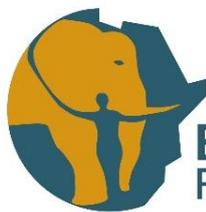


July 2018

THE EXTINCTION BUSINESS

South Africa's 'Lion' Bone Trade



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PREAMBLE

For more than a decade, South Africa has been actively supporting and growing the international trade in big cat bones, despite local and international outrage and condemnation from conservation and protection organisations, lion scientists, and experts.

In 2017, South Africa's Minister of Environmental Affairs, Edna Molewa, controversially, and in the face of vociferous opposition and robust arguments against this trade, set the annual export quota at 800 lion skeletons. Even more alarmingly, Molewa, without stakeholder participation, took the incomprehensible decision to almost double the quota in 2018 to 1,500 skeletons. On July 11th 2018, the person in charge of the quota at the DEA told us categorically that no quota had been set for 2018. A few days later the DEA was forced to make a public announcement about the 2018 lion bone quota following a public outcry when a letter from Molewa, dated June 7th 2018, informing the provinces of the new quota allocation, was leaked. The undeclared reasons behind government's decision to conceal this information from interested and affected parties needs to be brought to light and interrogated.

The Department of Environmental Affairs (DEA) justified its decision to dramatically increase the quota on a single government commissioned interim study which, from the get-go guaranteed a skewed outcome, particularly because of the inclusion of outspoken pro-trade economist, Michael 't Sas-Rolfes, in the small research team. The report itself admitted that the findings were based on insufficient data and that "further avenues need to be explored". By no stretch of the imagination can this interim study translate into a conclusive scientific justification for a lion bone quota, and even less, an increase of the quota. Notably, some of the researchers involved in this study have distanced themselves from the decision-making process around the 2018 quota, stating that all the decisions were made by the Scientific Authority and the DEA, and that the researchers provided no input on what the quota should, or should not, be. They specifically added that "The wording of that quota letter via NW [NorthWest] is a bit unclear concerning our involvement...we provided no input on what the quota should, or should not, be. We correctly excluded ourselves from this process."

In the last 18 months, the EMS Foundation and Ban Animal Trading have been gathering extensive information and investigating South Africa's international 'lion'¹ bone trade. This data has provided the basis of our Report, *The Extinction Business: South Africa's 'Lion' Bone Trade*.

The South African captive big cat industry is a pariah and it is under severe local and *international* scrutiny. Hunting associations that support the trophy killing of captive bred lions have been sidelined by international hunting associations and organisations. Instead of working with all the stakeholders to limit and close down the industry, South Africa is steadfastly supporting it. It is facilitating its conversion into an even crueler industry: captive breeding and farming lions so they can be slaughtered solely to feed the problematic big cat bone trade in Southeast Asia. This is evidenced by the emergence of lion slaughterhouses in South Africa as well as the fact that we have clear evidence that 91% of the 'lion' skeletons exported from South Africa in 2017 included skulls.² Thus showing that South Africa's lion bone trade is not a by-product of an existing industry (i.e. trophy hunting) but an entirely separate industry. Consequently, a trade in wild animal body parts, with links to international criminal networks, in countries where they are attempting to lower demand for big cat body parts, is being stimulated.

Alarmingly, the Minister is unpersuasively attempting to argue that this abhorrent and destructive industry is a sustainable, and ethical alternative to trophy hunting. By doing so, true conservation efforts that should benefit wild animals in this country, as well as its citizens, are being undermined. A ban on the captive breeding of lions and tigers will bring an end to this unacceptable and brutal South African industry. The DEA, however, refuses to recognise this and instead, for inexplicable reasons, chooses to intensify its support for an industry that is tarnishing Brand South Africa's image. South Africa's tourism industry is suffering reputational damage, and this will, in turn, have a negative impact on South Africa's economy and job creation. A vast number of individuals rely on continued employment in the tourism sector, and their livelihoods

¹ Throughout this Report the word lion, when it relates to the international bone/skeleton trade is written in inverted commas - 'lion' - because it is not clear whether the bones/skeletons exported from South Africa are in fact only lion bones.

² Lions killed for hunting trophies always include their skulls.

are in the firing line in order to benefit only the few predatory elite in the 'lion' bone trade.

When it comes to the economics of the 'lion' bone trade on the South African side – after all, this is what is driving the trade – there is almost nothing in the public domain about the modalities of the industry and/or the processes and mechanisms of how the money flows along the entire supply chain. Access to this information and transparency is crucial, not only to understanding the nature of the trade, but in gaining insights into the illegal trafficking links. The South African government urgently needs to open up this industry, and its participants, to public scrutiny so that it can be fully and accurately interrogated, understood, and the money trail monitored.

The illegal trade in wild animals, which is not only devastating animal communities and consuming huge financial resources, cannot be adequately tackled without addressing the significant loopholes in the existing legal trade multilateral agreements, i.e. CITES. Drawing upon hundreds of CITES export permits, issued by South Africa's conservation agencies³, this Report examines and investigates substantial problems and endemic loopholes in the CITES permitting, enforcement and oversight system. It further demonstrates the failings of South Africa's national policies and procedures, all of which translate into a convergence of the legal and illegal trade in wild animal. Systemic weakness in the international wild animal trade permitting regimen, particularly in South Africa and Asia as illustrated in this Report, not only add to wild animal trafficking, but also undermine any efforts to address the illegal trade. It is also clear that transnational wild animal trafficking networks and crimes perpetrated against wild animals cannot be disrupted without examining the legal and regulated trade, and the supply and demand chain thereof. Indeed, the critical mechanism to disrupt transnational organised wildlife crime is to critique and amend the legal trade.

Our findings reveal that:

- There are substantial loopholes in the CITES permitting system itself;
- Merely complying with the CITES Treaty is insufficient and is a threat to wild animals and biodiversity. Countries need to do more in the context of their own

³ Gathered through responses to Promotion of Access to Information Act (PAIA) requests from the Gauteng province and data received from other provinces in South Africa.

national legal frameworks to protect wild animals caught up in the international trade;

- There is a lack of verification, one example of this is that more than the 2017 set quota of 800 skeletons went out of South Africa with legal CITES permits;
- There is a lack of required due diligence by the CITES Management authorities on both the exporting and importing side, in profiling and authenticating exporters, importers, addresses and destinations;
- There are major oversight problems in South Africa and in the countries of import.

This has created a situation where the legal trade in 'lion' bones is fueling the illegal trade in lion and tiger bones and providing laundering opportunities for tiger bones in Asian markets. This is brewing into a toxic mix, particularly when it is placed in the context of the widespread overlap between those involved in international lion trade, trade in tigers and other CITES-listed species, and the routine leakage of imported lion products into illegal international trade.

RECOMMENDATIONS

The evidence provided in this Report makes it abundantly clear that South Africa should immediately:

1. Place a zero-export quota for lion and other big cat body parts for commercial purposes, including from captive sources.
2. Undertake a forensic investigation into the financial affairs of all lion breeders and 'lion' bone traders.
3. Restrict the keeping and breeding of big cats.
4. Review and improve animal protection and welfare legislation.
5. Ensure that animal protection, welfare, care and respect is included in the appropriate environmental legislation, particularly in relation to the issuing of permits for the keeping, sale, hunting and exporting of wild animals and their body parts.
6. Convene a stakeholder meeting to discuss the dismantling of the captive big cat industry, including experts from the fields of animal welfare, sanctuary management and forensics, as well as NGOs.

7. Undertake targeted intelligence-led enforcement operations in cooperation with China, Laos, Thailand and Vietnam in order to dismantle the criminal networks involved in the transnational lion and tiger trade.
8. Ensure transparency and assist monitoring by placing copies of CITES permits in the public domain and that NGOs monitoring the wild animal trade have access to permit applications so that they can object if and when appropriate and where there is non-compliance.
9. Address any CITES legal oversights and amend the relevant gaps in regulation by strengthening national legislation, and the enforcement thereof.

THE DEPARTMENT OF ENVIRONMENTAL AFFAIRS VS. BRAND SOUTH AFRICA

Introduction

South Africa has been trading in and exporting lion bone, claws, teeth, skulls and skeletons sourced from both wild and captive lions. The contentious, unworkable and unenforceable decision taken by CITES Parties in 2016 allowing South Africa to continue to trade in lion parts from captive lions is heaping misery on lions and tigers held in captivity in South Africa. This decision directly facilitates the illegal trade in tiger body parts and is accelerating their extinction. It is also threatening Africa's wild lion populations, particularly because increasing demand is leading to a rise in illegal killings.

Controversially, South Africa is *the* largest exporter in the world of 'lion' skeletons, bones and other body parts to countries that are at the nexus of the illegal wild animal trade. These illegal trade organisations feature prominently in the trafficking of rhino horn, tiger bones and other wild animal body parts. The Department of Environmental Affairs (DEA) has repeatedly stated that it believes the breeding of lions in captivity for trophy hunting and trade in live lions and skeletons and bones is compatible with the concept of promoting the "Green Economy". Yet, they also acknowledge that they are unable to show whether captive breeding provides any conservational value. The DEA further concedes that it has no scientific evidence to demonstrate that this trade in bones will in fact protect wild lions in Africa or tigers in Asia. There is no data to support South Africa's whimsical notion that providing lion

bones to Southeast Asia would reduce demand for tigers. To the contrary, the NGOs working on the ground in these countries have found that the demand for tiger body parts is not dissipating.

Tigers are listed as endangered because the population of mature individuals may be fewer than 2,500 individuals in the wild. According to the International Union for the Conservation of Nature (IUCN), the tiger population fell by 50% in just 16 years, with an estimated remaining population of just 3,500.⁴ According to the Environmental Investigative Agency (EIA), tigers are becoming “functionally extinct in Cambodia, Vietnam and Laos, and as few as seven wild tigers estimated in China”.⁵ The global lion population has declined by 43% in just 21 years (3 generations) with high threat levels across the species’ broad geographic range, and they are extirpated in 12 African countries and probably in another 4.⁶

It is within this shocking context that the market for lion bone is growing, to what South African Professor Mark Shaw has described as “epidemic proportions.”⁷ At the same time the legal wildlife trade is enhancing the power of organised crime. It is well-documented that the trade in tiger bones is a substantial threat to wild tigers in Asia and that it catalysed negative consequences for lions and other big cats.⁸

The use of big cat bones to produce ‘tonic’ wines is a major driver of illegal trade as well as the poaching and killing of tigers, leopards and other big cats. The *Environmental Investigation Agency* (EIA) estimates that there are between 7000 and 8000 tigers in tiger farms, zoos and smaller facilities in Thailand, Laos, Vietnam and China.⁹ The farming of tigers in these countries, promotes demand and provides cover for the trafficking of wild tiger parts, and is leading to the extirpation of wild populations. The Worldwide Fund for Nature (WWF) says that the closure of tiger farms

⁴ <http://www.iucnredlist.org/details/15955/0>.

⁵ *The Lion's Share. South Africa's trade exacerbates demand for tiger parts and derivatives.* Environmental Investigation Agency, July 2017. <https://eia-international.org/wp-content/uploads/The-Lions-Share-FINAL.pdf>.

⁶ According to an IUCN Red List of Threatened Species Assessment conducted in 2016.

⁷ Mark Shaw. Africa's changing Place in the Global Criminal Economy. ENACT Continental Report 01/September 2017, p.14.

⁸ See: Vivienne L. Williams¹, Andrew J. Loveridge, David J. Newton, David W. Macdonald. A roaring trade? The legal trade in *Panthera leo* bones from Africa to East-Southeast Asia. PLOS ONE, October 24, 2017; K. Nowell. Tiger farms and pharmacies: the central importance of China's trade policy for tiger conservation. pp. 463±475 and MJ. `tSas-Rolfes MJ. Tigers, economic and the regulation of trade pp.477±400. In: Tilson RL, Nyhus PJ, editors. Tigers of the World. The Science, Politics and Conservation of *Panthera tigris*, 2nd edition. San Diego: Academic Press; 2010; Gratwicke B, Mills J, Dutton A, Gabriel G, Long B, Seidensticker J, et al. Attitudes toward consumption and conservation of tigers in China. PLoS ONE. 2008; 3: e2544.

⁹ <https://eia-international.org/international-tiger-day-zero-demand-zero-poaching>.

will help protect wild tigers because sales of bones from these facilities has promoted the belief that it is acceptable to use products made from them: “They undermine efforts to protect wild tigers and to halt the illegal trade by complicating enforcement activities, and by normalizing and legitimizing the sale of tiger parts and products, which in turn drives up demand...Many tiger range states have devoted considerable resources to conserving their wild tigers – efforts that are being undermined by the existence of these farms...Closing tiger farms will help countries to achieve the ambitious goal of doubling wild tiger numbers by 2022.”¹⁰



A miserable lion waits to be killed for its bones at the *Wag'n Bietjie* farm in the Free State, South Africa. Lions were held in very small crate for days before being slaughtered. Picture: Netwerk24 9 May 2018.

¹⁰ WWF press statement published on international Tiger Day, 29 July 2016.
<https://www.worldwildanimals.org/press-releases/wwf-tiger-farming-in-asia-must-end-us-has-role-to-play>

This view is supported by the EIA who states that, “...trade in captive tiger parts and products stimulates demand for tiger products – be it from wild or captive tigers – and undermines enforcement efforts by making it difficult to know whether seized tiger products come from wild or captive tigers.”¹¹ The EIA also makes a case against South Africa’s trade in African lion parts into Asia, along with the trade in captive-bred tiger parts, because it, “frustrates enforcement efforts and undermines the limited demand-reduction efforts to end tiger trade. At the heart of the lion trade is South Africa, the world’s largest exporter of lion bone, teeth and claws, and also an exporter of captive tiger parts. The Government, in sanctioning and setting an export quota of 800 lion skeletons in 2017 to generate profits for lion farmers, has failed to take into account the wider impact of such a decision on endangered wild tigers.”¹²

In the past three years African lions being killed across the continent has spiked to satisfy demand in China and Southeast Asia. The results of a 2017 survey of the pan-African trade in lion body parts, together with an increase in reports of lion poisonings and killings in Mozambique, Zimbabwe, South Africa, Uganda and Tanzania show there is an escalating trend in the trade of lion body parts, the result of which is an impending threat to some national populations.¹³

According to a report briefing released by Animal Defenders International (ADI) in July 2018 on *Captive Big Cat Poaching in South Africa: Media Accounts of Incidences 2016-2018*, “Since 2016 there has been a dramatic increase in the poaching of big cats, predominantly lions, from captive environments in South Africa. Nearly all captive lion and tiger poaching incidents identified have occurred in Limpopo province, with a few recent reports of captive lion and tiger poaching in the surrounding regions. Captive environments, classified as places where animals are fenced in and rely on humans for food, and from which these animals have been poached, include sanctuaries and game farms which breed big cats. Lions are typically killed with the use of poisoned meat and various parts of their bodies taken, including heads, paws and skin.

- A total of 65 captive lions and tigers have been killed in South Africa since 2016, with at least 5 additional lions subjected to attempted killings.

¹¹ July 2016. See <https://eia-international.org/international-tiger-day-zero-demand-zero-poaching>.

¹² *The Lion’s Share. South Africa’s trade exacerbates demand for tiger parts and derivatives.* Environmental Investigation Agency, July 2017. <https://eia-international.org/wp-content/uploads/The-Lions-Share-FINAL.pdf>

¹³ VL Williams, AJ Loveridge, DJ Newton, DW Macdonald DW. Questionnaire survey of the pan-African trade in lion body parts. 2017. PLoS ONE 12 (10): e0187060. <https://doi.org/10.1371/journal.pone.0187060>.

- Of the total 65 animals, 60 lions and 5 tigers were killed.
- Some incidences in which all lions survived attempted poaching, the number of lions affected is unknown so could not be added to the figures.
- A total of 22 captive lion and tigers were killed or subjected to an attempted killing in 2016.
- A total of 27 captive lion and tigers were killed or subjected to an attempted killing in 2017.
- A total of 21 captive lion and tigers have been killed in 2018 to date.”

Organised elephant and rhino trafficking groups, because they have the existing killing and smuggling infrastructure in place, can, and have, extended their activities to wild lions. These same syndicates are producing processed lion “cake” and tiger “jelly”/“cake” in South Africa from tigers and lions in the South African big cat captive industry. There are reports that these body parts are shipped out to Southeast Asia in cargo ships and through military/diplomatic channels.¹⁴ They are also leaving the country in parcels and luggage to other African transit countries (and then presumably from there on to Southeast Asia). For example in 2017 fifty-one lion claws and nineteen lion teeth were confiscated at the OR Tambo International Airport in a parcel destined for Nigeria.¹⁵ Another recent seizure (2016) which shows that African lion body parts are being shipped illegally is the arrest of a Vietnamese national who was in possession of 680 suspected tiger claws brought from Lao PDR to Vietnam. Later DNA analysis showed that the claws were in fact lion claws.¹⁶

The IUCN coordinator of the “red list” for big cats, Kristin Nowell says that South Africa’s legal trade is stoking Asian demand for lion parts as stand-ins for tiger parts and is fuelling a growing illegal trade in the teeth and claws of wild lions, further reducing their numbers. According to Nowell, confiscations and NGO research shows that some sellers are passing off lion teeth and claws as tiger parts. She states that, “unless you’re a big cat expert, knowing what’s actually on offer is anyone’s guess: What’s sold as tiger could be lion. And if the lion teeth on display are in fact just that, there’s no telling whether they’re from wild lions...or captive-

¹⁴ Outhwaite, Willow. TRAFFIC. *The Legal and Illegal Trade in African Lions: A study in support of Decision 17.241 e*). Preliminary findings for AC30. 16 May 2018. <https://cites.org/sites/default/files/eng/com/ac/30/E-AC30-25.pdf>.

¹⁵ <https://kempstonexpress.co.za/161469/lion-rhino-parts-found-at-airport/>.

¹⁶ <https://www.tienphong.vn/content/ODcxMTk3.tpo>.

bred lions from South Africa.”¹⁷ These alarming trends should be sufficient evidence for the DEA to close down its ‘lion’ bone trade. Yet South Africa’s Ministry and the DEA are resolutely and recklessly adding to this problem. They are enabling a similar fate for Africa’s wild lions through their support of the captive big cat industry in South Africa.

Lion body parts from South Africa are being passed off as tiger and thus stimulating demand. Of enormous concern is that the South African government has allowed the lion and tiger breeding industry to literally grow out of control, allowing the various tiger species and lion species to share enclosures and inter-breed. The bone trade industry will surely take advantage of this. Moreover there are proven links between syndicates smuggling rhino horn and those involved in the tiger/lion bone trade. The same syndicates, some of whose members were arrested in South Africa in 2011 for dealing in rhino horns, were also dealing in lion bones. For example, in June 2011 Pichet Thongphai and Punpitak Chunchom were arrested for lion parts found at a house in Edenvale in Johannesburg. Lion bones have been found inside containers transporting ivory and rhino horn, suggesting the same networks are involved.¹⁸

According to the EIA, “in China and South-East Asia, organised criminal networks involved in lion trade are also trading tiger and other Asian big cats. A criminal network operating from Tianjin city in northern China was convicted in 2015 for trade in seven tiger skeletons, 31 lion skeletons and nearly half a tonne of ivory. The Tianjin case involved the organised transportation in convoys of skeletons over a thousand miles from Guangxi in southern China, bordering Vietnam, to Tianjin.”¹⁹

Free-Reign: The Extent of the Captive Big Cat Industry in South Africa

In South Africa, the captive breeding of lions commenced in earnest in the 1990s, and by 1999 there were about 1000 lions in the industry. The number of lions and other big cats in the industry is unknown. Some publications cite the figure of 8,000 (lions only). In 2015, the Traffic/Wildcru *Bones of Contention* report estimated that there

¹⁷ <https://news.nationalgeographic.com/2018/06/wildlife-watch-illegal-trade-lions-teeth-claws-poaching/>.

¹⁸ John R Platt, A growing threat to lions: Illegal trade in their bones, *Scientific American*, 30 June 2016, <https://blogs.scientificamerican.com/extinction-countdown/>.

¹⁹ *The Lion’s Share. South Africa’s trade exacerbates demand for tiger parts and derivatives*. Environmental Investigation Agency, p.8 July 2017. <https://eia-international.org/wp-content/uploads/The-Lions-Share-FINAL.pdf>.

were more than 9,100 lions in South Africa, of which approximately 68% were in captivity, i.e. 6,188. In 2017, researchers from the University of the North-West made a claim, based on inadequate extrapolations, that there are 297 lion breeding facilities in South Africa.²⁰ In a presentation to the South African Parliamentary Portfolio Committee on Environmental Affairs, the DEA said that there were “just over 300 captive breeding facilities.”²¹ Essentially, this is all mere conjecture and cannot be verified, either by independent researchers, national or provincial government or even the industry itself. Our findings show that the number of lions and other African and Asian big cats in the industry and the number of places breeding them – including Ligers, x-brown with white lions, x-Siberian and Bengal Tigers and everything in-between - is substantively higher than any of these estimates. The truth, however, is that the number of lions (and other African and Asian big cats) in captivity in South Africa is officially unknown.



Photograph: Vivienne Williams.

²⁰ Peet Van der Merwe, Melville Saayman, Jauntelle Els and Andrea Saayman. The economic significance of lion breeding operations in the South African Wild animals Industry, Vol. 9(11), pp. 314-322, *International Journal of Biodiversity and Conservation*, November 2017. DOI: 10.5897/IJBC2017.1103.

²¹ 23rd May 2017, <https://pmg.org.za/committee-meeting/24431/>.

The South African authorities should be reigning in this recalcitrant, cruel and renegade industry and should at the very least be prohibiting:

- Any further captive breeding of big cats by private owners;
- The sale of live big cats both locally and internationally.

Instead, however, they are deliberately enabling and encouraging its existence and growth, while at the same time being extremely lax at sufficiently regulating or controlling these private breeders and their spin-off industries. It stands to reason, therefore, that, as a result, the population of near-factory-farmed big cats in South Africa must be increasing exponentially. Given the move by hunting organisations internationally²² to expel South Africa's main hunting associations (PHASA and CHASA) for defending and supporting canned lion hunting, in contravention of their international policies, the obvious re-focus of this industry must be on the bone trade.

Furthermore, the DEA and most of the relevant provincial authorities either refuse to provide information relating to the extent of the industry, or the players involved, when requested to do so through the *Promotion of Access to Information Act (PAIA)* applications. On April 13th 2017, the EMS Foundation requested from the DEA, via a formal PAIA application:

- A list of Predator Breeders, including names, addresses and name of the provinces; and
- A list of Predator Bone Traders and middlemen, including names, addresses and province.

Both the PAIA Request and the subsequent appeal (in terms of PAIA) were refused by the DEA, because they argued that “this requested information does not fall within the ambit of the responsibility of the Department” and it was transferred to the provinces. Given the controversy around the industry and the lion bone trade (which falls under the national Department) it seems irrational and unconscionable that the DEA could not or would not provide this information, particularly since the DEA, representing national

²² Such as Europe's International Council for Game and Wildlife Conservation (CIC), Safari Club International, Dallas Safari Club, Boone and Crockett, The Wild Sheep Foundation, Custodians of Professional Hunting South Africa (CPHSA) Namibian Professional Hunters Association (NAPHA) and Operators and Professional Hunters Associations of Africa (OPHAA).

government, signs international treaties which relate to the oversight and monitoring of the captive predator industry and the lion bone trade which it vocally supports.

The Parliamentary Portfolio Committee also expects the DEA to have this information and to be accountable for it. At the DEA Briefing to Parliament on the May 23rd 2017, the Chairperson asked the DEA staff member, Thea Carroll, if they had any information on the breeding facilities, to which she replied that the DEA did have the information and that “who the owners were, and the exact location of the facilities, should be requested through PAIA.” Ms Frances Craigie (Acting Deputy Director-General: Legal, Authority and Compliance Enforcement, DEA), also replied that the DEA did have a project focussing on compliance-monitoring at the breeding facilities, and that information could be made available. The DEA also told Parliament that “there were just over 300 captive breeding facilities for lions in the country, mostly in the North West, Free State and Limpopo.”²³ How would the DEA know this if it does not have a list of these facilities?

Although the PAIA request was transferred to the provinces (and despite several follow up emails from the EMS Foundation to the provinces), only three provinces (Gauteng, Northern Cape and Western Cape) have provided information. Also of concern, is the uneven and patchy responses to PAIA requests from the provinces as a whole, as well as the incompleteness of their responses when they do respond.

Alarminglly there appears to be no control or interest by South African authorities on the breeding, inter-breeding (also across species) and keeping of lions and tigers or the conditions under which they are kept. The DEA does not have a national database on lions in captivity and has not conducted a national audit into the numbers of lions held at these facilities. The DEA also does not have a national database of tigers in captivity and has not conducted a national audit into the numbers of tigers held at these facilities. So who has them, who is breeding them, how many there are or where they are remains a mystery.

²³ For the minutes of this Briefing see: <https://pmg.org.za/committee-meeting/24431/>.



In-breeding at Letsatsi la Africa (Free State).

Image: EMS Foundation (September 2017).

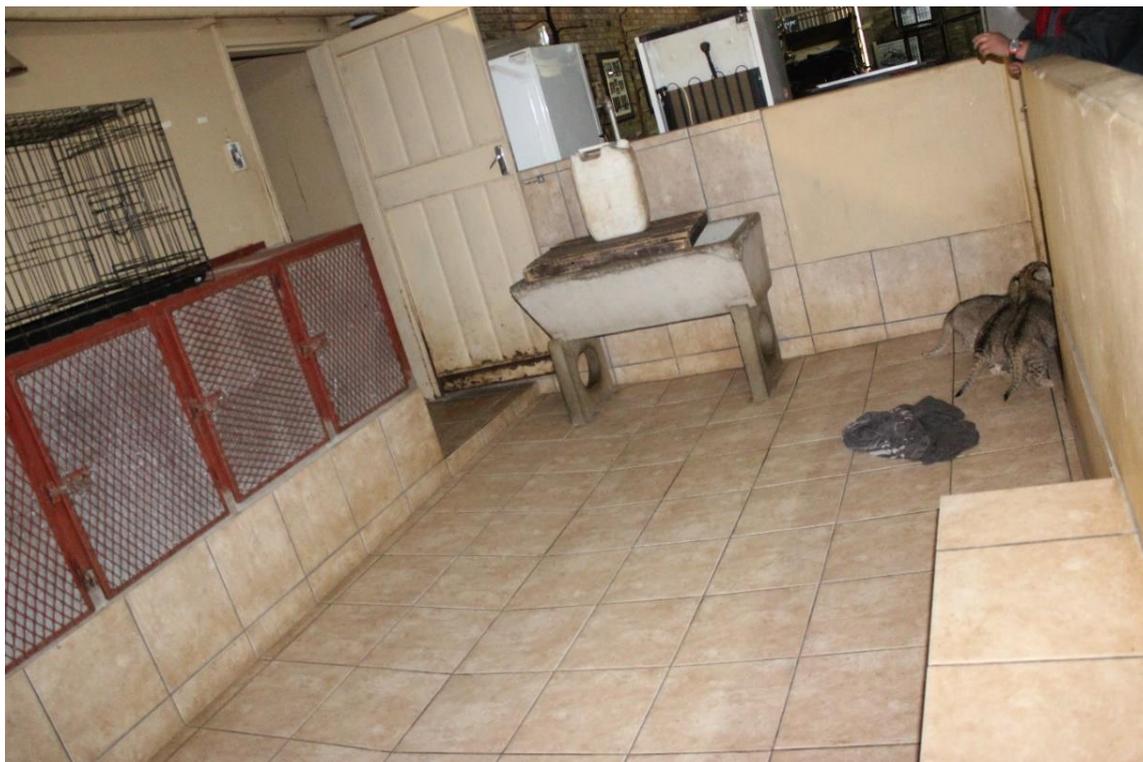
The 2017 ‘Lion’ Bone Quota

Appetite for profit propels the captive-bred big cat industry in South Africa and it fits comfortably within the current South African government’s wild animal ideology of “sustainable use”. An ideology which is vociferously pro-trade and pro-trophy hunting. South Africa is a key player in advancing the commercial trade in African lions at CITES meetings. This, together with political ‘horse-trading’ has meant that the African lion, via a split listing, is the only big cat listed on Appendix II. The South African government is clearly placing the greed and profits of a marginal and problematic grouping before sound and ethical conservation management. This poses a direct reputational threat to Brand South Africa and the tourism industry.

