

A close-up photograph of a tiger's face, partially obscured by a dense thicket of tall, green grass and dry, brown reeds. The tiger's eyes are visible, looking directly at the camera with a focused expression. The lighting is natural, highlighting the texture of the tiger's fur and the surrounding vegetation.

HIDDEN IN PLAIN SIGHT

China's Clandestine
Tiger Trade



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CONTENTS

1 SUMMARY

3 INTRODUCTION

5 LEGAL CONTEXT

6 INVESTIGATION FINDINGS

12 TIGER FARMING

13 PREVIOUS EXPOSÉS

17 STIMULATING POACHING OF WILD ASIAN BIG CATS

20 MIXED MESSAGES

24 SOUTH-EAST ASIA TIGER FARMS

25 CONCLUSIONS AND RECOMMENDATIONS

26 APPENDICES

- 1) TABLE OF LAWS AND REGULATIONS RELATING TO TIGERS IN CHINA
- 2) TIGER FARMING TIMELINE



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SUMMARY

Undercover investigations and a review of available Chinese laws have revealed that while China banned tiger bone trade for medicinal uses in 1993, it has encouraged the growth of the captive-breeding of tigers to supply a quietly expanding legal domestic trade in tiger skins. This Government-authorized trade spurs the poaching of wild tigers and undermines the international ban on tiger trade agreed by the majority of the world through the UN Convention on International Trade in Endangered Species (CITES). The lack of clarity over the use of bone from captive-bred tigers to make wine has further stimulated trade and demand.

I) BACKGROUND

- The world is operating under a misunderstanding of China's intentions where tigers are concerned.
- Having ratified the UN Convention on International Trade in Endangered Species (CITES), China is subject to CITES requirements. CITES strictly prohibits international commercial trade in tiger parts and derivatives and, recognising the threats posed by growing captive tiger populations, also calls for:
 - domestic trade prohibitions;
 - the consolidation and destruction of stockpiles of tiger parts and products;
 - assurance that tiger parts and derivatives from captive-bred tigers do not enter legal or illegal trade.
- Contrary to CITES requirements, China has a massive captive tiger population and is allowing a *legal* trade in tiger parts sourced from captive-bred tigers.
 - Under favourable policies, as well as with support and funding from the State Forestry Administration (SFA) of China, the captive tiger population in China has grown from fewer than 20 in 1986 to between 5,000-6,000 in 2013, spread across up to 200 'farms' and 'zoos'. China's wild tiger population has fallen from 4,000 in the late 1940s to approximately 40-50 animals.
 - China's wildlife and agricultural laws and policies promote the breeding,

domestication and utilisation of wildlife for so-called "conservation" as well as for economic growth. Thus, under such a system, "utilisation" or commercial sale of certain products derived from captive-bred endangered species, including tigers, is *legal*. For example, the Environmental Investigation Agency (EIA) has uncovered the commercial sale of luxury tiger skin rugs, which are made with skins sourced from captive-bred tigers with the *express authorisation* of the SFA.

II) TIGER SKINS

- In the past 10 years, regulatory systems have been introduced to allow the commercial sale of skins of captive-bred tigers, prepared as luxury skin rugs for home décor.
- New EIA research and undercover investigations document the sale of captive-bred tiger skins at 1.5 to three times the price of skins of wild tigers, leopards and snow leopards, making the skins of wild animals a cheaper option for consumers.
 - At least 10 tiger skin rugs were sold in the first half of 2012, by only two companies. Potentially, hundreds more may have been traded, given the large number of companies licensed to process wildlife.
- EIA investigations in 2012 also show that the smuggling of skins of wild tigers and other Asian big cats continues, with skins from India and Nepal for sale in established trade hotspots in China.

- During just several days, EIA investigators were offered three fresh tiger skins, one leopard skin, one snow leopard skin and big cat bones, teeth and claws.

III) TIGER BONE

- A 1993 State Council order in China banned the use of tiger bone for medicinal purposes and the SFA has stated it has a strict ban on use of tiger bone; however, traders have told EIA investigators about the continued use of tiger bone.
- Despite the ban, tiger bones sourced from captive-bred tigers are not being destroyed, leading to what is likely to be a massive stockpile and consumer assumptions that trade is legal or will soon be legal.
- Tonics made by soaking tiger bones in wine are being produced and marketed despite the apparent 1993 ban, with traders referencing a “secret” Government notification issued in 2005.
- In 2012 EIA identified a company using this method to produce “Real Tiger Wine”, which does not list tiger bone as an ingredient and returns the bones to the stockpile to be available for audit and inspection.

BELOW:

EIA investigators were offered wild and captive bred tiger skins for sale in China in 2012.



IV) CONCLUSIONS AND RECOMMENDATIONS

- Wild Asian big cats are being poached to supply the market demand *stimulated* by China’s legal domestic trade in skins of captive-bred tigers at a time when the international community has agreed that demand *reduction* is essential to save wild tigers.
- The parts of more than 5,400 Asian big cats have been seized since 2000; INTERPOL’s rule of thumb is that seized contraband represents approximately 10 per cent of actual trade.
- Contrary to the understanding of the international community, evidence suggests that commercial use of tiger bones continues.
- Promotion and facilitation of trade in captive-bred tiger parts puts China in non-compliance with CITES requirements and undermines Premier Wen Jiabao’s commitments to end tiger trade.
- China is defying the will of the international community to end demand for tiger parts and products, and to end the breeding of tigers for trade in parts and products.
- The new Government in China has an opportunity to change the course of the wild tiger’s fate. Current pro-use policies are being championed by only a handful of officials in a couple of Government departments.
- The National People’s Congress could ensure that:
 - laws are amended to end *all* trade, in *all* parts and products of tigers and other Asian big cats, from *all* sources;
 - stockpiles of tiger parts and products are consolidated and destroyed;
 - clear messages are sent to tiger breeders and the industry that the objective is to end all demand and trade.
- Policies in China are directly stimulating demand and poaching, and the problem of tiger ‘farming’ and trade is spreading to Thailand, Laos and Vietnam.
- EIA urges Parties to the 16th Conference of the Parties to CITES (Bangkok, March 2013) to note this report and impose all effective measures, including punitive, to stop the trade in tiger parts sourced from captive-bred tigers.
- A failure to act indicates an implicit acceptance of a legal trade in the skins of captive-bred tigers, the beginning of a slippery slope towards accepting a legal trade in the bones of captive-bred tigers, and ultimately extinction of tigers in the wild.



Amur Tiger, Lutka © WCS

INTRODUCTION

New research by the Environmental Investigation Agency (EIA) shows that the Government of China allows legal domestic trade in the parts and products of captive-bred tigers, creating confusion among consumers, stimulating demand and driving the poaching of wild tigers and other Asian big cats.

This runs contrary to the impression held by the international community, the United Nations and fellow tiger range countries that tiger trade has been banned in China since 1993.

However, the international community seems to have overestimated the scope of China's ban by assuming it encompassed *all* parts and products of *all* tigers, wild and captive-bred.

It is time for a reality check. China's national policy and laws, dating back to the 1980s, encourage the domestication and utilisation of wildlife, including tigers. Regulations introduced in the past 10 years facilitate the commercial trade in skins of captive-bred tigers.

Tiger skin rugs made from captive-bred tigers can be up to three times the price of those prepared from wild tigers and several times that of leopards and snow leopards. The use of big cat skin rugs as luxury home décor has been actively promoted and is now a fashionable symbol of social status. Skins are often given as prestigious gifts or bribes and are seen as an investment.

The skins of wild tigers and other Asian big cats continue to be illegally trafficked to established trade hotspots in China, and since 2006 the primary consumers have been the business, military and political elite.

Loopholes in the regulatory system allow the laundering of illegally acquired specimens, and there are overlaps between those involved in handling captive-bred and wild-sourced skins.

Parallel to this legal trade, thousands of wild Asian big cats have died. It is clear that trade in captive-bred tigers has not alleviated pressure on wild animals but has instead stimulated demand and poaching.

A lack of clarity over the use captive-bred tiger bones has created an environment of confusion in which tiger bone wine is being produced and marketed. With 5,000-6,000 tigers in captivity there is a growing 'bank' of bones stockpiled by private tiger breeders and owners. Instead of being destroyed, skin and bone stockpiles are being registered and labelled, further fuelling speculation of future trade.

At present, law and policy in China makes it clear there is no intention to end the domestication of tigers or use of their parts and products. This defies the will of the international community that tigers should not be bred for trade in their parts and products, and undermines Premier Wen Jiabao's commitment to end tiger trade and work with fellow

Tiger Range Countries to double the wild tiger population by the next year of the tiger in 2022.

It doesn't have to be this way. With a new Government forming in China, there is an opportunity to update laws and policies to value live tigers and other Asian big cats in the wild over the value of their body parts.

Legislative change would bring China into compliance with UN agreements and in harmony with the efforts of other Tiger Range Countries, donor governments and non-government organisations (NGOs) working to save the remaining 3,500 wild tigers and to end demand for tiger parts and products.

Other countries with tiger 'farms', such as Thailand, Laos and Vietnam are watching to see what China can get away with. Trade in captive-bred tiger parts in and between those countries is

illegal. A handful of dedicated police officers are seizing parts of butchered tigers and arresting those involved but a lack of support further along the enforcement chain means few have been punished, and tiger farmers with the right connections continue to operate.

It is past time for transparency around the status of trade in parts and products of captive-bred tigers. Governments of countries concerned about the survival of wild tigers and other Asian big cats must not shrink from calling for full disclosure and meaningful action under CITES to end all tiger trade and to end the breeding of tigers for trade in their parts and products.

A failure to act indicates an implicit endorsement of a legal trade in the skins of captive-bred tigers, and the beginning of a slippery slope towards accepting a legal trade in the bones of captive-bred tigers.

BELOW:

Demand for tigers skins as luxury home décor is a growing threat to wild tigers.



© WWF Pavel Fomenko (21st Century Tiger)

LEGAL CONTEXT

INTERNATIONAL OBLIGATIONS

International trade in parts and products of tigers and other endangered Asian big cats is prohibited under CITES. Tigers, leopards, snow leopards, clouded leopards and Asiatic lions have been listed on Appendix I of CITES since the 1970s with the exception of the Siberian tiger, added in 1987.

In 1993, recognising that domestic trade was driving the poaching of wild tiger populations, CITES passed a resolution that, *inter alia*, called for domestic trade prohibitions and the consolidation and destruction of stockpiles.

Since then, Parties have recognised that the same threats from trade apply equally to other Appendix I Asian big cats, and that tiger 'farming' and domestic trade in captive-bred tiger parts and products is a threat to the chances of wild tiger recovery.

Moving with the times, these threats have been reflected in CITES debates and captured in the relevant resolution and, more recently, in a decision that tigers should not be bred for trade (including domestic trade) in their parts and products.

