR. In EIA's view, it would therefore be premature to relax compliance measures at this stage.

CAMEROON AND CONGO

According to the Secretariat's assessment, the Republic of the Congo (Congo) has achieved only 12 per cent of its NIAP actions, representing the lowest level of implementation progress among the assessed Parties, despite more than a decade in the process. This is particularly concerning given Congo's continued involvement in transnational ivory trafficking. In August 2026, more than 1.1 tonnes of ivory were seized in Vietnam in a case in which Congo was identified as a transit country. This recent seizure underscores the need for Congo to address persistent implementation gaps and ensure that its NIAP is responsive to current trafficking routes and networks.

Congo's NIAP, developed in 2015, comprises six pillars and does not include a dedicated reporting pillar, as set out in Step 2, paragraph a), of the Guidelines.[9]

Cameroon's NIAP was also developed more than a decade ago and comprises six pillars: (A) Legislation; (B) Legal proceedings; (C) Information-gathering and investigation; (D) National and international cooperation on wildlife crime; (E) Enforcement operations; and (F) Communication and awareness-raising.[10]

Given the continued involvement of both countries in illegal ivory trafficking as source and transit countries, EIA recommends that the Standing Committee requests Cameroon and Congo to revise and update their NIAPs in accordance with Step 2, paragraph a), subparagraph ii), of the Guidelines. Updated plans should reflect current trafficking patterns, address outstanding implementation gaps and incorporate all relevant pillars, including reporting. We also agree with the Secretariat's recommendation that both Parties should be encouraged to identify their technical assistance needs and seek appropriate support to address persistent implementation challenges.

NIGERIA

EIA agrees with the Secretariat's overall assessment that Nigeria has made progress in implementing its NIAP. However, EIA shares the Secretariat concern that Nigeria has not reported regularly to ETIS since 2016. Given Nigeria's role as Category A Party and the importance of ETIS reporting in identifying illegal ivory trade trends, informing NIAP assessments and supporting evidence-based decision-making by the Standing Committee, EIA considers that regular and timely reporting to ETIS remains a critical component of NIAP implementation. As the Secretariat proposes a specific recommendation for the Republic of Congo to improve ETIS reporting, EIA considers that a comparable recommendation should also be made for Nigeria.

DOC. 34.2 REVIEW OF THE NATIONAL IVORY ACTION PLANS PROCESS (DECISION 20.101)

EIA encourages the Standing Committee to support the Secretariat's proposed recommendations under paragraphs 25(a), 25(c) and 25(d) and to amend paragraph 25(b) as follows (deletions in ~~strikethrough~~, new text underlined):

b) request the Secretariat to:

i) amend the templates for the development of NIAPs and NIAP progress reports to include ~~means of verification linked to NIAP actions and~~ provision for the submission of relevant supporting documentation with the reports, as well as information on the renewal or extension of timelines for NIAP actions that were not achieved within the originally established timeframe;

ii) to the extent possible, publish progress reports on the NIAP webpage within 10 days of their receipt from Parties; ~~and~~

iii) ~~compile a list of indicators used in previous and existing NIAPs that are considered sufficiently relevant and adaptable for use in other contexts for Parties to consider when developing or revising their NIAPs~~; to issue a Notification to the Parties seeking the views of Parties, ICCWC partners, relevant experts and observers on indicators and associated means of verification for the NIAP process; to compile, on the basis of the responses received, a repository of indicators and associated means of verification; and

iv) further consider options for strengthening verification and objectivity in the NIAP process, including by consulting with the MIKE-ETIS TAG on the potential for them to play an advisory role in the review of NIAP progress; and

v) consider, where a Party remains in Category A across successive ETIS analyses, experiences a deterioration in ETIS categorisation, or is implicated in significant ivory seizures, whether the Party's NIAP remains fit for purpose and, where appropriate, provide recommendations to the Standing Committee.

EIA welcomes the Secretariat's efforts to implement the Review's long-term recommendations, particularly those relating to indicators and means of verification. However, the recommendations in paragraph 25 do not fully reflect the Review's broader findings on verification, quality assurance, performance measurement and objective assessment of NIAP implementation.

While the Secretariat's proposals are a useful first step, they do not establish a process for developing and agreeing indicators and associated means of verification, nor do they provide for consultation with Parties, experts and observers or Standing Committee oversight of the resulting framework.

Furthermore, EIA considers that indicators and associated means of verification should be developed together rather than through separate workstreams, as currently set out in the Secretariat's recommendations. Indicators without associated means of verification may be difficult to assess consistently, while means of verification have limited value in the absence of clearly defined indicators. The Review also called for collaborative development of indicators and further consideration of targets and baselines, which are not adequately reflected in the Secretariat's current recommendations.