There was no public consultation for the sale of an estimated 6058²⁴ ‘lion’ skeletons between 2008 and 2016. One of the requirements of setting the quota of 800 skeletons in 2017 was that the DEA should convene a meeting with all stakeholders. However, the first stage that most stakeholders and the general public heard about

²⁴ <https://www.timeslive.co.za/news/sci-tech/2017-10-31-a-roaring-trade-6000-sa-lion-skeletons-shipped-to-asia/#>.

specific figures was at a meeting convened at short notice on January 21st 2017. At the meeting, the DEA said that, along with SANBI, it had calculated that a quota of 800 skeletons was appropriate. Stakeholders were given two weeks from the date of the meeting to make submissions on the matter. This despite South African law specifying a 30 day minimum period to make submissions. In June 2017, five months after the January stakeholder meeting, the Minister announced that the 800 skeleton quota had been approved.



Puruma Pride Lion Farm (Free State).

Image: EMS Foundation September 2017.

Civil society has raised a number of concerns in relation to the trade and the quota.

These include:

- An absence of scientific evidence showing the conservation value of captive breeding of lion, including potential impacts on wild populations;
- Failure to adopt the precautionary principle approach which suggests that no major policy decisions (in this case regarding the lion skeleton quota) should be made unless it can be proved that the decision will not have harmful consequences to wild lion populations;
- Inadequate official scrutiny of the welfare of captive predators;

- Concerns over provincial capacity (funding and skills) to effectively monitor trade, for example the capacity to differential between lion and tiger bones or between bones from wild lions and captive bred lions;
- Impact of legal trade from South Africa on illegal trade, particularly with regard to wild lions and tigers;
- Absence of independent research of market dynamics with regard to lion-tiger bone trade;
- The DEA's failure to respond in a constructive way to the threat of reputational damage caused by the captive breeding controversy to South Africa's international image as a responsible custodian of wild animals and the environment. This is damaging Brand South Africa and the tourism industry;
- A lack of information as to how, in the light of the involvement of organized criminals in the ongoing poaching of rhino and the difficulties in controlling this activity, South Africa will prevent laundering and other illegal activities with regard to the lion bone trade;
- Lack of consultation with anyone apart from traders and SAPA;
- A misunderstanding of the role of the DEA in conserving wild animals, and not driving the trade in its body parts when no conservation value at all can be proven.

None of the stakeholders who had opposed the quota were told why their submissions had been rejected. On August 16th 2017, the EMS Foundation put in a PAIA Request to the DEA requesting: All records, including minutes of meetings, relating to the receipt, filing, treatment, perusal, consideration, and/or assessment of the public submissions on the lion bone export quota received by the DEA pursuant to its call for public comment on 25 January 2017, including the recordal of the reasons why any submissions were or were not taken into account. On the 9th February 2018 the EMS Foundation received a letter from the SANBI CEO saying that:

- The component that related to minutes of the Scientific Authority meeting in which the recommendation for the lion bone export quota was made was transferred from the DEA to SANBI as the Secretariat for the Scientific Authority, and received on 18 January 2018.

- The request was processed by SANBI as part of its obligations to provide administrative support to the Scientific Authority.
- The allocation of the 2017 lion bone quota was discussed at the 13th meeting of the Scientific Authority, held from 22-23 February 2017 and the request therefore refers to the summary record of this meeting.

The response was provided via a document titled “Addendum: Summary record for Agenda item 8.6 from the 13th Meeting of the Scientific Authority”. The entire item is reproduced below:

Record of discussion

The CITES CoP17 annotation to the Appendix II listing of the African lion provides for annual export quotas for the trade in captive lion bones from South Africa to be established. The annotation was based on a situation where captive breeding facilities have been trading in bone and there was no basis on which to prohibit this trade. However the trade should be regulated through a quota to ensure that it does not impact negatively on wild lion populations.

Towards establishing the current annual sustainable supply, MP²⁵ consulted the TRAFFIC report on the lion bone trade and the SADC Trade Analysis, as well as information provided by DEA and SAPA. Data on trophy export numbers and trends show that South African CBOs can sustainably produce in excess of 800 lion skeletons annually - about 10% of the captive lion population in 2016. It is difficult to determine whether a quota of 800 lions would meet export demand, but exports ranged between 720 and 1 300 in 2015/16. A 3-year project on *Analysing and monitoring the lion bone trade In South Africa* will be initiated by SANBI in collaboration with DEA, NZG, the University of the Witwatersrand and Oxford University. The project will generate reliable information on the captive lion breeding industry and bone trade, and thus assist in determining sustainable annual quotas. In the public consultation process, DEA received over 1 000 emails with comments on the proposed quota. Mpho Tjiane (MT) presented a summary of these, which ranged from organisations and individuals opposed to hunting to members of the industry opposed to a quota. Issues raised included the ethics of hunting and of the lion bone trade; lack of transparency; inadequate research; lack of community beneficiation; animal cruelty; lack of monitoring capacity in government; and impact on wild populations of lion and other large cats. These important issues were raised and considered, although many were related to policy and management issues that are beyond the remit of the Scientific Authority.

The meeting discussed a proposed quota and the issue of demand and supply. While trophy hunting is a relatively small and stable industry, the demand for lion bone is much bigger and breeders may even try to grow the market. A limited quota could discourage breeders from euthenasing a large number of lions and selling bones in the short term but then creating an unsustainable demand that impacts on wild lion. However, a low initial quota could also lead to an increase in export applications for

²⁵ Michele Pfab (SANBI).

live lions or meeting existing demand from wild lion populations. The SA was advised that the SA²⁶ and MA²⁷ should not try to exercise too much control over the market, but rather gain a better understanding of its dynamics through the monitoring project. The key is to be adaptive: 800 lions was considered to be a reasonable baseline due to past trade patterns and this should be reviewed as more and better information becomes available.

Decisions

- The members agreed on a quota of 800 lion skeletons for the first year, to be reviewed when more information is available through the lion bone trade monitoring project.

There has been a tsunami of domestic and international criticism against South Africa, both locally and globally, with many conservation bodies, scientists and NGOs affirming that the DEA's unfettered support for this globally rogue predator breeding industry cannot be supported scientifically or from a tourism, conservation, ethical or welfare perspective. Calls to stop the captive breeding of lions, hunting and killing of these animals, live sales and the sale of their bones and skeletons, have been widespread and made by organisations including, the International Union for Nature (IUCN)²⁸, carnivore scientists, wild animals NGOs, hunting associations, The Minister of Environment in Namibia, the Minister of Environment, Conservation, Natural Resources and Tourism in Botswana, a former South African Minister of Tourism, scientists, and political parties.

In March 2017, scientist Dr Paul Funston of Panthera (an organisation specialising in the study of wild cats including lions), stated that "The government's proposed quota of 800 lion skeletons for legal export has absolutely no grounding in science. It is irresponsible to establish policy that could further imperil wild lions – already in precipitous decline throughout much of Africa – when the facts are clear; South Africa's lion breeding industry makes absolutely no positive contribution to conserving lions and, indeed, further imperils them...It is confounding that a country whose iconic wild lions are such a source of national pride, not to mention tourist revenue, would take such risks as to sustain a marginal captive breeding industry that is condemned globally for its shameful practices."²⁹

²⁶ Scientific Authority.

²⁷ Management Authority.

²⁸ IUCN Resolution 13 (2016) called on the South African government to terminate the hunting of captive-bred lions.

²⁹ <https://www.pressreader.com/south-africa/business-day/20170320/281663959826019>.

On March 22nd 2018, the Inkatha Freedom Party, one of the opposition parties in South Africa, put out a press release condemning the continued lion bone trade and captive lion breeding in South Africa. IFP Chief Whip in Parliament, Mr Narend Singh, MP, said “Despite no credible basis in science, or socio-economic benefits to the South African people, our government persists in what can be justifiably argued as the decimation of our wild lion populations through allowing the continued commodification of this iconic African apex predator, the African Lion. These appalling policy initiatives by government, which fly directly in the face of international best conservation practice, beggar all belief and raise serious questions as to the motivations that inform them. A growing body of evidence...suggests not only no legitimate ‘science’ in support of the determination of lion bone quota trade quotas, but also absolutely no conservation value in the practice. The practice is nothing more than a commodification of an apex African predator for the pecuniary benefit of a small handful of people, at great and distressing expense to brand South Africa.”

Linking South Africa’s Lion Bone Trade to the Illegal Trade

South Africa’s intimate involvement with Southeast Asia’s big cat trade means that it cannot be separated from the illegal market for tiger (and other big cat) body parts. It is in fact stimulating it and obstructing international efforts to stop the tiger trade. It has also meant that lions (and conceivably also Asian big cats) in South Africa are being killed specifically for ‘tiger wine’ and the bone trade in Southeast Asia. The DEA’s peculiar (and many would argue incomprehensible) interpretation of ‘sustainable use’ means the industry is *de facto* fully supported by the State, despite widespread opposition to the practice which is considered extremely cruel, linked to international criminal networks, a threat to Africa’s wild animal populations and run by a small monopoly of operators purely for financial gain.

According to TRAFFIC no legal trade in lion body parts has been reported between Vietnam, Lao PDR, China or Thailand.³⁰ These countries, however, show illegal cross-border trade (e.g. of skeletons, claws). This presents the potential scenario of lion bone items being imported legally into the region, but then re-exported (either in the

³⁰ *The Legal and Illegal Trade in Africa Lions. A Study in Support of Decision 17.241 E.* CITES Thirtieth meeting of the Animals Committee Geneva (Switzerland), 16-21 July 2018. African lion (*Panthera leo*). Document submitted by the CITES Secretariat at the request of TRAFFIC in relation to agenda item 25.

raw form or as processed products) illegally to neighbouring countries. Currently it is not clear which countries are acting as processors or consumers, and how the products are moving across borders. Little open trade was observed in the three countries surveyed, it appears that trade takes place through existing networks or is arranged via social media, making it very difficult to monitor.” It is likely that the legal trade in captive bred ‘lion’ skeletons and bones is being used as a cover by criminal syndicates to launder illegally obtained bones and skeletons from their wild caught counterparts. The link between rhino horn and ‘lion’ bone trafficking syndicates and the legal ‘lion’ bone trade in South Africa was already established and in the public domain as far back as 2011 with arrests in South Africa of *Xaysavang Network* syndicate members.

According to the US Department of State Bureau of International Narcotics and Law Enforcement Affairs, “The Xaysavang Network, an international wild animals trafficking syndicate, facilitates the killing of endangered elephants, rhinos, pangolins, and other species for products such as ivory and rhino horn. Vixay Keosavang, a Lao national, is believed to be the leader of the network. Xaysavang associates smuggle illegally taken wild animals from countries in Africa and Asia into Laos, and then export them to countries such as Vietnam and China. Affiliates are suspected to be active in South Africa, Mozambique, Thailand, Laos, Malaysia, Vietnam, and China. The Xaysavang Network has been linked to several major seizures of wildlife products. The U.S. Department of State is currently offering a reward of up to \$1 million for information leading to the dismantling of the Xaysavang Network.”³¹ According to the Freeland Foundation, Vixay Keosavang, “from his base in Paksan, western Laos, Keosavang was sucking in animals...and illegally churning out body parts at up to ten tonnes a week, investing his profit in hotels and a transport business.”³²

A boss of the Xaysavang Network involved in rhino poaching and trafficking, Chumlong Lemtongthai (a Thai national)³³, was also in South Africa to source ‘lion’ bones for shipping to Southeast Asia, along with Phichet Thongphai and Punpitak Chunchom (also Thai nationals). Chumlong Lemtongthai was also involved with international wildlife traffickers and dealers, ‘Fatty’ (Leuthai Tiewcharoen) and the

³¹ <https://www.state.gov/j/inl/tocrewards/c60273.htm>.

³² <https://www.theguardian.com/environment/2016/sep/26/bach-brothers-elephant-ivory-asias-animal-trafficking-network>.

³³ See J. Rademeyer. *Killing for Profit*. Cape Town: Zebra Press; 2012.

Bach brothers, Bach Mai (also known as 'Boonchai') and Bach Van Limh. The Bach brothers are key players in the smuggling gateway from Thailand into Laos. Although they are active in Thailand, the brothers are originally Vietnamese and have networks in both countries. Apart from the export of wild animals and their body parts through Laos, Thai police intelligence reports also link Boonchai with the importing of drugs from Laos into Thailand. According to Vietnamese police, Bach Van Limh is involved in running prostitutes and smuggling cars as well as wild animals and their body parts. He also owns a hotel, a café and legitimate businesses trading gold and placing migrant workers.³⁴

After a 10-year long investigation, in December 2017, Boonchai Bach was arrested in Thailand's northeastern border province of Nakhon Phanom for his involvement in the smuggling of 14 rhino horns worth over \$1 million from Africa into Thailand in December 2017. The arrest happened after Thai customs ran a routine X-ray inspection of cargo on an Ethiopian Airlines flight, which originated from South Africa, and found rhino horns in luggage destined for the Chaiyamat family (relatives of Boonchai Bach). Also arrested was an associate of Bach's, Nikorn Wongprajan³⁵, an official at Suvarnabhumi Airport. Nikorn Wongprajan is linked to Chumlong Lemthongthai and the trafficking of rhino horns from South Africa. In 2011 he was one of the traffickers who used CITES trophy hunting permit loopholes to export rhino horn for trade.³⁶ Wongprajan is also linked to Pisit Pakawan, a live animal smuggler/breeder/dealer who was also the recipient of 'lion' bones from South Africa. According to an in-depth *Guardian* newspaper investigation, "Chumlong commissioned the killing of hundreds of lions and supervised the boiling of their corpses to separate the bones from the flesh. He then parceled up the bones in ten-kilo bags - roughly one bag for each dead animal - and shipped them back to the Bach's and to Keosavang, who...sold them onwards to Vietnam and China."³⁷

³⁴ The Crime Family at the Centre of Asia's Animal Trafficking Network, *Guardian*, 26 September, 2016. <https://www.theguardian.com/environment/2016/sep/26/bach-brothers-elephant-ivory-asias-animal-trafficking-network>.

³⁵ Also known as Nikon Wongchan.

³⁶ North West province list of rhino hunts, 2009 - 2013. The 'professional' hunter was Harry Claasens and the hunt took place on Steyl's farm Aurora.

³⁷ The Crime Family at the Centre of Asia's Animal Trafficking Network, *Guardian*, 26 September, 2016. <https://www.theguardian.com/environment/2016/sep/26/bach-brothers-elephant-ivory-asias-animal-trafficking-network>.

The Xaysavang/Bach Network set up a scheme with professional hunter Marthinus Philippus (known as Marnus) Steyl³⁸, who helped to procure the rhinos and trophy hunting permits, and assisted in shooting some of the animals. Steyl initially appeared alongside Lemtongthai but charges were later dropped because of a plea bargain. Lemtongthai told the courts that Steyl had also offered to supply lion skeletons. “Invoices also revealed the rate at which he was commissioning the death of lions: 327 of them during one two-year period, roughly one every couple of days.”³⁹ Forensic investigator Paul O’ Sullivan, who had been working on the case, said that he was “leaked a copy of an order form allegedly sent to Marnus Steyl for 50 rhinos as well as 300 sets of lion bones. The order is signed by Chumlong – the alleged kingpin.”⁴⁰

Steyl, a prominent member of the lion breeding and trophy hunting industry, was, between late 2016 and October 2017 a council member of the South African Predators Association (SAPA). The SAPA council helps set policy and administers the affairs of the organisation which has been a vocal proponent of lion breeding, the trophy hunting of captive bred lions and trade in lion bones. Two other SAPA council members have also previously been charged in connection with illegal rhino trophy hunting.⁴¹ It appears that the relationship between the South African bone dealers and the Bach network continues. In 2016, *The Guardian* surveillance team photographed multiple visits to the Bach brothers’ offices in Nakhon Phanom (Thailand) by two South African lion bone merchants with whom Chumlong Lemthongthai was working. The investigators also identified a Thai courier, known as ‘Jimmy’, at the office in Nakhon Phanom. ‘Jimmy’ worked for Boonchai Bach and was caught at OR Tambo airport at the time of Chumlong’s arrest. He was convicted for attempting to bring undeclared cash into the country.⁴²

³⁸ Companies Steyl has include: Steyl Game, Bon Accor Safaris and Steyl Endurance Racing and Stud Farm (Mandalay Farm).

³⁹ The Crime Family at the Centre of Asia’s Animal Trafficking Network, *Guardian*, 26 September, 2016. <https://www.theguardian.com/environment/2016/sep/26/bach-brothers-ivory-asias-animal-trafficking-network>.

⁴⁰ <https://rhinofriendlyriders.wordpress.com/2011/11/09/rhino-files-iii-carte-blanche-documentary/>.

⁴¹ Cash before Conservation: An overview of the breeding of lions for hunting and bone trade. 2018. Born Free.

⁴² The Crime Family at the Centre of Asia’s Animal Trafficking Network, *Guardian*, 26 September, 2016. <https://www.theguardian.com/environment/2016/sep/26/bach-brothers-ivory-asias-animal-trafficking-network>.

The 2012 court case against Phichet Thongphai and Punpitak Chunchom⁴³ revealed that contact with the *Xaysavang/Bach Network* wild animals trafficking syndicate was initiated by members of the South African big cat captive-breeding industry.⁴⁴ How would they know how to contact a wild animals trafficking syndicate? Any reasonable person would be aware that Vixay Keosavang and the Bach brothers were wild animal crime kingpins and that they were trafficking wild animals and their body parts. This, and the fact that the South African CITES Management Authorities continue to issue export permits for 'lion' skeletons to addresses in Laos and elsewhere possibly linked to traffickers, highlights the concern that the big cat captive breeding industry could be associated with illegal wild animal trafficking.

In addition, research by Williams *et al.* (2017) submitted that "Xaysavang's involvement in the lion bone trade precedes their involvement in the rhino horn trade, and that the company started legally procuring lion bones from farmers c. February 2008 when the first CITES export permit was issued."⁴⁵

BAT and the EMS Foundation went to Southeast Asia to investigate the supposed destinations in Southeast Asia as provided on the CITES permits which were sanctioned by CITES and the ratifying parties. Our inspections showed that most of the addresses and the actual and/or final destinations of the skeletons could not be properly verified and are not known. It is widely accepted that trade on the Southeast Asian side is not transparent, properly understood or identified, and is associated with wild animal trafficking, poaching and the demise of tigers. Given this knowledge, it highlights a particularly worrying trend and literally means that governments on the supply and demand side, and the CITES Secretariat by implication may be, unknowingly, aiding and abetting criminal activities.

As Williams *et al.* noted in 2015, "since wild animal trade often makes use of the same established networks and supply lines, the Lion bone trade may have piggy-backed on existing wild animals routes in Lao PDR, Viet Nam, China, Thailand and

⁴³ Thongphai and Chunchom were arrested for being in possession of lion bones, fined and their 5-year sentence suspended if they left the country.

⁴⁴ See: Vivienne L. Williams, Andrew J. Loveridge, David J. Newton, David W. Macdonald. A Roaring Trade? The legal trade in *Panthera leo* bones from Africa to East-Southeast Asia. PLOS ONE, pp.5, October 24, 2017. <https://doi.org/10.1371/journal.pone.0185996>.

⁴⁵ Vivienne L. Williams, Andrew J. Loveridge, David J. Newton, David W. Macdonald. A roaring trade? The legal trade in *Panthera leo* bones from Africa to East-Southeast Asia. PLOS ONE, pp.6, October 24, 2017. <https://doi.org/10.1371/journal.pone.0185996>.

possibly Myanmar...If Lion bones are being traded between countries in East–Southeast Asia, then the trade is presumed to be mainly illicit given the absence of CITES export–import permit records to legitimize the trade.”⁴⁶

According to written answers to questions in the South African Parliament, the first legal trade in lion bones and skeleton from South Africa began in 2008⁴⁷ when lion bones began to be used as a substitute for tiger bones in the making of fortifying “wine” and other “medicinal” products used in some Southeast Asian communities. Lion bones are sometimes substituted for tiger bones without the knowledge of consumers.⁴⁸ From the outset, as with much other record keeping relating to wild animals, there were serious permit inaccuracies. The 2015 TRAFFIC & WILDCRU joint report showed that “Destinations” were recorded as Vietnam instead of Lao PDR and the quantities recorded as “bones” instead of full skeletons.

Williams *et al.* found that the trade in lion bones from South Africa to Southeast Asia has risen consistently since 2008. They also estimated that the total number of skeletons legally exported from the whole of Africa to Southeast Asia for the period 2008±2016 is around 6058 skeletons and that 64% (3877) were exported from 2014±2016.⁴⁹ Information gathered by BAT and the EMS Foundation estimates that from 2014±2017 South Africa exported approximately 2945 skeletons of which 46.4% went to Lao PDR, 38.6% to Vietnam and 15% to Thailand. Lao PDR and Vietnam are South Africa’s main trading partners, with 85% of all ‘lion’ skeletons collectively exported to them. It is of serious concern that South Africa’s major trading partners are countries listed by global conservation and law enforcement agencies as having weak law enforcement and high levels of corruption and therefore key conduits for the massive illegal trade in wild animals.⁵⁰

Moreover, South Africa’s 2015 *Biodiversity Management Plan for the African Lion* also justified its support for the trade, as follows “the controversial trade in lion bones for the Asian market appears to be supplied by bones obtained as a legal by-product of

⁴⁶ Williams, V.L., Newton, D.J., Loveridge, A.J. and Macdonald, D.W. (2015). *Bones of Contention: An Assessment of the South African Trade in African Lion Panthera leo Bones and Other Body Parts*. TRAFFIC, & WildCRU, p.x, 2015.

⁴⁷ https://www.environment.gov.za/sites/default/files/parliamentary_updates/question2935.pdf.

⁴⁸ www.wildcru.org/wp-content/uploads/2015/07/Bones_of_contention.pdf.

⁴⁹ Williams VL, Loveridge AJ, Newton DJ, Macdonald DW (2017) A Roaring Trade? The legal trade in Panthera leo bones from Africa to Southeast Asia. PLoS ONE 12(10), p.18.

<https://doi.org/10.1371/journal.pone.0185996>.

⁵⁰ www.wildcru.org/wp-content/uploads/2015/07/Bones_of_contention.pdf.

the trophy hunting industry where the lions are almost exclusively captive-bred.”⁵¹ If the industry was merely a by-product of the trophy hunting industry the skull, jaw and clavicles would be absent from the skeleton exports. However, our research shows that 91% of the skeletons that went out in 2017, after the quota was initiated, had skulls present. It can therefore be concluded, contrary to claims from government, that South Africa’s ‘lion’ bone trade is not simply a by-product of the canned trophy hunting industry. In South Africa, big cats are being killed specifically for their bones.

The CITES endorsement of South Africa’s lion bone trade and the allocation of a quota is fast becoming a primary enabler of the commercial breeding of lions and tigers.

FARMING TIGERS AND LIGERS: SOUTH AFRICA’S CALAMITOUS ROLE IN THE ASIAN BIG CAT BONE TRADE

In South Africa tigers are classified as ‘exotics’ and thus, afforded limited and inadequate legal regulation and protection. Consequently, tigers are being bred and inter-bred in private breeding facilities and urban back yards. According to WWF’s species policy expert, Leigh Henry, this situation threatens the work that has been done to conserve wild populations in Asia. “A patchwork of regulations governs these tigers, meaning no agency can say how many there are, when they are born, when they die and what happens to their valuable parts when they do. Illegal trade in tiger parts remains the primary threat to tigers in the wild, and the last thing we want is parts from captive tigers helping sustain or even fuel this black market.”⁵²

Despite the CITES minimum standards that the breeding of tigers as Appendix I animals, needs to be regulated and at the very least, the organisations/businesses that breed tigers need to be registered with CITES through the national authority, South Africa has not listed one breeding operation with CITES. As a result:

- No national audit of tigers has been undertaken so who has them, who is breeding them, how many there are or where they are is not known.
- There is no reliable data on the numbers of tigers that are trophy hunted in South Africa as generally a permit is not required to hunt a tiger;

⁵¹ Gazetted 2 December 2015 (No. 39468), p.28.

⁵² <https://www.theguardian.com/environment/shortcuts/2018/jun/20/more-tigers-live-in-us-back-yards-than-in-the-wild-is-this-a-catastrophe>.

- There are no regulations governing trade in tiger parts and derivatives within the country;
- No one needs to account for how tiger body parts are “disposed of”.



Mystic Monkeys and Feathers (Limpopo).

Image: EMS Foundation (September 2017).

South Africa’s pugnacious, pro-sustainable use ideological framework and the consequent lax and/or non-existent regulations as well as inadequate enforcement of the captive breeding and farming industry (and particularly because a large number of lion breeders in South Africa also breed tigers) means that the tiger/lion bone traders and criminal networks could easily take advantage and exploit it. It may also provide fertile ground for the bone industry to launder tiger bones into the market. As a recent article in the *Daily Maverick* noted, “an irony at the heart of the tiger bone trade is that, in Asia, lion bones are being used in fake tiger bone wine, while in South Africa tiger bones are being faked as lion bones because the DEA has licensed lion bone export.”⁵³

By allowing tigers to be bred for international trade, South Africa could be in violation of the country’s commitment to CITES, specifically [CITES Resolution Conf.](#)

⁵³ <https://www.dailymaverick.co.za/article/2018-04-23-tigers-being-bred-in-gauteng-backyards-for-petting-and-bone-export/#.Wt7gNi5ubX4>.

[12.10](#), which requires registration of Appendix I breeding facilities operating for commercial purposes. [CITES Decision 14.69](#) may also apply as it requires such facilities to “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.” [Resolution Conf. 12.5 \(Rev. CoP16\)](#) also urges “Parties and non-Parties on whose territories tigers and other Asian big cat species are bred in captivity to ensure that adequate management practices and controls are in place to prevent parts and derivatives from entering illegal trade from or through such facilities”.

In February 2018, BAT and the EMS Foundation wrote to the CITES Secretariat with regard to facilities/individuals keeping Asian big cats (mainly tigers) in captivity in South Africa pointing out that we are very concerned that South Africa’s lax and unregulated approach is contributing directly to the demise of tigers and their ill-treatment and the growth of the tiger bone industry. South Africa’s management practices and controls are totally inadequate for such facilities and as a consequence there is nothing to prevent Asian big cats from entering the illegal trade from or through the breeding and keeping facilities in South Africa, including the ‘disposal’ of their body parts. There are also a number of individuals in South Africa that are breeding and keeping Asian big cats in their backyards in city suburbs.

Since early 2016, including in the recent past (3 October 2017 and 14 December 2017) BAT and EMS have asked the DEA whether they know the number of Asian big cats in South Africa and whether they monitor and audit the South African facilities. The DEA have continuously and consistently replied that they do not make any attempt as Asian big cats are ‘exotics’ and therefore, it is not their responsibility. This, despite the fact that they are CITES Appendix I animals.

During a conversation on 3rd October 2017 with Mr Mpho Tjiane Deputy Director: CITES Policy Development and Implementation, Biodiversity and Conservation (DEA), we asked:

Question: *Are people allowed to hunt tigers in South Africa?*

DEA Reply: *I don’t know, you must ask the provinces. We don’t regulate hunting of tigers here.*

During another meeting with Mr Mpho Tjiane, on 14th December 2017 in relation to South Africa’s procedures *vis-à-vis* the lion bone quota, we asked:

Question:So there is a possibility that I could replace the lion bones that you've now put the tag on with tiger bone, and hope for the best, that you don't pick it up. I mean, that's possible.

DEA Reply: Yes. I can send a piece of anything in South Africa and stick something in, you won't know.

In terms of CITES regulations, all facilities breeding Appendix 1 animals (whether indigenous or exotic) need to be registered with CITES by the National Authority. However, South Africa does not have a single facility listed with CITES for any Asian big cats, despite the fact that there are many places that are breeding them in South Africa and South Africa has a burgeoning international trade in live tigers to Southeast Asia.