RELEVANT LAWS IN CHINA

Under the 1989 Law of the People's Republic of China (PRC) on the Protection of Wildlife (amended in 2004), the sale and purchase of Grade I nationally protected species,¹ including tiger (*Panthera tigris*), leopard (*Panthera pardus*), snow leopard (*Panthera uncia*), clouded leopard (*Neofelis nebulosa*) and Asiatic lion² (*Panthera leo persica*), without a permit is prohibited.³ If sale, purchase or utilisation is necessary for scientific research, domestication and breeding, exhibition or other special purpose, approval must be obtained from the relevant department under the State Council.⁴

The law clearly states it is Government policy to encourage the domestication and breeding of wildlife species for utilisation⁵, and that a licence to breed can be obtained from the relevant department under the State Council.⁶ Further, those who have such license to breed can then sell the specimens or products thereof to "purchasing units" designated by the Government.⁷

A series of regulations sets out the administrative processes to implement the law, including domestication and breeding operations and the sale of wildlife products of Grade I nationally protected species (See Appendix I).⁸

In 1993, the State Council of China issued an order to prohibit the use, manufacture, sale, import and export of medicines derived from tiger bone and rhino horn, and products claiming to contain these.⁹

In 2003, the State Forestry Administration (SFA) and the State Administration for Industry and Commerce (SAIC) announced a pilot project to allow the marking and utilisation of wildlife products.¹⁰ Subsequent notifications have set out details of implementation and labelling, and name the companies awarded licences to breed wildlife, process and sell parts and products.¹¹

According to traders EIA has met, the deaths of tigers in facilities licensed to breed or keep tigers are registered with the SFA. Licensed traders may apply for SFA approval to buy the skins of those registered animals. Once the skin has been turned into a rug or taxidermy specimen, licensees provide the paperwork and photographs to the SFA and acquire a permit in return. As long as a skin is accompanied by such a permit it can be sold.

In 2005, the SFA, SAIC, Ministry of Health, State Food and Drug Administration and the State Administration of Traditional Chinese Medicine issued Notification 2005 No 139. The full content of this notification is not available but the title states that it enables the pilot use of captive-bred tiger bone and the reduction of use of leopard bone. It is not clear what exemptions to the 1993 State Council order this notification provides, or whether it was subsequently withdrawn.

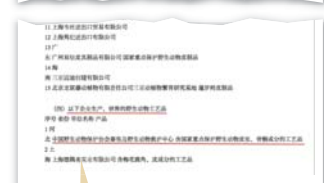
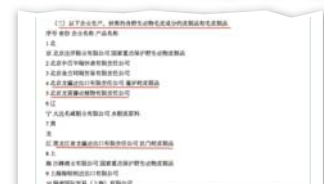
The accompanying association chart on pages 14-15 summarises the relationships described above, including the relevant Government licenses issued to businesses and facilities, including those visited by EIA in 2007 and 2012. Many of these facilities, flagged orange, have previously been the subject of NGO and media exposés.

BELOW:

EIA followed the paper trail online to find companies that were licensed to process and sell parts of captive bred wildlife, including tiger.



Translation:
SFA's notification allows Xiaofeng Animal Specimen Factory to produce and trade taxidermies, including tigers, from 2005.



Translation:
SFA's notification in 2007 allows China Wildlife Conservation Association affiliated Wildlife Rescue Centre in Qinhuangdao to produce and trade crafts containing skins and bones of national specially protected wildlife species.



INVESTIGATION FINDINGS

ABOVE:

In 2012, EIA investigators obtained first hand evidence of skins of captive bred tigers being offered for sale, accompanied by permits issued by the China State Forestry Administration, SFA.

“Once we get the skins, even before making them, they will all already be reserved ... Anyone can buy. There are so many wealthy guys, some can sell it again.”

Staff at Qinhuangdao Wildlife Rescue Centre

FOLLOWING THE PAPER TRAIL

EIA’s investigation began by following the paper trail available through the SFA website. Documents there gave details of the national “wildlife utilisation and marking system” launched in January 2003 by the SFA and SAIC. Subsequent SFA notifications list at least 150 companies licensed to process and/or sell parts and products of wildlife, including Grade I nationally protected species, including tigers.

The following is a snapshot of this trade. EIA met with two companies legally selling tiger skins. With 200 facilities licensed to keep over 5,000 tigers in captivity and over 100 companies registered under the “wildlife utilisation and marking system”, it is likely that many more skins are sold each year. The SFA can provide clarity as to how many of the companies registered under the “wildlife utilisation and marking system” have been issued with permits to process skins, and how many skins have been processed.

The findings also report on a company engaged in the manufacture of tiger bone wine, which was identified during the course of the skin trade investigation.

LUXURY TIGER SKIN RUGS FOR SALE

Between May 2012 and January 2013, EIA undertook a series of investigations to document the legal sale of captive-bred tiger parts and products. Investigators met with SFA-licensed traders; two in particular regularly process skins of captive-bred tigers into high quality rugs, which they can sell if the finished items are accompanied by Government permits.

Xiaofeng Animal Specimen Factory, in Chaohu, Anhui Province, had two skins, one ready for purchase and a second, a white tiger, being processed. The owner, who has been in this business since 2004, said he had sold five rugs in the first half of 2012 and was expecting to receive more skins before the end of the year.

Local government records online confirm he had permission to process *at least* nine skins in 2012 and has processed at least a further 11 tiger skins and one leopard skin since 2009, although more records may be available than EIA has been able to access. Records indicate the skins come from zoos across the country.^{12, 13, 14, 15, 16, 17}

The manager of the taxidermy workshop at Qinhuangdao Wildlife Rescue Centre (established by the China Wildlife Conservation Association, a national non-profit organisation affiliated to the

SFA) in Beidaihe, Hebei Province, showed investigators a pile of skins waiting to be processed for a university. However, most tiger skins are sold to wealthy individuals rather than for educational or scientific purposes; five tiger skin rugs were sold in the first half of 2012 to individuals seeking luxury home décor.

He also confirmed that “anyone” can buy these skins from the Centre. This shows that the *legal* trade in tiger skin rugs is not restricted to scientific or educational purposes but is growing through a lucrative commercial retail market.

As with Xiaofeng Animal Specimen Factory, the prices quoted for captive-bred tiger skins were 1.5 to three times higher than for wild tiger skins, and several times higher than the skins of wild leopard and snow leopard offered to EIA investigators in July 2012 in Lhasa, TAR, Linxia, Gansu Province and Xining, Qinghai Province. This legal trade is clearly not alleviating pressure on wild tigers and other Asian big cats.

The owner of Xiaofeng Animal Specimen Factory said the establishment of a taxidermy industry had been proactively encouraged by the SFA, stating that a few years previously a senior SFA official had complained that not enough was being done to make the most of the tigers dying in captivity; promoting the taxidermy process and industry.

Active promotion of the taxidermy industry also featured in a Qinhuangdao Wildlife Rescue Centre brochure, which stated that the use of taxidermy items as luxury home décor is an increasingly fashionable way to demonstrate higher status.

This echoes statements made by traders selling wild tiger, leopard and snow leopard skins, and is also reflected in the way wild skins are now prepared and trafficked, with head and paws intact for taxidermy; until 2006, less care was taken as skins were also used to decorate traditional costumes.

Skins are also offered as prestigious gifts and bribes and are increasingly, as with ivory and rhino horn carvings, and pre-1993 tiger bone wine, seen as an investment; commodities among the new asset classes.¹⁸

It is clear that legal trade is sustaining a perception that tiger skin rugs are valuable, thereby perpetuating demand and stimulating the poaching of wild tigers. In 2012, over the course of just several days, EIA investigators were offered the fresh skins of wild Asian big cats - three tigers, one leopard and one snow leopard.

ABUSE OF THE LEGAL TRADE SYSTEM

The domestic skin trade regulation system is flawed and traders described ways in which it can provide a cover for black market activities, including the re-use of permits and falsification of origins.

That the legal market offers a means to launder illegally acquired tiger specimens was evidenced by the tiger carcass in the freezer at Xiaofeng Animal Specimen Factory. The owner takes delivery of the entire tiger carcass from the zoos with which he has an agreement; he explained that since no-one is paying attention to the bones he can sell them too. Given the serious penalties, he will not sell them on the open market himself, but he has regular buyers in Wuxi, Jiangsu Province who buy from him.

BELOW:

Permit for Xiaofeng's tiger skin, shown on page 6

BOTTOM:

These skins are destined for a university, but the staff of the Qinhuangdao Wildlife Rescue Centre claimed they had sold five tiger skins as rugs to individuals in the first half of 2012.



" ... because when we pay, we pay for the whole tiger.... there is no record of the bones...."

Owner of Xiafeng

ILLICIT RE-USE OF PERMITS FOR ADDITIONAL TIGER SKINS

The only identifying feature connecting the tiger skin rugs for sale with the accompanying permits is a photo of the skin on the back of the permit. The owner of Xiafeng Animal Specimen Factory explained that he photographs the processed skin and sends it with the paperwork to the SFA, which in turn issues a laminated and stamped permit bearing the photo.

However, the photo is so small that there is no way the stripe patterns of the photo can be matched with those of the skin for sale, presenting opportunities for the same permit to be used for different skins. Indeed, it seemed that this was the case with the specimen he was showing us.

While the permit stated it was issued in 2011 for a tiger skin sourced from Nanjing Pearl Spring Zoo, during the course of the conversation it became clear this may not be the case; the owner changed his mind twice about where the tiger came from and then claimed it had died in March 2012. Pressed, he warned EIA to ask no more questions on this issue: *"No, you don't ask about that. The certificate is here, and you don't need to know more. It's like you ask a child trafficker, who does the child belong to ..."*.

BELOW:

Carcass of the tiger shown on page 6 in the freezer at Xiafeng.



Further, he went on to offer a substantial discount on the skin if purchased without the permit, describing a process whereby the buyer would take the permit with the skin to ensure it could be safely transported and then return it for a refund and so enable the taxidermist to fraudulently re-use the permit for other skins. He suggested this had been done before.

LEGAL AND ILLEGAL SKINS ENTER SAME MARKET

Skins of wild and captive-bred tigers are feeding into the same consumer demand for luxury home décor, and there is overlap between those involved in the legal and illegal trade. The owner of Xiafeng Animal Specimen Factory claims he does not buy wild tiger skins himself. However, he claimed to have processed two skins originally from India and purchased in the Tibet Autonomous Region (TAR), including one he processed on behalf of a local deputy governor who had received it as a gift.

Likewise, traders in known hotspots for illegal tiger and other Asian big cat skins, such as Linxia in Gansu Province and Lhasa in TAR, confirm that the skins of wild Asian big cats coming from India and Nepal are destined for the luxury home décor market, which is also evident from the way they are processed (see page 19). Buyers come from all over the country and one trader in Linxia, known to EIA as an illegal trader since 2006, uses a third party in Hebei Province to 'fine tan' wild-sourced tiger, leopard and snow leopard skins on behalf of a buyer in Inner Mongolia.



The photo on this permit is too small to accurately identify the skin it accompanies.

THE TIGER BONE WINE TRADE

Beijing Longying Trading Ltd (also known as Beijing Longfuteng Fauna and Flora Ltd) is one of the few companies that has the license to breed wildlife (including tigers), the license to process their parts and products, and the license to sell.

