

Domestic markets driving illegal trade in pangolins

Historically, pangolins have been used as an ingredient in Traditional Chinese Medicine (TCM). Pangolin scales have been commonly used to improve blood flow, reduce gas, stimulate lactation, reduce swelling, and promote the discharge of pus⁹. Research by the Environmental Investigation Agency into the online availability of TCM products containing pangolin scales in 2022 identified a minimum of 57 such products, manufactured by 47 Chinese companies¹⁰; a concerning finding as the demand for pangolin scales in TCM is one of the key drivers of pangolin poaching and illegal trade.

Despite the Appendix I listing of pangolins in 2016, which prohibits international commercial trade in all pangolin species, pharmaceutical companies and hospitals in mainland China are still permitted to trade in TCM containing pangolin scales¹¹. While the removal of raw scales from the 2020 edition of the Pharmacopoeia of the People's Republic of China made headlines, processed pangolin scales continued to be recommended for the manufacture of TCM¹².

From 2010 to 2021, mainland China has consistently remained one of the countries with the highest volume of pangolin parts seized, with at least 192 incidents of pangolin scale smuggling amounting to over 74.5 tonnes of scales¹³. This indicates the extent of illegal imports and domestic consumption occurring in the country.

Other key source, transit and consumer countries, including Cameroon, Lao PDR, Malaysia, Nigeria, Thailand and Vietnam were identified in CITES SC74 Inf. 2 as having potential domestic markets for pangolin parts and derivatives based on analysis of relevant laws, market surveys and seizure data¹⁴. On the issues of trade in elephant and tiger parts, CITES Parties have agreed that legal domestic markets which contribute to poaching and illegal trade should be closed. Markets dealing in pangolin parts should be treated the same way.

In 2021, Nigeria, Singapore and Thailand responded to CITES Notification to the Parties No. 2021/016 stating possession of stocks of more than 1 tonne each¹⁵. Cameroon, mainland China, Kenya and Uganda had previously reported similar amounts to Notifications 2014/059 and 2017/035, but as there have been no updated information since, the Secretariat has estimated that there remain existing stockpiles consisting of below 1,500 kg in each country¹⁶.

Mainland China reported a domestic pangolin scale stockpile of unknown quantity to CITES Notification to the Parties 2014/059, with provisions in place for management¹⁷. However, there are serious misgivings over the country's transparency of the stockpile, relating to its total quantity and the verification of its legal acquisition¹⁸. These misgivings apparently led to Norges Bank's decision in 2021 to exclude five TCM companies from the Government Pension Fund Global, as recommended by their Council of Ethics, citing "unacceptable risk that the companies contribute to serious environmental damage"^{19,20}.

Given the dire conservation status of pangolin species, which range from Vulnerable to Critically Endangered on the IUCN Red List²¹, the continuing high levels of illegal trade in pangolin parts and derivatives are almost certainly unsustainable and should be urgently addressed by the CITES Parties.



汉语拼音: Liyanling Pian
【成份】穿山甲(制)、土鳖虫、僵蚕、牡蛎(煅)、玄参。

Liyanling Pian tablets containing pangolin scales (circled in red) used for relieving laryngitis, available for sale online.

We therefore urge Parties to support CoP19 Doc. 71.2, which seeks to strengthen Resolution Conf. 17.10 on Conservation and Trade in Pangolins and associated Decision text including to recommend:

- improving enforcement action, by conducting intelligence-led and post incident investigations, strengthening efforts in key border regions, and ensuring effective support for enforcement personnel;
- closing legal domestic markets for commercial trade of pangolin specimens that contribute to poaching or illegal trade;
- establishing strict control measures to secure and monitor stocks of pangolin parts and derivatives;
- raising awareness among consumers about pangolins and threats posed to their survival by illegal trade to encourage the removal of pangolin parts and derivatives where necessary from the official pharmacopoeia by consumer States and promotion of appropriate alternatives; and
- reviewing progress and developing time-bound, measurable recommendations to range, transit and consumer Parties at SC78.



⁹ TAWAP. Available at: <https://www.tawap.org/>

¹⁰ EIA. (2022). Untitled research for publication in 2022.

¹¹ EIA. (2020). Smoke and Mirrors: China's complicity in the global illegal pangolin trade. Available at <https://eia-international.org/wp-content/uploads/EIA-Smoke-and-Mirrors-2020-FINAL.pdf>

¹² EIA. (2020). Smoke and Mirrors: China's complicity in the global illegal pangolin trade. Available at <https://eia-international.org/wp-content/uploads/EIA-Smoke-and-Mirrors-2020-FINAL.pdf>

¹³ EIA Global Environmental Crime Tracker. Available at: <https://eia-international.org/global-environmental-crime-tracker/>

¹⁴ CITES. (2022). SC74 Inf. 2: Domestic Markets for Frequently Illegally Traded Specimens. Available at: <https://cites.org/sites/default/files/eng/com/sc/74/Inf/E-SC74-Inf-02.pdf>

¹⁵ CITES. (2022). SC74 Doc. 73: Pangolins (*Manis* spp.) Report of the Secretariat. Available at: <https://cites.org/sites/default/files/eng/com/sc/74/E-SC74-73.pdf>

¹⁶ CITES. (2022). SC74 Doc. 73: Pangolins (*Manis* spp.) Report of the Secretariat. Available at: <https://cites.org/sites/default/files/eng/com/sc/74/E-SC74-73.pdf>

¹⁷ CITES. (2021). Implementation of CITES Decision 18.240 paragraph c) on Pangolins (*Manis* spp.). Available at: <https://cites.org/sites/default/files/eng/com/sc/74/E-SC74-73-A2.pdf>

¹⁸ EIA. (2020). Smoke and Mirrors: China's complicity in the global illegal pangolin trade. Available at <https://eia-international.org/wp-content/uploads/EIA-Smoke-and-Mirrors-2020-FINAL.pdf>

¹⁹ Norges Bank Investment Management. (2021). Decisions on exclusion and revoking of exclusion. Available at: <https://www.nbim.no/en/the-fund/news-list/2021/decisions-on-exclusion-and-revoking-of-exclusion/>

²⁰ Norges Bank Investment Management (2021). Decisions on observation and exclusion. Available at: <https://www.nbim.no/en/the-fund/news-list/2021/decisions-on-observation-and-exclusion-2/>

²¹ IUCN Red List. Available at: <https://www.iucnredlist.org/>