

Pangolins at CITES CoP17

What are pangolins ?

Pangolins, or scaly anteaters, are the world's only truly scaly mammals. Their unique behaviours include scooping up ants and termites with their long, sticky tongues and curling up into a ball when threatened. There are eight species in total – four in Africa and four in Asia.

Pangolins are regarded by UNODC and others as the most illegally traded wild mammals on the planet. They are poached for their meat, which is eaten as a luxury delicacy, and their scales, which are used in Traditional Asian Medicine.

What are the eight species?

The [Chinese pangolin](#) is found in Bangladesh, Bhutan, China, Hong Kong, India, Laos, Myanmar, Nepal, Taiwan, Thailand and Viet Nam. It is classified as critically endangered by IUCN.

The [Indian pangolin](#) has the most westerly range of the Asian species, being found in Bangladesh, India, Pakistan and Sri Lanka, and is classified as Endangered.

The [Philippine pangolin](#) occurs only in that country, and is also classified as Endangered.

The [Sunda pangolin](#) is found in Brunei, Cambodia, Indonesia, Laos, Malaysia, Myanmar, Singapore, Thailand and Viet Nam, and is classified as Critically Endangered.

The [Giant pangolin](#) is found in Cameroon, CAR, Congo, DR Congo, Equatorial Guinea, Gabon, Ghana, Guinea, Guinea-Bissau, Ivory Coast, Kenya, Liberia, Senegal, Sierra Leone, Uganda and Tanzania, and is classified as Vulnerable.

The [Tree pangolin](#) is found in Angola, Benin, Cameroon, CAR, Congo, DR Congo, Equatorial Guinea, Gabon, Ghana, Ivory Coast, Kenya, Liberia, Nigeria, Rwanda, Sierra Leone, Sudan, Togo, Uganda, Tanzania and Zambia, and is classified as Vulnerable.

The [Ground pangolin](#) is found in Angola, Botswana, CAR, Chad, Ethiopia, Kenya, Malawi, Mozambique, Namibia, South Africa, Sudan, Swaziland, Uganda, Tanzania, Zambia and Zimbabwe, and is classified as Vulnerable.

The [Long-tailed pangolin](#) is found in Cameroon, Congo, DR Congo, Côte d'Ivoire, Equatorial Guinea, Gabon, Ghana, Liberia, Nigeria and Sierra Leone, and is also classified as Vulnerable.

What is the current situation regarding pangolins under CITES?

CITES lists all pangolins on Appendix II. Normally this would allow for regulated trade, where exported pangolins or pangolin products must be accompanied by export permits certifying that they were legally obtained, and that the exports are sustainable. However, since the year 2000, the Asian species have been subject to a zero annual export quota for specimens removed from the wild and traded for primarily commercial purposes.

This effectively makes international commercial trade in Asian species illegal, but it does not require importing countries to issue import permits for non-commercial imports, so that the burden of enforcement lies entirely with the exporting countries.

The Animals Committee – CITES' committee of zoological experts – is currently conducting a review of trade in two African species, the giant pangolin and the tree pangolin, arising from concerns that this trade is unsustainable.

What is proposed at CITES CoP17?

The Parties to CITES will consider five proposals which, if adopted, would place all pangolin species on Appendix I. This would outlaw commercial trade in pangolins taken from the wild, and would require importing countries to share the enforcement burden by issuing import permits for the exceptional cases where imports were allowed. The five proposals are as follows:

- The **Indian pangolin** is the subject of two separate proposals, by Bangladesh, and by India, Nepal, Sri Lanka and USA respectively;
- The **Philippine pangolin** is proposed for uplisting by Philippines and USA;
- The proposal for the **Sunda pangolin** and **Chinese pangolin** is tabled by USA and Viet Nam;
- The proposal for the four African species, **the Giant pangolin, Tree pangolin, Ground pangolin** and **Long-tailed pangolin**, is tabled by Angola, Botswana, Chad, Gabon, Guinea, Ivory Coast, Kenya, Liberia, Nigeria, Senegal, South Africa, Togo and USA.

There is also a Resolution on pangolins, agreed by a working group of the CITES Standing Committee. The content was based on recommendations from a meeting of pangolin range states in Viet Nam in 2015. If adopted, it would call on countries to:

- Ensure that their legislation adequately protects pangolins, including through provision for deterrent penalties;
- Ensure strict enforcement controls to address illegal trade in pangolin specimens;
- Strengthen national interagency cooperation and international cooperation to combat illegal trade in pangolin specimens;
- Carry out capacity-building activities with a particular focus on:
 - detection and identification of pangolins in illegal trade;
 - best practice for safe handling, care and rehabilitation, and release back into the wild of live confiscated pangolins; and
 - promoting the understanding of legal provisions concerning trade in and use of pangolins;
- Promote the development of techniques for identifying parts and derivatives of pangolins in trade;
- Ensure that any captive breeding facilities are properly regulated to prevent laundering of illegal pangolin parts through such facilities;
- Ensure that adequate measures are in place to secure stockpiles of pangolin parts and derivatives;
- Raise awareness among the law enforcement community including the judiciary, local communities, relevant business sectors such as courier companies, and consumers about the conservation status of pangolins and the threats posed to their survival by illegal trade;

- Work with local communities to develop non-consumptive livelihood programmes and educational programmes to assist local communities in sustainably managing pangolin populations;
- Conduct research on the uses of pangolin specimens, and on consumer motivation for consumption of pangolin parts and derivatives, in order to then to implement measures to reduce demand for illegal pangolin specimens; and
- Develop *in situ* pangolin management and conservation programmes.