The owner claimed he was a co-founder of the State-founded Hengdaohezi Big Cat Breeding Centre, China's first tiger farm, before going into private business importing and exporting wildlife. He claimed two of the tigers he had bred himself were gifted by the Government of China to South Korea in 1994, to mark the visit of then-President Jiang Zemin. He also said he had arranged to import 100 tigers from Sri Racha, in Thailand, to Sanya Love World, in Hainan Island, in 2002. He is a successful crocodile farmer and also the co-author (with Hengdaohezi Big Cat Breeding Centre and Northeast Forestry University) of a research paper on the chemical content of Siberian tiger bones.¹⁹

While crocodiles appear to be his main business, he also had samples of "bone strengthening wine" produced by wineries associated with the Xiongsen Bear and Tiger Village, in Guangxi Province, and the Harbin Siberian Tiger Park, in Heilongjiang Province. Both are licensed under the 2003 wildlife utilisation and marking scheme and the owner of Beijing Longying insisted it was made using tiger bones but, because of the 1993 State Council order, the wineries are unable to say so on the ingredients.

He currently has eight tigers at his compound on the outskirts of Beijing and two in a park in Sanya, on Hainan Island, but his long-term goal is to raise 500 tigers; his business plan to achieve this includes seeking investors while also generating income from ticket sales to visitors and selling tiger skins to "private collections".

When asked why the figure of 500, he explained that an official notification circulated in 2005, regarding the sale of captive-bred tiger bone to designated medicinal manufacturers authorised to supply hospitals with tiger bone wine, stipulated that only operations with 500 tigers or more could apply for permission.

He described it as a "secret" and "internal" notification, not widely distributed because of the international outcry at the time; news broke in 2005



that tiger breeders were petitioning the SFA to repeal the 1993 State Council ban on the use of tiger bone.²⁰ He added that the only two facilities to meet the '500' requirement are Xiongsen Bear and Tiger Village and the Harbin Siberian Tiger Park.

"Now there is an internal notification ... when the number of the bred tiger reaches 500, if you get some special permission, you can sell the tiger bones to assigned medicine-making factories and the products will be directly circulated in hospitals. For instance, if a patient is in a hospital for arthritis treatment, he will get a bottle of the bone wine."

He calculates a breeding operation with 200 tigresses could potentially produce 600 cubs each year, and that it would be "very easy to naturally get rid of 100-200 every year."

These revelations fly in the face of repeated assertions by the SFA, at various CITES and Global Tiger Initiative meetings, that the Government is committed to a 1993 State Council Order prohibiting the use of tiger bone for medicine.

EIA investigators searched online for Government notifications pertaining to the use of captive-bred tiger bone and found records of Notification 2005 No 139, which "enables the pilot use of captive-bred tiger bone for medicine and the reduction of the use of leopard bone."



ABOVE:

Harbin and Xiongsen both have permits to produce "bone strengthening wine", which is labelled in Latin as containing lion. It is marketed however, as having been made using tiger.



ABOVE:
Sanhong's website describes "real tiger wine" and provides images of the wine manufacturing facility.

NOTIFICATION 2005 No 139

Found on the website of a local Shanghai government department,²¹ the Notification appears to have been issued by the SFA, SAIC, Ministry of Health, State Food and Drug Administration and the State Administration of Traditional Chinese Medicine.

The same text appears in a list of relevant laws governing the administration of medicines at the Taizhou Hospital, in Zhejiang Province,²² and in a "feasibility study report" by the Hunan Sanhong Biotechnology Company, in Changsha, Hunan Province, a member of the CWCA. The report and business plan were prepared in 2005 and describe the "great market potential" for tiger bone wine. Accordingly, it sets out the production and marketing strategy for a projected annual output of 800 tonnes of Quanzhen Hujiu, "Real Tiger Wine", worth an estimated RMB 1b / US\$160m.²³

Unlike other SFA notices, the content of Notification 2005 No 139 is not publicly available, so it is not known what exemptions it stipulates that might allow restricted manufacture and use of tiger bone wine. EIA has, however, documented the *impact* of the Notification, which has prompted the Sanhong Biotechnology Company to invest millions to put the feasibility report plans, *extracts below*, into practice to produce a range of "Real Tiger Wine".

Notification 2005 No 139 -

"...enables the pilot use of captive bred tiger bone for medicine and the reduction of the use of leopard bone."

"QUANZHEN HUJIU", SANHONG'S "REAL TIGER WINE"

Sanhong's plan states the wine is made from tiger bone and other controlled wildlife parts, including pangolin scales and caterpillar fungus (*Cordyceps sinensis*). The recipe for Sanhong's "Real Tiger Wine", prepared with technical guidance from the Hunan Academy of Chinese Medicine, is detailed in the report, the tiger bone requirements are as follows:

"... According to relevant technical parameters, 160 kilograms of tiger bones may produce 3 tons [sic] of tiger bone stock. One kilogram of tiger bone wine contains 2 to 4 grams of tiger bone stock. Based on an average of 3 grams per kilogram, 800 tons [sic] of tiger bone wine require 2,400 kilograms of tiger bone stock, supplied by around 128 kilograms of tiger bones."

The report goes into enormous detail about consumer attitudes and demographics, brand positioning, marketing, competition, production processes, sourcing of raw tiger bone (including establishing a tiger-breeding operation) and financing. The company's motivation appears two-fold – the need to prepare an honest product to compete with fake products that bring down the name of traditional medicine, and the need to capitalise on the Government's policy to use wildlife:

"The Chinese Government, by referring to the open protection measures of African elephants, has set forth a humanistic approach for the development-based protection policy, where the wildlife supply is replaced by captive-breeding. Under the Government's guidance and strict permit management, this project is therefore specifically established for the valuable utilisation of tiger bone resources, satisfaction of the public's demand for tiger bone wine and funding additions to the Government's animal protection endeavours."

Critically, the feasibility report sets out the legal basis upon which the entire project rests, and specifically refers to Notification 2005, No 139.

The report goes further, specifying additional Government policy promoting the use of captive-bred tiger bone.

"Our Government has established a clear protection and development strategy for rare flora and fauna (please refer to: Animal Protection Order No. [2005]93) ... The Real Tiger Wine provides a feasible path where the development of utilising the value of tiger carcass helps serve the protection purposes."

FROM PLANNING TO PRODUCTION

EIA has obtained independent confirmation that Sanhong has gone into production of a range of “Real Tiger Wine” products. Manufacturing occurs near Changsha, where the owners also have a taxidermy workshop (Changsha Sanzhen Animal Artistic Specimens Company) licensed to process tiger skin^{24, 25} and a small breeding centre with six tigers.²⁶

Local government officials are well aware of production and, in 2011, a local Changsha government website announced that the Sanzhen Animal Taxidermy Company had started production of tiger bone wine in 2009, quoting the company’s reported investment of nearly RMB 40m/US\$6m.²⁷ In addition, in 2011 a post on a Ministry of Commerce website advertises wildlife taxidermy services and tiger bone wine, providing contact details for the owner of Sanzhen and Sanhong.²⁸

The products are not for sale at the premises and may not be found in regular retail outlets. A few instance of online sales have been documented,^{29, 30, 31} but otherwise distribution is via regional agents who market to elite clients and, according to one Beijing-based distributor, Beilan, this includes guesthouses and restaurants catering to high-ranking officials.³²

As with other tiger wines, the word ‘tiger’ does not appear in the ingredients, even though the use of tiger bone in the manufacturing process is the main marketing message distinguishing it from other bone-strengthening wines.

This could be explained by the fact that, unlike traditional and clinical medicines, the finished product doesn’t actually

contain a piece of bone. Sanhong’s production methods involve soaking tiger bones in vats of wine to make a ‘stock’ that is mixed with other ingredients.

Bones are used for a maximum of three batches before being returned to the stockpile of legally acquired captive-bred tiger bone, ensuring it is available for official auditing.

Along with the fact the bone is from captive-bred tigers, and the possibility that Notification 2005 No139 limits distribution, this could explain why Sanhong and others believe they can sell “bone strengthening wine” made using tiger bone. The SFA would have to provide clarity on this since the content of the Notification is not publicly available.

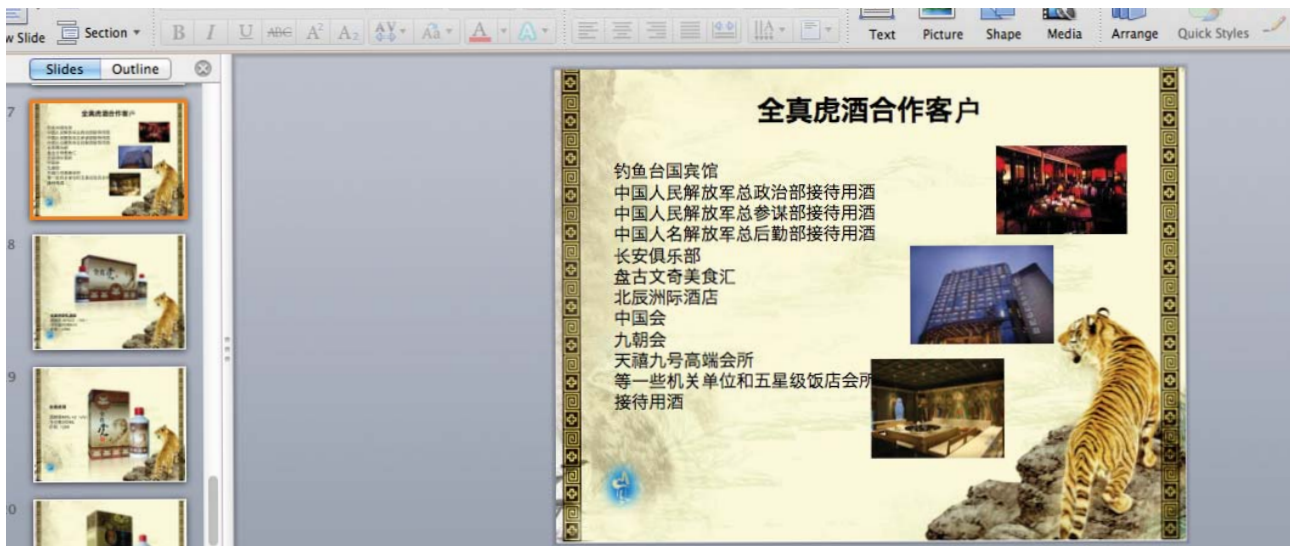
Whatever the legal situation, the practices at Sanhong and, possibly, other wineries suggest tiger bone is being used for commercial purposes before being sealed and stockpiled.

BELOW:

A bottle of Sanhong “Real Tiger Wine” manufactured in 2012.

BOTTOM:

Distributing agent, Beilan, claims in this marketing power point presentation available online, that they supply Sanhong’s “Real Tiger Wine” to high ranking officials and private members clubs.





TIGER 'FARMING'

ABOVE:
Tigers at the Xiongsen Bear and Tiger Village, one of China's largest tiger 'farms'.

WHERE ARE THE CAPTIVE TIGERS COMING FROM?

There is a perception that all tiger 'farms' are huge, industrial-scale speed-breeding operations for hundreds of animals; in reality, the majority of operations involved are small enterprises and in many cases may not even be breeding tigers but merely keep them.