Another problem is that the South African authorities are allowing tigers to breed with lions as well as with other sub-species of tigers. Very often these predators are kept in the same enclosures.

Aware that under Decision 17.229⁵⁴ taken at COP 17, held in South Africa in September 2016 the CITES Secretariat was directed to conduct a review of the number of facilities keeping Asian big cats in captivity in the territories of CITES Parties and the number of Asian big cats kept in these facilities, on the 24th January 2018 we wrote to the DEA as follows:

Question: *We are aware that under Decision 17.229, the CITES Secretariat is directed to conduct a review of the number of facilities keeping Asian big cats in captivity in the territories of CITES Parties and the number of Asian big cats kept in these facilities. The EMS Foundation understands that the Secretariat has issued a Notification to the Parties to seek such information from the Parties. Does DEA have this information? If so please can it be provided to ourselves? If DEA does not have this information, how does it plan on obtaining it and what is the timeline?*

We received no reply and we sent a reminder email to the DEA on 16th February 2018, to which we received this brusque reply from Mpho Tjiane, Deputy Director: CITES Policy Development and Implementation, Biodiversity and Conservation, Department of Environmental Affairs:

⁵⁴ <https://cites.org/eng/node/48653>.

DEA Reply: *Yes email received and we will be communicating with Secretariat on how we will deal with this matter as you can appreciate that there are 9 Provinces in South Africa and we have to coordinate the information. We have no time lines to achieving this goal as we have not planned.*

In answer to Parliamentary Question (No. 2688, 8 September 2017): What is the total number of (i) registered breeders of tigers, (ii) tigers in captivity and (iii) tigers that have been hunted in South Africa since 1 January 2017 and (b) what is the breakdown of the numbers for each province? The Minister of Environmental Affairs replied: Tigers are alien in South Africa and are kept for among others zoological and breeding purposes. Tigers are not regulated in terms National Environmental Management Biodiversity Act (Act No. 10 of 2004) or Threatened & Protected Species Regulations (TOPS). The national Department of Environmental Affairs, therefore, does not keep statistics on numbers of registered breeders, tigers in captivity, and hunting in South Africa as it is done with the key indigenous big mammals (Rhino, Elephants) as well as other big cats (Lions and Leopards). Provincial Authorities may have statistics on a number of registered captive facilities and hunting as such may be regulated through respective provincial legislation.

In terms of Schedule 4 of South Africa's Constitution, Environment is a shared competency between national and provincial governments. We are concerned by the DEA's apparent strategy of obfuscating its responsibility by blaming the provinces when it comes to the provision of information in relation to the implementation and fulfilment of South Africa's obligations in term of international treaties it is a signatory to, such as CITES. This appears to be a possible tactic on the DEA's part to deflect from its lack of compliance, oversight and implementation, particularly as there are established government forums represented by all the provinces, the DEA and SANBI which meet regularly and where information is supposedly shared.

In a meeting between ourselves and the Limpopo province Director for Wild animal trade and Regulation, Mr. Sam Makhubele and his team, on the 22nd February 2018, we asked if their department had ever received a request from the DEA in relation to Asian big cats, specifically: Species concerned; Name of establishment; Address of establishment; Date of establishment of the facility and last known date on which it was still in operation; Source of information about the existence of the facility. Their reply

was one of surprise, stating categorically that no request to the Limpopo province from the DEA had ever been received.

The 2015 TRAFFIC/Wildcru report, *Bones of Contention*, also raised serious concerns about the growing trade in tigers and their parts and products from South Africa, and that tiger bones from South Africa may be laundered as Lion bones using CITES Appendix II. Limitations in the South African legislation applying to endangered exotic animals have made it possible for an unregulated domestic trade in Tigers. The report also flagged the lack of transparency by the government and the industry on the matter.

In 2015, the *Bones of Contention* Report estimated that there were more than 280 tigers (mainly Bengal) in at least 44 facilities in South Africa. In January 2018 we conducted preliminary, and mainly Internet, research to try to identify 'facilities' that had tigers in South Africa. Our research showed that the industry has grown and there are now more facilities and more tigers. It also clearly showed that inbreeding in many of these facilities is rampant. We identified 56 'facilities' (this figure does not include individuals who keep tigers in urban suburbs)⁵⁵:

Free State – 15.

North-West – 14.

Limpopo – 10.

Gauteng – 8.

Eastern Cape – 5.

Western Cape – 2.

KwaZulu Natal – 1.

Our list of 'facilities' can be accessed from our [Website](#).

This list is by no means exhaustive, as the number of facilities/individuals and number and species of Asian big cats is not known, regulated or quantified in South Africa.

⁵⁵ Since the publication of our list we have identified an additional 3 tiger facilities in South Africa

“BONES FOR SALE, BONES FOR SALE”: SHOW US THE MONEY!

Mindmap

Please follow the link to our [Mindmap](#). It identifies the linkages between exporters and importers of ‘lion’ bones from 2014-2017.

The need for Forensic Investigations

South Africa’s so-called legal bone trade is far from transparent and virtually nothing about how the industry functions, the make-up of the industry, or the key actors involved has been placed in the public domain by the State or the industry. Of concern is that the key question of how local actors become linked into and integrated into the Asian side of the trade, and the foreign criminal networks and operations is undocumented. The South African environmental agencies appear to be issuing ‘lion’ bone permits willy-nilly without doing due diligence or proper appraisal and evaluation of the traders in South Africa - particularly in relation to who they are, how they become involved in the trade or how they became connected to the mainly illicit networks in Southeast Asia.

Through PAIA responses from the Gauteng province (GDARD), interviews and investigations, BAT and the EMS Foundation have been able to piece together some elements of the so-called legal trade, including the traders/agents involved (on both the supply and demand side), the supposed destinations, as well as a few of the big cat owners who sell the skeletons on to the traders/agents. However, when it comes to the details of the money flows and economics of the ‘lion’ bone trade on the South African side – after all, this is what is driving the trade – very little is known. Given the links of the big cat bone trade to illegal activities, criminal syndicates and tax evasion, it seems incredulous that a government department whose key mandate is conservation and biodiversity is given the exclusive responsibility on decisions on whether to trade or not and what to trade in, based solely on a highly contested and deeply-flawed and ideological interpretation of “sustainable use”. If the DEA’s policies fail to prevent corruption, criminality and suffering, then it follows that it should be held legally liable.

There are clear links of the big cat bone trade to trafficking (which goes hand-in-hand with tax evasion, corruption and money laundering) and that the bones for tigers

and other big cats hold the most value on the international black market. Yet, there is very little in-depth analysis of the money flows for this industry. Much more needs to be understood about: the actors involved and their credentials; the structures of the industry; and mechanisms and physical movement of money along the trade chain. It is also important to probe their financial networks, i.e. who may be bankrolling them or why and if they may be fronting for other entities. Who is providing the high-level planning, organization and financial resources along the transactional trade chain, including sourcing, purchasing, killing, processing, storing, packaging and shipping?

It is crucial to unpack how the South African traders come into contact with the traders in Southeast Asia, what networks they are linked into within South Africa and what relationships they have with the predator breeders and the [South African Predator Association](#). How do the South African exporters receive payments from the buyers in Lao PDR, Vietnam and Thailand? Can the South African government give the assurance that money laundering is not being facilitated and that the movement of significant illicit financial flow is not involved? How do the customers in Southeast Asia transfer funds to their South African suppliers? Can the South African government give the assurance that bones/skeletons that are exported to Lao PDR are not illegally exported to and traded in Vietnam? South Africa as a Party to CITES is obligated to take preventative action to stop these illegal activities. Moreover, South Africa has ratified the United Nations Convention Against Transnational Organized Crime (UNTOC) and the United Nations Convention Against Corruption (UNCAC).



Boskoppie Lion and Tiger Reserve.

Image: EMS Foundation (September 2017).

Access to, and analysis of, this information and transparency is crucial, not only in understanding the nature of the trade but in gaining insights into its links into illegal trafficking. The South African government urgently needs to open this murky industry (and its participants) to public scrutiny so that it can be fully and accurately interrogated and understood and the money trail thoroughly monitored. Particularly given that this is a highly lucrative trade and that our investigations of the destinations on the demand side bring into question the *bona fides* of the recipients as well as their possible links to illegal traffickers. What needs to be publicly investigated is how the South African traders (breeders/suppliers/etc., middlemen and exporters) make and receive payments, from and to whom, how much and where they have bank accounts. Their payments to the South African Revenue Services (SARS) also needs to be urgently examined and all their paperwork and invoices scrutinised to check whether they may be producing 'shadow' invoices for the purposes of non-disclosure to SARS. Indeed the entire industry needs to be investigate by the Auditor-General.

Not Adding Up: What the Bone Traders Declare

BAT and EMS have had access to documents that show what some of the bone traders supposedly charged for their 2017 shipments to Southeast Asia, i.e. transaction amounts as provided to South African authorities. The inconsistencies related to these amounts raise serious concerns. It should be noted that traders had to pay ZAR550 per

skeleton for DNA tests, which presumably was built into the charged amount. Examples include:

- ZAR615,039 for 26 skeletons (R23,655 per skeleton) to Lao PDR.
- USD86,000 for 40 full skeletons, i.e. with skulls etc. (USD2,150 – approximately ZAR26,000) per skeleton to Lao PDR.
- USD49,000 for 32 skeletons (USD2,150 each for 10 full skeletons, i.e. with skulls etc. and USD1,250 each for 22 skeletons) to Lao PDR.
- USD8,750 for 7 skeletons (USD1,250 per skeleton) to Lao PDR.
- ZAR34,600 for 5 skeletons (ZAR6,920 per skeleton) to Lao PDR.
- ZAR4,000 for 4 skeletons (ZAR1,000 per skeleton) to Lao PDR.
- ZAR31,000 for 31 skeletons (ZAR1,000 per skeleton) to Vietnam.
- ZAR29,000 for 29 skeletons (ZAR1,000 per skeleton) to Vietnam.
- ZAR29,600 for 37 skeletons (ZAR800 per skeleton) to Thailand.
- ZAR 27,000 for 54 skeletons (ZAR500 per skeleton) to Vietnam.
- ZAR28,500 for 57 full skeletons – 53 with skulls and 4 without (ZAR500 per skeleton) to Vietnam.
- ZAR11,000 for 22 full skeletons, i.e. with skulls etc. (ZAR500 per skeleton) to Vietnam.
- ZAR6,000 for 12 skeletons (ZAR500 per skeleton) to Thailand.
- ZAR2,000 for 4 skeletons (R500 per skeleton) to LAO PDR.

As stated in the TRAFFIC & WildCRU 2015 *Bones of Contention Report*, in 2013 local South African traders bought complete skeletons from the industry for a maximum of about ZAR20 000 and that prices escalated along the trade chain and were several times higher when the skeleton reached dealers in Southeast Asia.⁵⁶ While according to interviews conducted in 2017 with a number of South African professional trophy hunters the price at “the breeding farm gate” the price was ZAR30,000 to ZAR50,000 a skeleton, depending on the size and whether it had a skull, teeth and claws.⁵⁷ If, indeed, the current price “at the breeding farm gate” is between ZAR30,000 to ZAR50,000 then, since it is all about profit, it is also very plausible that illegally killing wild lions for the bone trade may be cheaper than sourcing bones from the captive-breeding industry.

⁵⁶ www.wildcru.org/wp-content/uploads/2015/07/Bones_of_contention.pdf.

⁵⁷ Interviews conducted by Mike Cadman, 2017.



Bones ready for export from South Africa to Southeast Asia.

Image: Vivienne Williams.

Williams *et al.* (2017) found that the bone traders buy skeletons from multiple sources in different provinces, consolidate the shipments, and then usually apply for CITES export permits from their home province. Our research shows that since the establishment of the quota this is not always the case. Of the twenty-seven CITES export permits issued in 2017, 13 were issued by Gauteng, eight by Free State, five by North West and the origin of one is unknown. Of the four traders who exported 'lion' bones in 2017, three are domiciled in Gauteng and one is in the Free State.

Taking the Gap: Exploiting the Severe Flaws in the Oversight Process

Weak Procedures

Information obtained from the DEA revealed the following procedures for 2017:

1. The DEA runs the quota and allocates it per application.
2. The provinces check/count the skeletons before permits are issued or before the skeletons/sets of bones are tagged.
3. The origin/source of the individual skeletons/bones or how and where the lion was killed is not recorded. This is a major shortcoming as there is therefore no way to check where the lions come from and where or how they were killed. This obviously also has major welfare implications.

4. Each tag is supposed to be individually numbered, e.g. 1/800 2017(one of 800) and so on, and this number must be listed on the CITES export permit Addendum.
5. Before the skeletons/sets of bones are packed a DNA sample is taken per set of bones (per skeleton) and sent to the National Zoological Gardens for testing. DNA tests would not be able to distinguish between wild or captive lions as it only identifies species.
6. The traders/exporters pay approximately R550 upfront per skeleton.
7. A huge flaw in the system is that the traders take the bones after the DNA sample and then pack them. This is where tiger bones could be swapped for lion bones and smuggled out of the country. The TRAFFIC/WILDCRU Joint Report, Bones of Contention also identified that there is a serious risk of tiger bone, teeth and claws from South Africa being laundered and exported as legal lion specimens using CITES export permits.⁵⁸
8. A random DNA sample *may* be taken at the airport, however if it does occur only one item per consignment would be tested. This is because DNA costs (at this stage of the process) are paid for by State and only a limited budget has been allocated for this purpose. (The LAB-IN-A-BOX portable DNA barcoding kit, which makes species identification possible for port officials within a few hours was only presented to South Africa on 20 November 2017.⁵⁹ The information we found is that these kits have not yet been rolled out in South Africa. Port officials would also need to be trained to use the kit.) As the majority of the skeletons left South Africa before the 20th November, DNA samples, if taken at ports of exit, would have had to be sent to a laboratory for testing and this would have taken days if not weeks, by which time the consignments would have already left the country.

⁵⁸ www.wildcru.org/wp-content/uploads/2015/07/Bones_of_contention.pdf.

⁵⁹ <https://www.sciencedaily.com/releases/2017/11/171120085428.htm>.



Photograph taken by Vivienne Williams.

What Moratorium?

It is important to note that CITES export permits were issued in 2017 before 19 June (when the quota was set) and at least 50 skeletons were exported before June as a result in 2017⁶⁰. This also means that they were not subjected to the above procedures, despite the fact that they were part of the 2017 quota and that the DEA had publicly stated it had placed a moratorium on the export of 'lion' bones until the quota had been set and even although in a press release dated 28 June 2017 announcing the quota the Minister stated that "This announcement is in line with the commitment made earlier this year by the Minister that no lion bones or other derivatives would be exported from South Africa from January 2017 until a quota has been set, and a determination made as to how the process will be managed." However, the DEA only sent an email dated 20 January 2017 instructing the Provinces to withdraw all permits dealing with lion bones until the quota has been established. As this email was retracted by the DEA in February 2017, South Africa did not comply with its commitment to CITES.

⁶⁰ According to information we have obtained using PAIA.

On the February 2nd 2017, 'lion' bone trader Andries Van Tonder legally disputed the CITES annotation (that an annual quota must be established before any bones can be exported and which came into effect on 2 January 2017). It was settled out of court as the DEA, in response, decided to retract its email to the Provinces on 20 January 2017 and validate the export permits. This situation arose because the Gauteng Department of Agriculture and Rural Development (GDARD) issued a number of permits to traders *after* the decision was taken at CITES COP17 on 2 October 2016, including two permits in October 2016 to Van Tonder to export 60 skeletons to Son Long Investments in Vietnam. GDARD continued to issue permits in November and December 2016 and January and February 2017. Shipments also went out of the country in January and February 2017.

Manus (Marthinus Philippus) Steyl also lodged an Application against the Free State Department of Economic Development, Tourism & Environmental Affairs (Case No.: 2841/17, Bloemfontein) on 23 June 2017. Steyl was seeking an order “compelling the Province to consider the applications submitted by the applicant for the exportation of any bones, bone pieces, bone products, claws, skeletons, skulls and teeth of Lions derived from captive breeding operations”. Steyl argued that the Province had not considered his applications for permits because of the decision at CITES COP17 in 2016 to set a quota. His Motion was that the Province can still consider the applications and allow Steyl to trade pending the finalization of the quota.⁶¹

QuotaShmota: Why Worry About Weights and Quantities?

The DEA set and allocated the 2017 quota at 800 lion skeletons. But our research, which also gave us access to the CITES export permits, damningly shows that the DEA, who were running the quota nationally, oversaw the issuing of CITES permits for 870 skeletons and signed-off on their export. The DEA cannot argue that all these permits may not have been used, as we have verified every one of them against actual exports. Moreover, some of the allocated numbers were issued/used twice.⁶²

As if all of this is not worrying enough, our investigations reveal that if one analyses the weights of the big cat skeletons that were exported in 2017, many more than 870 were actually exported. In fact, it could mean that at least twice or three times

⁶¹ <https://pmg.org.za/committee-meeting/25178/>.

⁶² For examples, allocated numbers: 494-497, 499, 501-508, 510, 519, 520.

as many lion skeletons were exported than what was declared and it could also mean that tiger bones could have been included in the consignment.

There are mounting concerns that the legal sale of lion bones is masking an illegal trade. In addition, given that the captive breeding of tiger and ligers in South Africa is unregulated and growing, and that provincial conservation authorities are aware that the demand to “euthanize” tigers is dramatically increasing⁶³, the probability is high that bones from CITES Appendix I tigers, and/or ligers, bred in captivity in South Africa are being laundered as lion bones using CITES Appendix II permits. This can be achieved by fraudulently falsifying the quantities of skeletons declared on CITES export permits. Researchers Williams, Loveridge, Newton and Macdonald developed a method for the authorities to detect “mis-declarations” in the lion bone trade by using “the average mass of a lion skeleton to corroborate the numbers of skeletons declared on CITES permits, relative to the weight of the consolidated consignments stated on the air waybills”.⁶⁴ Their peer-reviewed 2015 research article, *‘Skullduggery’: Lions Align and Their Mandibles Rock!*, demonstrates that the average weight of a lion skeleton with a skull is nine kilograms (but can vary between six and thirteen) and that skeletons without skulls weigh between six to nine kilograms.

Given that the mean average of a full lion skeleton is 9 kilograms, our examination of a sample of 10 skeleton consignments exported in 2017 alarmingly indicates that the individual skeletons actually exported on average weighed between 11 and 30 kilograms (and before being put into cartons for shipment). Moreover, in one instance, the veterinary certificates (which have the weights as provided by the processing taxidermist) indicated that the total weight for 71 skeletons was 1,580 kilograms – an amount equal to at least double the quantity of skeletons declared.⁶⁵ This implies that the industry is trying to conceal an illegal trade in tigers, ligers and lions and that some of the traders are deliberately under-declaring the quantities/number/species of skeletons they are commercially exporting by fraudulently falsifying documentation (possibly with the help of corrupt officials) to

⁶³ Werner Boing, pers. comm. 11/03/2015, quoted in Vivienne L. Williams, Andrew J. Loveridge, David J. Newton, David W. Macdonald ‘Skullduggery’: Lions Align and Their Mandibles Rock! PLoS ONE 10(11): e0135144, p.7, November 2015.

⁶⁴ Vivienne L. Williams, Andrew J. Loveridge, David J. Newton, David W. Macdonald ‘Skullduggery’: Lions Align and Their Mandibles Rock! PLoS ONE 10(11): e0135144, November 2015.

⁶⁵ It is not known if they had already been packed in cartons when weighed.

increase their profits. It also means that the real extent and nature of this controversial, sordid and yet inexplicably legal, trade is not known.

Of grave concern is that these consignments were all stamped and approved by the DEA at the airport and attached to the CITES export permit. It is also alarming that this has not been picked up by any of the CITES authorities along the trade chain and as a result could point to corruption. Examples of some of these illegally exported bone consignments are:

- An average weight per skeleton of 20.5 kilograms (62.75% which they declared had no skulls). This is more than double the average weight of a lion skeleton with a skull and could mean that at least twice or three times as many lion skeletons were exported than what was declared and it could also mean that tiger bones could also have been included in the consignment.
- An average weight per skeleton of 18.7 kilograms (50% which they declared had no skulls). This is double the average weight of a full lion skeleton and could mean that at least twice as many lion skeletons were exported than what was declared and it could also mean that tiger and/or liger bones could have been included in the consignment.
- An average weight per skeleton of 18.3 kilograms (full skeletons). This is double the average weight of a full lion skeleton and could mean that at least twice as many lion skeletons were exported than what was declared and it could also mean that tiger and/or liger bones could also have been included in the consignment.
- An average weight per skeleton of 17.6 kilograms (50% which they declared had no skulls). This is almost double the average weight of a full lion skeleton and could mean that at least twice as many lion skeletons were exported than what was declared and it could also mean that tiger and/or liger bones could also have been included in the consignment.

In 2017, an illegal wildlife trader in Vietnam claimed that lion bone from Africa sent to Vietnam cost him USD880 per kilogram (approx. ZAR10,500).⁶⁶ If indeed this is an accurate indication, then killing lions and captive tigers and ligers for their bones is not

⁶⁶ Grinding Rhino Operation Red Cloud, Elephant Action League Investigative Report, July 2017, p.69.
<https://elephantleague.org/wp-content/uploads/2017/07/Grinding-Rhino-July2017-Elephant-Action-League.pdf>

only a dangerously lucrative endeavour but one which may serve to motivate the various actors involved to illegally fabricate the quantities (and species) of skeletons declared on CITES export permits.

Of major concern is information that has recently been brought to light by the EIA, *CITES AC30 AGENDA ITEM 25: Supplementary Information on Lion Trade, July 2018*, which shows that in China lion bone is now being sold at about three times the price of wild tiger bone. According to the EIA, rather than “serving as a ‘cheaper more readily available substitute’ to tiger in consumer markets, lion trade is exacerbating demand for tiger and other big cat products...publicly available court records from China indicate that lion parts are not traded as a cheaper substitute to tiger, and instead are sold to consumers as tiger. We are very concerned that trade in lion is exacerbating the perceived availability and acceptability of tiger products and is stimulating further demand. In eight of a total 23 seizures of lion parts in China collated by EIA..., court records specifically indicate that the item in question was being sold as tiger, and thus was not serving as a substitute product. We therefore support the alternative interpretation that lion parts are serving to augment demand for tiger. Court records also reveal that per kilogram prices for lion bone in China one step in the trade chain away from the final consumer are 2-3 times higher than those for wild-sourced tiger bone.”

EIA also revealed that the scale of illegal lion trade in China is much larger than reported and that China is a key destination country for trafficked lion parts. “EIA has collated information on seizures of lion parts and products in China from open source media, including news reports and publicly available court records” and the totals are significantly higher than those presented by CITES for the upcoming CITES Animal Committee meeting (AC30, July 2018).

Apart from the trader networks, other actors in the trade chain include airlines and shipping agents. Our investigations reveal that the airline that transported all the ‘lion’ bones to Southeast Asia in 2017 was Singapore Airlines. The shipping agents were Airline Express/U-Bag and Air Menzies.

It is also clear from permit information that South Africa's policies are allowing and condoning the domestic trade in lion bone.⁶⁷

THE PREDATORY ELITE: WHO'S WHO IN THE BODY PARTS TRADE ZOO

Only a small group of people benefit from the industry. Indeed, in 2017 there were **four traders** from South Africa (Sandra Linde Taksidermie, Stephanus Jacobus Alberts, Herman De Jager, and Gavin Oberholzer) exporting 'lion' bone to **five importers** via CITES permits. Three are domiciled in the Gauteng and one in the Free State. In terms of 2017 declared quantity, Vietnam was the largest importer (Thanh Manh Hung Company and Vinh-Phu Joint Stock Company), followed by Lao PDR (Ainthaphone Trading/Vannaseng Trading and Somok Phaimany) and Thailand (Natakorn Yuennan).

It is unclear why the DEA would choose to support the business interests of a small group of people driven by the desire to make profit from the body parts of lions and other big cats at the expense of ethical conservation practice. If South Africa is to be regarded as a responsible and ethical custodian of wild animals, and a country that cares about wild animals in other African countries and across the globe, urgent action needs to be taken to curtail the captive breeding of lions and other big cats and the sale of their bones and skeletons.

The DEA has consistently denied the EMS Foundation access to information on the actors in the captive breeding industry, the bone traders/exporters and the actual destination addresses, i.e., the information on the CITES export permits. Without this information it is almost impossible to effectively analyse and understand the 'lion' bone industry. Fortunately for BAT and the EMS Foundation, different agencies within the State's Environment cluster interpret South Africa's access to information legislation differently, and it was a game-changer when the Gauteng Province gave us access to their permits. This information plus additional data made available to us, information in

⁶⁷ Permit no. 000059 (GDARD) issued on 31/05/2017 to Mr Nkuna in Mpumalanga for buying and transport of lion bones from bone-trader S. J. Alberts.

the public domain and our own investigations meant we could try to piece together information on the Traders and Destinations.

In response to Parliamentary Questions (1734 and 1343) from the Democratic Alliance in April and June 2011 requesting the names of the exporters and end recipients on export consignments to Lao PDR in 2009 and 2010, the Minister of Water and Environmental Affairs provided the following information:

South African Traders:

- Mr S. H. Rothman.⁶⁸
- Mr J. P. Wapenaar / Mr S H Rothman.⁶⁹
- Hatari Taxidermy.
- Mr G. J. van Zyl (c/o Hatari Taxidermy).
- Mr T. Cloete.
- Sandra Linde Taxidermy.⁷⁰
- Mr M. P. Steyl (c/o C Williamson Savuti Taxidermy).
- Mr J. J. van der Westhuizen (Letsatsi la Africa).

Importers:

- S. Durosagham.
- Sipharpra Duarseram.
- Vixay Keosovang.
- Jacek Raczka.
- Bounpasong Paphatsalang.

This information has been published on the internet by the DEA.⁷¹ It also linked the following 'lion' bone industry members *directly* to Vixay Keosavang⁷²:

- Sandra Linde Taxidermy.
- Sebastian Rothmann.
- Manus (Marthinus Philippus) Steyl.
- J. J. (Kobus) Van Der Westhuizen.

⁶⁸ Note: spelling is actually Rothmann.

⁶⁹ *Ibid.*

⁷⁰ Registered as *Sandra Linde Taksidermie*.

⁷¹ https://www.environment.gov.za/sites/default/files/parliamentary_updates/question1734.pdf.

⁷² Most of them remain in the live lion and lion body part business.

However, the Minister did not include reference to transactions that took place in October 2010 between Xaysavang Trading Export-Import, 174 Ban Anousonxay, Paksan District, Bolikhamxay, Lao PDR and several South African traders. This information (including copies of invoices and permits) was placed in the public domain by forensic investigator Paul O' Sullivan⁷³ and exposed some of the following:

- Juan Pace (Shangwari Safaris) for 17 lion carcasses.
- Steyl Game (Marnus Steyl) for 13 skeletons.
- Leeuwbosch Game Farm (Dr Deon Engelbrecht) for 45 lion carcasses.
- Letters from Steyl Game and Leeuwbosch Game Lodge "To Whom it May Concern", stating that they are registered companies that also "act as game brokers within the local wild animal trade in South Africa", that they "do trading with Xaysavang Trading in Laos regarding legal hunting and game broking in South Africa and assist with the exports of predators, wild game, antelope and exotic species (rhino, sable and roan antelope)" and "help to organize and conduct hunting for clients of Xaysavang Trading Export Import co ltd of Laos." Further they "assist the above mentioned company in the buying of wild animals and obtaining the necessary permits required for exporting to Laos."

According to investigative journalist Julian Rademeyer, "Xaysavang first came to the attention of South African authorities in September 2008, when Chunchom and four other suspects were arrested in Middelburg in Mpumalanga after they allegedly offered an undercover policeman \$60 000 for three rhino horns. The case against Chunchom and two other suspects was later withdrawn. In July 2009 the Kenya Wild Animals Service (KWS) and customs officers seized 260kg of elephant ivory and 18kg of rhino horn at Jomo Kenyatta International Airport. The shipment was registered to Xaysavang and was destined for Laos. Officials suspected the shipment originated in South Africa."⁷⁴ In addition, Keosavang's role in widespread illegal wild animal trade had been noted by various law enforcement agencies in Asia from as early as 2003.⁷⁵ The fact that South Africa was issuing CITES export permits to criminal syndicates and questionable

⁷³ Copies of all the original documents can be found on Forensic Investigator Paul O' Sullivan's website: <https://www.forensicsforjustice.org/portfolio-posts/rhino-poaching/> Annex. G.