The draft Resolution also calls on all governments, intergovernmental organizations, international aid agencies and NGOs to support the efforts of range, transit and consumer States in tackling illegal trade, including through capacity-building, technical assistance, operational support, funding support, educational interventions, and law enforcement support and cooperation, as may be needed.

There are also draft Decisions tabled by the Standing Committee mandating the CITES Secretariat to work with the International Consortium on Combating Wildlife Crime (ICWC), partner agencies and relevant regional enforcement networks, to request them to take pangolins into account when developing work programmes, and mandating the Secretariat to report back to the Standing Committee, which can then make recommendations or even consider compliance measures.

What is WWF's recommendations in relation to the listing proposals and draft Resolution?

WWF supports the listing proposals to place all Pangolin species on Appendix I. We agree with TRAFFIC's recommendations, which are as follows:

The **Indian Pangolin**, *Manis crassicaudata* was classified as globally Endangered by the IUCN in 2014, owing to the immense threat that trade poses across its range in five Indian subcontinent countries, although it may be extinct in Bangladesh owing to illegal hunting for trade. Since 2000, seizure data indicate that illicit international trade in at least 8000 *M. crassicaudata* took place, while it is likely to become more heavily targeted as other species decline: close to 600 000 Asian pangolins were in international trade from 1977 to 2012. There are few data on the population status of this species, though it is believed to have been extirpated from some of its range in Bangladesh and populations appear to have declined markedly due to poaching in parts of Pakistan. Very little is known on the population in India which is the majority of the species' range, although it is believed to have been reduced. This is despite national legislation protection from hunting and trade in all range States. International demand for pangolins is believed to be increasing and, despite the lack of detailed information, the level of extractive pressure this species is experiencing is such that a listing is likely to be in the best interest of the conservation of the species. **Recommendation: Accept.**

The **Philippine Pangolin** *Manis culionensis* is endemic to Palawan and five smaller adjacent islands and is considered Endangered by IUCN largely owing to negative impact from illegal hunting for local and international trade in its meat, scales and skin, which is further compounded by habitat loss. Philippine legislation has prohibited the export of all wild-caught pangolins since 1995.

While there are no baseline data on which to base population trends, the species may meet the criteria for inclusion in Appendix I as a marked decline in trade in the past 20-30 years (from ca. 1200 per year in the 1980s to around 70 per year in 2000-2013) might be indicative of a corresponding

marked decline in the wild population. *M. culionensis* seizure cases increased by over 600% between 2010-2012 and 1999-2012 alongside a decrease in the number of pangolins per seizure, indicative of a persistent illegal trade. Given its already precarious status, any further offtake of the species therefore poses a great threat to the survival of the species. **Recommendation: Accept.**

The **Sunda pangolin**, *Manis javanica* and the **Chinese pangolin**, *M. pentadactyla* are considered Critically Endangered by IUCN based on the rapid decline (>80%) of both species owing to illegal trade for their scales, meat and skin. Information on population status is scarce but neither species is believed to have a small global population. However, there are reports of very severe declines in the past two or three decades in a number of range States of both species, invariably ascribed to exploitation. For example, the population of *M. pentadactyla* in China (which comprises the greater part of the range of *M. pentadactyla*) is estimated to have reduced by some 90% between the 1960s and the early 2000s. *M. javanica* is known to be harvested extensively and, given its low productivity and likely relatively low population density, it is possible that this harvest has led to a decline in population within the guidelines for inclusion in Appendix I. The levels of population declines and harvest pressure is such that a listing is likely to be in the best interest of the conservation of the species. **Recommendation: Accept.**

In the case of the four African species, the **Giant pangolin, Tree pangolin, long-tailed pangolin and Ground pangolin**, illegal and unregulated exploitation and, for the first three forest-dwelling species, habitat loss and degradation, are thought to be an increasing threat to all African pangolin species. Although there are insufficient population data to determine whether the species meet the biological criteria for inclusion in Appendix I, there is increasing evidence of rapidly growing illegal international trade, largely of scales, to Asian markets. According to the Supporting Statement to the proposal, almost 15,000 kg of scales from African pangolins were seized between 2013 and 2015, representing an estimated 4,000 to 25,000 animals, depending on the species. There is evidence that hunting intensity for pangolins in general in Africa has increased markedly in recent years and, given their low productivity, this is very likely to have a significant impact on populations of all species. African pangolins are clearly at risk of following the Asian species into serious decline due to illegal trade. Inclusion of these species in CITES Appendix I could greatly enhance efforts to safeguard pangolins and support regulatory control mechanisms by placing an overall higher degree of international protection. However, this can only happen if national legislation provides for higher fines and punitive measures for illegal trade in Appendix I-listed species. **Recommendation: Accept.**

WWF also supports the draft Resolution, having participated in the drafting process. The measures proposed are, in our view, essential to ensure proper implementation of the Appendix I listings.