EIA therefore believes the Secretariat's recommendations in paragraphs 25(b)(i) and 25(b)(iii) should be combined and strengthened to seek feedback via a Notification to the Parties in a transparent consultative process involving Parties, ICCWC partners, relevant experts and observers. The resulting repository of indicators and associated means of verification provided in responses to the Notification should be submitted to SC82 for consideration and approval before being applied within the NIAP process. This would more fully operationalise the Review's recommendations without creating additional obligations for Parties.

EIA does not agree with the Secretariat's conclusion that the Review's recommendation concerning timely ETIS reporting has been sufficiently addressed through existing processes. SC81 Doc. 34.1 clearly demonstrates that ETIS reporting performance remains a relevant consideration when evaluating NIAP implementation, with the Secretariat explicitly highlighting reporting deficiencies for several Parties and proposing a specific recommendation to improve ETIS reporting in the case of the Republic of Congo. However, despite flagging Nigeria's similarly poor ETIS reporting performance, the Secretariat has not proposed any equivalent recommendation for Nigeria. ETIS reporting, although recognised as an important measure of progress within the NIAP process, is still not assessed consistently. EIA therefore considers that timely and complete ETIS reporting performance should be explicitly incorporated into any indicators and associated means of verification developed pursuant to EIA's proposed amendments to paragraph 25(b).

Furthermore, the Standing Committee should not regard the Review's recommendation concerning an advisory mechanism as fully addressed. The Review identified verification and objectivity as important challenges within the NIAP process and explicitly suggested that an advisory body could help address these issues. To address concerns relating to membership, time constraints and resource implications identified by the Secretariat, the Standing Committee should explore the use of existing expert mechanisms that may be able to support greater verification, continuity and objectivity within the NIAP process. EIA therefore supports the addition of a new subparagraph under paragraph 25(b) requesting the Secretariat to engage with the MIKE-ETIS Technical Advisory Group to consider how the group could support assessment of NIAP implementation and progress and to report back to SC82.

Lastly, EIA welcomes the Secretariat's efforts to address the Review's recommendations on keeping NIAPs up to date. However, the Secretariat's response focuses on extending implementation timelines rather than addressing the Review's broader finding that NIAPs should remain relevant and responsive to changing circumstances. The Review explicitly identified persistent Category A status, deterioration in ETIS categorisation and involvement in significant ivory seizures as circumstances that may indicate a NIAP is no longer fit for purpose and warrants reconsideration.

EIA therefore supports a more adaptive approach and proposes a new recommendation under paragraph 25 to ensure that significant changes in a Party's risk profile can be considered through existing oversight processes This would better reflect the Review's findings.

DOC. 34.3. CONSULTATION PROCESS WITH PARTIES IDENTIFIED IN THE ETIS REPORTS IN THE IMPLEMENTATION OF STEP 1 b) AND c) OF THE NIAP PROCESS (DECISION 20.95)

EIA encourages the Standing Committee to support the adoption of the recommendations in SC81 Doc. 34.3 and note the relevance of this document in discussions regarding SC81 Doc. 34.2 concerning verification and objectivity in the NIAP process.

EIA welcomes the additional transparency provided by the Secretariat regarding consultations with Parties identified in ETIS analyses prior to recommendations under Steps 1(b) and 1(c) of the NIAP process.

The document demonstrates the important role of Secretariat-led consultations and expert input in informing decisions on Party participation in the NIAP process. At the same time, it highlights the continued importance of ensuring consistency, continuity, transparency and objectivity across NIAP-related assessments.

These considerations are also reflected in the findings of the independent Review of the NIAP process, which identified verification, quality assurance and objectivity as important long-term issues and suggested that additional mechanisms, including an advisory mechanism, may merit consideration.

Parties should consider the relevance of SC81 Doc. 34.3 when discussing the remaining long-term recommendations in SC81 Doc. 34.2, particularly proposals aimed at strengthening verification, consistency and objectivity within the NIAP process, including the potential role of an advisory mechanism.

DOC. 34.4 GUIDANCE ON PARTY-SPECIFIC COMPLIANCE MEASURES INFORMED BY THE ETIS REPORT (DECISION 20.102)

EIA encourages the Standing Committee to adopt the recommendations in SC81 Doc. 34.4, subject to the following two additions to the indicative and complementary elements proposed for inclusion under paragraph d) of Step 1 of the Guidelines to the National Ivory Action Plan Process, contained in the annex of this document:

- Forensic analysis of seized ivory, particularly large-scale ivory seizures, and the use of resulting information to support enforcement action;
- Ivory stockpile reporting and stockpile management information;

EIA welcomes the Secretariat's efforts to provide greater clarity and transparency regarding the factors used to identify Parties for participation in the NIAP process. The proposed additional elements represent a positive step towards ensuring that recommendations are informed by a broader range of information than ETIS analyses alone.

In particular, EIA welcomes the inclusion of organised criminal activity, law enforcement responses and international cooperation elements. EIA's investigations have consistently demonstrated that large-scale ivory trafficking is driven by transnational criminal networks and cannot be assessed through trade/seizure indicators alone. EIA therefore supports a framework that considers enforcement effectiveness, judicial outcomes and broader trafficking dynamics while recognising that the proposed elements are intended to be indicative and complementary considerations and that the Standing Committee retains flexibility to determine their relevance on a case-by-case basis.