⁷⁴ <https://www.news24.com/SouthAfrica/News/Bloody-rhino-poaching-trail-leads-to-SA-safari-operator-20110721>.

⁷⁵ See: <https://www.theguardian.com/environment/2016/sep/27/revealed-how-senior-laos-officials-cut-deals-with-animal-traffickers>.

destinations *after* they had knowledge of the *Xasavang Network* speaks to the gapping loopholes in CITES permitting mechanisms.

In answer to a Parliamentary Question (NW2564, September 2017) the Minister of Environmental Affairs said that the reasons for setting the lion skeleton quota was to “avoid the creation of a monopoly in the supply of lion bones to Asia... [and to] avoid stimulating illegal trade.”⁷⁶ Yet, all the available evidence shows that it is reinforcing the existing monopoly of bone-traders in South Africa and stimulating the illegal trade in Southeast Asia.

According to Williams *et al.*, in March 2017 there were six exporters, “five from Gauteng... and...one of whom was listed in the 2011 DEA document.”⁷⁷ From our own investigations it is likely to be Sandra Linde Taksidermie, meaning that Johann Linde and his mother, Sandra have been exporting the bones of big cats to Southeast Asia since at least 2009. Our research shows that they continue to do so.

Our investigations, as well as information gathered from PAIA responses, clearly show that officially only a small number of people legally export ‘lion’ skeletons and bones; that these exporters know each other; and that at times they deal with the same importing entities. From 2015±2017 there has been an exclusive monopoly on this trade, because there appear to be only 5 key exporters, with a sixth being a smaller player.⁷⁸ All of them reside in Gauteng province except for Johann and Sandra Linde who are in the Free State province.

The South African bone exporters have other business interests as well. In one case two exporters use addresses that do not correspond with businesses operating at those premises. He also owns, or owned a company, called Spikes Computers which is listed as being located at Voortrekker Road, Krugersdorp. This is the same address this is sometimes listed for Amabula Thatching which is owned by another predator bone trader, Herman de Jager. A visit to Voortrekker Road shows that four companies occupy this address - Smoke Braai Supplies; Cupcake Connexion; Bidvest Car Rental and Philkul’s Thai Massage.

⁷⁶ Question [NW2564](#) to the Minister of Environmental Affairs, 19 September 2017.

⁷⁷Vivienne L. Williams, Andrew J. Loveridge, David J. Newton, David W. Macdonald. A roaring trade? The legal trade in *Panthera leo* bones from Africa to East-Southeast Asia. PLOS ONE, p.12, 24 October 2017. <https://doi.org/10.1371/journal.pone.0185996>.

⁷⁸ JDT Exports/Johan Du Toit, Farm 154, Hartebeesfontein, Hekpoort, Gauteng (74 skeletons exported 2015± 2016).

Our research shows that these traders export exclusively to Lao PDR, Vietnam and Thailand. As they often send skeletons/bones to the same importing addresses, it means they are part of a shared network, and in some instances linked to illegal networks.

The key questions that need answers are:

- What mechanisms and linkages do the South African bone traders and exporters use to get in touch with the bone importers in Lao PDR, Vietnam and Thailand?
- What local networks (supply and financial) are the South African exporters part of?
- Do the South African bone exporters operate or front on behalf of other entities?

Information obtained through PAIA, public social networks and additional research disclose the following about the South African exporters:

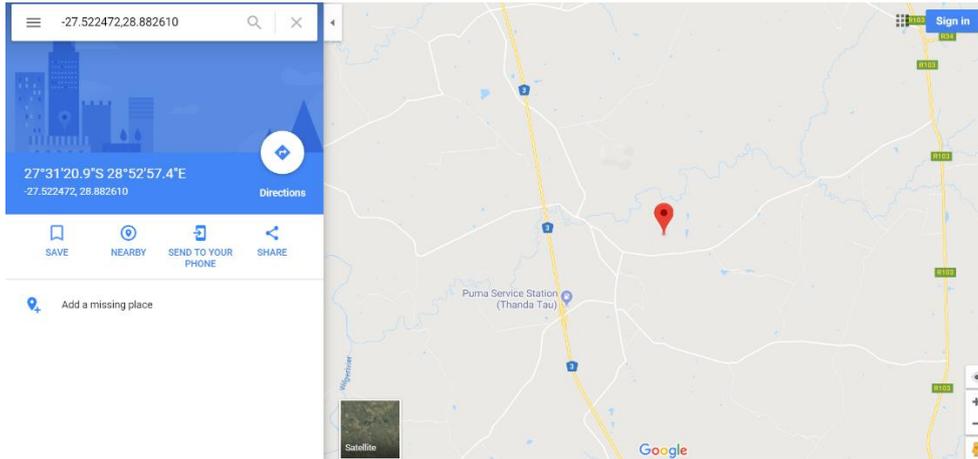
- *Hermanus Frederick De Jager*. Tarlton or Voortrekker Road, Krugersdorp, Gauteng. The address in Voortrekker Rd in Krugersdorp is also the supposed address of a company called Spikes Computers run by another big cat skeleton/bone trader: Andries VAN TONDER. However, Amabula Thatchers is not located at this address, instead Philkul's Thai Massage is.



Herman De Jager

- *Stephanus Johannes Alberts*. Doornpoort, Pretoria, Gauteng.
- *Sandra Linde Taksidermie*. In 2017, Johann Linde was by far the largest exporters of big cat bones from South Africa to Southeast Asia (specifically Vietnam) and is one of the first entities on record to legally export lion bones.

Address: Eensgevonden Farm, Free State. Tel: 058 913 2918. Company registration number: 2008-074810-23cc. Although the business is called Sandra Linde Taksidermie, in fact it is only registered in Johann Linde's name.



Pinned Location: Sandra Linde Taksidermie.



Johann Linde

- *Gavin Clifton Oberholzer (Clifton Trading)*. Bredell, Kempton Park, Gauteng. Some of the skeletons exported by Oberholzer are processed at Burns Taxidermy (Gerhard Riekert - see no.7. below).
- *Andries Van Tonder*. Krugersdorp, Gauteng. GDARD issued Van Tonder a Standing Permit (no. 20586) on 10 October 2017 (valid for three years) to possess, keep, convey, sell, buy, donate, access, transport and process lion bones/entire carcasses (with or without skulls).



Andries Van Tonder and his wife Narachon Damrongkul

According to Van Tonder's Facebook page, he is the owner of Spikes Computers. The address of Spikes Computers is 278 Voortrekker Road, Krugersdorp, which is the same address that bone trader, Herman De Jager, gives as his business address. Our on-site investigations show that neither of these businesses is located at the addresses provided on the CITES permits.

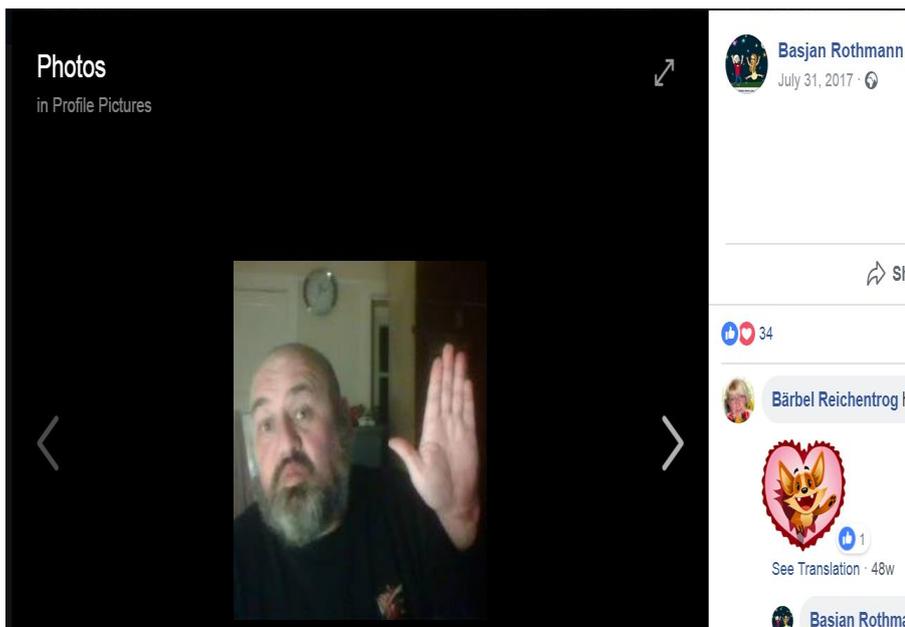
What is at 278 Voortrekker Street is Philkul's Thai Massage. Andries van Tonder's Thai wife, Narachon Damrongkul is a Facebook friend of Phikul Khejornsit Kemp the owner of Philkul's Thai Massage. Narachon is also listed as one of the recipients of lion bones from Andries Van Tonder (her husband) in 2014 in LAO PDR, namely, Development Agriculture and Industry, Paksane District, Bolikhamxay, Lao PDR. This address is also in the same District linked to named wild animals traffickers Xasavang Trading and Vannaseng Trading Company. This same address was also used by other 'lion' bone traders, namely Rothmann, Riekert and De Jager (with different "front" recipients, namely, Jirapon Donyota and Seree Kongsaree.



- Gerhard Riekert, owner of Burns Taxidermy. Exported 3 skeletons in 2014. Derdepoort, Pretoria, Gauteng. The same address on the CITES export permits was used as the address for Sebastian Rothmann.



- Sebastian Rothmann – also known as Basjan Rothmann (Exported 20 skeletons in 2014).



Source.

- *Images Of Africa Taxidermists (Kevin Cooper)*
Protea Ridge, Krugersdorp. Exported 2 skeletons in 2014.

According to the Minister of Water and Environmental Affairs in 2011, Rothmann was trading in 'lion' skeletons/bones since at least 2009.⁷⁹ In 2009, Rothmann (Address given as 17 Howitzer Laan, Ifafi, Hartebeespoort) paid ZAR50 to get a permit to buy 53 lion carcasses from the following places: B. B. Joubert Uitspan Leeus Mareetsane, North West (5); A. K. Reinaiker, Broekskuurfarm, Tosca North West (19); J. J. Taljaard, Madiakgama Farm, Tlakgameng North West (11); Dr Deon Engelbrecht, Leeuwbosch Game Lodge, 52 Stella Street, Stella, Olifantshoek North West (18).⁸⁰

- JDT EXPORTS/Johan Du Toit, Hartebeesfontein, Hekpoort, Gauteng. Exported 74 skeletons in 2015±2016.



Karin Du Toit

Profile pictures · 26 September 2017 · Facebook for

⁷⁹ Question no. 1734 internal question paper no. 18 nw1959e, 24 June 2011: with reference to her replies to question 1134 on 11 April 2011 and 1343 on 10 June 2011, for each export consignment to Lao People's Democratic Republic in 2009 and 2010, what is the name of the (a) exporter and (b) end recipient receiving the goods?

⁸⁰ Copies of all the original documents can be found on Forensic Investigator Paul O' Sullivan's website: <https://www.forensicsforjustice.org/portfolio-posts/rhino-poaching/> Annex. A.

Basjan Rothmann
+ 27 83 761 9602

Johan du Toit
+27 79 255 8691
+27 83 982 7729



Posbus 16
Hekpoort
1790

johandutoit@live.co.za

Source: Annex F: <https://www.forensicsforjustice.org/portfolio-posts/rhino-poaching/>

The business card above shows that JDT Exports/Johan Du Toit and Sebastian Rothmann were linked. Moreover Du Toit's wife Karin's previous surname was Rothmann. The 2010 Forensics for Justice/Paul O' Sullivan documents link Rothmann (and Engelbrecht) to Xasavang.⁸¹ Moreover, according to *Guardian* investigative journalist Nick Davies, Sebastian Rothmann and Johannes Du Toit frequently visited the offices of Boonchai Bach and his brother in Nakhon Phanom, northeast Thailand in 2016.⁸² Du Toit's Facebook page shows that he was also in Nakhon Phanom in 2014 and that he spends months at a time in Thailand and Laos. He was in Vientiane on 1 September 2017 and Paksan in October 2017 as well as 19 October 2014. Paksan is where a number of the 'lion' bones are exported to.

Du Toit's Facebook page provides evidence that he is linked to Vixay Keosavang in some way. His Facebook friends include: Randy Westraadt, Khaek Soumeexay. Soumeexay is also Facebook friends with wildlife trafficker boss Vixay Keosavang, Keosavang's wife Nong Paphutsalang, Johan Du Toit and Andries Van Tonder (South African bone dealer) and Narachon Damrongkul (the wife of Andre Van Tonder). Vixay Keosavang, Johan Du Toit and Du Toit's wife Karin are Facebook friends with Somok Phaimany (Den), a big cat bone importer. Du Toit and Keosavang are also both Facebook friends with Sutthichia Jangjumrus. Jangjumrus is also Facebook friends with Du Toit's wife Karin, Khaek Sounixay, Den Phaimany and Seree Kongsaree (see Development Agriculture Industry).

⁸¹ <https://www.forensicsforjustice.org/portfolio-posts/rhino-poaching/> Annex-C and Annex-F.

⁸² Email correspondence with Nick Davies, 05 June 2018.

Du Toit now lives in Mkuze in the KwaZulu-Natal province. We have written confirmation from the Ezemvelo KZN Wildlife that they “have no registered predator bone traders” in the KZN province.⁸³ Could Du Toit be a bone broker (a middleman) for the South African dealers? The link between Laotian ‘lion’ bone importer Somok Phaimany and John Du Toit also links him to Keosavang. It also links South African ‘lion’ bone trader S. J. (Stefan) Alberts to Du Toit. Du Toit and Rothmann’s connection to the infamous traffickers the Bach Brothers, including visits to their offices in Thailand in 2016, also links South African ‘lion’ bone trader S. J. (Stefan) Alberts to the Bach brothers (see shipment by Alberts to Limited Partnership Boonchai.

Somok Phaimany (@den_cfc)
Instagram videos & photos •
Imgtaram
imgtaram.com > den_cfc

... Keosavang (@vixaykeosavang) · Tar Osm (@tar_osm) · ຄານ ທຸມພະອິນ (@thumphain) ... Tia Xayalinhong (@tiaxayalinhong) · Johan Du Toit (@johan.lionsdutoit) ...

... (@keoviseth4477) · Touktik Keoviseth (@touktikkeoviseth) · Tia Xayalinhong (@tiaxayalinhong) · Johan Du Toit (@johan.lionsdutoit) ...

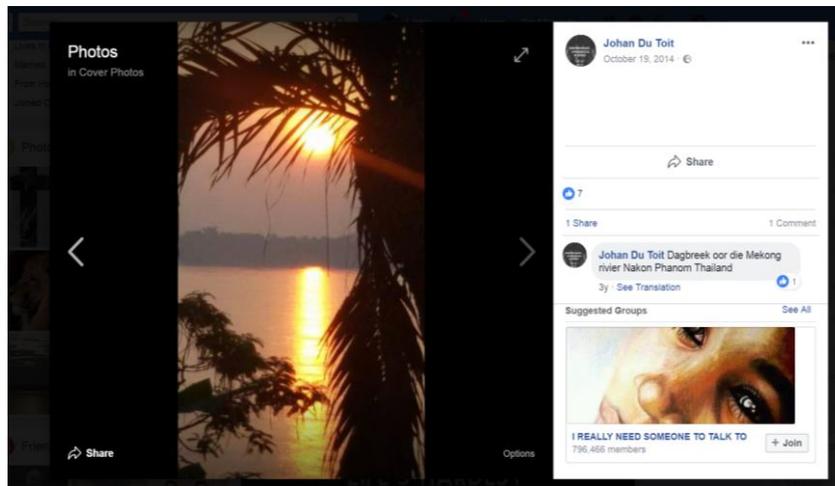
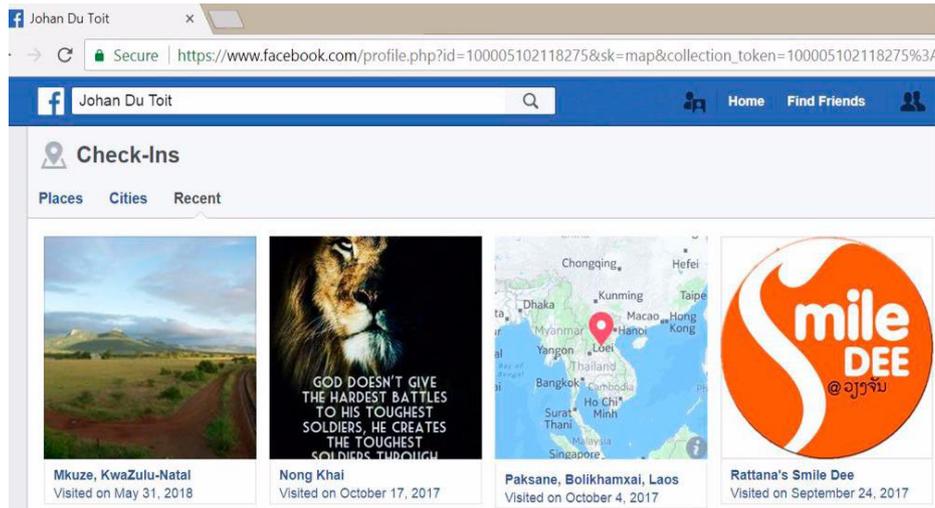


IMAGES VIEW ALL





⁸³ Email received from EKZN Wildlife Andrew Muir, Senior Legal Advisor dated 13 March 2018.



- In 2014 three skeletons with skulls were exported to the USA as hunting trophies. The importer was Siu-Ming HONG, Midlothian Virginia.

The details of the Gauteng 'lion' bone traders/exporters was confirmed in a written response from GDARD in May 2018, see below. It includes Casper Jan Hendrik Van Wyk who, according to GDARD, although registered in 2016, has not as yet exported.

Number	Name of lion bone traders	Province
1.	Gavin Clifton Oberholzer	Gauteng
2.	Hermanus Frederick de Jager	Gauteng
3.	Andries van Tonder	Gauteng
4.	Casper Jan Hendrik van Wyk	Gauteng
5.	S.J. Alberts	Gauteng
6.	J.H. du Toit	Gauteng

Part One South African **big cat skeleton** traders 2014 - 2017

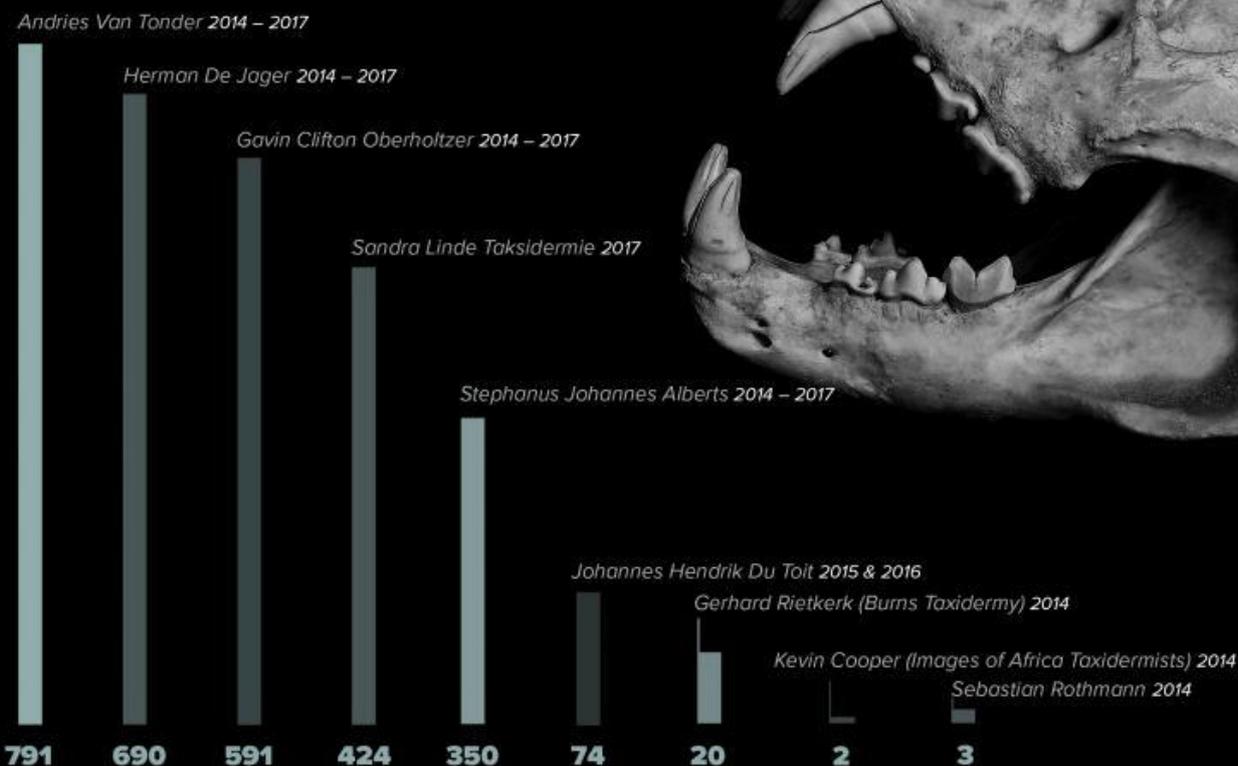
Not Just a by-product of the **trophy hunting** industry

91 % of the skeletons exported in 2017 had skulls present.
In South Africa **Big Cats** are being killed specifically for their bones.

Total number of **skeletons** exported 2014 - 2017

2,945¹

Traders and Number of Skeletons



BAN
ANIMAL TRADING
Compassion in Action

EMS
FOUNDATION
compassion - energy - solidarity

¹ Based on research and PAIA information gathered on CITES export permits issued in 2017

The confirmed declared 2945⁸⁴ skeletons exported from 2014 to 2017⁸⁵ (which BAT and the EMS Foundation are aware of and can account for) were exported as follows:

TRADER	NUMBER OF SKELTONS
Andries VAN TONDER	791 (2015 – 2016)
Herman DE JAGER	690 (2014 – 2017)
Gavin Clifton OBERHOLTZER (Clifton Trading)	591 (2014 – 2017)
Sandra LINDE Taksidermie	424 (2017)
Stephanus Johannes ALBERTS	350 (2014 – 2017)
Johannes Hendrik DU TOIT	74 (2015 and 2016)
Gerhard RIEKERT (Burns Taxidermy)	20 (2014)
Sebastian ROTHMANN	3 (2014)
Kevin COOPER (Images of Africa Taxidermists)	2 (2014)

A breakdown of where each trader sent the skeletons and the quantities declared is as follows:

TRADER	COUNTRY	IMPORTER AS PER CITES PERMIT	SKELETONS	YEARS
<i>VAN TONDER, Andries</i>	Vietnam	Son Long Investments	484	2015-2017
	Lao PDR	Vinasakhone	128	2016
	Vietnam	Bao Huy Import- Export Trading	101	2015
	Lao PDR	Empt-Import - Export Lao LTD	48	2015
	Lao PDR	Development Agriculture & Industry	25	2014
	Thailand	Lisa Lion Import Export	5	2015
<i>DE JAGER, Hermanus F</i>	Lao PDR	Ainthaphone Trading	408	2016, 2017
	Lao PDR	SVT Trading	112	2015, 2016
	Vietnam	Son Long Investments	49	2016

⁸⁴ It is likely that this number is considerably higher given the evidence of illegally falsified “misdeclarations” of skeleton quantities.

⁸⁵ Based on information gathered by BAT and the EMS Foundation. Note that totals per year are based on the exports of permits issued in that year.

	Vietnam	Bao Huy Imp -Exp	39	2015
	Vietnam	Trans Giang	39	2015
	Lao PDR	Phonsavanh Trading	32	2015
	Lao PDR	Development Agriculture & Industry	10	2014
	Thailand	International Logistics	1	2015
OBERHOLZER, Gavin Clifton (Clifton Trading)	Thailand	Natakorn Yuennan	383	2015,2016 - 2017
	Lao PDR	Vannaseng Trading	112	2014
	Lao PDR	Wattanasook Trading	67	2014
	Lao PDR	Johnny Pakxam	29	2014
SANDRA LINDE TAKSIDERMIE	Vietnam	Thanh Manh Hung Co.	251	2017
	Vietnam	Vinh Phu – CMT Joint Stock Company	173	2017
ALBERTS, Stephanus Johannes	Lao PDR	Somok Phaimany	110	2017
	Lao PDR	Sinthavy Import- Export Co	75	2016
	Lao PDR	Lilavady (correct sp. Lilavadi)	53	2016,2017
	Lao PDR	KNT Trading LTD	46	2015,2016
	Thailand	Lisa Lion Import Export	21	2015
	Thailand	Limited Partnership Boonchai	20	2016
	Lao PDR	CNP Import- Export LTD	16	2015
	Lao PDR	Vinasakhone	9	2016
DU TOIT, Johannes Hendrik (JDT Exports)	Lao PDR	Jikplecheep (or Jitplecheep) Ning	50	2015
	Lao PDR	JDT Imports	12	2016
	Thailand	Lisa Lion Import Export	12	2015
RIEKERT, Gerhard (Burns Taxidermy)	Lao PDR	Development Agriculture and Industry	20	2014

ROTHMAN(N), Sebastian	Lao PDR	Development Agriculture and Industry	3	2014
COOPER, Kevin (Images of Africa Taxidermists)	Vietnam	Hoan Van Dien	2	2014

UNLEASHING HELL: THE RISE OF LION BONE SLAUGHTERHOUSES, FACTORY FARMING AND THE MASS KILLING OF LIONS

On the April 25th 2018, a whistleblower, Armand Gerber, a manager at *Predator's Pride* (a captive predator business located in Hartbeespoort in the North West province), told members of the animal protection community and the media about the existence of a lion slaughterhouse in the Free State province established for the sole purpose of killing lions for their skeletons to sell into the tiger/lion bone trade in Southeast Asia.



Elite Trofee & Aanteel WILDVEILING

VERWELKOM U BY DIE WILDVEILING

Baie welkom by Choice Wildlife Group se veiling in Boshof – ons vertrou dat jy die dag saam met ons sal geniet.

Die Vrystaat is die ideale habitat vir gesonde wildteling. Wildboere het gevind dat die wild vanuit die Vrystaat besonder sterk en maklik aanpasbaar is.

Choice Wildlife Group is in 2013 deur Randy Westraadt en André Steyn gestig nadat hulle besef het van Suid-Afrika se voorste wildboere trap hul drumpel deur om by hulle wild te koop. Hulle wild is baie gesog vanweë die gehalte van die wild asook die diversiteit van die spesies en hul gene.

André en Randy boer reeds vir meer as tien jaar met wild op hul onderskeie plase in die Vrystaat. André het meer gefokus op wildteling op die Wag-'n-Bietjie Privaat Natuurreservaat en Randy het op die jagmark gefokus. Randy is aan die stuur van die suksesvolle Choice Africa Safaris op die Choice Ranches.

Hulle boer gesamentlik op ongeveer 7 300 ha wildgrond. Sowaar 3 600 ha is tussen Brandfort en Bloemfontein geleë en die meeste van die wildteling vind hier plaas. Die ander 3 700 ha is tussen Boshof en Kimberley aan die Vrystaat-kant geleë en hier word op jag gefokus. Randy en André glo albei dat daar in die totale wildbedryf baie moet word en daarom speel die jagaspek ook 'n baie groot rol in die groep se bestuursplan.

Hulle pas top-gehalte genetica in teeldiere toe om sodoende oor die langtermyn goeie tropgesondheid te bereik. Hoewel gemiddelde horinglengtes van die diere belangrik is, stel die groep meer belang om die speenpersentasie en liggaamsbou van die troppe te verhoog.