China reportedly has 200 facilities³³ licensed to keep 5,000-6,000 tigers,³⁴ a population and an industry that has grown rapidly in the past two decades (see Appendix 2). Starting with fewer than 20 tigers in one facility in 1986 (35), annual estimated breeding rates ranged from 200 new cubs a year in 1999³⁶ to 800 new cubs a year in 2006.³⁷

Even after CITES adopted a decision in 2007 that tigers should not be bred for trade in their parts and products, the SFA reported an increase of 1,000 tigers by 2010 taking them to 6,000.³⁸ This has dropped to "over 5,000" in 2012.³⁹ A request from CITES to provide more specific information on how many tigers

there are, where they are, the status of stockpiles and intentions regarding what to do with those stocks, has gone unanswered.⁴⁰

Despite official requests from CITES,⁴¹ the Government of China has not provided any information on the exact number of tigers, where they are kept, the volume of stockpiled skins and bones or their purpose. Although the SFA insists facilities and stockpiles are tightly controlled to prevent *illegal* trade, it has not been transparent over how much has entered *legal* trade.

According to official records,^{12, 13, 14, 15, 16, 17} the Xiaofeng taxidermists obtained 13 tiger skins from Nanjing Pearl Spring Zoo between 2011-12, and a further seven tiger skins and one leopard skin from Hefei Wild Animal Park, Tongling City Zoo, Pang Park Zoo, Yangzhou Zoo and Huaibei City Garden Zoo.

Several other facilities have been documented by national and international journalists and NGOs as involved in the tiger bone wine business.

PREVIOUS EXPOSÉS



© Belinda Wright WPSI

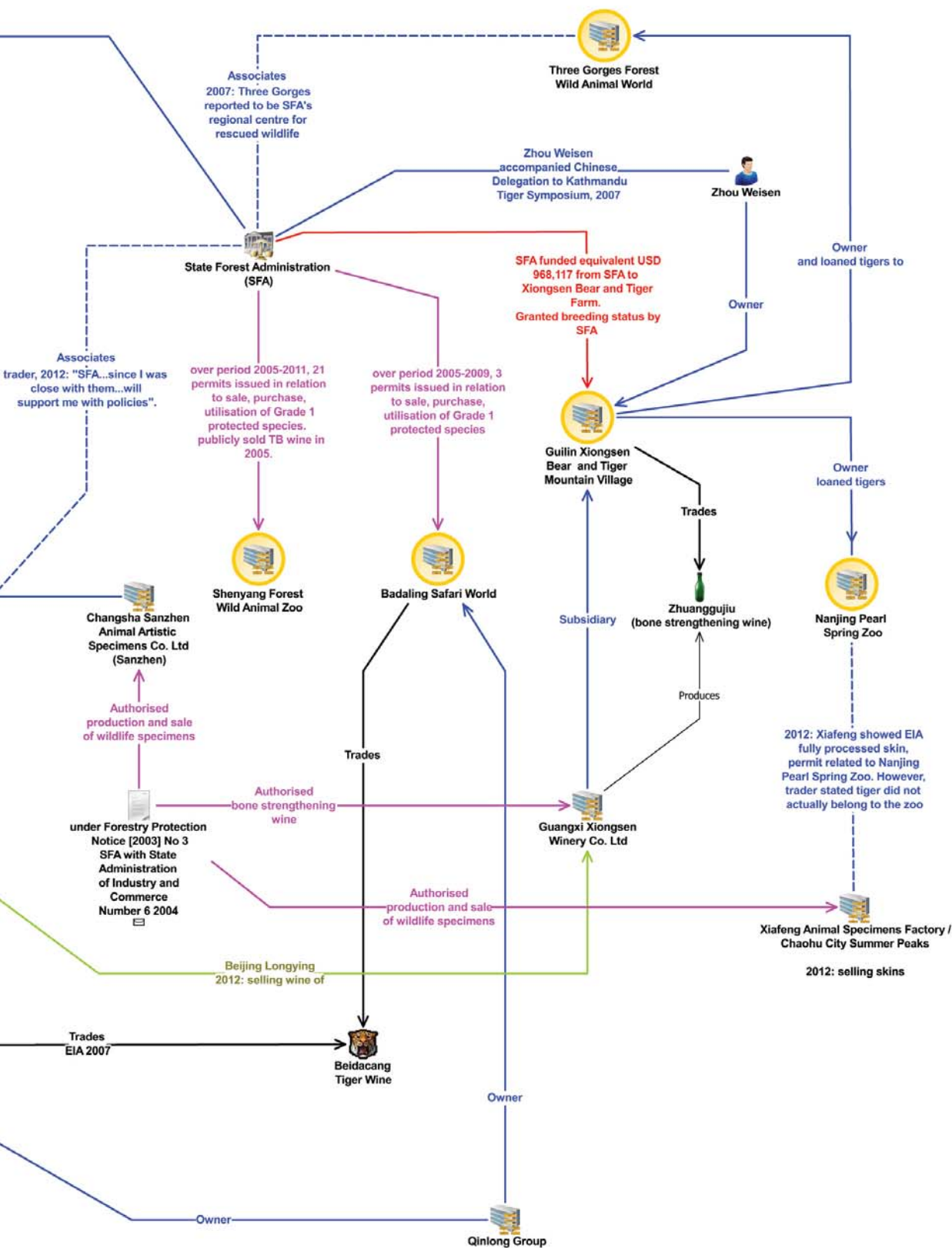
TIGER BONE WINE

- The two biggest tiger-breeding facilities in China, with more than 1,000 tigers each, have been documented trading tiger bone wine on several occasions - Xionsen Bear and Tiger Village^{42, 43, 44, 45} and the Harbin Siberian Tiger Park.^{46, 47}
- In February 2006, bottles of 'healthy bone wine' made from tiger bones were on sale at Shanghai Wild Animal Park.⁴⁸
- In December 2007, an investigation into the death of a Siberian tiger at Three Gorges Forest Wild Animal World revealed an on-site tiger bone winery.⁴⁹ Other zoos, such as Dalian Forest Zoo,⁵⁰ Nanning Zoo⁵¹ and many more have also been exposed for illegal operations.
- In January 2008, Shenzhen Wildlife Park reportedly operated a 'tiger bone wine processing centre' with bottles sold to visitors.⁵²
- Shenyang Zoo, in Liaoning Province, was reportedly openly selling tiger skeletons for "drug wine" in 1987, when prices were being driven up by the shortage of tiger bones,⁵³ but staff reported in 2005 that sales of tiger bone were an "open secret" and the wines were mainly consumed by forestry authorities and police.⁵⁴ The facility hit the headlines in 2010 when it was found to be starving tigers to make tiger bone wine.⁵⁵
- In February 2012, a manager at Nanjing Pearl Spring Zoo revealed to journalists that it produced tiger bone wine primarily for consumption by Government officials.⁵⁶



ABOVE:

Freezer full of tiger carcasses at the Xionsen Bear and Tiger Village, 2007, and Xionsen's "bone-strengthening wine" marketed in a tiger shaped bottle.



This chart summarises the relationships described in this report. Facilities flagged orange have previously been the subject of NGO/media tiger exposés

PREVIOUS EXPOSÉS (CONTINUED)

TIGER BONE WINE FOR SALE AT QINHUANGDAO WILD ANIMAL PARK AND WILDLIFE RESCUE CENTRE

In 2007, EIA documented the sale of a brand of tiger bone wine, Beidacang Tiger Bone Wine, at the Qinhuangdao Wild Animal Park, adjacent to the Qinhuangdao Wildlife Rescue Centre.⁵⁷ The manager of the park's retail outlet showed investigators a copy of the permit issued in 2004 by the SFA to allow the use of tigers that had died of natural causes on the premises. The permit stated: *"tiger skins can be made into specimens and bones can be made into wine ... the remainder of the tiger is to be voluntarily and properly taken care of"*.

A leaflet distributed with the wine states: *'Currently, the wildlife park has Government permission to carry out plans to soak tiger bones in wine. Beidacang Wine Factory was appointed to extract the sap through long-term soaking of tiger bones in vats, after which it is filtered and packaged to produce Tiger Wine [sic]*. EIA found the same wine for sale at Badaling Safari Park near Beijing, also documented by TRAFFIC.^{58,59}

Also in 2007, EIA found a different brand of tiger bone wine, reportedly made by the neighbouring Qinhuangdao Wildlife Rescue Centre, documented for sale online.⁶⁰

Details were provided to the SFA in 2007, and provincial forest police officials subsequently announced in the media the specific date and time of an inspection of the facility to ensure there was no illegal trade (an enforcement strategy that seems self-defeating).⁶¹ The SFA has not provided any feedback about the inspection nor the permit's validity.

In 2012, there were no obvious signs of tiger bone wine for sale at either Qinhuangdao Wild Animal Park or the Wildlife Rescue Centre. According to staff, there are six or seven "sets of bones", presumably skeletons, sealed in freezers. The sealing process is filmed and the bones off-limits and subject to inspection. Staff said if the freezer seals are broken the Rescue Centre would lose its permission to operate.

They also revealed that some tiger bones from animals dying on the premises were being steeped in wine, in secured containers, to protect them from "going off". This wine is reportedly available to guests at the discretion of the Centre's Director.

Beidacang tiger wine, on the other hand, still appears to be widely available online,^{62,63,64,65,66} adding to the general lack of clarity as to what is and is not allowed for sale, creating confusion among consumers.



LEFT AND BELOW:

There was no satisfactory answer over the legality of the Beidacang Tiger Wine, which was offered for sale at Qinhuangdao Wildlife Park in 2007.





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STIMULATING POACHING OF WILD ASIAN BIG CATS

In 2012, EIA investigators were offered the fresh skins of three tigers, one leopard and one snow leopard along with big cat bones, teeth and claws during several days in well-known trade hotspots in China. All had been sourced from the wild.

EIA analysis of seizure records and market observations indicates that since 2000, over 5,400 Asian big cats have died for the trade and more than 90 per cent of these were destined for markets in China.^{67,68} Contrary to pro-trade lobby assertions running a legal trade in the skins of captive-bred tigers for nearly 10 years has not stopped the poaching of wild tigers and other Asian big cats.

The demand for luxury home décor promoted by SFA policy is precisely what the skins of wild tigers, leopards and snow leopards are being used for. In 2004, EIA documented traders in the TAR describing Chinese demand for tiger skin as home furnishings.⁶⁹ Following the collapse of the demand among Tibetans in 2006, traders trafficking skins from India and Nepal simply shifted them onto the home décor market, catering to the Chinese business, political and military elite who wanted taxidermy specimens for themselves or as a prestigious gift to bosses and officials.⁷⁰

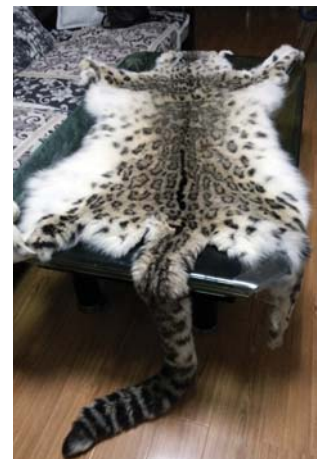
This is evident not just from the way in which skins are prepared, with intact heads and paws, but also from what traders in Lhasa in TAR, Linxia in Gansu Province and Xining in Qinghai Province have said about their customers from China. One persistent trader in Linxia, whom EIA has documented trading in wild Asian big cat skins from 2006-12, has told investigators on two separate occasions about a regular buyer in Inner Mongolia who purchases them for home furnishing.