However, EIA recommends adding two key elements to paragraph d) of Step 1 of the Guidelines to the National Ivory Action Plan Process, contained in Annex 3 to Resolution Conf. 10.10 (Rev. CoP20). These include:

- forensic analysis of seized ivory: Explicitly include forensic analysis of seized ivory, particularly in relation to large-scale ivory seizures, recognising its value in identifying source populations, trafficking routes and criminal networks, as recognised in paragraph 23 of *Resolution Conf. 10.10 (Rev. CoP20)*.

- stockpile reporting and management: Explicitly include information on ivory stockpile reporting and stockpile management, recognising that leakage from stockpiles may contribute to illegal ivory trade and should be considered alongside poaching and seizure data, as recognised in paragraph 7 e) of *Resolution Conf. 10.10 (Rev. CoP20)*.

Furthermore, EIA believes that Article XIII proceedings and the NIAP process are potentially complementary tools and that the existence of one process should not preclude participation in the other where additional value could be achieved, as stated in paragraph 10(iii) of this document.

Lastly, we consider that paragraph 10(iv), on other Party-specific considerations, is broad and open to interpretation. The Standing Committee must be provided with a clear rationale when such considerations are relied upon in order to support transparent, consistent and objective decision-making and prevent unnecessary ambiguity or abuse.

DOC. 39. RHINOCEROSES (*Rhinocerotidae spp.*) (DECISION 20.84)



EIA recommends the Standing Committee adopts the recommendations in the docume and establish an intersessional working group on rhinos that will make recommendations to SC82 and CoP21.

Poaching and rhino horn trafficking continue to threaten wild rhino populations. Although there have been welcome reductions in poaching in some range states, others – such as South Africa – continue to experience

high levels of rhino poaching. At the same time, rhino horn sourced from poached animals and stockpiles continues to be trafficked from Africa to Asia by organised criminal networks.

Recent rhino horn seizures in Lao PDR and Thailand, as well as the open display of substantial amounts of rhino horn in Laotian "supermalls" filled with illegal wildlife products demonstrate the continued activity of organised IWT networks engaging in rhino horn trafficking.[11]

At the same time, rhino horn leakage from stockpiles in South Africa is further contributing to the illegal trade. For instance, the seizure of at least 37 rhino horns in two separate incidents have been linked backed to a private game reserve in South Africa owned by a notorious Vietnamese wildlife trafficker.[12] Other seizures made in Asia have included rhino horn bearing signs indicative of stockpiled horn, including stockpile record markings on the surface of the horn.[13] The contribution of stockpiled horn to the illegal trade is likely greater than is currently understood; however, an absence of publicly available information on the provenance of rhino horn in seizures based on the outcomes of DNA and RhODIS analysis has resulted in a persistence information gap.

Considering these ongoing challenges, EIA is deeply disappointed by the poor response rate to the Notification to Parties seeking information on the implementation of the CITES Rhinoceros Enforcement Task Force outcomes. Only six Parties responded and several of those responses contained little to no substantive information.

Key Parties affected by rhino horn trafficking, including Angola, Lao PDR, Namibia and Vietnam, among others, did not submit responses.

A poor response rate for decisions, notifications and other requests for information, as well as limited critical analysis when information is made available, has been a chronic issue at CITES for rhino issues in recent years. Capacity and funding challenges together with a lengthy agenda to cover at CITES meetings have contributed significantly to this dilemma.

To allow CITES Parties the opportunity to consider the best available information and develop recommendations that will have meaningful impacts on rhino conservation, we recommend the Standing Committee establishes an intersessional working group to consider the responses contained in the annexes to Doc. 39, the IUCN/TRAFFIC report to CoP20, and other relevant IGO and NGO reports, and makes recommendations regarding implementation of the strategies and actions in the CITES Rhinoceros Enforcement Task Force outcome document to SC82 and CoP21.

DOC. 41. IMPLEMENTATION OF THE RECOMMENDATIONS OF THE ETIS PROGRAMME (DECISIONS 19.96, 20.94, 20.98, & 20.103)



The revised draft ETIS Data Validation Protocol presented in Annex 1 is improved over the previous version. However, the revised draft protocol still presents opportunities to exclude ETIS data without relevant and objective, evidence-based justification. Indeed, the MIKE-ETIS TAG has noted that further consideration may be required for assessing the documentation and justifications for exclusion of ETIS data from analysis.

The draft protocol also still presents opportunities for prolonged and de-facto permanent exclusion of valid data due to unresolved inquiries.

Doc. 41 recommends that the MIKE-ETIS Subgroup be requested to review the revised ETIS data validation protocol during SC81. We recommend that the MIKE-ETIS Subgroup and the Standing Committee adopt amendments to the draft protocol that will ensure the onus is on the inquiring Party to provide legitimate, verifiable information supporting any request to exclude ETIS data, including specific data elements, from analysis.