Choice Wildlife Group beskou hulself as 'n alles-in-een-besigheid. Hier bedien hulle die beginner en ervare wildboer met gehalteeiere en advies. Die biltongjagter en beroepsjagter word ewe belangrik geag en hulle glo dat eerlikheid, integriteit en gehalte die belangrikste is. Verskeie van hul wild word op veilinge en privaat bemark en meer as 100 jagters besoek jaarliks die plase. Hier sal kopers die SUPERIOR DIVERSITY eerstehands sien en ervaar.

Randy is genomineer as een van die finaliste vir die WRSA Wildsboer van die jaar 2017.

WELCOMES YOU TO THE GAME AUCTION

Welcome to Choice Wildlife Group's auction in Boshoff - we trust that you will be enjoying our day.

The Free State is the ideal habitat for healthy wildlife production. Game ranchers have found that game from the Free State is very strong and easily adaptable.

Choice Wildlife Group was founded by Randy Westraadt and Andre Steyn in 2013 after they realized leading ranchers from South Africa's are all the time on their threshold to shop for game. They game is very popular because of the quality of the game, the diversity of species and their genes.

André and Randy has been farming for more than ten years with wildlife on their respective farms in the Free State. André focused more on wild breeding on Wag-'n-Bietjie Nature Reserve and Randy focused on the hunting market. Randy is looks after the successful Choice Africa Safaris on the Choice Ranches.

They farm together about 7 300 ha wildlife land of which 3,600 hectares located between Brandfort and Bloemfontein where you find most of the game breeding farm. The other 3,700 hectares located between Boshoff and Kimberley on the Free State side and here the focus is on hunting. Randy and André both believe that you need to invest in the entire game industry and therefore the hunting side also play a major role in the group's management plan.

They use top quality genetics in breeding animals to achieve the long-term good herd health. Although average horn lengths of the animals is important, the group focus more on increasing weaning percentages and physique of the herds.

Choice Wildlife Group sees itself as an all-in-one business. Here they serve the novice and experienced game farmer with quality animals and advice. The biltong hunter and professional hunter are considered equally important, and they believe that honesty, integrity and quality are the most important values. They sell the game at game auctions and to the private market. Annually more than 100 hunters visit the farms. Here buyers will experience SUPERIOR DIVERSITY first-hand.

Randy is nominated as a finalist for the WRSA Game farmer of the year 2017.





Randy Westraadt
Randy Westraadt is genomineer as een van WRSA se finalis wildboer van die Jaar 2017.



André Steyn





The slaughterhouse is located on the farm *Wag 'n Bietjie* in the Glen district outside of Bloemfontein and owned by Andre (Andreas Jacobus) Steyn (47).⁸⁶ Steyn a former *SA Predator Association* council member⁸⁷ is also a co-owner of the Choice Wildlife Group, along with Randy (RC) Westraadt (owner-manager of Choice Africa Safaris, which owns Montague Private Nature Reserve). In 2017, Steyn was issued with a CITES permit to export eight live lions to Bangladesh. This illustrates an association between the live animal traders and the big cat bone traders. Westraadt was also one of the professional hunters involved in the rhino horn trafficking enterprise where CITES trophy hunting permit loopholes were used to export rhino horn for trade by Vietnamese criminal syndicates linked to Chu Dang Khoa.

Predator's Pride, which is jointly owned by J. J. (Kobus) Van Der Westhuizen, (also the owner of *Letsatsi la Africa*), and Johan Willem Pio (the previous owner of Otavi Lion Park – now called Kimba Game Lodge) sell their lions to the *Wag 'n Bietjie* slaughterhouse. Gerber went public because he had formed an attachment with two of the lions – *Jabula* and *Star*, both of whom – along with twenty others - were sold by Predator's Pride into the bone trade on the 22nd April, held in small transport cages for three days and then killed. According to Reinet Meyer from the Bloemfontein SPCA, she was at *Wag 'n Bietjie* on April 24th when these two lions - and a number of others - were

⁸⁶ Steyn is also a director of Blockpave.

⁸⁷ <https://conservationaction.co.za/media-articles/two-sa-hunting-organisations-expelled-over-canned-lion-hunts/>.

killed right in front of her. The day she went to investigate twenty-six lions were killed and on another day that week twenty-eight were killed in the *Wag 'n Bietjie* slaughterhouse. She said that week 80 lions were waiting there to be killed. Andre Steyn breeds lions and has 264 lions on his farm.⁸⁸ Lion farmers also told journalist Marietjie Gericke in an article published on May 9th 2018, that there are also more lion slaughterhouses in the Free State – including one in the Winburg district - and that at least 400 lions have been killed in the Free State slaughterhouses in the last year.⁸⁹

Sandra Linde Taksidermie is currently, without a doubt, the largest big cat skeleton trader, and is based in the Free State. Therefore, it seems compelling that the lions killed in the slaughterhouses in the Free State are being killed for international big cat skeleton exports by Sandra Linde Taksidermie. And as far as we are aware she is also the only international bone exporter in the Free State. When a *Netwerk 24* journalist spoke to Johann Linde, who is also works with her in the taxidermy business, he blatantly lied and denied that they were involved in the lion bone export business. Linde said they only clean the lion bones. And when asked if it was true that he handled all 400 lions in the last year he said, “Nee, waar hoor jy dit? Ek het geen kommentaar nie.” [No, were did you hear that? I have no comment].⁹⁰ Unanswered questions remain in relation to the lion slaughterhouses in the Free State: is there a bigger network of people involved and who are they? Does Steyn work for Linde? Does Linde export skeletons/bone on behalf of other parties? Who pays who and how much?

The crux of the matter is that despite the public outcry, the cruelty and brutality involved and the links of the big cat bone trade to their demise in the wild and crime syndicates and networks, the existence of these lion slaughterhouses is something the South African government sanctions and approves through its permitting system. Steyn had a permit from the *Free State* Department of Economic Development, Tourism and Environmental Affairs to kill lions. And it has only been temporarily withdrawn while the department investigates his other permit-related infringements, such as moving the lions from Predator’s Pride to *Wag’n Bietjie* without a transport permit. It is therefore likely that they will not investigate the actual practice. According to spokesperson, Festy Nyamate, “DESTEa can confirm that permits were issued for the authorization of lions

⁸⁸ Die Burger, 7 May 2018.

⁸⁹ Beeld, 9 May 2018.

⁹⁰ <https://www.netwerk24.com/Nuus/Omgewing/nog-leeuslagplase-in-vs-lewer-bene-vir-ooste-20180508>.

at the farm Wag 'n Bietjie based on a decision taken by the DEA and CITES in 2017, to allow a quota of lions to be slaughtered per annum, and products to be exported.”



Jabula – who waited in this small cage for days before being killed for his bones.

Disingenuously, but unsurprisingly, the spokesperson for the Department of Environmental Affairs, Albi Modise, said that “the welfare of captive-bred lions was not their concern as it fell under the mandate of the Department of Agriculture and Fisheries”⁹¹. The Minister of Environmental Affairs and her Department, are solely to blame for the existence of, and rise in, lion bone slaughterhouses. Indeed, their policy serves to guarantee them. We would argue that it is not only the owners of these slaughterhouses, or the people who have instructed these owners to kill lions for their bones, that need to be charged under the Animal Protection Act, it is the Minister herself, particularly since the DEA, because it runs the lion bone quota process is fully aware that most of the skeletons being exported (91%) include skulls and therefore they are killed specifically for their bones.



⁹¹ Louzel Lombard Steyn. How our Lions are Cruelly Slaughtered – With government consent. May 2018. <http://conservationaction.co.za/media-articles/opinion-how-our-lions-are-cruelly-slaughtered-with-government-consent/>.

South Africa's conservation authorities provide permits and oversight for the transportation, captivity, exportation and killing of nonhuman animals but they currently ignore the Animals Protection Act because they argue that their existing environmental legislation does not include animal welfare issues. Although the DEA promised to address the issue almost a decade ago, to date they are still dragging their feet. Notwithstanding this, the DEA and the provincial conservation agencies cannot be immune from compliance with existing legislation such as the Animals Protection Act, and if they are issuing permits that endorse and facilitate cruelty and suffering they need to be held to account.

GOING ASTRAY: CITES SUPPORT FOR DODGY DESTINATIONS

Introduction: a severe lack of oversight from importing countries

South Africa exports big cat skeletons and bones exclusively to Lao PDR, Vietnam and Thailand. It is of serious concern that South Africa's major trading partners are countries listed by global conservation and law enforcement agencies as having weak law enforcement and high levels of corruption and therefore key conduits for the massive illegal trade in wild animals. The Wildlife Crime Scorecard Report by the World Wildlife Fund identified China, Thailand, and Vietnam as the primary destination countries in Asia for illegal wildlife.⁹² While, according to researcher Adam Cruise, South Africa (along with Mozambique), Vietnam and Lao PDR, have become a nexus of an international criminal network that rivals drugs, arms and human trafficking in both scale and profitability and...are doing little to combat the criminal networks involved in the flood of wildlife products out of Africa."⁹³

Transparency International's 2017 Corruption Perceptions Index, which ranks 180 countries and territories by their perceived levels of public sector corruption according to experts and business uses a scale of 0 to 100, where 0 is highly corrupt and 100 is very clean. South Africa: 43 (ranked 71 out of 180 countries); Thailand: 37

⁹² WWF 2010.

⁹³ <https://www.traveller24.com/Explore/Green/wildlife-trafficking-the-sordid-southern-african-south-east-asian-connection-20170116>.

(ranked 97 out of 180 countries); Vietnam: 35 (ranked 107 out of 180 countries); and Lao PDR: 29; (ranked 135 out of 180 countries). According to the United Nations Office on Drugs and Crime, corruption “is a major facilitator of all types of transnational organized crime. However, compared with other crime types, wildlife crime represents an opportunity with much lower risk and higher rewards for criminals. The very high profits also enable traffickers to bribe low-paid public officials to reduce their risks even more.”⁹⁴

These high levels of corruption, inadequate enforcement, fragmentation, and party political agendas craft and support a pro-wild animal trade position. It also means that there is a lack of political will to disrupt the trade – both legal and illegal - in most source and consumer countries. Crucially, and in practice, it also means that transnational criminal networks are being incentivised and fostered by these governments. The CITES permit system is designed to facilitate trade of wild animals, and their parts, across international borders. Given this, and all the regulatory and enforcement loopholes inherent in the permitting system, as well as gaping local inefficiencies in the supply and demand countries, it is obvious that criminal networks will also exploit the permitting system to their advantage.

Our analysis of the CITES permits for big cat skeletons and bones reveals that although the official CITES export permits contain a name and address of the supposed exporter and a name and address of the supposed importer many of the destination addressees’ and addresses could not be satisfactorily verified, have little or no public profile and in some cases may be linked to illegal activities. Moreover, there are no telephone numbers or identification or passport numbers on the permits which makes it even harder to authenticate or validate. This makes verification untenable, as one cannot analyse whether, in terms of CITES export permits, a destination is ‘acceptable’ when the stated address on the permit is problematic or is not in fact the final destination, but instead that of a middleman.

Given our findings, which clearly show that there is, at the very least, uncertainty in terms of the destinations/addresses of the CITES export permits, the responses to

⁹⁴ Criminal Justice Response to Wildlife Crime in Thailand: A Rapid Assessment. United Nations Office on Drugs and Crime, June 2017.
https://www.unodc.org/documents/southeastasiaandpacific/Publications/2017/Thai_Assessment_13_16_May_2017.pdf.

email questions from Leon Lötter, Deputy Director, Directorate of Nature Conservation, Gauteng Department of Agriculture and Rural Development (GDARD)⁹⁵ are confusing and clearly show significant loopholes in the CITES export procedures:

Q: *Does GDARD check on the address of the exporter for legitimacy?*

A: The address on the application form often is the address where the animals are kept so when we do the inspection the address is verified.

Q: *If the wild animals or bones etc. are exported to an individual how does GDARD check their credentials and/or suitability of the destination etc.?*

A: We check the destination as far as is possible through Google searches. Sometimes we ask DEA to contact the management authority to verify the destination and give their support. Often the application is accompanied by an import permit from the country of destination in which case we accept the permit of the destination country. We sometimes ask DEA to verify the permit with the destination country. For example for CITES I the destination country has to issue the import permit first. We will not issue an export if the destination country has not issued an import permit first for CITES I listed animals.

To adequately monitor the contentious wildlife trade in order to inform policy and enforcement, access to up-to-date, accurate and comprehensive data is crucial. Through its CITES Trade Database, CITES is failing essential democratic principles to which most governments subscribe, i.e. accountability, transparency and access to information. The Database is hugely problematic because it is incomplete, vague and the information is not-up-to-date. Our investigations have shown that it is vital that, at the very least, the Trade Database must provide detailed information, which needs to include:

1. Permit application requests (so that civil society can object if necessary)
2. All the information on the permit – and more: detailed information on the sender and receiver (including contact details, registration details, valid address); complete details of the intermediary (if there is one); conservation justification; detailed and accurate species information: type, number, age, sex, microchip number.

⁹⁵ Sent on December 15th 2017.

3. We must know that the information above has been properly verified on both the import and export side. We must know where the animals and their body parts come from and where they are going. Not only do the addresses need to be verified by the countries officials but they also need to physically check on them.

The decision by the Department of Environmental Affairs to issue CITES permits for the exportation of 'lion' bones and skeletons without first having undertaken any indisputable and conclusive research into the negative impacts of the industry, or providing scientific evidence of the trade in lion bones to conservation is inexplicable and cannot be condoned. To aggravate matters, this decision is promoting wild animals trafficking as the primary destination countries for 'lion' bones and skeletons from South Africa have extremely poor wildlife protection reputations and in some cases, even promote illegal wild animal trade through neglect, inefficiency and/or corruption. Moreover, the inherent problems with the CITES permit process and the permits themselves literally means that most of the big cat skeletons from South Africa are going into a black hole, one that is not reducing demand for tigers but increasing and driving demand for tigers. It is extremely likely that the availability of South African 'lion' bone is flooding the market, thereby increasing and sustaining the demand and desirability of tiger bone, particularly because it is often marketed as tiger bone and consumers then believe that supply is not a problem.

Joining the Syndicate Dots

Individuals, and some companies operating in these countries to whom South Africa is sending 'lion' skeletons and bones, have been, and still are, the recipients of many of the rhino horns taken from animals killed by South African/Southeast Asian syndicates. They are also linked to the illegal trade in tigers. As Onkuri Majumdar, a programme officer from the Freeland Foundation has pointed out, "These syndicates have tentacles all over Africa and Southeast Asia. They are responsible for the slaughter of thousands of endangered animals including rhinos and elephants. And let's not forget rangers in Africa who have died, killed by poachers financed by [them]." ⁹⁶

The Chumlong Lemtongthai (Xasavang and Bach syndicates) rhino poaching and fraud trial (2012) confirmed that the South African CITES authorities were issuing

⁹⁶ <http://www.chicagotribune.com/lifestyles/pets/sns-bc-as--thailand-wildlife-smuggling-20180120-story.html>.

CITES export permits without checking (much less scrutinizing) the destinations, addressees, destination addresses or the senders. In addition, some of the Vietnamese hunters were killing more than one rhino each despite the fact that South Africa was supposedly limiting each hunter to just one rhino kill per year. This, despite the fact that, between 2009 and 2011 hundreds of CITES permits were issued for the killing (hunting) of rhinos (200 by the North West province alone) and the export of their horns to Southeast Asia. As forensic investigator, Paul O’Sullivan, said at the time: “Without a doubt the permit office in North West Parks should be picking up on it. Someone must have thought: *‘Well hang on, what’s going on here?’*”⁹⁷ If the South African permitting authorities had been doing proper due diligence in the issuing of these permits and properly checking the credentials of the permit applicants – loud alarm bells would have been ringing.

There is no doubt that Lemtongthai and his cohorts are criminals and that they used the CITES export permits to legally ship rhino horn internationally for commercial purposes/trade (it is supposedly illegal to trade internationally in rhino horn). However, what needs to be interrogated further is that the CITES permit system – then and now - has so many inherent flaws and loopholes which effortlessly aid wildlife traffickers and also allows live wild animals to be sent to dubious dealers and middlemen.

In the Lemtongthai case, it is not just that the CITES permits were supposedly “abused” because the South African CITES authority put an “H” (i.e. hunting) when in fact the rhino horns were being sold off for profit. The real issue is that the South African government is not doing the required due diligence when issuing export permits for wild animals and their body parts. We would argue that they need to be much more proactive, thorough and conscientious, and cannot merely implement the lowest common denominator, i.e. the highly flawed and detrimental CITES procedures. One of the obvious problems with merely following the bare bones of the CITES permitting system, as the Lemtongthai case has shown, is that the government authorities use the CITES permitting system to hide behind, do the bare minimum, and to avoid sanction.

Had the South African authorities, both provincial and national, been more attentive that would have connected the obvious dots, particularly in relation to the

⁹⁷ <https://rhinofriendlyriders.wordpress.com/2011/11/09/rhino-files-iii-carte-blanche-documentary/>.

destinations and names provided on the CITES permit application. For example, a Vietnamese wildlife trafficker, Nguyen van Hai, appeared in the Hatfield court in April 2009 after the police raided what the press called an “illegal abattoir” in Brooklyn, an upmarket suburb in Pretoria. The Vietnamese Embassy is also located in Brooklyn. Police found ‘lion’ bones and rhino horn “all over the house” while more was hidden in containers and bags. They also confiscated foreign currency of about ZAR1million. At the time this story was reported nationally in the media. Alarmingly, a year later the South African CITES authority in the North West province issued Van Hai with a CITES permit (No. 17115, dated 07 July 2010) to hunt rhino.⁹⁸ According to Douglas Hendrie, Director of Enforcement and Investigations at Education for Nature-Vietnam, Van Hai is currently a major wildlife trafficker in Vietnam.

An official list/register of rhino hunts/hunters provided by the North West Department of Agriculture, Conservation and Environment to the Democratic Alliance in 2012, shows Van Hai’s name along with other wildlife traffickers and individuals linked to Chu Đăng Khoa/DKC Trading/Voi Lodge (in the North West province) and the Xasavang Network.⁹⁹ Indeed, this list itself seems to point to a likely link, connection and overlap between Chu Đăng Khoa/DKC Trading/Voi Game Lodge and Xasavang/Keosavang. It also links the rhino horn syndicates to the big cat bone trade. In addition, according to Hendrie, Chu Đăng Khoa and his underlings have been involved in lion bone trade, shipping it legally directly into Vietnam.

When examining some of the actual CITES permits,¹⁰⁰ many of them had different addressees **but** the same address in Lao PDR, i.e. Ban Anousonxay, Paksan District, Bolikhamxai Province. This is the address given for Vannaseng Trading Company,¹⁰¹ a very controversial importer of big cat bones from South Africa. One of the addressees to this address was Vixay Keosavang, thereby creating a possible link between Keosavang to the Vannaseng Trading Company. In addition, there are other big cat bone traders close by in this area, namely, Somok Phaimany (House 037, Paksan

⁹⁸ We cannot find any court records linked to the Van Hai arrest. However it may be that he was merely told to leave the country. Even if there was a court judgement, in the main the trend is to fine (instead of jail sentence) and then send out of the country instead of sending to jail.

⁹⁹ Carnie, Tony, *Bogus Rhino Hunters*, *Wildside*, p. 27, Autumn, 2012.

¹⁰⁰ <https://www.forensicsforjustice.org/portfolio-posts/rhino-poaching/>.

¹⁰¹ Lao yellow pages <http://www.laoy.com/loc.php>.

District) and Development Agriculture and Industry (House no.210, 43 Paksane District).

Chu Đăng Khoa, aka Michael Chu, a wealthy Vietnamese businessman from Nghệ An, used CITES trophy hunting permit loopholes to export rhino horn for trade. In this context, he was the 'hunting client' of 'professional' hunter from Mossel Bay, Christiaan (Chris) Van Wyk. Chu was arrested in Limpopo in 2011, found guilty, fined R40,000 and deported for illegally being in possession of five rhino horns.¹⁰² Despite this, his activities (and those of his associates) have been allowed to continue and grow without interference from South African law enforcement agencies and with the continued endorsement of national and provincial CITES management authorities.

In 2005, Chu Đăng Khoa established a company in South Africa called *DKC Trading* (registration number B2005/185716/23), it was named after himself and he is the sole member. Its business description is "trade and investment in various commodities". It may be coincidence that 2005 was also the year Chumlong Lemthongthai came to South Africa because, according to *The Guardian* newspaper, "he was having trouble supplying his customers from the dwindling sources of wildlife in South East Asia, and he decided to move to the biggest potential source in the world, South Africa."¹⁰³ DKC Trading is still in business and has lodged regular annual returns. The accountant for DKC is Louis Munro in Port Elizabeth. According to Rademeyer, DKC operates as DKC Outdoor Furniture. DKC Outdoor Furniture is not listed in the South African White Pages and the number listed on the website - 021 552 8101 – according to Truecaller is for *Richard Jones*. The website does not give a physical address,¹⁰⁴ however according to their Facebook page the address is Unit 4, 3 Drill Avenue, Montague Gardens, Cape Town.

¹⁰² <https://www.businesslive.co.za/fm/fm-fox/2016-07-15-the-crooks-behind-rhino-slaughter/>.

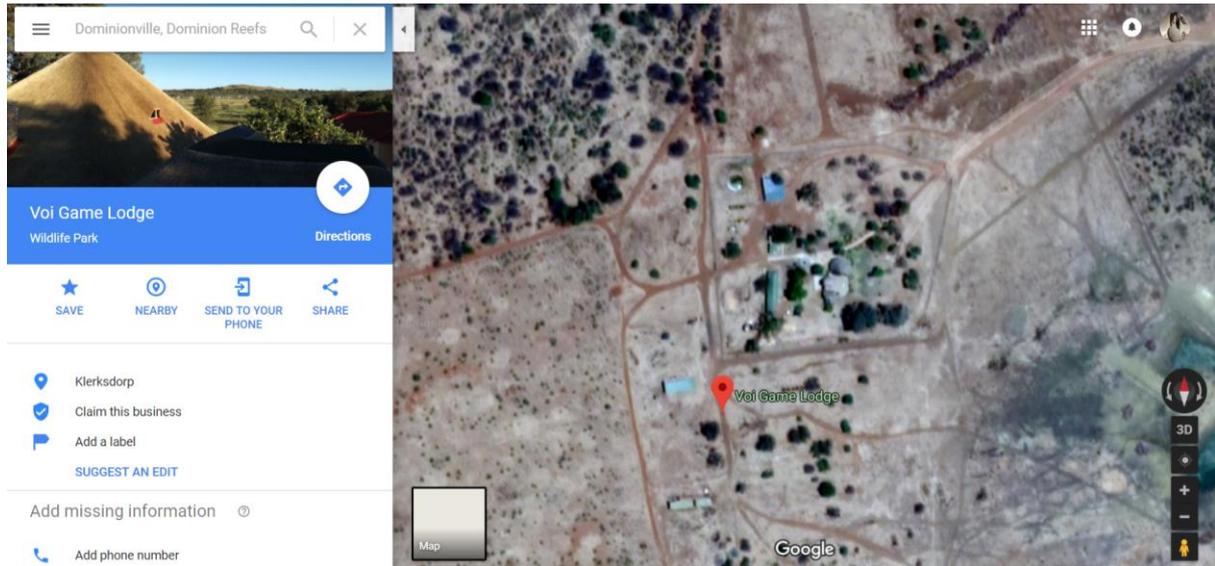
¹⁰³ The Crime Family at the Centre of Asia's Animal Trafficking Network *The Guardian*, 26 September, 2016.

¹⁰⁴ See: <http://www.easyinfo.co.za/htm/custom/dkcoutdoor/contacts.htm>.



In 2010 and 2011 DKC Trading bought two farms (Rhenosterspruit and Syferfontein) in the Klerksdorp area of the North West province, (close to rhino farmer John Hume's, Buffalo Dream Ranch) and these together became the 924-hectare hunting and breeding farm called Voi Game Lodge. Here rhinos, lions and tigers (and a number of other animals) are breed and hunted.





Co-ordinates.

Allegations have been made that bones obtained from captive tigers from Voi Game Lodge have been fraudulently exported as lion bones.¹⁰⁵ As far back as 2015, the Traffic/Wildcru Report, *Bones of Contention* called for an investigation of “the Vietnamese-owned tiger facility in North West”, a clear reference to Voi Game Lodge. “...little is known about the actual activities being conducted on this farm. If Tigers are being bred on this facility for international trade in their parts and derivatives, then this would be in contravention of CITES *Resolution Conf.12.10* (Rev. CoP15) for the “Registration of operations than breed Appendix I animal species in captivity for commercial purposes”, due to its non-registered status, and CITES Decision 14.69 which states that “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” (CITES, 2009). Furthermore, Resolution Conf. 12.5 (Rev. CoP16) urges “Parties and non-Parties on whose territories tigers and other Asian big cat species are bred in captivity to ensure that adequate management practices and controls are in place to prevent parts and derivatives from entering illegal trade from or through such facilities”.

¹⁰⁵ Tipping Point: Transnational organised crime and the “war” on poaching. Part 1 of a 2-part investigation into rhino horn trafficking in Southern Africa, J. Rademeyer, 2016, July, The Global Initiative Against Transnational Organised Crime and <https://conservationaction.co.za/resources/reports/failure-prosecute-mixed-messages-south-africa-can-single-handedly-lose-second-rhino-war/>.

Although aimed primarily at Tiger range States, this Decision clearly also applies to South Africa.”¹⁰⁶

According to Rademeyer, DKC Trading is closely linked to the Vingroup.¹⁰⁷ In 2015 DKC Trading was the key entity in sourcing and supplying South African wild animals (including approximately 100 rhinos) to the Vingroup’s Vinpearl Safari Park (a theme park zoo based on Phú Quốc Island).¹⁰⁸ Vinpearl has been accused of **causing the deaths** of thousands of animals and purchasing animals of questionable and illegal origin.¹⁰⁹ Between September 2015 and February 2016, South Africa issued CITES export permits for 130 animals, including 20 tigers and 23 lions as well as monkeys, baboons, servals, caracals, pythons, hyenas, zebra and reptiles, to be sent to Vinpearl Safaris and/or Tourism Development.¹¹⁰ The animals apparently flew via Emirates Airline.



Source: <http://bluevn.info/chu-dang-khoa-ty-phu-sung-te-giac-trong-tam-ngam.html>. Reproduction of picture taken by Chu Đăng Khoa’s ex-wife *Le Van Anh*.

Chu Đăng Khoa is also connected to the Thien Minh Duc Joint Stock Company. (website: dkcpetro.vn). According to Vietnam Credit the details of this company are: “Address: No. 287, Ngo Duc Ke Street, Vinh Tan Ward, Vinh City, Nghe An Province, Vietnam. Registration Number: 2900471372. Tax Code: 2900471372. Year Founded: 2001. Phone: (84-238) 3563 507/ 3582 246. E-mail: dkcpetro@gmail.com

¹⁰⁶ https://www.wildcru.org/wp-content/uploads/2015/07/Bones_of_contention.pdf p.74.

¹⁰⁷ One of Vietnam’s largest companies.

¹⁰⁸ <https://www.corruptionwatch.org.za/wp-content/uploads/2017/02/Global-Initiative-Tipping-Point-Part1-July-2016.pdf>.

¹⁰⁹ <https://tuoitrenews.vn/society/33403/cites-vietnam-authorities-say-rhinos-at-vinpearl-safari-of-legal-origin>.

¹¹⁰ <https://www.businesslive.co.za/fm/fm-fox/2016-07-15-the-crooks-behind-rhino-slaughter/>.

Description: Founded in 2001 in Nghe An Province of Vietnam by the family's members...Its chartered capital is large with VND 260 billion. Ms. Chu Thi Thanh is the biggest shareholder, holding 88.16% of shares, keeping Chairwoman position. The rest is owned by Mr. Chu Dang Khoa (11.27%) and Mr. Vuong Dinh Quan (0.57%).¹¹¹ While according to a Vietnamese publication, Chu Dang Khoa's family owns one of the largest wildlife parks in the Nghe Anh province and they have expanded their business in Laos.¹¹²



DKC South Africa "brothers". From Dang Khanh's Facebook page.

¹¹¹ <https://vietnamcredit.com.vn/products/company-report/thien-minh-duc-joint-stock-company-20395>, accessed on 8 April 2018.