Interestingly, this buyer often requests that the skins he buys are diverted via professional taxidermists in Hebei Province. EIA confirmed this with the middleman in Hebei, and this national criminal network further illustrates the overlap between the trade in captive-bred tiger skins and those of wild Asian big cats. Full details of this network were passed to the relevant authorities in 2012.

It is no surprise that the skins of wild Asian big cats are feeding into the luxury home décor market; as has previously been argued,⁷¹ with transnational criminal networks moving small consignments of contraband across the porous trans-Himalayan borders, it is cheaper to kill and trade wild tigers than to raise them in

BELOW:

For every tiger poached, at least four leopards are killed. In 2012, EIA was offered fresh skin and bone of leopard and snow leopard in China.





ABOVE: Since 2006, this persistent trader has offered EIA investigators three tiger skins and many leopard and snow leopard skins.

captivity, process them professionally, pay permit fees and trade them in a legal market. Moreover, it is the wild tiger that is most desired for its bones. It is not an uncommon belief among Chinese traditional medicine consumers that wild products have greater potency than farmed.⁷²

The SFA has claimed at international meetings that this international illegal trade in skins of wild Asian big cats has been effectively deterred. It is true that trade in hotspots such as Lhasa, Linxia and Xining is not nearly as open as it was up until 2006 but it has not been deterred, it's just gone underground.

In May 2012, Indian officials sounded the alarm when informant networks reported that traders had put down a deposit and "commissioned" 25 tiger skins.⁷³ In just over a month in 2013, two tigers and nine leopards have died for trade in India;⁷⁴ seven tiger skins and bones weighing the equivalent of 14 tigers were seized in Nepal en route to China.⁷⁵

As recently as July 2012, EIA documented known criminals continuing to operate, sourcing stock in the border areas with India in Ali County in the TAR, or travelling to Nepal and India to choose Asian big cat parts and products from established associates and arrange carriage across the border by foot, pack animal and vehicle.

One persistent offender in Linxia has described on three separate occasions

how his relationship with Government officials has enabled him to avoid prosecution. He is aware he has been the subject of a previous media exposé and his only concern was that the investigators were not undercover journalists. He also gets advance warning of official inspections, but so does the entire Province since the Forestry Bureau announces in the media its intention to undertake inspections, rendering enforcement little more than cosmetic.⁷⁶

In addition, investigators also found traders not previously encountered in Lhasa and Xining. They visited retail outlets selling other wildlife parts and products, or products manufactured in India or Nepal. In Lhasa, one trader proactively asked investigators if they were looking for something more "special" and arranged a private viewing of two fresh tiger skins at a residence. Likewise, in Xining investigators were taken to a residence, shown a full snow leopard skin and skull, and told more were available.

While none of the traders with illegal Asian big cat products for sale openly displayed Asian big cat skins, some in Linxia openly displayed leopard skulls. The more clandestine nature of the trade means it is impossible to ascertain the scope or scale of trade based solely on observational market surveys, and the practice of publicly announcing official inspections in advance means market inspections are unlikely to generate information since traders ensure their shops are clean.

INTERNATIONAL ILLEGAL TRADE IN ASIAN BIG CATS

International trade in parts and derivatives of Appendix I Asian big cats is prohibited under CITES. Since 2000, at least 5,559 Asian big cats have been intercepted in trade; this is based on seizures of skins, carcasses and live big cats. Bones and skeletons have been discounted to avoid double counting.^{68, 77}

This represents the deaths of at least 1,031 tigers, 4,189 leopards, 152 snow leopards, 26 clouded leopards and 17 Asiatic lions; as per the INTERPOL rule of thumb, contraband seized is about 10 per cent of what is being trafficked.⁷⁹

Additionally, 136 live tigers, four live leopards, two live snow leopards and two live clouded leopards have been seized, either being kept illegally or in trade.

More than 90 per cent of the total was destined for markets in China – taking into account intelligence surrounding the incidents in India, Nepal, Burma, Russia and China, and historical information on markets and trafficking routes.

While there are relatively good records of incidences of tiger and leopard trade across Asia, there is little if any official information regarding the trade of snow leopards and clouded leopards, despite quantities documented for sale by NGOs.

Further, the proportion of leopards in trade compared to tigers highlights the importance of robust and timely official reporting on all Asian big cats (covered under CITES Res. Conf. 12.5).

In addition to big cat numbers identified through seizures, since 2000 a total of 887 whole skins have been documented for sale by EIA, the Wildlife Protection Society of India (WPSI) (461 skins) TRAFFIC and other NGOs and journalists (426 skins).⁷⁷ This figure does not include the number of traditional costumes decorated with tiger and leopard skins, often entire skins, documented and in use and trade in 2005-06.

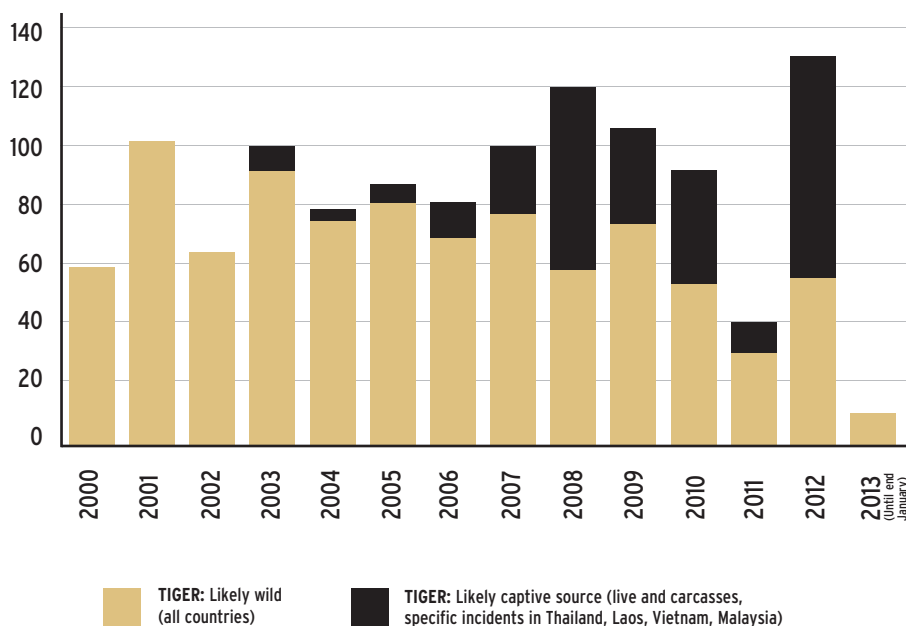
It is important to note that, despite being a criminal activity, trading does not necessarily take place in the same locations as seizures. For example, as a source country and with good records, India understandably contributes a significant proportion of big cats (66 per cent) to this overall figure. However, documentation of trading occurs in often persistent markets outside of India, such as border towns, in China and TAR, where law enforcement actions are not correspondingly reflected.

FIGURE 1

Tigers intercepted in trade, 2000-2013

Including where likely from captive sources (selected countries only)

Source: EIA analysis of seizure data^{67, 68}





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ABOVE:

The international community has long recognised the threat posed by tiger farming to the survival of wild tigers.

“... China has one of the strictest domestic trade bans in the world, enacted in 1993, which prohibits hunting, sale, purchase and use of Tigers and Tiger products”.⁸³

HIDDEN IN PLAIN SIGHT

How did we get to the situation where international commitments and national action plans have been based on the assumption that there is a full tiger trade ban in the largest historical consumer of tiger parts and products?

Documents circulated at CITES indicate that by 1996, reference was increasingly made to a generic domestic trade ban in China and it appears to have become common assumption that the 1993 domestic trade ban applied to all tiger parts and products, when in fact it only applied to use of tiger bone in medicines.

At a CITES Standing Committee in December 1996, the China delegation is quoted as stating: *“China had banned all internal trade in tiger parts and products”.*⁸¹

The CITES Tiger Technical Missions, which visited China in 1999 reported: *“In 1993, a State Council Order banned internal and international trade in rhinoceros and tiger parts and derivatives.”*⁸²

A timeline of relevant statements, quotes and events is included as Appendix 2 to this report.

In 2005, news of a re-opening of tiger trade in China sparked national and international discussions and by 2007, at the 14th Conference of the Parties to

CITES (CoP14), SFA statements became increasingly refined. It stressed it is committed to ending illegal trade and that the 1993 State Council order has not been repealed: *“We seek to assure parties that China will not bring any change in its existing policy on domestic use of tiger bone unless it can be demonstrated to have positive effect on conservation of wild tigers internationally.”*⁸⁴

At the same time, there were increasing references to a domestic policy of labelling and registering skins for likely future use (see Appendix 2). Also, in the Secretariat’s report to CoP14 on a recent mission to China, it was confirmed that the 1993 State Council order “relates solely to tiger bones or tiger bone products.”⁸⁵ Shortly after CoP14, the SFA issued a notification declaring skins of captive-bred tigers, and leopards as being of “legal origin”.⁸⁶ This prompted direct questions, in numerous international forums and in bilateral dialogue, as to the status of a legal trade in captive-bred tiger skins.

As recently as May 2012, at a “Stocktaking Conference” of the Global Tiger Recovery Programme in India, EIA asked the Chinese delegation if the Government allows the domestic sale of captive-bred tiger skins. The delegation stated the use of such skins is allowed for educational or scientific purposes, and reiterated that China has a domestic trade prohibition on the use and sale of

tiger bone in medicines. This response does not answer our question.

The SFA has neither denied it allows a legal domestic trade in captive-bred tiger skins nor openly declared it to the international community. To the tiger's detriment, this lack of transparency has not been adequately challenged, and against the backdrop of this deception the demand for and trade in tigers skins for luxury home décor has sustained a market for the skins of wild tigers and other Asian big cats.

Another misleading and disingenuous tactic employed by officials in China, apparently ignoring the evidence over the continued use and demand for skins of wild tigers and other Asian big cats for luxury home décor and taxidermy, has been that when discussing the illegal skin trade the default response has been to refer to the sensitivities of addressing cultural demand for skins among Tibetans; however, this is no longer valid. Until 2006, skins were used to decorate traditional costumes but, following targeted outreach by religious leaders, Tibetans burned their skins and the demand and market has declined significantly.

It has clearly suited the Government of China to divert attention from the trade and demand for Asian big cat skins as a luxury status symbol and home décor. It has had ample opportunity to inform the international community of its extant licensing system, the scale of legal trade, the volume of tiger and leopard parts and derivatives in stockpiles and the purposes of such stockpiles, but has chosen instead to deliberately ignore specific and direct questions posed by CITES and EIA. This is not compliant with the resolutions and decisions of CITES, either in letter or spirit.