EIA's recommendations for specific text edits can be found below (additions are underlined and deletions are ~~struck through~~):

1. Section 5 i) a) i) – Data reported by a CITES Management Authority

Proposed amendment:

"Where a Party that submitted an inquiry contests the accuracy or authenticity of one or more of the seizure data elements referred to in section 2 b) and c) and provides ~~the basis for the concern, including available documentation or other information supporting the inquiry~~, credible and substantiated justification for its concern, supported by relevant documentation or other information, the reporting Party shall respond within one month of receipt of the inquiry (or within any extension period granted)."

2. Section 5 i) a) iii) – Data reported by a CITES Management Authority

Proposed amendment:

"If the Party that submitted an inquiry maintains its objection following the response from the reporting Party, the data elements subject to the inquiry shall remain excluded from the relevant analyses only where the Party that submitted the inquiry provides ~~information supporting its objection~~ credible and substantiated information demonstrating reasonable grounds to question the accuracy or authenticity of the contested data elements."

3. Section 5 ii) a) i) – Data collected by TRAFFIC from open and proprietary sources

Proposed amendment:

"Where a Party that submitted an inquiry contests the accuracy or authenticity of data collected by TRAFFIC from open and proprietary sources and provides ~~the basis for the concern, which may include any available documentation or other information supporting the~~

~~inquiry~~ a credible and substantiated justification for its concern, supported by relevant documentation or other information, TRAFFIC shall respond within one month of receipt of the inquiry (or within any extension period granted)."

4. Section 5 ii) a) iii) – Continued objections to TRAFFIC-collected data

Proposed amendment:

"If the Party that submitted an inquiry maintains its objection following the response from TRAFFIC, the data elements subject to the inquiry shall remain excluded from the relevant analyses only where the Party that submitted the inquiry provides ~~information supporting its objection~~ credible and substantiated information demonstrating reasonable grounds to question the accuracy or authenticity of the contested data elements."

5. Sections 5 i) d) and 5 ii) d) – Unresolved inquiries

Proposed addition to both provisions:

Unresolved inquiries shall be periodically reviewed to assess whether the continued exclusion of contested data elements remains justified. Where no credible and substantiated justification for continued exclusion has been provided, the matter should be referred to the Secretariat for further consideration, with a view to ensuring that valid seizure data are not excluded from ETIS analyses indefinitely.

DOC. 53.1. REGISTRATION OF THE OPERATION UNIDAD DE BIOTECNOLOGÍA EN PISCICULTURA DE LA UNIVERSIDAD AUTÓNOMA DEL ESTADO DE BAJA CALIFORNIA (MEXICO) BREEDING *Totoaba macdonaldi*

EIA encourages the Standing Committee not to accept the application by Mexico to register the captive breeding operation Unidad de Biotecnología en Piscicultura de la Universidad Autónoma del Estado de Baja California breeding *Totoaba macdonaldi*.

Trafficking of totoaba swim bladders from Mexico is a significant enforcement problem. Until this enforcement issue is addressed and resolved, registration of facilities breeding totoaba for commercial purposes should be denied.

This registration must be rejected for the reasons articulated by the EU and United States in their respective objection letters, including due to the risks of encouraging illegal trade, traceability concerns, whether this operation contributes meaningfully to the conservation of the totoaba and due to the proposed replenishment of the captive breeding stock with totoaba caught in the wild.

The successful amendment of Res. Conf. 12.10 at CoP20, allowing any Management Authority to unilaterally amend its facility registration conditions including by, in this case, removing the exclusion of totoaba swim bladders from trade means that Mexico can unilaterally adjust the specimens that can be exported from registered facilities, including totoaba swim bladders. Such a move could open the door to a "legal" totoaba swim bladder trade which would incentivise illegal fishing due to the demand for wild-source swim bladders and drive the vaquita to extinction.

A full briefing on this agenda item is available here.



DOC. 56. ELEPHANTS (*Elephantidae spp.*): REPORT OF THE SECRETARIAT ON THE IMPLEMENTATION OF RESOLUTION CONF. 10.10 (Rev. COP20) [RESOLUTION CONF. 10.10 (Rev. COP20) PARAGRAPHS 12], 19) AND DECISIONS 19.36 (Rev. COP20), 18.117 (Rev. COP20), 18.185 (Rev. COP20), 20.104 & 20.168]

EIA encourages the Standing Committee to amend the Secretariat's recommendations in paragraph 71 of the document as follows (additions are underlined and deletions are in ~~strikethrough~~):

a) take note of the continued decline in PIKE values across Africa, with the lowest PIKE level recorded since the inception of the MIKE Programme, while noting that poaching remains the principal cause of elephant mortality in Central Africa, poaching levels remain high in West Africa and the limitations of available data for assessing trends in Eastern and Southern Africa;

b) increase dedicated resources to support MIKE implementation in Asia, particularly in light of the limited up-to-date information on illegal trade threats affecting Asian elephants;