¹¹² <http://enternews.vn/dai-gia-kim-cuong-chu-dang-khoa-giau-co-nao-100782.html>.



Frikkie Jacobs poses with a dead lion. Accessed, 12 February 2018

Asian criminals cannot succeed without the participation and facilitation of private ranch owners, 'professional' hunters, and outfitters. In South Africa the private wildlife industry certainly does not equate to conservation or wildlife protection. The North West rhino hunting register/list also showed that Frikkie Jacobs from Shingalana Game Breeders and Hunting Safaris, conducted at least 48 rhino hunts between June 2009 and July 2011 with the Vietnamese traffickers who used CITES trophy hunting permit loopholes to export rhino horn for trade.¹¹³

Shingalana and Jacobs are still very much in business, as are most of the South African professional hunters, safari outfitters and landowners [for example: Shingalana, Harry Claassens, Randy Westraadt, Brad Rolston, Ashton Crafford, Hartzview Hunting Safaris, Charl Watts, Dr Gideon (Deon) Engelbrecht/Leeuwbosch Game Lodge, and

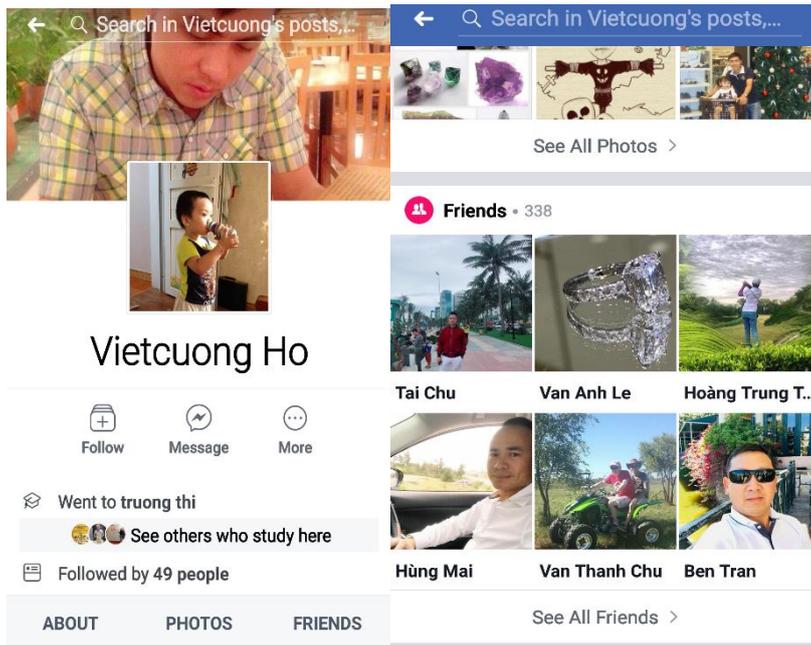
¹¹³ <https://www.businesslive.co.za/fm/fm-fox/2016-07-15-the-crooks-behind-rhino-slaughter>.

Savva Englezakis) and taxidermists (Savuti Taxidermists and Marakalalo Taxidermy), which was largely used by Marnus Steyl].¹¹⁴

These individuals and their companies were more than just complicit parties, they played an instrumental role in the activities of these syndicates, and without their participation the rhinos would not have been killed. Some of the North West officials who provided these dodgy permit have been promoted to the national Department of Environmental Affairs, for example, Oupa Chauke, who is now a Deputy Director (Enforcement) at the DEA.

Apart from Nguyen Van Hai, the names on the North West list included:

- P (Punpitak) Chunchum (Xasavang Network)
- T (Tool) Sriton (Xasavang Network)
- Chumlong Lemtongthai (Xasavang Network)
- Cuong Ho Viet. Linked to DKC.



- Le Hoai Nam. Linked to DKC and Voi. Currently lives in Pretoria.

¹¹⁴ Names included in the official list/register of rhino hunts/hunters provided by the North West Department of Agriculture, Conservation and Environment to the Democratic Alliance in 2012.

 **Le Hoai Nam** is at  **Voi Game lodge.**
2 Sep 2013 at 18:18 • 

Hunting game



 9

 **Le Hoai Nam**
2 Sep 2013 at 20:52 • 



 7

 2 comments

- Chu Duc Gui Lit (also known as Tai Chu gl.) and Dang Khánh (also known as Nguyen Đăng Khánh, Ba Cu Bop, Cu Bop Ho Nguyen, or Than Sau Thanh Ho). Both are linked to Voi Lodge, Chu Dang Khoa and DKC Trading. They were arrested in South Africa for rhino horn poaching and trafficking as part of an operation that targeted organized crime groups in 2012.



Chu Duc Gui Lit and Nguyen Đăng Khánh. Photo Credit: SAPS (from Rademeyer, J. p.50)



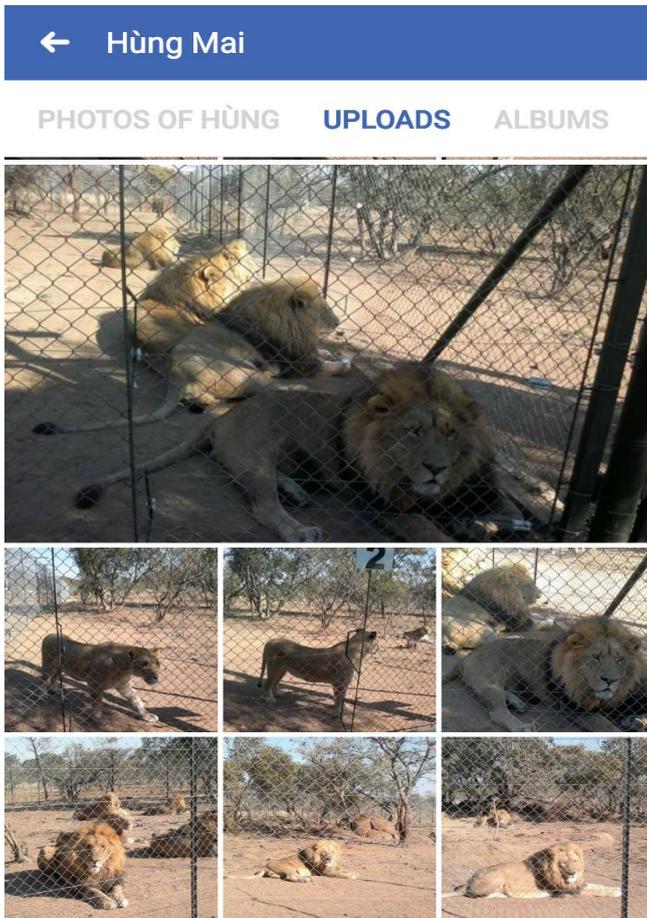
Chu Dang Khoa with David Thai, Tai Chu and one other. All wearing Voi shirts except David Thai. From [David Thai's Facebook page](#), 3 March 2018. The post says: "boss and the hunters".



Chu Dang Khoa with Tai Chu. Vietnamese New Year, February 2018.



- Mai Van Hung (Hung Mai). Linked to Voi Lodge.



From Hung Mai's Facebook page, July 2011.

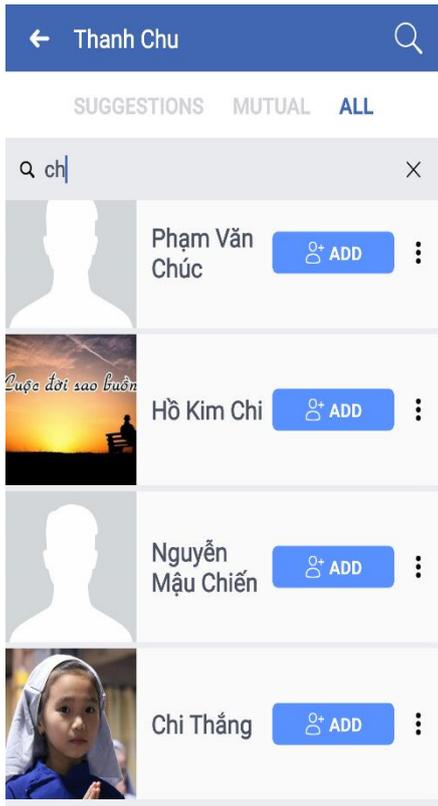
- Nguyen Mau Chien (spelled Chin on the list). Linked to Voi Lodge/DKC.

Chien is a known leader of a wildlife trafficking ring which specializes in bringing wild animals (and their body parts) from Africa. He was arrested in Vietnam in April 2017. According to the EIA, he is “the suspected leader of a major criminal network trafficking rhino horn, tigers, lion and other wildlife specimens, recovering two frozen tiger cubs and one lion skin. Chien began his business in wildlife trafficking trading fake tiger bones before establishing his own tiger farm in Vietnam. With an arrest history in Tanzania, he is just one of several Vietnamese wildlife traffickers with links to Africa”.¹¹⁵ Education for Nature (Vietnam) say that Chien’s activities have been linked to numerous cases involving illegally trading and smuggling of wildlife since 2007, when he was caught in Tanzania and fined for smuggling wildlife products. They state that “Chien has also long been suspected of laundering tigers through his farm in Thanh Hoa Province, and has been linked to a number of tiger seizures in recent years. Over the past five years, Chien’s network has surfaced in Africa where he appeared to be expanding his operation considerably, focusing mainly on rhino horn, ivory, and pangolin scales.”¹¹⁶ In March 2018, despite the 2017 Penal Code (which came into force since January 1, 2018) which increased maximum jail sentences for wildlife crime from seven years to 15 years, Nguyen Mau Chien was only sentenced to 13-month imprisonment for his behaviour of ‘storing and transporting prohibited goods.’

- Thanh Chu. He is linked to Voi Lodge and is a Facebook friend of Nguyen Mau Chien.

¹¹⁵ *The Lion’s Share. South Africa’s trade exacerbates demand for tiger parts and derivatives*. Environmental Investigation Agency, p.8 July 2017. <https://eia-international.org/wp-content/uploads/The-Lions-Share-FINAL.pdf>.

¹¹⁶ <https://www.envietnam.org/index.php/news-blog/829-alleged-rhino-horn-kingpin-arrested>.



<https://www.facebook.com/mauchien.nguyen.96>.¹¹⁷

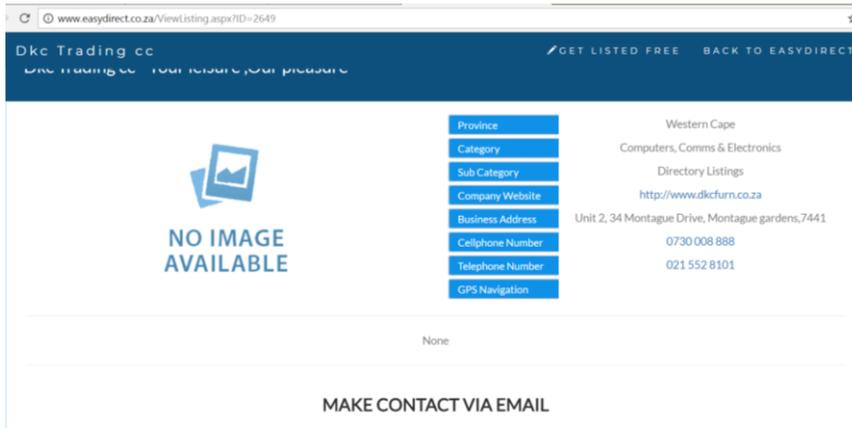
ENV USA Twitter 27112017.

- Tran Huy Bao. Linked to Voi/DKC network. According to Rademeyer is also known as Ben Tran and he is the manager of DKC Trading's import and export operations in South Africa.¹¹⁸ He lives in Cape Town.
- Phuong Kieu (Anna). Linked to Voi/DKC network and according to Rademeyer is a DKC Trading representative in South Africa.¹¹⁹ Also known as Ana. She lives in Cape Town and is the wife of Ben Tran. Ana is a contact number (073 000 888) for DKC Trading, see below:

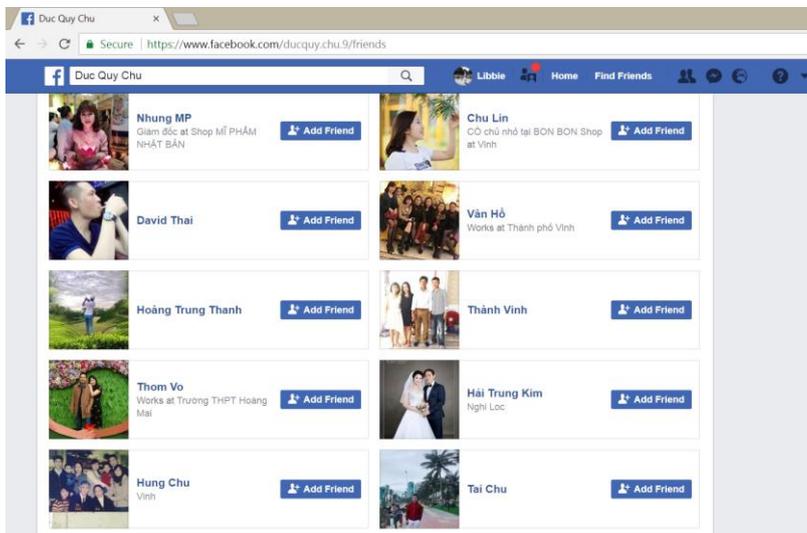
¹¹⁷ Accessed 07052018.

¹¹⁸ Rademeyer, Julian, Global Initiative against Transnational Organized Crime *Tipping Point: Transnational organised crime and the 'war' on poaching*, p.50, July 2016.

¹¹⁹ <https://www.corruptionwatch.org.za/wp-content/uploads/2017/02/Global-Initiative-Tipping-Point-Part1-July-2016.pdf>, p.50.



- Chu Duc Quy Linked to Voi/DKC network.



- Ngo Vi Thu. He is linked to Voi/DKC network.



 **Thu Vi Ngo** updated his cover photo.

29 Jun 2014 at 08:11 • 🌐



👍 33

💬 3 comments 1 share

- Tuan Le. Pictures below taken in March 2018 to Voi Game Lodge. From Tuan Le's [Facebook page](#). Most of them removed.







- Chu Van Thanh/ Thanh Chu. Closely linked to Voi Game Lodge and DKC.

According to Rademeyer there is also a relationship between Voi Game Lodge and Frikkie Jacobs from Shingalana Game Breeders & Hunting Safaris, “As recently as December 2015, a Vietnamese national named Van Thanh Chu, who is involved in the day-to-day running of Voi Lodge, posed for a photograph in the Shingalana helicopter, a Robinson R44. His relationship with Shingalana dates back to at least March 2010 when he shot a white rhino there, according to North West hunting records. Frikkie Jacobs is listed as the outfitter who arranged the hunt and also as the professional hunter who accompanied Van Thanh Chu on the shoot. Other images show Van Thanh Chu posing in front of caged tigers and lions at Voi Lodge. In one photo he holds a dead jackal by the scruff of the neck. In another, posted on Facebook on 22 November 2013, he crouches behind a dead tiger, rifle in hand. “Went hunting yesterday,” he wrote.”¹²⁰

¹²⁰ <https://www.businesslive.co.za/fm/fm-fox/2016-07-15-the-crooks-behind-rhino-slaughter/>.



Thanh Chu with Hoang Trung Thanh) at Voi Lodge.



Thanh Chu with someone from Shingalana – Voi Game Lodge.



- Hoang Trung Thanh (Micky Hoang). Linked to Voi Game Lodge and DKC. Probably involved in the day-to-day running of Voi.



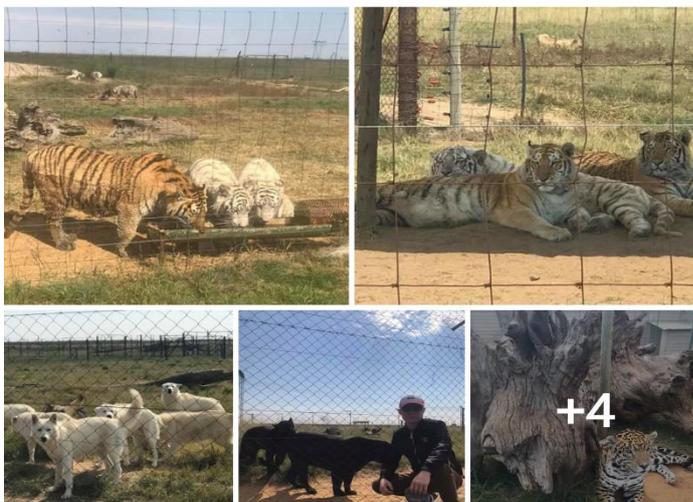
Micky Hoang and Tai Chu – Vietnamese New Year 2018.

Thanh Chu and Hoang Trung Thanh Facebook pages, dated 2 May 2018, showed pictures of tigers, a leopard and wolves on Voi Game Lodge. Most of the photos from that day (shown below) were later removed from their pages.

 **Thanh Chu** is 😞 feeling alone ...
with **Hoàng Trung Thanh**.
2 May at 09:32 • 🌐

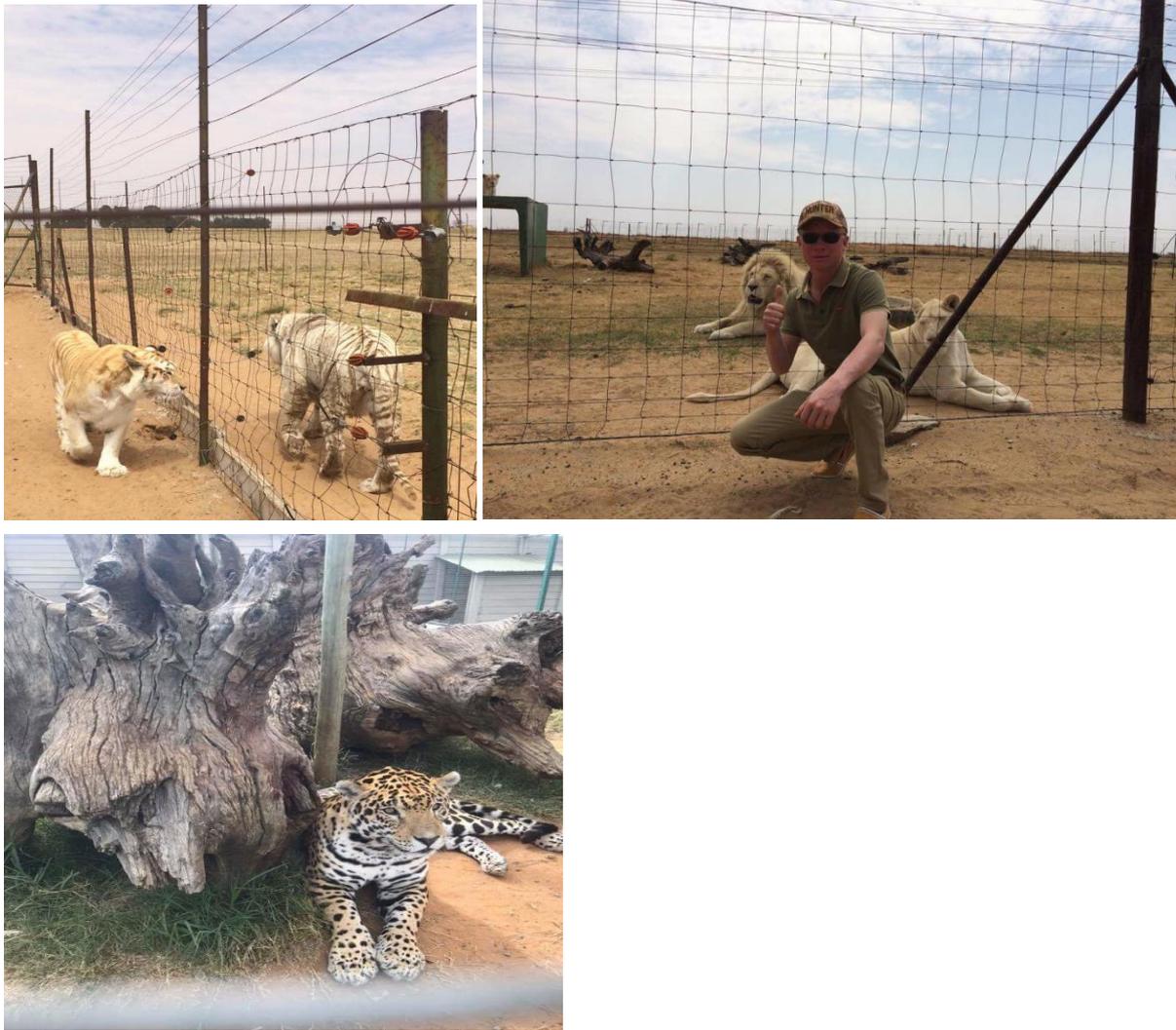
Thiên nhiên hoang dã.

See Translation



   212

 125 comments



Of concern is the relationship between the DKC Network and the Vietnamese Embassy in South Africa as well as the involvement of embassy staff in the illegal trade of wild animals. The Vietnamese embassy in Brooklyn, Pretoria has been implicated in several incidences of rhino horn smuggling.¹²¹ Since diplomatic immunity is invoked it protects embassy staff members from public scrutiny, it is very difficult to track all the occurrences, however according to a 2013 news article at least 3 officials based at the Vietnamese embassy in Pretoria have been documented participants in rhino-horn trafficking.¹²²

In 2006, Nguyen Khanh Toan, the commercial attaché was caught trafficking rhino horn¹²³ and in 2008 a Vietnamese embassy staff member, Vu Moc Anh, was sent

¹²¹ <https://conservationaction.co.za/recent-news/mahlobos-rhino-poacher-mate/>.

¹²² <https://steelburgernews.co.za/15375/rhino-poached-every-11-hours-3/>.

¹²³ <http://www.thanhniennews.com/society/two-more-vietnamese-caught-with-rhino-horns-in-south-africa-14104.html>.

home after she was suspected of being involved in the smuggling of rhino horn to the East.¹²⁴ In 2016 a six-month Al Jazeera undercover investigation exposed the links between the Vietnamese Embassy in South Africa and Voi Game Lodge/DKC Trading which, according to Al Jazeera, traffics rhino horn and tiger bones. The Al Jazeera documentary also provided evidence that high-ranking Vietnamese officials, including the country's ambassador to South Africa at the time, Le Huy Hoang, have visited or have ties to Voi Game Lodge.¹²⁵

There are several pictures of DKC connected individuals with a vehicle (registration number: XJL909GP) that is registered in the name of Mr Huy, Brooklyn, Pretoria. In April 2006 Nguyen Tien Hoan was one of the traffickers who used CITES trophy hunting permit loopholes to export rhino horn for trade. He was 'hunting client' at the Leshoka Thabang Game Lodge in Limpopo where permission to "hunt" the rhino was given by the owner Johan van Zyl.¹²⁶ Christiaan (Chris) Van Wyk organised the "hunt" and he was convicted and fined R30,000 for this in 2010 as he did not have a permit to hunt the rhino and was not registered in Limpopo as a 'professional hunter'. During the trial Van Wyk was found with rhino horn and ivory and was also arrested in the Western Cape after being found with rhino horn. He was also found guilty in both those cases. Van Wyk was also the person who organised rhino "hunting" for Chu Dang Khoa. Nguyen Tien Hoan was also one of the traffickers on the North West list, who used CITES trophy hunting permit loopholes to export rhino horn for trade. The killing of the rhino took place at Shingalana (close to Voi) on 10 October 2010 and Frikkie Jacobs is listed as the "professional" hunter. Nguyen Tien Hoan is linked to the DKC network. Below is a picture from his Facebook page taken at Voi Game Lodge with the mystery vehicle. Nguyen Tien Hoan also has another Facebook page.

¹²⁴ <https://www.news24.com/SouthAfrica/News/Cops-describe-house-of-horrors-20090401>.

¹²⁵ <https://www.pressreader.com/south-africa/citypress/20161113/281547995469364>.

¹²⁶ Leshoka has been involved in several controversies. In April, 2013, 66 rhino horns worth almost \$3 million were stolen from the farm. In addition to hunting rhinos on the property, 4 white rhino were also poached in 2013. In 2014 Van Zyl sold off 45 rhinos. In 2002 a woman was mauled by a captive lion at Leshoka. In May 2017 the head and legs of 2 Bengal tigers were cut off at Leshoka after being poisoned.

Intro

Works at Thành phố Vinh
Lives in Vinh

Photos

Friends · 19



Ngọc Lợi, Ninh Huệ, Cát Duy, Ben Tran, Trần Thành Tuấn, Nguyễn Thủy Vân

Nguyen Tien Hoang updated his profile picture.
July 23, 2014 · ©



Hoàng Trung Thanh
25 Feb 2017 at 15:20 · ©

Goodbye February .

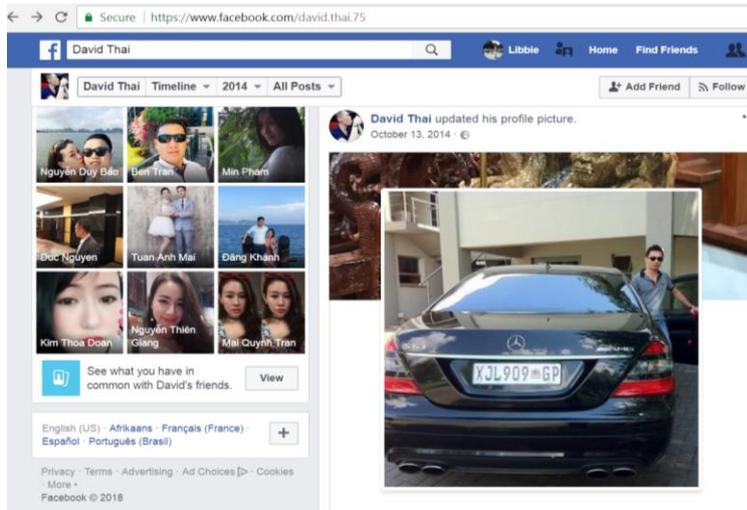


Micky Hoang
March 2, 2017 · ©

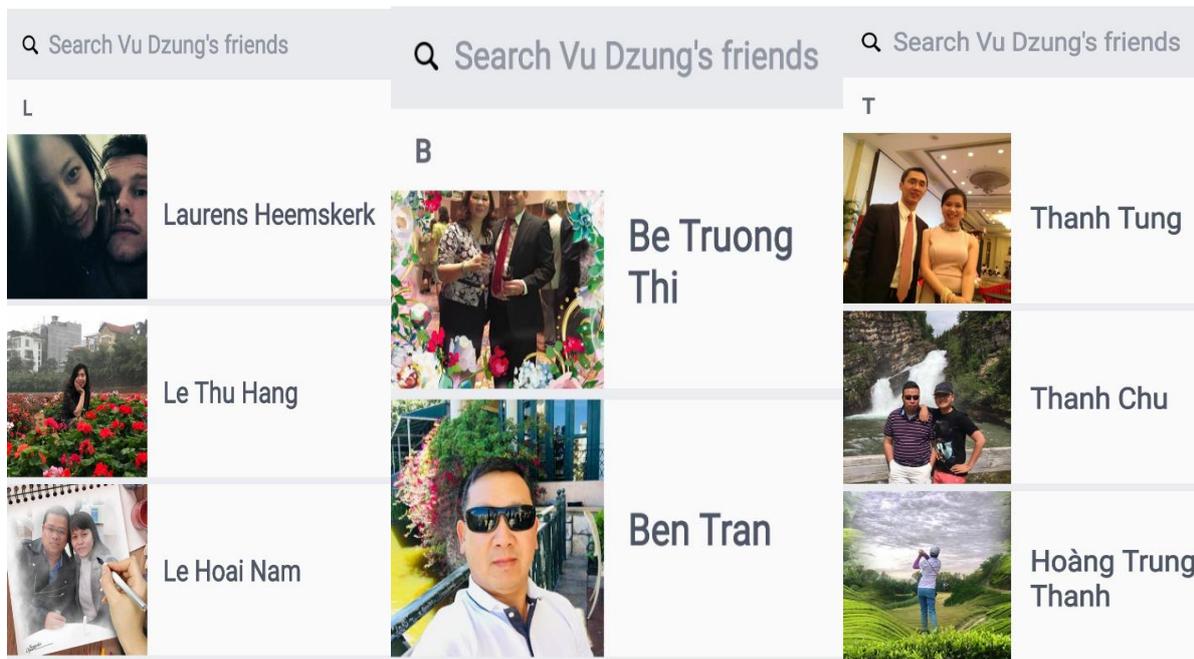
Ptrs Oil Phaholyuttakij

Add Friend





Le Huy Hoang is now the ambassador to the Republic of Mozambique, and the Republic of Madagascar, the Republic of Seychelles and the Republic of Mauritius.¹²⁷ The current ambassador of Vietnam to South Africa is Vu Van Dzung and it appears he is also Facebook friends with the DKC Network, see below:



Given this context it is alarming that in September 2017 South Africa announced that trade between South Africa and Vietnam will be accelerated, including wild animals.¹²⁸

¹²⁷ <http://en.qdnd.vn/politics/news/president-presents-appointment-decisions-to-new-ambassadors-491274>.