This policy and attitude also undermines the statement by Chinese Premier Wen Jiabao when he shared a platform with Russian Prime Minister Vladimir Putin and other Tiger Range Countries leaders at the St Petersburg International Tiger Forum in 2010, convened to launch the Global Tiger Recovery Programme to double the wild tiger population by 2022. Premier Wen stressed: *"Countries should enforce more stringent legal and administrative instruments, and severely crack down on tiger poaching and the trade in, and smuggling of, tiger products".*⁸⁷

Had the SFA clearly informed the international community about the legal domestic trade in tiger parts, discussions over changes in national law and policy could have been launched a lot sooner.

Fellow Tiger Range Countries combating the poaching of their tigers for trade in China would have at least understood the conservation landscape in which they were operating under the Global Tiger Initiative. Key enforcement authorities and donor governments and conservation charities investing in enforcement and demand-reduction could have evaluated strategies in light of a parallel legal trade. Even the lobby groups advocating 'tiger farming' as a conservation solution have based their theories on there being no legal trade in tiger parts and products in China.

It is clear, however, that it is not just a matter of implementing national regulations and laws; the very officials tasked with protecting the tiger have proactively issued statements illustrating there is no intention to end the use of tiger parts. This only further confuses consumers and gives hope to industry, providing a possible explanation as to why China's captive-bred tiger population has grown tremendously – they are "banking on extinction"⁸⁸ of the wild tiger while sitting on growing stockpiles.

In 2007, at the height of international debate over the lifting of the domestic trade ban on the use of tiger bone, the then SFA Deputy Director was quoted in the media saying he was opposed to the ban⁸⁹ and that: *"The ban won't be there forever, given the strong voices from tiger farmers, experts and society."*⁹⁰

In 2009, a senior SFA official in the China CITES Management Authority wrote in a national magazine explaining why China could not legally implement the 2007 CITES decision calling for the phase-out of operations breeding tigers for trade in parts and products. He stated that he thought tigers should be bred for trade in parts and products, his main argument being that a legal trade would alleviate pressure on wild tigers. His emphasis was on demand for tiger *bone* used as medicine; at no point did he acknowledge the impact of the legal trade in tiger *skins* on wild tigers and other Asian big cats.⁹¹

Ironically, at CITES Standing Committee in 2012, during discussions from the floor on tiger trade, an official from the SFA's Wildlife Conservation Department acknowledged that merely discussing a market for tiger parts will stimulate poaching.⁹²



ABOVE:

Across the Tibetan plateau skins were burned as demand crashed in 2006.

BELOW:

Chinese Premier Wen Jiabao calls for an end to tiger trade at the St Petersburg International Tiger Forum in 2010.



“The manager of the Siberian Tiger Park says the SFA’s plan requires that by 2005 they reach 500 tigers and 1,000 by 2010.”⁸⁰

DEFYING THE WILL OF THE INTERNATIONAL COMMUNITY

The international conservation community, Tiger Range Countries and other Parties to CITES have long recognised that legal trade, domestic and international, in tigers from any source, including captive-bred tigers, is not a conservation solution. The very existence of tiger ‘farms’ and stockpiles of parts has been seen for decades as a threat by conservation experts. (see Appendix 2).

On two separate occasions – 1992 and 1995 (See Appendix 2) – China has considered registering commercial tiger-breeding operations for international trading purposes but both times withdrew formal proposals following intervention from the International Union for the Conservation of Nature (IUCN) Cat Specialist Group and other experts.

Despite the CITES Appendix I listing for tigers, Parties recognised the future of the species depended on domestic trade prohibitions and so Res. Conf. 9.13 was adopted in 1994. The resolution was strengthened over the years and expanded to cover other Asian big cats subject to the same poaching and demand threats. CITES Res. Conf. 12.5 (Rev CoP15) now also calls for the consolidation and destruction of stockpiles of tiger parts and products,

and actions to ensure parts and derivatives from captive-bred facilities do not enter trade.

The resolution also recognises that “trade in skins from the tiger and other Asian big cat species appears to be escalating again, and that this trend could fuel poaching that could lead to extinction in the wild” and “financial gain from the sale of live specimens, parts and derivatives” is one of “the driving forces behind the illegal killing of tigers and other Asian big cats and the illegal trade in specimens thereof.”

In the wake of the SFA’s open discussion about re-opening the domestic trade in tiger bones, the CITES Secretariat undertook a mission to China in 2007. In its report, it stated:

*“The Secretariat encountered some officials who apparently did not appear to fully appreciate the wording of the Resolution and that **any change in China’s present policy, for example with regard to medicinal products, would bring it into a state of non-compliance with the recommendation of the Conference of the Parties.** ... It is clear that the Government of China is coming under considerable pressure from various sources to authorize resumption in the use of tiger parts and derivatives from captive-breeding operations.”⁹³*

BELOW:

Government policy in China proactively encourages breeding, domestication and utilisation of wildlife, including tigers.





© Navtej Mangat

Shortly after the Secretariat filed the above reports, CITES CoP14 adopted Decision 14.69, reinforcing the letter and spirit of the Res. Conf. 12.5 (Rev CoP15):

“Parties with intensive operations breeding tigers on a commercial scale shall implement measures to restrict the captive population to a level supportive only to conserving wild tigers; tigers should not be bred for trade in their parts and derivatives.”

The Decision was adopted by consensus, with Parties voting to specifically stress that trade in this context applies not only to international but also to domestic trade. It was understood that domestic trade in parts and products of captive-bred tigers would stimulate demand, not just for tiger products but for other Asian big cats as substitutes; over four times as many leopards have entered trade compared to tigers.

The China CITES Management Authority objected to the CITES intervention on domestic issues on this occasion, but there is adequate precedent of this, including in the interests of China’s Tibetan antelope populations, with domestic requirements placed on India as the primary consumer.⁹⁴ Other cases where the situation is sufficiently grave to warrant CITES addressing domestic matters include resolutions on rhinos, elephants and sturgeon.^{95, 96, 97}

Since 2007, the CITES Secretariat has circulated two notifications specifically requesting information to show compliance with Res. Conf. 12.5 and associated Decisions.

In relation to implementation of Decision 14.69, in 2008 the SFA advised CITES *“that its national laws and policy made compliance with the Decision difficult”*.⁹⁸ In 2010, it implied it could not comply with CITES Resolutions and Decisions requiring domestic trade prohibitions or the phase-out of operations breeding tigers for trade because they *“interfere with the (sic) Parties’ sovereignty to control domestic trade in CITES-listed species and inviolate relevant laws and regulations of China”*.⁹⁹

This does not only apply to China. With growing incidences of illegal trade in captive-bred tiger parts across South-East Asia, Parties such as Thailand, Vietnam and Laos should be furnishing CITES with proof they are taking action to address the problem. They have not.

In the absence of any punitive action by CITES, trade in parts and products of captive-bred tigers has continued unhindered.

ABOVE:

Tigers in India and Nepal are still poached for their skins. In May 2012, poachers were “commissioned” to source 25 tiger skins.

SOUTH-EAST ASIA TIGER FARMS



© ENV

Tiger farming is not limited to China. Facilities (private zoos and farms) with captive-bred tigers exist in Thailand, Vietnam and Laos, where tiger parts leaking into the trade have been the subject of NGO and media exposés.

Based on the circumstances of seizure incidents in Thailand, Vietnam, Laos and Malaysia, at least 291 big cats, including 260 tigers, appear likely to have originated from captive-bred sources (based on the recovery of live animals and carcasses only).^{100, 101}



© ENV

As with operations in China, these tigers are not bred for conservation purposes. Conservation breeding would require maintenance of maximum genetic diversity through centrally managed breeding of a population with fully known ancestry, selecting particular individuals for pairing on genetic grounds, housing the stock in facilities preserving natural behaviours and avoiding hand-rearing or use of unnatural social groups.¹⁰²

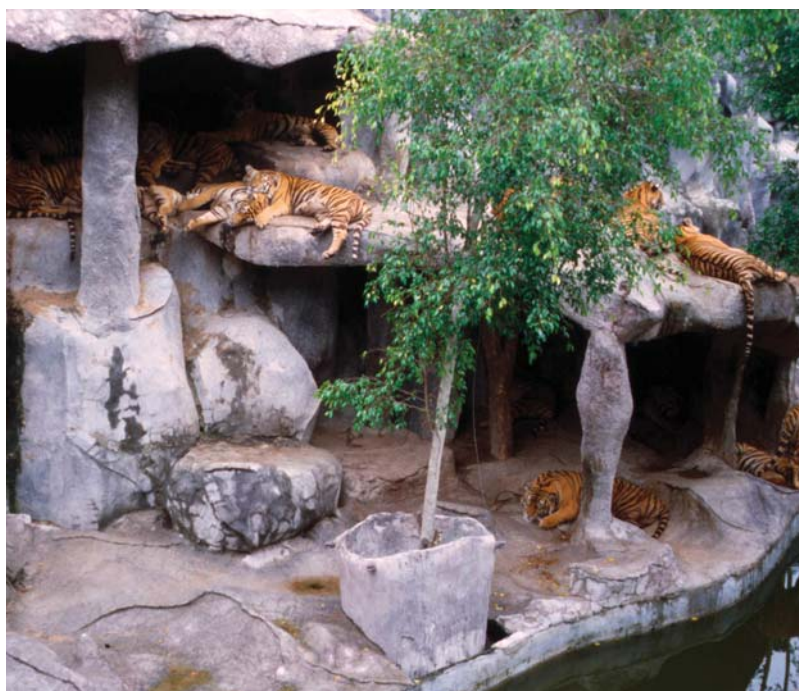
In these countries, the vast majority of big cat interceptions involve tigers, identified during transport (live and carcasses) or kept at private facilities. Cross-border movement is frequently implied, whether from Thailand into Laos or Laos into Vietnam. Additionally, despite having a larger estimated wild tiger population than Laos or Vietnam, Malaysia has also been implicated in the captive trade, and tigers have been seized in Thailand with links to Malaysia.

ABOVE:

Trade in tiger in Vietnam is largely from captive bred tigers.

BELOW:

Tiger "farms" like this one in Thailand, serve no conservation purpose.



Captive-bred trade in South-East Asia continues and requires that countries not only commit to their CITES obligations and rigorous monitoring, but also undertake cooperative and sustained enforcement activities across the region. The October 2012 seizure of 16 tiger cubs in Thailand, allegedly en route to Laos, highlights how significant a contribution captive-breeding facilities make to illegal trade.

Evidenced by a proliferation of cases throughout the country in 2012, Thailand's tiger trade appears alive and well, yet even those caught red-handed have been allowed to walk free.¹⁰³

In Vietnam, too, at least six live tigers were reported seized in transport in 2012 in central provinces bordering Laos. Tiger trade in Vietnam is mainly characterised by trade coming from Laos. An INTERPOL-coordinated operation in South-East Asia during 2012 recovered eight tiger cubs.¹⁰⁴ Yet there is little evidence of convictions in these cases and reporting to CITES remains scant or non-existent.