~~b)~~ c) take note of the increase in the relative weight of worked ivory in seizures, with 2024 recording the highest proportion of worked ivory by weight over the past decade;

~~c)~~ d) encourage elephant range States to continue using the MIKE Online Database for the submission of MIKE data, and Parties to continue using ETIS Online for the reporting of ivory seizure information;

e) encourage Parties to include the key data elements of seizure weight and trade route information whenever practicable when submitting data to ETIS;

f) encourage Parties and donors to provide sustainable and predictable financial support to ensure the continued operation of the MIKE and ETIS Programmes;

g) urge all Parties that have not closed their domestic markets for commercial trade in raw and worked ivory to implement Resolution Conf. 10.10 (Rev. CoP20), paragraphs 3-9, and to this end continue reviewing and strengthening, as appropriate, their regulatory, monitoring, traceability and enforcement measures;

h) urge Parties that have never submitted or have failed to update inventories to do so in accordance with Resolution Conf. 10.10 (Rev. CoP20);

i) direct the Secretariat to provide guidance and training on stockpile management and reporting, particularly for range States and Parties identified in paragraphs 57-61;

j) encourage Parties to conduct forensic analyses of ivory from large-scale seizures and government-held stockpiles to support traceability, enforcement and judicial action in line with Resolution Conf. 10.10 (Rev. CoP20);

~~d)~~ k) take note that separate PIKE analyses can be conducted for the two African elephant species; and

~~e)~~ l) request the MIKE-ETIS Subgroup to consider whether investment in species-specific analyses is necessary when the subregional analysis for Central Africa provides sufficient information on trends affecting forest elephant; and

m) request the Secretariat to report to SC82 on the implementation of paragraphs a-l.

PART 1: REPORT OF THE SECRETARIAT AS PER PARAGRAPH 13 OF RESOLUTION CONF. 10.10 (Rev. COP20) ON TRADE IN ELEPHANT SPECIMENS

The Secretariat's recommendations in paragraph 71(a) do not adequately reflect the full range of available evidence on elephant poaching and illegal ivory trade. In particular, the recommendations do not fully capture the findings of the Monitoring the Illegal Killing of Elephants (MIKE) programme, including regional trends in the Proportion of Illegally Killed Elephants (PIKE), or sufficiently address the status of illegal trade affecting Asian elephants.

AFRICAN ELEPHANTS

While the record number of African MIKE sites reporting in a single year and the overall decline in the continental PIKE estimate in 2025 are welcome developments, these aggregate trends mask important regional differences. The report indicates that PIKE in Central Africa remains above the continental estimate, with illegally killed elephants continuing to account for the majority of elephant carcasses recorded in the subregion. A similar concern remains in West Africa, although the available

data are limited. Meanwhile, the available information does not provide a sufficiently clear picture of poaching trends in Eastern and Southern Africa over the past five years. This is particularly concerning given the repeated involvement of countries in these regions in multiple large-scale ivory seizures since 2023.

According to EIA's Global Environmental Crime Tracker, between 2023 and October 2026 11 of the 15 large-scale ivory seizures recorded, totalling approximately 17 tonnes, involved countries from the Southern African Development Community (SADC) such as Angola, Botswana, the Democratic Republic of the Congo (DRC), Mozambique, Namibia, Tanzania and Zambia. These seizure trends provide important complementary evidence of the scale and geographical reach of illegal ivory trade, yet they are not adequately reflected in the ETIS analysis presented in the report. Furthermore, declining PIKE levels should not necessarily be interpreted as indicating a reduced threat to elephants. The continued occurrence of large-scale ivory seizures highlights the need to consider seizure data alongside poaching indicators when assessing trends in illegal ivory trade and the ongoing threat posed by trafficking networks to elephant conservation.

ASIAN ELEPHANTS

In Asia, the continental PIKE trend has remained broadly stable in 2025. However, the data are heavily skewed towards South Asia, particularly India, which accounts for approximately 97 per cent of carcass records in the subregion. Consequently, the report does not provide disaggregated PIKE trends for South and South-East Asia, limiting the ability to assess regional differences in elephant poaching. These limitations are compounded by the lack of dedicated resources to support MIKE implementation in Asia, as noted in Part 2 of the report. Several sites have reportedly received no support for more than a decade, raising concerns about the consistency of monitoring and the quality and representativeness of the data available to assess poaching trends across Asian elephant range States.

The assessment of illegal trade affecting Asian elephants also relies on outdated information, using references from 2019 and 2021 to illustrate illegal trade threats, particularly trade in elephant skin. However, these sources provide limited insight into more recent developments.