¹²⁸ <http://www.dirco.gov.za/docs/2017/viet0908.htm>.

Big Cat Skeleton Importers by Country 2014 - 2017

It is likely that these figures are higher given the evidence of illegally falsified "misdeclarations" of skeleton quantities

LAO PDR

Number of **Skeletons** imported from South Africa **1365**

Importers

Ainthaphone Trading	408	Lilavady	53
Vinasakhone	137	Jitplecheep Ning	50
SVT Trading	112	Empt- Import - Export Lao LTD	48
Vannaseng Trading	112	KNT Trading LTD	46
Somok Phaimany	110	Phonsavanh Trading	32
Sinthavy Import- Export Co	75	Johnny Pakxam (Pakxan)	29
Wattanasook Trading	67	CNP Import- Export LTD	16
Development Agriculture and Industry	58	JDT Imports (JH Du Toit)	12



VIETNAM

Number of **Skeletons** imported from South Africa **1138**

Importers

Son Long Investments	533	Thanh Manh Hung Co	251
Bao Huy Imp -Exp	140	Trans Giang	39
Vinh Phu - CMT Joint Stock	173	Hoan Van Dien	2

THAILAND

Number of **Skeletons** imported from South Africa **442**

Importers

Natakorn Yuennan	383	Limited Partnership Boonchai	20
Lisa Lion Import Export	38	International Logistics	1



Images: © EIA / Education for Nature Vietnam.

BIG CATS

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Lao PDR

South Africa's largest big cat bone importer is Lao PDR. This fact on its own warrants concern because this country is at the centre of global illicit wildlife trafficking and has the fastest growing trade in ivory in the world. Effective law enforcement and control of the trade in wild animals is practically non-existent; and CITES has failed to hold Lao PDR to account.¹²⁹ In addition, according to wildlife trafficking investigation organisation, *Freeland Foundation*, in Lao PDR, "there is a public-private partnership with law enforcement agencies acting as partners to crime syndicates."¹³⁰

Moreover, and of acute concern, particularly in this seemingly anarchical context, is that despite the large volume big cat body parts that have been sent to Lao PDR by South Africa over more than a decade, no imports of lion body parts have been reported by Lao PDR in the CITES Trade Database. The Lao PDR Scientific Authority stated there had been no imports or re-exports of lions.¹³¹ Lao PDR is in fact the single biggest importer of lion bones and skeletons and there is also an extensive illegal international trade in lion parts and products out of the country.

This shocking denial by Lao PDR authorities is symptomatic of persistent oversight failures in the country.

It is likely and very probable that 'lion' bones from South Africa imported into Lao PDR follow the usual illegal routes that other wildlife imported into Lao PDR follows, i.e. once it arrives at the international airport in Vientiane (Wattay International Airport) it goes to Paksan in Bolikhamxay (Lao PDR) and from there is then illegally exported to Nghe Anh in Vietnam.

Lao PDR, because of its geographic position, size and weak government, plays a pivotal role as a transit country for wild animal body parts, including rhino horn and big cat bones, moving illegally along smuggling routes from Africa and other parts of Asia, into China and Vietnam. Although trade in animals such as tigers, rhinos and elephants

¹²⁹ Lucy Vigne and Esmond Martin. *The Ivory trade of Laos: Now the fastest growing in the world*. Save The Elephants, 2017.

¹³⁰ <https://www.theguardian.com/environment/2016/sep/27/revealed-how-senior-laos-officials-cut-deals-with-animal-traffickers>.

¹³¹ Dr Souriodong Sundara of the Lao PDR Scientific Authority, quoted in Willow Outhwaite. *TRAFFIC. The Legal and Illegal Trade in African Lions: A study in support of Decision 17.241 e*. Preliminary findings for AC30. <https://cites.org/sites/default/files/eng/com/ac/30/E-AC30-25.pdf>, 16 May 2018.

is theoretically prohibited by Laotian law the trade in these animals and their body parts continues unabated. The Golden Triangle Special Economic Zone (GTSEZ) is a global hub for trade in some of the world's most endangered wildlife species. Perfectly situated where Thailand, Myanmar, Laos and China come together, the area is home to large casinos, shopping malls and local markets that attract tourists from around the region, especially China. It has become a haven for gambling, prostitution and illicit trade in many goods, including wildlife.¹³² And CITES researchers found that, "Everyone can buy everything and cross the border. Informal border trade between China, Thailand, Lao PDR and Vietnam escape the regulatory framework...Wild animals consumers and investors are not from Lao: Citizens from neighbouring countries visit Lao PDR to buy wild animals products such as ivory, jewellery, figurines and carvings, tiger wine, pangolin scales, crocodile skins, rosewood carvings, seahorses and rhino horns. The investors behind major illegal wild animal transactions appear to be powerful businessmen from neighbouring countries."¹³³

One of the key problems with the global trafficking of wild animals and their body parts is that often the key players have diversified, privately owned mainstream businesses and have powerful and complicit connections in government. In Lao PDR three legal companies have been publicly identified as being big players in the illegal wildlife trade and breaking international and Lao law: the. Xeosavang Trading Company (run by Vixay Keosavang), Vinasakhone¹³⁴ and Vannaseng Trading Company.¹³⁵

Evidence collected by the *Guardian* shows that each of them has been supported by deals with the Lao government.¹³⁶ Despite Keosavang's clear involvement in wildlife slaughter and trafficking cases in Kenya, Mozambique and South Africa he has never been arrested. Indeed, the Laotian government, ignored international pressure and authorized similar agreements with other companies with a track record of wildlife crime, such as Vinasakhone and Vannaseng Trading Company. "The Guardian has had

¹³² Top Ten Most Wanted. Endangered Species in the Markets of the Golden Triangle. WWF, 2017.

¹³³ Report entitled *Application of Article VIII in the Lao PDR*, July 2017.
<https://cites.org/sites/default/files/eng/com/sc/69/E-SC69-27.pdf>.

¹³⁴ Vinasakhone is jointly owned by Sakhone Keosouvanh and a Thai-Vietnamese national known as Chook and his wife Vina Sayavong. According to Karl Ammann, Mr Sakhone has just opened a new 'resort' with a zoo at Thabok, which is also going to include a new tiger farm (apparently this is close to completion). Apparently three Laotian governors attended the opening festivities which were huge and which Karl documented.

¹³⁵ The Crime Family at the Centre of Asia's Animal Trafficking Network *The Guardian*, 26 September, 2016.

¹³⁶ <https://www.theguardian.com/environment/2016/sep/27/revealed-how-senior-laos-officials-cut-deals-with-animal-traffickers>.

access to compelling evidence that in December 2013 the then Lao prime minister's office ordered four government ministries and two provincial governors to help these companies traffic wildlife with huge annual quotas. The agreements were worth a fortune – up to \$30m in a single month for one company – with the government once again taking its 2%...these agreements specifically sanctioned the sale of the three iconic species that are closest to extinction as a result of this trade: tigers, rhinos and elephants. And in vast quantities.”¹³⁷ Like the Laotian government, South Africa also appears to be openly supporting and endorsing these wildlife traffickers by issuing CITES export permits to all three companies on an on-going basis. And although the CITES secretariat in Geneva was given detailed information about Keosavang by the Freeland Foundation in 2003, 2006, 2009, 2011 and 2012, Lao PDR remains a full member of CITES.¹³⁸

A *Guardian* investigation revealed that “Vinasakhone has been illegally killing and selling tigers to order for buyers in Vietnam and China and also selling tigers to the notorious Golden Triangle area on Laos's borders with Myanmar and Thailand where they are sold as meat, drink and decorative skins; and that Vannaseng, on one of its farms, has been breaching CITES by trafficking hundreds of tigers and bears.”¹³⁹ According to the *Guardian* and Freeland Foundation investigation, Vinasakhone and Vannaseng have clearly been violating international law because they have “been involved in the illegal trafficking of hundreds of tonnes of wildlife from Africa as well as Asia...through Laos and into Vietnam and China. During 2014...the evidence suggests that between them they traded \$45m of animal body parts including derivatives from three iconic endangered species: tigers, rhinos, lions and elephants.”¹⁴⁰ This included permission from the government for Vinasakhone and Vannaseng to import and sell 110 tonnes of elephant ivory, which equates to 16,417 dead elephants. The quotas also included 10 tonnes of lion bone. In 2014 Lao officials found that between January and October Vinasakhone and Vannaseng had traded a combined total of 7.7 tonnes of lion and tiger bone. At least some of that trade must have been illegal...Even if the entire 7.7 tonnes was lion bone, at an average weight of 10kg per skeleton that would represent

¹³⁷ *Ibid.*

¹³⁸ Lao PDR was briefly suspended in 2015 and again in 2016 for failing to deliver a national plan to deal with the ivory trade and for failing to submit a second report on implementing the ivory plan.

¹³⁹ The Crime Family at the Centre of Asia's Animal Trafficking Network *The Guardian*, 26 September, 2016.

¹⁴⁰ *Ibid.*

770 dead lions. But CITES records show that during the whole calendar year of 2014, Laos had permits to import the skeletons of only 360 lions.”¹⁴¹

Documentary filmmaker, Karl Ammann, who went undercover in Lao PDR in 2017 and 2018 revealed that the lion-bone exports from South Africa to Lao PDR “do not stay in Laos. Filming local dealers, our hidden cameras documented that they were instead trafficked into China and Vietnam. Here they are sold as tiger bones, resulting in a litany of CITES infractions along the way.”¹⁴² This means that South Africa through CITES is supplying an international organised illegal trade in big cat body parts and products for consumption by Chinese and Vietnamese buyers.

South Africa, over a number of years, and in breach of CITES regulations, exported ‘lion’ skeletons to Lao as hunting trophies.¹⁴³ This means that South Africa has been sending out ‘lion’ skeletons under the pretext of so-called non-commercial purposes when in fact ‘lion’ skeletons are traded purely for commercial purposes. Moreover, South Africa was extremely negligent because it also allowed dealers to send out sets of bones, making it almost impossible to monitor the quantity of lions or whether tiger or ligers were included in the shipments.

The information currently available through the CITES Trade Database in relation to South Africa’s ‘lion’ trade with Lao PDR is problematic, inaccurate and inadequate. This accentuates that the CITES permitting process appears to be merely a paper producing activity for its own sake rather than a system that ensures adequate or effective reporting, regulation and enforcement of trade activities. Furthermore, alarmingly it shows that there is a severe lack of even basic monitoring and verification by the CITES Secretariat or the Parties. Despite the fact that the Trade Database pointed to blatant irregularities over years, they were never rectified. For example:

- Lao PDR did not report any import of ‘lion’ body parts from South Africa over a six year period, namely 2009 – 2015
- Hundreds of “lion’ body parts went out as trophies/personal.

¹⁴¹ <https://www.theguardian.com/environment/2016/sep/27/revealed-how-senior-laos-officials-cut-deals-with-animal-traffickers>.

¹⁴² <https://www.dailymaverick.co.za/article/2018-05-11-on-the-trail-of-asias-shifting-rhino-horn-market/#.WvWSeKSEFPX4>.

¹⁴³ CITES Trade Database.

- “Lion’ body parts went out in kilograms and ‘bones’, making it difficult to accurately calculate the number of ‘lions’ exported.

See below extract from CITES Trade Database of ‘lion’ body part exports from South Africa to Lao PDR from 2009 – 2015.

Year	App.	Taxon	Class	Order	Family	Genus	Importer	Exporter	Origin	Importer reported quantity	Exporter reported quantity	Term	Unit	Purpose	Source
2009	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			30	bodies		H	C
2009	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			50	bodies		P	C
2009	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			250	bones	kg	H	C
2009	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			5	skeletons		T	C
2009	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			1	trophies		P	C
2010	I	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			29	skeletons		T	C
2010	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			357	bones		T	C
2010	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			229	bones		T	W
2010	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			54	claws		T	C
2010	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			101	skeletons		T	C
2010	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			6	skulls		T	C
2010	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			90	teeth		T	C
2010	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			1	trophies		H	W
2010	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			43	trophies		T	C
2010	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			10	trophies		T	W
2011	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			1573	bones		T	C
2011	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			127	skeletons		H	C
2011	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			369	skeletons		T	C
2011	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			36	trophies		T	C
2012	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			20	bodies		P	W
2012	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			49	bodies		T	C
2012	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			107.5	bones	kg	T	C
2012	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			2	bones		T	C
2012	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			108	skeletons		T	C
2012	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			7	skulls		T	C
2012	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			8	skulls		T	W
2012	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			1	trophies		H	F
2013	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			42	bones		T	C
2013	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			676	skeletons		T	C
2013	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			161	skeletons		T	W
2013	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			7	skulls		T	C
2013	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			27	skulls		T	W
2013	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			42	trophies		T	C
2013	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			18	trophies		T	W
2014	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			14	skeletons		H	C
2014	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			360	skeletons		T	C
2014	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			12	skulls		T	C
2014	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			3	trophies		T	C
2015	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			12	bones		T	C
2015	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			480	skeletons	kg	T	C
2015	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	LA	ZA			148	skeletons		T	C

Based on CITES export permits that we have had access to, between 2014 and 2017, South Africa exported 1,268 big cat Skeletons to Lao PDR. However, given the evidence we have seen in relation to the weight of the shipments that were actually exported we believe this number to be possibly two or three times that amount (see Bones for Sale section of this Report).

Our investigations, including an *in situ* investigation in Lao PDR in January and February 2018, revealed that the largest importer of big cat bones from South Africa is Vannaseng Trading Company because they are also possibly trading as Ainthaphone (supposedly another importer). By muddying the waters in terms of who the actual importers are, big cat bone importers may be deliberately diversifying their contacts and reinvent themselves, so as to possibly:

- Create uncertainty about who the actual actors and networks are on the importing side, particularly so as not to appear to be controlled by one or two major players only;
- Confuse law enforcement;
- Create a ‘moving target’ environment;
- Spread their risk.

The loopholes and inadequacies in the CITES permitting system once again enable this duplicity.

Below is what our investigation in Lao PDR found in relation to the addresses on the CITES permits where the ‘lion’ body parts were supposedly sent.

Please note that we did not go to Vinasakhone as other NGOs have documented it.

Although we tried very hard, we **could not find** the addresses (as per the CITES permits) for most of the importers. These were:

- ***CNP Import- Export LTD***, Ban Thongthoum, Vientiane.¹⁴⁴
- ***Empt-Import Lao Ltd***, Chengsavanh Village, Khammouane (Vinasakhone?)
- ***Johnny Pakxan***
- ***Laos Food and Trading Import and Export (Pty) ltd.***, Ning Jitpticheep (or Jitplecheep), Office 022 T2 Road, Ban Sosarek Village
- ***Phonsavanh Trading***
- ***Sinthavy Import- Export Co***, Ban Saysana, Vientiane
- ***SVT Trading***, Ban Savang Chanthabuly City, Attapeu
- ***Trading Co. Ltd., Mr Watanasook***, Ban Thongpong, Vientiane

Ainthaphone Trading (See Also Vannaseng)

Address on CITES Permits: 127 Dongdok Street, Dongdok Village, Vientiane. Telephone number: +856 20 5555 7799 (According to Truecaller the number belongs to V Kksmile).

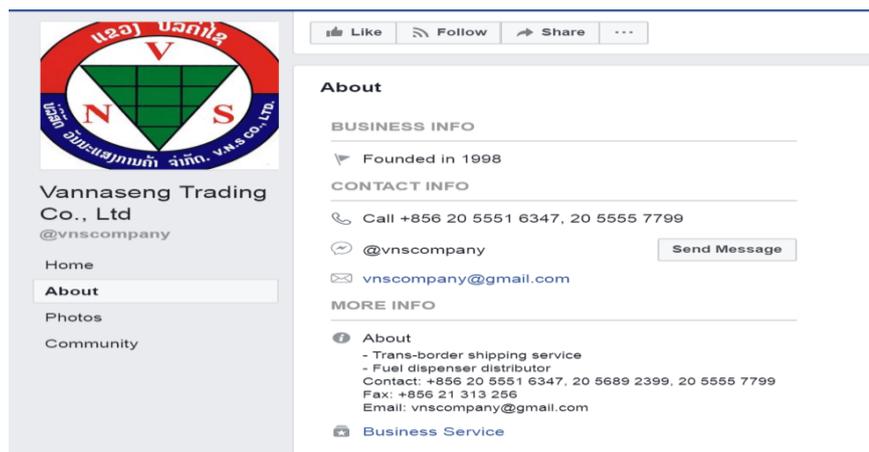
¹⁴⁴ According to searches the only CNP trading company is a mining exploration company. Address: Ban HuaKhua Road, Xaysettha District, Vientiane. Tel: +856 21 461 340. When we spoke to them they said they have nothing to do with the import or export of live animals or animal body parts.

Permits issued in 2016 and 2017.



127 Dongdok Street, Dongdok Village, Vientiane, Lao PDR

Ainthaphone must be linked to the Vannaseng Trading Company because this number is listed as the contact number for Vannaseng on their [Facebook page](#).



Our Laotian researcher rang the number and spoke to a Miss Toun. Toun says she works in Khammouane Province, and not in Vientiane. She informed our Laotian researcher that Ainthaphone would be moving to Khammouane Province soon.

According to Toun the owner of Ainthaphone is Mr. Thanakone.

Lilavadi International Import and Export

Address on CITES permits: Sisangvone Village, Xaythany District, Vientiane.

Additional information obtained through investigations:

Tel: +856 205 551 4792.

(According to Truecaller: Irene, Singapore Embassy Laos [written in Russian].

Tel: +856 21 417051 (according to Truecaller: Kpvsmt).

Tel: +856 558 12 88.

Actual Address: 17 Sisangvone Road, Ban Hongke, 4237 Vientiane.

Trading as: Societe Mixte de Transport Co Ltd (Cargo and Freight Company).

According to Business France¹⁴⁵: "Societe Mixte De Transport Co., ltd (SMT) found in 1990 in the form of state Private Joint Venture Company under Ministry of Communication, Transport, Post and Construction and was later privatized in 1996 SMT is a Lao owned company specialized in the field of freight forwarding and logistics services with head office based in Vientiane Capital and 4 branches in the main provinces of Laos.

SMT is providing daily transport and transit services between Thailand and Laos with his own facilities and equipment and transport and transit services between Laos and Vietnam and domestics transport services nationwide.

Products / Service:

- Project cargo handling.
- Warehouse/Storage.
- Customs Clearance/Customs broker.
- Freight /logistics service.
- International removals.

Contact person: Kham Lar (other name: Prachith Sayavong)

¹⁴⁵ <https://events-export.businessfrance.fr/laos-cambodge/societe-mixte-de-transport-co-ltd-smt>.



Social Media associates:

- Aiy Keosouvanh (Vsk). Believed to be a nephew of Sakhone Keosouvanh, though raised as a son.
- Phou Keosouvanh. Could be Sakhone Keosouvanh's son. Married to Douangchay
- Douangchay Keosouvanh. Wife of Phou. She has a familial link to one of the key Vietnamese behind Vannaseng.
- Somdy Keosuovanh. Nephew of Sakhone Keosouvanh (of Vinasakhone) and is operations manager at the Thakek tiger farm. He is also connected to other individuals in the tiger farming/trade in Thailand & Lao PDR.

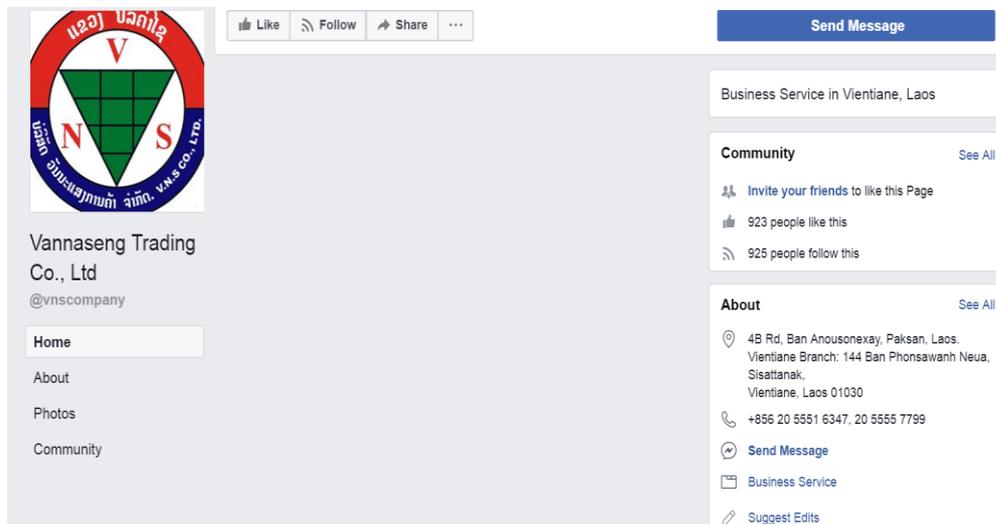
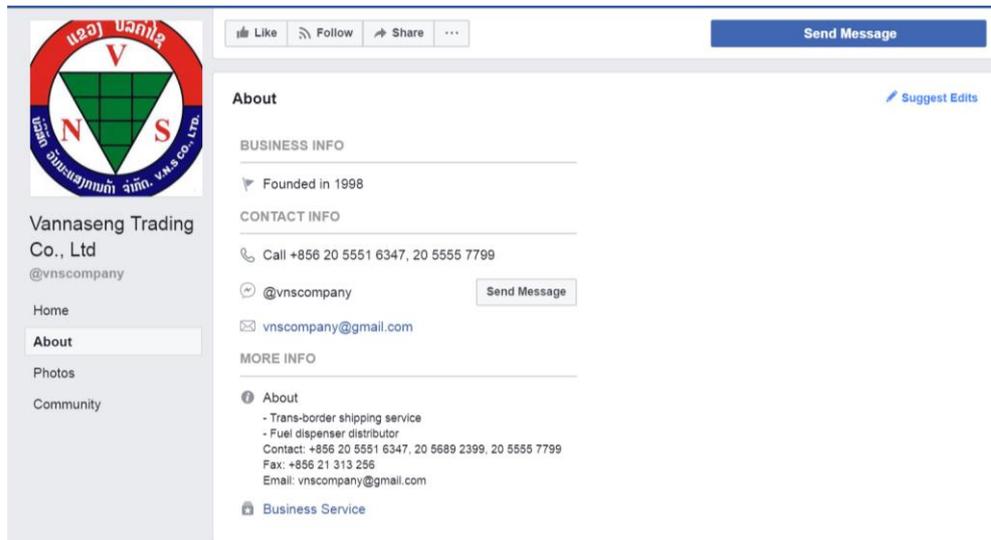


Vannaseng Trading Company (See Also: Ainthaphone)

Address on CITES permits: Pisit Pakawan, Vannaseng, 4Brd Anou Sonne Xay, Pakxan District, Bolikhamxai Province.

Permits issued in 2014.

<https://www.facebook.com/vnscompany/>



As per the addresses on the permits, Vannaseng Trading, Development Agriculture Industry and Somok Phaimany are all very close together in the same area.

We met with the Village Headman (who is in charge of the village on behalf of the Lao Government), and after we paid a fee he pointed out the address on the permit. It is a private residence, with no indication of any company registered at this address. The Village Headman went purely on the address and he had not heard of Vannaseng Trading

Company. The person at the property, Mai Kham, gave the following as a contact number: +856 228 228 37 (True Caller ID Maykham 01 Ansx).

Of interest is that CITES permits for 'lion' bone to Vannaseng Trading associated the company with Thai national Pisit Pakawan. Pakawan is also a live animal smuggler/breeder/dealer who imports large quantities of meerkats and bushbabies from Mystic Monkeys and Feathers in Limpopo South Africa to trade in pet shops in Thailand and Malaysia. Pakawan also has a wildlife farm in Northeast Thailand (which borders Lao PDR).¹⁴⁶ Pakawan also shares the same telephone number (+66 869 743 757) with Prajoub Thianthong and Kittitat Sirilakkhananan from the wildlife petting Café, *Mini Zoo Cafe* located in Chatuchak market, Bangkok.



Picture of Pisit Pakawan in South Africa

Pakawan is linked to Nikorn Wongprajan, the Laotian Ministry of Agriculture Inspector arrested in 2017 along with 'Boonchai' Bach, in connection with rhino horn trafficking. Both Pakawan and Wongprajan have visited South Africa together. We could not find a Facebook page for Pakawan but from a cursory Facebook search, it can be seen that Prajoub Thianthong is very close to a 'lion bone' importer in Thailand, Natakorn Yuennan and his wife as they are Facebook friends with a lot of comment exchanges. This may also link Pakawan and Vannaseng Trading to Natakorn Yeunnan in Thailand. Kittitat Sirilakhananan is also believed to link to this circle as he sometimes comments on same posts with Natarkorn and Prajoub Thianthong. The three sometimes

¹⁴⁶ <https://www.straitstimes.com/singapore/from-chatuchak-to-woodlands-smuggled-animals-face-long-and-perilous-journeys>.

checked in (not together) at the Cargo Free zone Suvarnabhumi Airport, supposedly when they come to clear their animal cargoes.

Vannaseng Trading Company has a track record of wildlife crime and is implicated in the illegal bear, macaque¹⁴⁷, tiger, rhino and elephant ivory trade.¹⁴⁸ TRAFFIC has also voiced considerable scepticism about the legitimacy of the so-called “captive breeding” of Burmese Pythons, Reticulated Pythons or East Sumatran Short-tailed Pythons is taking place in the numbers reported in annual CITES trade reports by the sole commercial breeder and exporter: Vannaseng Trading/Farms.¹⁴⁹

According to the EIA the Vannaseng Trading Company established a tiger farm in 2002, but has expanded and now has at least two tiger ‘facilities’ (one in the village of Lakxao, Khammouan, on the border of Vietnam). The EIA states that “the number of captive tigers in the Vannaseng facility more than doubled – in 2016 there were 102 tigers in the facility, which increased to 235 in 2017. The company has reportedly exported large amounts of tiger products to Vietnam and provided Chinese companies based in Lao PDR with the raw materials for the production of tiger bone wine for the Chinese market.”¹⁵⁰

Apart from the information given in the section above, Vannaseng is also implicated in the Kromah Moazu money laundering and illicit trafficking case in Uganda. In July 2017 Mr Kromah Moazu, a Liberian national, Mr Kourouma Bangaly and Mr Mohammed Kourouma both Guinean nationals, were charged with: unlawful possession of protected species; unlawful possession of restricted goods; unlawful importation of specimen of protected species; conspiracy to commit offence and money laundering. They were found in possession of 437 pieces of ivory weighing 1.303.76kg, and valued at Shs 9.3billion. The Vannaseng Trading Company, between 2014 and 2017, illegally provided Moazu with \$190,000 (nearly Shs685m).

In 2015, the South African national Department of Environmental Affairs did not properly answer a parliamentary question as to whether they [South Africa] authorised the sale of lion bones to Vannaseng – instead they deflected the question and absolved

¹⁴⁷ Vannaseng illegally imported 2,000 macaque monkeys captured and sold by villagers in Cambodia, according to an internal Lao government report. http://globaltigerforum.org/wp-content/uploads/2017/07/09_DEC_2016-1.pdf.