Further, there is reason to believe some officials and businesses in Thailand, Laos and Vietnam seek to follow in China's footsteps. In 2012, Vietnam's Ministry for Agriculture and Rural Development submitted a proposal to the Prime Minister so "dead tigers (from captive facilities) can be used to make specimens and traditional medicine on a pilot basis."¹⁰⁵ The proposal was not supported by other Government agencies and actively opposed by Vietnamese civil society, international NGOs and the Secretariat of the Global Tiger Initiative. The Prime Minister subsequently rejected the proposal.

In Laos in 2009, a businessman with a farm of over 250 tigers was reported as calling for amendments under ASEAN for tigers to be treated as other agricultural animals.¹⁰⁶ Laos is a black hole when it comes to CITES compliance and enforcement. Investigators in Thailand and Vietnam know Laos operates as a hub for trade in captive-bred tigers and has tiger farms, but as a Party it has not submitted a report to indicate it has taken steps to comply with Decision 14.69.

CONCLUSIONS AND RECOMMENDATIONS

Current policies and the legal framework in China have created a favourable environment for State-supported and private enterprise to profit from the domestication and utilisation of tigers.

The breeding of tigers in captivity in China has not contributed to wild tiger conservation. In fact, the legal domestic trade in captive-bred skins is stimulating the poaching of wild tigers and other Asian big cats.

Bone from captive-bred animals is used to make “bone strengthening wine”, but whether this is legal or not remains to be clarified by the Government.

With a massive captive tiger population, a growing ‘bank’ of tiger bones and continued trader speculation that the 1993 ban will be fully repealed, there are further risks associated with continuing current policies.

China’s active policies undermine the letter and spirit of the CITES resolution and the Global Tiger Recovery Programme.

It is not too late for the Government of China to amend laws and policies towards the recovery of wild tigers, reflecting the value of live tigers in the wild over that of body parts.

Such changes would have a positive impact, not just on wild tigers but other Asian big cats persecuted for the same market demand and trade.

A failure by the international community to take action to end the breeding of tigers for trade will sound the death knell for wild tigers and other Asian big cats.

EIA urges the National People’s Congress to revise legislation and policies to end *all* trade in *all* parts of tigers, sourced from both wild and captive-bred tigers, as well as products and derivatives thereof, including products made by using tiger parts in the manufacture process, so that:

- stockpiles of tiger parts and products can be consolidated and destroyed;
- clear messages are sent to tiger breeders, taxidermists, wine manufacturers, the public and consumers declaring an end to all demand and all trade;

- the national emphasis is on the recovery of wild tigers;
- tigers are not bred for trade in parts and products and tiger ‘farms’ are gradually phased out;
- the SFA, as the representative of China to CITES, can report compliance with CITES Resolution 12.5 (Rev CoP15) and associated Decisions.

EIA urges all Parties to CITES, but especially Thailand, Laos and Vietnam, to demonstrate commitment to CITES Resolution 12.5 (CoP15) and associated decisions by:

- strengthening the criminal justice system to ensure more effective enforcement outcomes against those involved in illegal tiger trade, including commerce in parts and products of captive-bred tigers;
- complying with Decision 14.69 to phase out operations breeding tigers for trade in parts and products.

EIA urges Parties to the 16th Conference of the Parties to CITES (Bangkok, March 2013) to note this report and impose all effective measures, including punitive, to stop the trade in tiger parts sourced from captive-bred tigers.



APPENDICES

APPENDIX 1: TABLE OF LAWS AND REGULATIONS RELATING TO TIGERS IN CHINA

Date	Title	Summary	Source
1 Mar. 1, 1989 (amended 2004)	Law of the People's Republic of China on the Protection of Wildlife	The Law regulates activities concerning the "protection, domestication, breeding, development and utilisation of species of wildlife" (Article 2). Article 4 provides the policy of the State which is to, <i>inter alia</i> , pursue active domestication and breeding of wildlife and rationally developing and utilizing wildlife resources. Article 17 specifically provides that the State shall "encourage the domestication and breeding of wildlife" and that "anyone who intends to domesticate and breed wildlife under special state protection shall obtain a license." Article 22 provides that "[u]nits and individuals that domesticate and breed wildlife under special state protection may, by presenting their domestication and breeding licenses, sell wildlife under special state protection or the products thereof, in accordance with the relevant regulations, to purchasing units designated by the government."	http://www.forestry.gov.cn/portal/sjga/s/2569/content-467595.html
2 Mar. 1, 1992	Regulations for the Implementation of the People's Republic of China on the Protection of Terrestrial Wildlife	The regulations provide the procedures and rules concerning domestication and breeding operations. A domestication and breeding license is required for the domestication and breeding of wildlife under special protection by the State (Article 22). Captive-bred wildlife or the products thereof can be purchased by "units" proposed by the SFA.	http://www.forestry.gov.cn/portal/wlmq/s/3579/content-565450.html
3 May 29, 1993	State Council Circular Concerning the Ban on Trade in Rhinoceros Horns and Tiger Bones	Forbids all trade of tiger bone and rhino horn, including selling, buying, and transport. Products produced before the ban went into effect are also required to be sealed and banned from trade.	http://www.china.com.cn/chinese/zhuanti/chunlei/313829.htm http://www.asianlii.org/cn/legis/cen/laws/cotsc/obtorhatb696/
4 Nov. 25, 1993	Ministry of Health directive on the implementation of the 1993 State Council ban.	Provides details on implementation of the State Council ban such as changing the name of products containing the words 'rhino horn' and 'tiger bone'.	http://law.people.com.cn/showdetail.action?id=2569859
5 Jan.2, 2003	Forestry Protection Notice [2003] no 3 by the State Forestry Administration, State Administration of Industries and Commerce launching a "pilot marking scheme" applying to the enterprises utilising wildlife and its products.	This notice establishes a 'pilot marking' scheme for utilisation of wildlife products. Such "markings" are given to approved enterprises and/or their wildlife products, which will then be allowed for transportation and trade. Under this pilot scheme, the following circulars/notices have been issued: <ul style="list-style-type: none"> • 10 more notices were issued under the same scheme during 2003 - January 2013, expanding the list of "pilot" entities with the marking from the initial three to over 400. • From May 1, 2004, ivory production and retail outlets are included under the scheme, only outlets with the special mark can legally operate. • From January 1, 2005, the scheme starts to include production and individual possession of taxidermy. Xionsen's "bone strengthening wines" are granted a marking. • From July 1, 2005, the scheme starts to include processing and trade of pelt products made of nationally protected species. • From January 1, 2006, the scheme starts to include production and trade of traditional Chinese medicine containing leopard bones, as well as certain species of living captive bred animals, including tigers and leopards. • From January 1 2008, the scheme starts to include tiger skins, leopard skins and their products; Siberian Tiger Park's "bone-strengthening wines" are granted a marking. 	http://www.forestry.gov.cn/portal/main/govfile/13/govfile_1076.html http://www.forestry.gov.cn/portal/main/govfile/13/govfile_1077.html http://www.forestry.gov.cn/portal/main/govfile/13/govfile_1081.html http://www.forestry.gov.cn/portal/main/govfile/13/govfile_1082.html http://www.forestry.gov.cn/portal/main/govfile/13/govfile_1103.html http://www.forestry.gov.cn/portal/main/govfile/13/govfile_1104.html http://www.forestry.gov.cn/portal/main/govfile/13/govfile_1102.html http://www.forestry.gov.cn/portal/main/govfile/13/govfile_1694.html http://www.forestry.gov.cn/portal/main/govfile/13/govfile_1787.htm http://www.forestry.gov.cn/portal/main/govfile/13/govfile_1893.htm

APPENDIX 1: TABLE OF LAWS AND REGULATIONS RELATING TO TIGERS IN CHINA (CONTINUED)

Date	Title	Summary	Source
6 2005	Forestry Protection [2005] no 139 by State Forestry Administration, Department of Health, State Administration of Industry and Commerce, State Food and Drug Administration Inspection Bureau, State Administration of Traditional Chinese Medicine Management Bureau concerning a pilot project to enable the use of captive-bred tiger bone in medicine and the gradual reduction of use of leopard bones.	N/A [Note: While EIA has not been able to access this notification, its title indicates that it concerns "a pilot project to enable the use of captive-bred tiger bone in medicine".]	Document not available. Citation found here: <ul style="list-style-type: none"> • http://hhsr.sh.gov.cn/Front/BanshiDT/index.html?parl=3&par2=295&applyType=0285&businessFlag=2 • public.tzhospital.com/dagl/2005年文书档案.xls • http://www.2003doc.com/excel/22460.html • http://www.gsj-kf.gov.cn/index.aspx?menuid=4&type=articleinfo&lanmuid=146&infolid=1075&language=cn
7 Mar. 21, 2006	State Food and Drug Administration notice [2006] no 118: Notice on matters concerning the use of leopard bones	States that since January 1, 2006 the hunting of wild leopards and purchase of leopard bones have been prohibited; however, it is permissible to use up the existing inventory of leopard bones. Externally applied medicine containing leopard bones are no longer permitted; however orally administered medicines containing leopard bones are still permitted subject to registration with authorities and audits by the State Pharmacopoeia Commission.	http://former.sfda.gov.cn/cmsweb/webportal/W945325/A64008195.html
8 Sept. 1, 2006	Regulation on the administration of the import and export of endangered wild animals and plants	The regulations describe the rules and procedures concerning import and export of endangered wild fauna and flora and compliance with CITES.	http://www.gov.cn/flfg/2006-05/17/content_283018.htm
9 Sept. 29, 2007	2007 Notice No. 206 issued by State Forestry Administration and State Ethnic Affairs Commission regarding registration and trade of tiger and leopard pelts and products thereof.	Notice requests "investigation, verification and registration" of the origin of tiger and leopard pelts and the products thereof. It defines "legal origin" as "owned prior to the implementation of Wildlife Protection Law of China, legally bred, or sourced via other legal means". It also introduces tiger and leopard pelts and the products thereof to the "Wildlife Management and Utilisation Marking Scheme" (launched in 2003). From January 1 2008, those registered to be from legal origin are allowed to apply for a "marking" to enter trade.	http://www.forestry.gov.cn/portal/main/govfile/13/govfile_1092.html
10 Dec. 25, 2009	State Forestry Notice 2009 no 298: Notice to strengthen the protection and management of wild tigers through stringent combating smuggling and illegal trade in tiger products	Calls for stringent targeting of smuggling of and illegal trade in tiger products and regulation of the tiger domestication and breeding activities. The notice states that facilities must have a comprehensive record system of tracking all dead tigers. Tiger parts that have been separated into bones and skins have to be sealed and stored as per the 1993 ban to prevent any unauthorised use.	http://bhs.forestry.gov.cn/portal/main/govfile/13/govfile_1719.htm
11	Approval Guideline for the Sale, Purchase and Utilisation of Terrestrial Wildlife under First Class Protection or the Products Derived thereof	Describes the application and approval procedures for sale, purchase and utilisation of terrestrial wildlife under special State protection (including tigers). An application is required to be submitted to the provincial SFA for preliminary examination however, the final approval will be issued by the SFA at the central level (Articles 6 and 7). The entire review and approval procedure is expected to be completed within 20 work days and may be extended by another 10 work days under exceptional circumstances. The guidelines describe the documents that are required to be submitted in the application (Article 4)	http://www.forestry.gov.cn/XxgkQuickPathPortalAction.do?dispatch=getWorkDetail&scope=bszn&serverid=20