EIA's research conducted in 2024-25 on the availability of non-ivory elephant specimens across social media and e-commerce platforms in the Greater Mekong Sub-region found a consistent year-on-year increase since 2020, in particular skins.[14]

In addition, the document does not reflect relevant discussions and outcomes from the 12th meeting of the IUCN SSC Asian Elephant Specialist Group (AsESG), held in Vietnam in September 2025, which provided updated information on national conservation plans, elephant distribution and country-level conservation priorities.

The reliance on outdated sources and omission of relevant updates limit the assessment of evolving illegal trade threats and highlights the need for the Secretariat to incorporate up-to-date information on these matters, including by requesting relevant updates from Asian elephant range States reporting pursuant to Decision 18.226 (Rev. CoP20) for consideration at SC82.

QUALITY OF ETIS DATA SUBMISSIONS

Analyses of ETIS data and subsequent decision making by Parties informed by the results of such analyses, including decisions related to the NIAP process, are fundamentally dependent on the quality of the underlying ETIS data. EIA is therefore deeply concerned by the drastic reduction in the reporting of key ETIS data elements – ivory weight and trade route – by Parties.

Only 22 per cent of reported seizure records from 2017 through 2025 contained trade route data, down from 58 per cent from 2008 through 2016. According to Figure 12 in Annex 1, it appears China, one of the countries most affected by ivory trafficking, has not submitted **any** trade route data since 2020.

EIA urges the Standing Committee to draw attention to the decline in Party reporting of seizure weight and trade route information to ETIS and recommend that Parties include this information in their reporting to ETIS whenever practicable.

PART 2: IMPLEMENTATION OF DECISIONS 19.36 (Rev. COP20) ON FINANCIAL AND OPERATIONAL SUSTAINABILITY OF THE MIKE AND ETIS PROGRAMMES

EIA appreciates the EU's provision of funding for the MIKE programme to support priority activities in Africa through 2029. However, EIA is concerned that the continued reliance on time-limited project funding and the lack of dedicated resources for ETIS and MIKE implementation in Asia threaten the continuity and effectiveness of these two critical monitoring programmes.

Alarming funding shortfalls remain for ETIS. At present, the ETIS programme does not have the necessary funding to complete its full scope of work in 2027 and 2028. Meanwhile, MIKE implementation in Asia remains unsupported by dedicated resources. These gaps risk undermining the continuity, geographical coverage and reliability of the data and analyses needed to assess elephant poaching trends and monitor illegal ivory trade. Sustainable and predictable funding for both programmes is therefore essential to ensure that Parties and the Convention can make informed decisions based on robust evidence.

EIA therefore proposes a dedicated recommendation on securing the operational sustainability of both programmes be added to paragraph 71 of the document.

PART 3: IMPLEMENTATION OF DECISIONS 18.117 (Rev. COP20) AND 18.118 ON CLOSURE OF DOMESTIC IVORY MARKETS

Japan remains an outlier among Parties by maintaining the world's largest remaining domestic ivory market. According to Japan's response to Notification to the Parties No. 2026/086, there is at least 173.4 tonnes of legal ivory available on Japan's market in the form of raw tusks alone. When including cut pieces of raw ivory, this total balloons to an estimated 250 tonnes.

Despite claims by Japan that ivory trade is prohibited "in principle", there are approximately 4,500 registered ivory dealers in Japan who are authorised to sell all manner of ivory products, ranging from whole tusks to carved products.[15]

Illegal ivory exports from Japan remain a persistent problem. While much of the ivory seized that originated from Japan consists of small amounts of worked ivory, incidents involving greater quantities and organised planning to smuggle ivory out of the country also occur. For instance, in early 2026 the Tokyo Metropolitan Police Department arrested four individuals for advertising and selling unregistered whole ivory tusks with one suspect allegedly intending to illegally export the horns to Thailand.[16] In 2023, authorities seized a sea freight shipment reportedly destined for Thailand that contained 710 pieces of worked ivory from Japan.[17]

All legal markets, including Japan's, perpetuate the demand for ivory which fuels elephant poaching and trafficking. Legal markets also provide opportunities to source ivory for personal use or resale in jurisdictions that have prohibited the trade in ivory, thereby undermining illegal wildlife trade enforcement efforts globally. EIA strongly urges all Parties to implement Resolution Conf. 10.10 (Rev. CoP20) and close domestic ivory markets that contribute to poaching or illegal trade as a matter of urgency.

PART 4: IMPLEMENTATION OF DECISION 18.184 (Rev. COP20) ON IVORY STOCKPILES

The Secretariat was tasked, under Decision 18.184 (Rev. CoP20), with identifying Parties that have not reported on their ivory stockpiles or where stockpiles may not be adequately secured. In SC81 Doc. 56, the Secretariat highlights ongoing challenges relating to the completeness, consistency and availability of ivory stockpile reporting information, which significantly limits the ability of Parties and the Secretariat to assess stockpile management, stockpile security and potential leakage into illegal trade. While the Secretariat's analysis identified persistent deficiencies in stockpile reporting and management, the Secretariat fails to propose any measures to address these shortcomings in its recommendations to SC81. Given that stockpile reporting remains a recurring challenge and that leakage from government-held stockpiles continues to be recognised as a potential source of illegal ivory entering trade, especially considering the persistence of large-scale seizures in the last few years, this issue should remain a priority for the Standing Committee.