¹⁴⁸ Cultivating Demand: The growing Threat of Tiger Farms, 2017. <https://eia-international.org/wp-content/uploads/Cultivating-Demand-The-Growing-Threat-of-Tiger-Farms.pdf>.

¹⁴⁹ The Trade in South-East Asian Python Skins Geneva: International Trade Centre, 2012.

¹⁵⁰ *Ibid.*

themselves of any responsibility by replying: “To provide information relating to the above questions requires consultation with the provincial conservation authorities. We do not authorize any export of lion bones at the national department. My suggestion and advice is that the honourable member should use the Provincial Legislature representatives to ask this question so as to get direct response from the spheres of government which deals directly with permitting such exports. Should the honourable member require that this question be responded to at a national level, it should be acknowledged and accepted that this will take longer, a period of up to more than six months.”¹⁵¹

Somok Phaimany

Address on CITES permits: Somaok Phaimany Paksane District, Bolikhamxai.

Visited on 02 February 2018. Permits issued in 2017.



Somok Phaimany, January 2018.

¹⁵¹ https://www.environment.gov.za/sites/default/files/question633_lionbones_exportation.pdf.

As per the addresses on the permits, Vannaseng Trading, Development Agriculture Industry and Somok Phaimany are all very close together and in walking distance of each other. When our researcher rang the number, the person who answered called himself “Mr. Kop” and said that “Samoak Phaimany” is the name of a company, and not a person. Initially he said they were prevented from doing business with South Africa by the Lao PDR government. Later, he said they would like to do business with anyone from Africa who has animals for sale and that he had not told the truth about the company being prevented from doing business with South Africans. He said the lion bones come to him and then they go (trafficked) to Vietnam. He told our researcher that the South African he deals with (in all likelihood SJ Alberts and/or Johan Du Toit) is upset because the Vietnamese had not paid him in full for the last ‘shipment’. Somok Phaimany (calls himself Den) is Facebook friends with Vixay Keosavang, Johan Du Toit and Du Toit’s wife Karin (*nee* Rothmann). He is also Facebook friends with Sakhone Keosouvanh (the part owner of Vinasakhone).

We believe there may be a link between Somok Phaimany and the My Quynh Zoo in Vietnam. After our visit to My Quynh Mr Kop called our researcher and said they wanted to know what we were doing in Vietnam.

JDT Imports (Johan Du Toit)

Address on CITES permit: Hengboun Road, Ban Anou, Chantabuly District, Vientiane.

Additional info obtained through investigations: Tel. no.: +856 21 251 094.

Permits issued in 2016.

The exporter, Johan H Du Toit (Hartbeesfontein, Hekpoort, Gauteng, South Africa) is exporting to himself as the exporter and importer have the same business name.



There is no street number on the permits, and this is a very busy, very long and winding road. The village headman, took us to a business called V. A. T. Import-Export Co. Ltd. as he said that JDT sometimes 'share' their office and address. However, their address is completely different: 233 02 Chao Anou Street, Anou Vientiane.



KNT Trading

Address on permits: Sana Sombon Village, Vientiane Province.

Permits issued in 2015 and 2016.

According to the village headman it is in Ban Anou Village, Vientiane. It may also be known as the Kengkai Import - Export Company. Tel: +856 21 216 831. Whether it is this business that the bones went to is inconclusive.

There is reference to KNT Trading being implicated in ivory trafficking in 2015. According to a Thai PBS article, “The Ministry of Industry and Commerce of Laos has issued a statement to dismiss as untrue reports by Thai media, which alleged companies in Laos to have been smuggling elephant ivory through Thailand, Vientiane Times reported. In the latest reports to emerge in mid-December, Thai and other foreign media outlets reported that on Dec 10 Thai authorities seized 789kg of elephant tusks and 587kg of other wildlife items. The reports said the shipment had originated in Nigeria and passed through Singapore before arriving in Thailand en route for Laos. They also said the shipment would be received by a Lao company, KNT Trading, upon arrival in Laos. Following the Thai media reports, including one by Channel 7, the ministry investigated the issue but found no company registered as KNT Trading as mentioned by the Thai media. The Lao ministry also dismissed earlier reports by Thai media, including Channel 3, alleging that two Lao companies were involved in the illegal trade of elephant tusks seized by Thai authorities with the tusks allegedly shipped through Thailand destined for Laos. The Thai media reports alleged that two Lao companies – Manisouk Trading Lao and Soukpasong Import-Export – were supposedly to receive the tusks, which were seized by Thai authorities on April 2 and April 26 last year en route through Thailand. Investigations revealed that there were no companies registered under the names Manisouk Trading Lao and Soukpasong Import-Export.”¹⁵²



¹⁵² 29 February 2016. <http://englishnews.thaipbs.or.th/laos-dismisses-reports-illegal-ivory-trade/>.

Development Agriculture Industry

Address on permits: House no.210, 43 Paksane District, or Bolikhamxay.

Bones sent in 2014. Visited on 02 February 2018.

Development Agriculture Industry, Vannaseng Trading & Somok Phaimany are all very close together in this area.

This address was used by South African dealers: Rothmann, Riekert, De Jager and Van Tonder. The addressees were all different people with one even being Van Tonder's Thai wife Narachon Damrongkul (who is domiciled in South Africa).

We found the address. It is a shop/factory that sells building materials. When we went inside we were also given a "business card" for the owners of the shop.



Translation of the card:

Chanthanome Industry Factory Co. Ltd.

Product: Zinc aluminium roof, rolling door, roof template, front gate, front roof, inside window. Glass and aluminium product: all types of door and window, sensor door, glass for house, glass wardrobe, glassfish, mosquito net, ceiling. Curtain products. Also, other product available for service.

Mr Chan 020 22337219, 55553 5296.

Mrs Ting 020 2233 3386, 5553 5196.

Landline phone: +856 54 280170.

Email: pschanthnome@gmail.com.

Research associated with the business card for Chanthanome Industry Company revealed the following [website](#).

Address listed as road no. 4B Phonxay Village, Paksan, Bolikhamxay.

Email on the business card links to Facebook of a Laotian man: [Alak Khounphaxay](#) who posted an advertisement for Chanthanome Industry Comp. One of Alak Khounphaxay's Facebook friends is [Alex Khounphaxay](#), same family name, who in turn has a Facebook link to Sakhone Keosouvanh, Somchay Keosouvanh (of Vinasakhone and Ban Ta Bak tiger facilities).



Vietnam

Vietnam leads the group of fastest growing economies in the world between 2016 and 2050 and by 2050, is projected to be among the Top 20 economies in the world.¹⁵³ Concomitantly, in the current context of rapid economic and population growth, the domestic demand for wildlife body parts is growing and is a key driver of trade. Vietnam a major consumer country for South Africa's 'lion' bone trade and live wild animals.

By the mid-1990s, Vietnam had become one of the important links of the global wildlife trafficking rings. According to a recent article in the Vietnamese press, "At first, wildlife trafficking in Vietnam served demand from China. However, in the last two decades, as the Vietnamese living standard has improved, Vietnam not only serves as a link in the international trafficking rings, but also as a consumer."¹⁵⁴ Particularly in the last decade Vietnam has regularly been identified as both a transit country and a consumer market for wildlife body parts (including elephant ivory and rhino horn) and this ongoing demand continues to drive trade and trafficking.

Vietnam has been listed by CITES Elephant Trade Information System (ETIS) of 'primary concern' both as a source and transit country for illegal ivory – Vietnam has been implicated in over 46 tons of seized ivory since 2005. A Wildlife Justice public hearing in The Hague in November 2016 revealed that 579 products of rhino horn, 220 tiger parts, and almost 1 000 pieces of ivory were sold openly in just one small village in Vietnam. While according to an April 2018 TRAFFIC bulletin, despite seizures of live tigers and tiger parts, the open trade and sale of tiger parts continues in Vietnam. TRAFFIC also raised concerns about whether the legal tiger farms are in fact acting as sources for illegal trade.¹⁵⁵ While, despite a MoU signed by South Africa with Vietnam in 2013 which supposedly had important demand-side aims to increase cooperation in wildlife conservation and collaboration on demand reduction campaigns, in South Africa, Vietnamese nationals remain the most commonly arrested Asian nationals related to wildlife trafficking.¹⁵⁶ Within this context it is concerning that the South

¹⁵³ <https://www.pwc.com/vn/en/publications/2017/spotlight-on-vietnam.pdf>.

¹⁵⁴ <http://english.vietnamnet.vn/fms/environment/201778/vietnam-makes-progress-in-wildlife-protection.html>.

¹⁵⁵ TRAFFIC Bulletin, Vol. 30 No. 1, April 2018.

¹⁵⁶ <https://www.dailymaverick.co.za/article/2017-01-10-wildlife-trafficking-the-sordid-connection/#.WvrZF4CFPX4>.

African government is feeding Vietnam’s insatiable demand for wild animals and their body parts.

As with Lao PDR and Thailand, the information currently available through the CITES Trade Database in relation to South Africa’s ‘lion’ trade with Vietnam is problematic, inaccurate and inadequate, with the data provided by both Vietnam and South Africa being substantially different or no reporting at all. This accentuates that the CITES permitting process appears to be merely a paper producing activity for its own sake rather than a system that ensures adequate or effective reporting, regulation and enforcement of trade activities. Furthermore, alarmingly it shows that there is a severe lack of even basic monitoring and verification by the CITES Secretariat or the Parties. See below extracts from CITES Trade Database of ‘lion’ body part exports from South Africa to Vietnam from 2008 – 2016.



New Search

Comparative Tabulation Report

Year	App.	Taxon	Class	Order	Family	Genus	Importer	Exporter	Origin	Importer reported quantity	Exporter reported quantity	Term	Unit	Purpose	Source	
2014	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	VN	ZA		2		bodies		H	C	
2014	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	VN	ZA			16	bodies		T	C	
2014	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	VN	ZA		4		bones		H	C	
2014	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	VN	ZA		2		skeletons		H	C	
2014	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	VN	ZA		479		781	skeletons		T	C
2014	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	VN	ZA		87			skeletons		T	W
2014	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	VN	ZA		26			skeletons		T	
2014	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	VN	ZA		2			skulls		H	C
2014	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	VN	ZA				1	trophies		H	C
2014	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	VN	ZA		1			trophies		T	C
2015	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	VN	ZA		93		618	bodies		T	C
2015	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	VN	ZA				60	bones		T	C
2015	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	VN	ZA		15			live		T	C
2015	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	VN	ZA		40		42	live		Z	C
2015	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	VN	ZA		616		208	skeletons		T	C
2016	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	VN	ZA		814			bodies		T	C
2016	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	VN	ZA		17			live		Z	C
2016	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	VN	ZA		1080			skeletons	kg	T	C
2016	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	VN	ZA		330			skeletons		T	C

1	Year	App.	Taxon	Class	Order	Family	Genus	Importer	Exporter	Origin	Importer r	Exporter r	Term	Unit	Purpose	Source	
2	2008	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	VN	ZA				60	bones		P	C
3	2009	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	VN	ZA				2	bones		H	C
4	2010	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	VN	ZA				26	bones		H	W
5	2011	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	VN	ZA				32	bones		H	C
6	2012	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	VN	ZA		738.82			bones	kg	H	C
7	2012	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	VN	ZA			738.82		bones	kg	H	W
8	2013	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	VN	ZA		459.2			bones	kg	T	C
9	2013	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	VN	ZA			4		bones		H	C
10	2013	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	VN	ZA				531	bones		T	C
11	2013	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	VN	ZA				2	bones		T	W
12	2014	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	VN	ZA			4		bones		H	C
13	2015	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	VN	ZA				60	bones		T	C

In Vietnam lion bone is being turned into lion balm (cooked lion bone), people wear lion claws and teeth, lion skulls and teeth are put on display as status symbols, and lion bone is being processed into “cake”, which is difficult to distinguish from tiger “cake”. A source interviewed by TRAFFIC in April 2018 anticipates that “the trade for lion bone cake will grow and that sellers are now openly telling consumers that the cake

contains lion (bones and gall bladder) and consumers are specifically requesting lion products... It has been suggested that there are already lion farms in Viet Nam, but the captive-population is unknown.”¹⁵⁷

Below is what our investigation in Vietnam found in relation to the addresses on the CITES permits where the ‘lion’ body parts were supposedly sent.

Vinh Phu-Cmt Joint Stock Company

Address on permits: Lam Anh Thang, Vinh Phu CMT Joint Stock Co. 232/5/28 Binh Loi Str, Ward 13, Binh Thanh District, Ho Chi Minh City.

Permits issued 2017.¹⁵⁸

Director: Mr Lam Anh Thang.

Business activities: “plants and wildlife breeding (birds, mammals, reptiles, amphibians, fish, insects, molluscs and corals). Trade of plants, live animals and animal products (bone, hair, skin, teeth, horns, claws”).

Tel: +84 3984 6905.

Their email address is also used for another ‘lion’ bone importer, Son Long Investment Development., Ltd. In Nghe An province.

Permits issued in 2017.

Visited 09 February 2018.

On inspection, this is a private house, with no indication that a company uses the premises as an office. It is an upmarket, quiet area in Ho Chi Minh.

The skeleton/bone consignments were addressed to Lam Anh Thang, the legal representative of the Vinh Phu CMT Joint Stock Corporation. Lam Anh Thang’s sister, Lam Bich Thuy, former treasurer of the Saigon Zoo (SGZ). Thuy and Thang’s brother, Lam Thanh Phong, were found guilty of the murder of a staff member of SGZ, in a corruption whistle-blower case. They received death sentences, which were commuted to life in 2005.

¹⁵⁷<https://cites.org/sites/default/files/eng/com/ac/30/E-AC30-25.pdf>. 16 May 2018.

¹⁵⁸ We only have information for 2017 so permits could have been issued in previous years too.

The actual owners are Bui Hong Thuy and veterinarian Phan Viet Lam¹⁵⁹. They are also the co-owners of two other wildlife supplier companies based in Vietnam, namely: Indochina Zoo Corp. and Nguyen Ngoc Company. This links the ‘lion’ bone traders to the trade in live animals, including live lions and tigers.



Thuy Bui Hong



Phan Viet Lam

Lam is the President of South East Asian Zoos Association. He was a previous director of Saigon Zoo. He sources wild animals for public and private zoos throughout Vietnam. Lam is linked to VinPearl and DKC Trading through his involvement in the DKC Trading/VinPearl animal shipment from South Africa in December 2015. He is also connected to imports of tigers from Europe and possibly South Africa, as well as rhino imports.

Vinh Phu-CMT has also directly imported live animals from South Africa:

- July 2012 - three rhinos sent by Bester Birds & Animals (veterinarian Charles Van Niekerk) with a transit in Thailand.¹⁶⁰
- February 2010 - two white tigers for Saigon Zoo, located in Ho Chi Minh City.

¹⁵⁹ Some of his Facebook friends include South African traders Adele Faul and Mike Bester. gfdsa¹⁶⁰ <https://annamiticus.com/2012/08/15/rhinos-from-south-africa-to-vietnam-via-thailand/>

- 2009 - two rhinos for Cu Chi Water Park, located in Ho Chi Minh City.

Son Long Investment and Development Co. Ltd

Address on permits: Xuan Dinh Hamlet, Dien Hong Commune, Dien Hong Commune, Dien Chau District, Nghe An.

Business activities: wholesale of cars and other vehicles, vehicle components, machines, construction materials, agricultural and forestry products, live animals.

Owner: Nguyen Tien Luc.

Address on permits not physically located.

Permits issued in 2015, 2016, 2017.

Thanh Manh Hung Company Ltd

Address on permit: Phan Van Sau, Thanh Manh Hung Company Ltd, 4 Hamlet Str., Nam Lam Dien Lam Ward. Dien Chau District, Nghe An

Additional Information obtained through investigations:

Business activities: wholesale of household goods, construction materials, transportation, production of timber products.

Chief accountant: Truong Thi Thuy.

Legal Representative: Phan Van Sau

Tel number +84 1656021269 (and +84 1678567555 (According to Truecaller that number belongs to Cau Thiet).

One of the 2017 consignments of 'lion' bone/skeletons from Sandra Linde Taxidermy was linked to two relatives of Nguyen Van Hai, a major Vietnamese wildlife trafficker, possibly linked to the DKC Network (see section *Joining the Syndicate Dots*):

- Nguyen The Du (son of Nguyen Van Hai). His name was on the shipment delivery note as the representative of the Thanh Manh Company.
- Dang Van Thiet (Nguyen Van Hai's son-in-law), the actual owner of the shipment. His wife, Thuy Duong is connected to several members of the DKC Network, e.g. Nguyen Dang Khanh and Chu Duc Gulit (both arrested for possession of rhino horns and elephant tusk in South Africa in 2012).

Bao Huy Import–Export Trading Co. Ltd

Address on permits: Dien Xuan Social, Dien Chau District, Nghe An OR Dien Chau District Nghe An.

Bones sent in 2015. Visited on 09 February 2018.

The above address could not be found.

There is a Bao Huy Import-Export Trading Company listed in the Yellow Pages but it is in Ho Chi Minh City, which is not in the Nghe An province:

Bao Huy Import-Export & Trading Company Limited

★ ★ ★ ★ ★ Listing has been verified: 2/8/2013

Address: 54/11 Le Van Luong, Tan Hung Ward, District 7, Ho Chi Minh City, Vietnam
Telephone: +84 28 37751496,
Fax: +84 28 37755379
Email: info@baohuyco.com.vn
Website: <http://www.baohuyco.com.vn>

Catetories

- Plastic Packaging - Bottles, Boxes, Vases
- Consumer Goods - Import And Distribution
- Plastic Companies
- Agricultural Products
- Plastic Drums

Product & Services

- Plastic Chair

Company Profile

- Company name: Bao Huy Import-Export & Trading Company Limited
- Year Established: 2011
- Number of Employees: From 11 - 50 People

Hoan Van Dien

Address on permits: 30 BT/1A Cao Yuan Auy Street, My Dinh, 2 Ward, Tu Liem, Hanoi.

Permits issued in 2014.

This is a private residence in an upmarket, quiet area and there is no indication of a company being registered at this address

Trans Giang

No address provided. Could not trace.

Thailand

Thailand is a source, transit and destination country for wild animals and their body parts, including CITES-listed animals. It has been identified as a principle market for elephant ivory, rhino horn, pangolin and tiger products and the large numbers of people consuming wild animals and their body parts in Thailand is significantly large enough to drive the market.

The United Nations Office on Drugs and Crime has identified Thailand as a hub for the smuggling, laundering and trafficking of wild animals into the international exotic pet market in the United States, Europe and other Asian countries and the Chatuchak Market in Bangkok has been widely identified as the epicentre of this illegal trade. Thailand also has a burgeoning trade in captive tigers with 32 licensed zoos having 1,287 tigers (as at April 2017).¹⁶¹ Given the context that it is very easy to obtain a zoo license (in Thailand and other source and demand countries), and that zoos exploit legal (domestic and CITES) loopholes to trade commercially under the pretext of their ‘non-commercial purposes’ status, makes this high number of tigers in captivity a major concern. Within this context it is also disquieting that Thailand does not currently have the legal framework to seriously challenge the criminal networks involved in the wildlife trade.¹⁶²

As with Lao PDR and Vietnam, the information currently available through the CITES Trade Database in relation to South Africa’s ‘lion’ trade with Vietnam is problematic, inaccurate and inadequate, with the data provided by both Thailand and South Africa being substantially different or no reporting at all. This accentuates that the CITES permitting process appears to be merely a paper producing activity for its own sake rather than a system that ensures adequate or effective reporting, regulation and enforcement of trade activities. Furthermore, alarmingly it shows that there is a severe lack of even basic monitoring and verification by the CITES Secretariat or the Parties. See below extracts from CITES Trade Database of ‘lion’ body part exports from South Africa to Thailand from 2013 – 2016.

1	Year	App.	Taxon	Class	Order	Family	Genus	Importer	Exporter	Origin	Importer r	Exporter r	Term	Unit	Purpose	Source
2	2013	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	TH	ZA		2910		14 skeletons	T	W	
3	2015	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	TH	ZA		48		118 skeletons	T	C	

1	Year	App.	Taxon	Class	Order	Family	Genus	Importer	Exporter	Origin	Importer r	Exporter r	Term	Unit	Purpose	Source
2	2015	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	TH	ZA				30 bones	T	C	
3	2016	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	TH	ZA		133		bones	T	C	
4	2016	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	TH	ZA		20		bones	T	W	

¹⁶¹ According to the Department of National Parks, Wildlife and Plant Conservation.

¹⁶² Criminal Justice Response to Wildlife Crime in Thailand: A Rapid Assessment. United Nations Office on Drugs and Crime, June 2017.

https://www.unodc.org/documents/southeastasiaandpacific/Publications/2017/Thai_Assessment_13_16_May_2017.pdf

Comparative Tabulation Report															
Year	App.	Taxon	Class	Order	Family	Genus	Importer	Exporter	Origin	Importer reported quantity	Exporter reported quantity	Term	Unit	Purpose	Source
2014	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	TH	ZA				7 live		B	C
2014	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	TH	ZA				2 live		T	C
2014	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	TH	ZA			10	10 live		Z	C
2014	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	TH	ZA				2 trophies		T	W
2015	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	TH	ZA				30 bones		T	C
2015	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	TH	ZA			13	11 live		Z	C
2015	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	TH	ZA			1	leather products (large)		P	W
2015	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	TH	ZA			48	118 skeletons		T	C
2015	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	TH	ZA				2 trophies		H	C
2015	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	TH	ZA				3 trophies		T	C
2016	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	TH	ZA			3	bodies		P	C
2016	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	TH	ZA			1	bodies		P	W
2016	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	TH	ZA			133	bones		T	C
2016	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	TH	ZA			20	bones		T	W
2016	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	TH	ZA			5	live		T	C
2016	II	Panthera leo	Mammalia	Carnivora	Felidae	Panthera	TH	ZA			9	live		Z	C

Below is what our investigation in Thailand found in relation to the addresses on the CITES permits where the 'lion' body parts were supposedly sent.

Natakorn Yuennan

Address on permit: Natakorn Yuennan, 838/116 Tapyao Ladkrabang (or Latkrabang). Bangkok 10900 (or 10520).

Permits issued: 2015, 2016 and 2017.

Additional Information: Tel: +66 8 6198 8128 and +66984194654.

Facebook: <https://www.facebook.com/tu.yuennan.5> and <https://www.facebook.com/PetproLogistic-443094885848158/>

On the face of it, Yuennan may be a middleman for the 'lion' bone imports from South Africa. It is unknown where the 'lion' bones actually go to. Yuennan is linked to illegal wildlife trader Attiya Sriduang on social media. He is also linked on social media to people from The Mini Zoo Café (Chatuchak Market, Bangkok), and they in turn are linked to Pisit Pakawan, a live wild animal smuggler/breeder/dealer and 'lion' bone importer.



CARGO SERVICES

One stop service for your pet

MR. NATAKORN YUENNAN

838/116 The Trop Village, Tapyao, Latkrabang,
Bangkok 10520, Thailand.
Mobile : 086-1988128 , 098-4194654
E-mail : unclctu_1967@hotmail.com

FaceBook : Natakorn Yuennan
Id line 1 : petprologistic
Id line 2 : tupetpro

Natakorn Yuennan (10/09/2016)

International Logistics

No address made available.

Limited Partnership Boonchai

Address on CITES permits: House 138 Mu 11 Road, 168 Tambon Naratchak, wai District, Muang, Nakhon Phanom.

Permits issued in 2016.

It is highly likely that these shipments went directly to known wildlife trafficker 'Boonchai' Bach given that offices are in Nakhon Phanom, northeast Thailand. It is incredulous that the CITES authorities in both South Africa and Thailand issued the documentation for these transactions given the high criminal profile of Boonchai Bach.

Lisa Lion Import Export

Address on CITES permit: Office More Travel, 210 Moo 9 Soi Buchao, Nongprue, Banglamung Chonburi, Pattaya. Also: Ms Parichat Chumtong Office More Travel, 210 Moo 9, Nongpru, Banglamung Chonburi, Pattaya, 20150.

Permits issued in 2015.

Infographics

Part One South African **big cat skeleton** traders 2014 - 2017

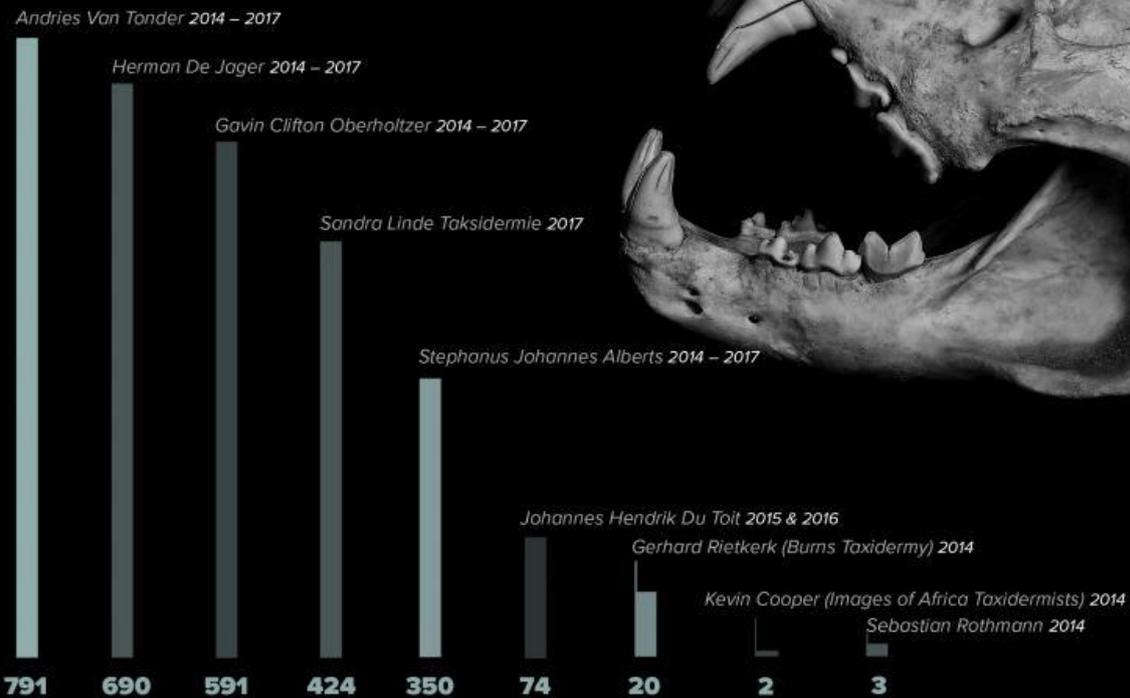
Not Just a by-product of the **trophy hunting** industry

91 % of the skeletons exported in 2017 had skulls present.
In South Africa **Big Cats** are being killed specifically for their bones.

Total number of **skeletons** exported 2014 - 2017

2,945¹

Traders and Number of Skeletons



¹ Based on research and PAIA information gathered on CITES export permits issued in 2017

Big Cat Skeleton Importers by Country 2014 - 2017

It is likely that these figures are higher given the evidence of illegally falsified "misdeclarations" of skeleton quantities

LAO PDR

Number of Skeletons imported from South Africa **1365**

Importers

Ainthaphone Trading	408	Lilavady	53
Vinasakhone	137	Jitplecheep Ning	50
SVT Trading	112	Empt- Import - Export Lao LTD	48
Vannaseng Trading	112	KNT Trading LTD	46
Somok Phaimany	110	Phonsavanh Trading	32
Sinthavy Import- Export Co	75	Johnny Pakxam (Pakxan)	29
Wattanasook Trading	67	CNP Import- Export LTD	16
Development Agriculture and Industry	58	JDT Imports (JH Du Toit)	12

VIETNAM

Number of Skeletons imported from South Africa **1138**

Importers

Son Long Investments	533	Thanh Manh Hung Co	251
Bao Huy Imp -Exp	140	Trans Giang	39
Vinh Phu - CMT Joint Stock	173	Hoan Van Dien	2

THAILAND

Number of Skeletons imported from South Africa **442**

Importers

Natakorn Yuennan	383	Limited Partnership Boonchai	20
Lisa Lion Import Export	38	International Logistics	1



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BIG CATS

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