APPENDIX 2: TIGER FARMING TIME LINE

Year	# Wild Tigers in Asia	# Wild Tigers in China	# Tigers in China's farms	Event	Description
1949		4,000 ¹	0		China is home to an estimated 4,000 wild tigers when the People's Republic of China is founded. ¹
1950s					Government offers bounty for killing tigers. ²
1981	8,000 ³				China accedes to CITES. ⁶
1983		150-200 ¹	0		US zoos ship eight live tigers to zoos in China. ⁴
1984		200 ⁵	0		Tiger bones for the manufacturing of traditional Chinese medicines become hard to obtain in China. ³ China establishes conservation-breeding program for South China tigers in Chongqing Zoo, overseen by National Environmental Protection Agency. ¹
1986		50-80 ¹	8-13 ^{6,7}		Ministry of Forestry "concentrates" all Siberian tigers from United States, intended for conservation breeding, on fur farm in Heilongjiang Province to establish Hengdaohezi Breeding Centre of Felidae Animals, China's first tiger farm, a Government-funded operation to breed tigers for profit, primarily to supply bones for medical use. ^{6,9,10} South China tiger declared near extinction. ¹
1987		32-42 ¹¹	21-33 ^{7,12}		Chinese National Pharmaceutical Bureau gives Beijing Pharmaceutical Company remit to plan tiger farm to solve shortage of tiger bones. ⁸
1989			50-56 ^{7,12}		China's law on the protection of wildlife comes into effect, giving wild tigers "Category 1" protection, and encourages wildlife farming and utilisation. ¹³ See Appendix 1 Fifteen tiger cubs born at Hengdaohezi Breeding Centre of Felidae Animals, bringing total to around 50. From 1985-1989, the Ministry of Forestry and other government agencies spend US\$1,333,350 to finance and manage this progenitor of China's tiger farming industry. ¹² Indian authorities arrest poacher in Rajasthan who claims to have sent skeletons of 18 tigers to China. ¹⁴
1991			74 ⁷		Sacks of tiger bones are seized in India and Nepal en route over the Himalayas into Tibet for the Chinese market. "The quest for bones for China medicine is the root of... poaching of tigers in Nepal and Northern India." Nepal has never before had "serious tiger poaching before" in its flagship Chitwan National Park. ¹⁵
1992			62-82 ^{6,7}		China asks CITES CoP8 for registration of the Hengdaohezi Breeding Centre of Felidae Animals in order to trade bones and skins internationally to pay for the facility's running costs. The delegation argues that the farm's trade would not hurt wild tigers because their numbers are so low they are hard for poachers to find, but withdraws proposal amid concerns from CITES Parties and NGOs that sale of farmed parts and derivatives will stimulate and provide cover for trafficking in wild tigers. ³ Lawyers for WWF and the National Wildlife Federation submit petition asking US Government to impose trade sanctions against China for its domestic trade in tiger (and rhino) parts and products. ¹⁶ US law allows imposition of trade restrictions against foreign countries whose nationals engage in trade that undermines international programs to protect endangered species, in this case CITES. ¹⁷
1993			96-413 ^{7,10,18}		India's flagship Ranthambore Tiger Reserve loses more than half of its tigers to poaching for bones. ¹⁸ China's State Council issues Notification stopping all trade in/use of tiger bone and removes it from official pharmacopeia. ⁹ See Appendix 1 What will become Xionsen Bear and Tiger Mountain Village, China's largest tiger farm, is established in Guangxi Province. ²⁰ Researchers from Northeast Forestry University and the People's Liberation Army University of Agriculture and Animal Husbandry help businessman Zhou Weisen become China's most prolific tiger breeder. ²¹
1994	4,600-7,700 ²²	20-100 ²³	85+ ⁷		China notes its continued tiger-breeding operation at CITES CoP9, where Parties adopt first tiger resolution, asking Parties to prohibit domestic trade in tiger parts and derivatives. ^{24,25}
1998	5,000-7,000 ²⁶		171 ^{7,21}		New tiger farm established in Shenyang, Liaoning Province. ²⁷
1999					CITES technical delegation visits China, which claims to have at least 944 kg of tiger bone and 48 whole tiger skeletons secured, while farms are producing about 200 tiger cubs annually. The mission's report cautioned, "farming would provide an opportunity for laundering wild-caught specimens that would simply accelerate and/or assist current poaching and illicit trade." ²⁸ Massive resurgence in illegal trade in tiger and leopard skins from India and Nepal into China. ²⁹
2002			600+ ²		CITES CoP12 approves Resolution 12.5, urging Parties and non-Parties with captive-breeding operations to prevent parts and products from those facilities entering illegal trade. ³⁰ Thailand's Sri Racha Tiger Zoo ships 100 tigers to Hainan in Sino-Thai venture to create world's largest tiger farm. Thai government finds Natural Resource and Environment Ministry official wrong in approving the export for commercial tiger farming. ^{31,32}
2003					State Forestry Administration issues Forestry Protection Notification 2003 No. 3 for a "pilot marking scheme" for legal trade in wildlife products. Additional notices will expand this scheme to include trade in skins from captive-bred tigers and "bone-strengthening wine" sold at tiger farms and purported by sellers to be made with tiger bone. ³³ See Appendix 1 Thirty-one tiger skins and 581 leopard skins seized at Sangsang in Tibet. ²⁹
2004					State Forestry Administration issues Forestry Protection Notification 2004 No. 6, extending marking scheme to allow Xionsen Bear and Tiger Mountain Village distillery to sell "bone-strengthening wine". ³⁴ Sariska Tiger Reserve has no more tigers due to poaching for skins and bones. ³⁵ Trader tells EIA investigators of market in luxury home décor among wealthy Chinese using tiger skins to "decorate their sofas" ²⁹
2005			3,000 ³⁶		Forestry Protection Notification 2005 No. 139 announces terms of pilot project for use of bones from captive-bred tigers in medicine. ³⁷ See Appendix 1 Hailin Hengdaohezi Siberian Tiger Liquor Industry Co., Ltd, is founded near Siberian Tiger Park. The company's "bone-strengthening tonic wine" depends on "resource advantages [sic] the largest Siberian tiger breeding base in the world" ³⁸

APPENDIX 2: TIGER FARMING TIME LINE (CONTINUED)

Year	# Wild Tigers in Asia	# Wild Tigers in China	# Tigers in China's farms	Event	Description
					EIA and WPSI document the dangerous scale of demand for skins used to decorate traditional Tibetan costumes. Investigators offered the skins of three tigers, 170 leopard skins and 60 snow leopard, and document hundreds of people wearing costumes decorated with leopard and tiger skins. ³⁹
2006			4,000+ ²		China Youth Daily reports tiger skeletons seen soaking in alcohol and tiger-bone wine for sale at Xionsen farm's distillery, to which China's State Forestry Administration contributed nearly US\$1 million for its development. ⁴⁰ "Tiger bone wine has re-emerged on the market in China, despite a ban on the trade.... "Amazingly, the company's sale of these products has been approved by the State Forestry Administration.... ⁴⁶ Xionsen's "Cellar Number One has a storage capacity of... 3 million liters of wine.... Of the 1,000 containers there in 2006, 400 contained tiger parts. World Federation of Chinese Medicine Societies (WFCMS), associated with China's State Administration of Traditional Chinese Medicine, says tiger-bone wine is not a medicine and manufacturing and sales should be stopped. ⁴¹ EIA and WPSI document reduction in Tibetan use of tiger skins following appeal from religious leaders appeal to end their use. ³⁹
2007	3,000-5,000 ⁴²		5,000+ ⁹		State Forestry Administration issues notification extending marking scheme to allow tiger skins and products from registered breeding facilities to enter trade. ⁴³ See Appendix 1 China tells CITES CoP14 its tiger farms can provide a "steady foundation" for resumption of legal trade in tiger bones and "fur". "By the end of 2006, the captive population of tigers in China exceeded 5,000 animals with a capacity to reproduce 800-1,000 cubs annually." ^{47, 3 & 44} CITES CoP14 approves Decision 14.69 against tiger farming and breeding tigers for trade in their parts and products. ⁴⁵
2008					The "Gallup" of China's survey organization polls six major Chinese cities and finds a majority of people believes parts and products from wild tigers are more effective and more desirable than those from farmed tigers. ⁴⁶
2009	3,200 ²⁶				Wan Ziming of China's CITES Management Authority publishes article outlining a strategy to build support for international trade in parts and products from farmed tigers. ⁴⁷ EIA documents continuing trade in skins of wild tigers, leopards and snow leopards to feed into Chinese market for luxury home décor. ⁴⁰
2010		40-50 ⁴⁹	6,000 ^{50 & 51}		The CITES Secretariat reports evidence of "leakage" of tiger products from tiger farms in South East Asia. ⁵² "Captive-breeding of tigers is occurring in several range States but many of these facilities appear to be owned and operated in a manner that would conflict with the goals expressed in Decision 14.69. Intelligence suggesting that tigers, or their parts and derivatives, from some of these facilities entering illegal commercial trade is growing." ⁵³ State Forestry Administration distributes brochures at CITES CoP15 saying, "China's legislation encourages the captive breeding of endangered animals including tigers" and that the number of tigers on China's farms has increased by 1,000 since CITES' 2007 call for the phasing out tiger farms in 2007. "All activities of the existing tiger farms are in line with Chinese laws... "More than 200 (work) units are engaged in tiger domestication and reproduction, up to 6,000 tigers are held in captivity, and the annual breeding capacity is over 1,000." ^{50 & 54} State Forestry Administration participates in World Bank's Global Tiger Initiative, promising to fight "illegal" trade and "illegal" demand, noting it has "a permit system for activities concerning" farmed tigers. SFA is inspecting tiger breeding facilities and markets, and employing a "special label system and standardized packages with official seal to enhance monitoring of tiger skins and storages of tiger bone from breeding facilities." ^{55, 56 & 48} At Russian "tiger summit," Premier Wen Jiabao specifically mentions ending "tiger trade" rather than specifying only "illegal trade." ⁵⁷
2011					Beijing auction house Googut makes public offering of more than 400 bottles of tiger-bone wine. ³⁸
2012	3200-4,000 ²⁶	40-50 ⁵⁹			CITES Standing Committee asks for Notification to "stress" the need for relevant Parties to report on phasing out intensive tiger breeding operations. ^{60 & 59} "Owing to the serious threat of extinction of some populations of tigers, the Secretariat believes this subject should continue to be an agenda item at each regular meeting of the Standing Committee." ⁶⁰
2013					China's report on Asian big cats to CITES CoP16 addresses "illegal" tiger trade and says parts of captive-bred tigers are "strictly regulated." Parts coming from captive bred tigers are "labeled" and "monitored" to "prevent the captive bred tiger parts from entering the illegal trade from or through such facilities." ⁶¹

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