The Secretariat's analysis identified 15 Parties that recovered ivory at MIKE sites between 2021-25 but did not submit stockpile reports during the same period, and 36 Parties that reported ivory seizures to ETIS but have never submitted a stockpile report. While the Secretariat notes that these analyses are indicative only and do not confirm the existence of stockpiles and that there is some overlap in the Parties identified in both analyses, these findings nevertheless highlight significant gaps in the information available on the disposition, management and potential storage of recovered and seized ivory. Importantly, the Secretariat's analyses suggest at least 17 out of 50 elephant Range States might not have reported their ivory stockpiles. Furthermore, half of the Parties currently participating in the NIAP process were identified through one or both analytical approaches, despite being among those countries subject to enhanced scrutiny because of their involvement in the illegal ivory trade.

Since at least SC74 in 2022, the Secretariat has repeatedly highlighted low quality and inconsistent ivory stockpile reporting by Parties, despite numerous reminder Notifications.[18] Between 2014-24, the number of Parties informing the Secretariat of their ivory stockpiles never exceeded 30 each year.[19] The latest ETIS report included in Annex 1 of Doc. 56 highlighted that only a total of 239 stockpile data submissions were provided from 51 countries and territories from 2013-25 and the reported weights from individual countries and territories showed substantial year-to-year variation, usually without accompanying explanation.

Persistent gaps and inconsistent reporting of ivory stockpiles continue to hinder the analysis of any relationship between stockpiles and ETIS data, as well as the evaluation of a Party's implementation of Resolution Conf. 10.10. Approximately 21 tonnes of ivory have been seized in large-scale seizures between 2023 and October 2026 suggesting ongoing accumulation of ivory stockpiles globally. It is therefore critical that Parties step up timely and quality stockpile reporting, as well as forensic testing, to assist with analyses, especially as ivory entering illegal trade may originate from both recently poached elephants and existing stockpiles.

The Secretariat also notes its limited capacity to engage with individual Parties and highlights its intention to provide guidance material and training on stockpile management to Parties and to report to SC82.

In light of the above, EIA therefore considers that additional action by the Standing Committee is warranted to improve stockpile reporting, strengthen stockpile management practices and promote implementation of existing provisions of Resolution Conf. 10.10 (Rev. CoP20) relating to forensic analysis and traceability.

DOC. 58. IMPLEMENTATION OF RESOLUTION CONF. 12.5 (Rev. COP20): TIGERS (*Panthera tigris*) IN CAPTIVITY (DECISION 20.189)

EIA encourages the Standing Committee to adopt the recommendations in paragraph 25 of the document and further:

a) request China to report on the legislative basis for the "three strict prohibitions" on trade in tigers and their products;

b) request China to clarify the reasons behind the sharp decline of its captive tiger population from October 2018 to May 2024; and

c) request South Africa for information on any safeguards it intends to implement to ensure that any trade in tigers is conducted in compliance with the Convention.

Submitted by the Secretariat, this document reports on the implementation of Decisions 14.69, 20.189 and 20.190 on tigers in captivity. The Secretariat reports that only six Parties responded to its notification and only three of these provided information relevant to the implementation of Decision 20.189. Accordingly, the Secretariat concludes that is unable to assess the extent to which Parties are implementing the methodological approach outlined in Decision 20.189 to ensure that tigers are kept and bred for primarily conservation purposes. The Secretariat notes that the methodological approach recommended in Decision 20.189 is long-term in nature and proposes that the Standing Committee instruct it to prepare a document that could serve as a basis for incorporation of this approach in Res. Conf. 15. (Rev. CoP20) as an Annex.

The Secretariat also reports on the responses provided by China, Thailand, Vietnam and the United States on implementation of the Standing Committee's country-specific recommendations directed to them about the keeping of tigers in captivity. While noting progress, the Secretariat identifies recommendations which have not been implemented by each country. These include the development of SOPs by China for the handling of tiger carcasses, inspection and audit of facilities and stockpile management, measures by Thailand to restrict the import of captive tigers and prohibit new captive tiger facilities, the development of SOPs by Vietnam for inspections of facilities and the disposal of carcasses and the establishment of a centralised database by the USA for tigers in captivity as well as the development of SOPs for the handling of carcasses and their destruction. Accordingly, the Secretariat has invited the Standing Committee to request China, Thailand, Vietnam and the USA to report on implementation of the recommendations it has identified.

Further, the Secretariat notes that South Africa, which has country-specific recommendations directed to it by the Standing Committee, has not provided any information on its implementation of these recommendations. The Secretariat has invited the Standing Committee to request South Africa to report to SC82 on the recommendations on captive tigers directed to it.

EIA encourages the Standing Committee to adopt the recommendations of the Secretariat in paragraph 25 of the document. In addition to these, EIA encourages the Standing Committee to make further recommendations as follows:

1) Clarify the basis of China's prohibition on trade in tigers and their products: In SC81 Inf. 9, China has reported in that it enforces "Three strict prohibitions" for tigers and their products meaning that the import, export, sale, purchase, transport of, mailing, carrying and use of tiger bone in medicine is prohibited. However, as EIA has repeatedly highlighted, a 2018 a notice by China's State Council repealed China's 1993 Notification prohibiting the use of tiger bone and rhino horn in medicine and allowed the use of captive-bred tiger bone and rhino horn in "eligible hospitals".[20] EIA has not been able to find any subsequent legislative instrument which incorporates the "three strict prohibitions" in Chinese law. Further, we have found numerous traditional Chinese medicine products displayed online purportedly licensed by the National Medical Products Administration of China which are stated to contain tiger as an ingredient. We therefore encourage the Standing Committee to request China to clarify what the legislative basis of the "three strict prohibitions" is.

2) Clarify the reason for the steep decline in China's reported captive tiger population: The Secretariat reported in May 2024 there were 2,744 captive tigers in China in 36 facilities.[21] As we have highlighted before, this is a precipitous decline from China's reported captive population for SC70 in October 2018 of 6,057 tigers in 209 facilities.[22] While this reduction of China's captive tiger population is welcome if accurate, we encourage the Standing Committee to request China to clarify the reason for such a sharp decline in a relatively short period of time. The Standing Committee is encouraged to request China to report on the status of deceased specimens, the purpose of retaining any carcasses and body parts and the current size of the stocks of deceased specimens accumulated to date.

3) Scrutinise South Africa's exports of captive tigers: At SC77 in November 2023, the Standing Committee encouraged South Africa to strengthen legislation for the keeping, breeding, international trade in and disposal of tigers and initiate a process to address the legislative gap regulating activities involving alien Appendix-I species, including tigers. As we have highlighted previously, the CITES Trade Database shows that from 2010-20, South Africa permitted the export of captive-sourced tiger specimens (live animals, skulls, bodies, trophies and skins) for commercial purposes (purpose code 'T') from facilities not registered with the Secretariat, which *prima facie* does not comply with the Convention. South Africa has been a prolific exporter of captive tiger specimens, with more than 20 live tigers exported in 2024 after the Standing Committee recommendations were made. Although no legal tiger exports were reported for South Africa in 2025, the country was identified as a source of illegal tiger parts destined for Asia[23] and at least 734 captive tigers have been recorded in the country by the government since 2023-24.[24] Since legislative gaps have been identified for the keeping, breeding and trade of tigers, we recommend that the Standing Committee request South Africa for information on any safeguards it intends to implement to ensure that any trade in tigers is conducted in compliance with the Convention.

DOC. 59. SAIGA ANTELOPES (*Saiga spp.*) [DECISION 19.216 (Rev. COP20)]

EIA recommends that the Standing Committee:

- Agree that, in its implementation of paragraph b) of annotation A3 for *Saiga tatarica*, it will request any prospective trade partner seeking to import saiga horn from Kazakhstan to publicly report the disaggregated volumes and provenance of its saiga horn stockpiles
- Recommends that CoP21 adopt a decision directing the primary importers of raw saiga horn according to the CITES trade database – China, Hong Kong SAR, Japan, Singapore, Malaysia, and South Korea – to report the disaggregated volumes and provenance of their saiga horn stockpiles to the Secretariat prior to SC85.

EIA strongly emphasises the need for transparent and accurate accounting of existing saiga stockpiles in important trading and consumer countries, given the impending commercial trade in saiga horn from Kazakhstan. Such transparency is essential to ensure that future legal trade does not exacerbate or provide cover for illegal trade in saiga horn.

International commercial trade in saiga horn from wild animals is set to resume imminently, yet there is no accurate accounting of the saiga horn stockpiles in important trading and consumer countries. The most recent stockpile estimates from China, Japan, Malaysia, South Korea and Singapore are now more than two decades out of date and even by conservative consumption rate estimates should have been depleted by now without the infusion of horn onto the markets in consumer countries.[25]

Illegal trade in saiga horn continues, with more than 8,000 horns seized in China, Kazakhstan and Russia since 2025 alone, according to EIA seizure records. EIA has also repeatedly documented wildlife traffickers based in South-East Asia offering raw saiga horn to prospective buyers.

We appreciate the information provided by Japan and Singapore on the volumes of their pre-convention saiga stockpiles, but note with concern the Secretariat's observation that the aggregated totals preclude the ability to reconcile the reported pre-Convention stockpile volumes with reported trade.

At the same time, we are concerned that China (including Hong Kong SAR) – which is expected to be among the future trading partners with Kazakhstan and among the primary intended destinations for seized saiga horn according to EIA records – has still not provided information on the volume and provenance of its saiga stockpiles.



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