

BREAKING POINT:

Uncovering South Africa's Shameful Live Wildlife Trade with China

INVESTIGATIVE REPORT

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THE EXTINCTION BUSINESS REPORT SERIES

Breaking Point: Uncovering South Africa's Shameful Live Wildlife Trade with China (2020) is Part 2 in the EMS Foundation and Ban Animal Trading, ***The Extinction Business*** Investigative Report Series. The purpose of this Report Series is to examine South Africa's wildlife trade. ***South Africa's Lion Bone Trade*** (2018) was Part 1 of the Series and can be found here:

<https://emsfoundation.org.za/wp-content/uploads/THE-EXTINCTION-BUSINESS-South-Africas-lion-bone-trade.pdf>

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TABLE OF CONTENTS

ACRONYMS.....	1
EXECUTIVE SUMMARY	2
OBJECTIVES	2
KEY FINDINGS	2
SUMMARY OF RECOMMENDATIONS	5
INTRODUCTION AND CONTEXT.....	6
INNOCENT VICTIMS CAUGHT UP IN THE WEB OF THE ‘LEGAL’ TRADE	12
SMOKE AND MIRRORS: INEFFECTUAL CONTROLS AND LOOPHOLES IN THE PERMIT SYSTEM	12
SPECIES EXPORTED FROM SOUTH AFRICA TO CHINA.....	19
List of Wild Animals Sold and Exported and Importers	19
The Trade in CITES Appendix I-Listed Species between South Africa and China.....	24
Chimpanzees	25
Cheetahs.....	33
Tigers	34
The Trade in CITES Appendix-II and Appendix-III Species between South Africa and China	35
Rhinos.....	37
Lions	37
Caracal and Serval	39
Non-Human Primates.....	39
The Trade in Non-CITES Listed Species between South Africa and China	40
African Wild Dog/African Painted Dog	41
Giraffe.....	42
Meerkat.....	43
THE SOUTH AFRICAN TRADERS	45
AFRICAN PRIDE IMPORTS & EXPORTS – EDWARD COETZER.....	45
CATS FROM AFRICA – HENDRIK STEYN.....	46
CLAASEN, GERT.....	47
CUTHBERTSON, ROZANNE/VOGES, EDWIN.....	47
HORSEBACK AFRICA – COLIN & THEONY MACRAE.....	48
INDUNA PRIMATE & PARROT PARK T/A IMPEX WILDLIFE – ANTHONY WILBRAHAM	49
JANSE VAN RENSBURG, JUDITH.....	49
LETSATSI LA AFRICA WILD ANIMAL & PREDATOR PARK – J. J. VAN DER WESTHUIZEN.....	49
MAFUNYANE – MANUS PRETORIUS & MARIUS PRETORIUS	51
NAAUWPOORT PARROTS / BUNDU BIRDS / P. F. DISTRIBUTORS – GIDEON FOURIE	52
SAVANNA GAME SERVICES	52
SNYMAN, ANDRE.....	52
VAN ZYL, THEUNS.....	53
ZOOLOGICAL LIVE ANIMAL SUPPLIERS CC – JAMES MAGILL.....	54

LOCAL SUPPLIERS TO SOUTH AFRICAN TRADERS	56
LEGISLATION IN CHINA	56
INDIGENOUS ANIMAL SPECIES IN CHINA	56
CAPTIVE WILD ANIMAL WELFARE LAWS IN CHINA	58
SO WHERE DO THEY GO?—THE DESTINATIONS	59
THEME PARKS AND ZOOS	59
PRIMATE BREEDING FACILITIES AND BIOMEDICAL ANIMAL RESEARCH	59
BREEDING FARMS	60
A ROOM WITH NO VIEW: ALPHABETICAL LIST OF CHINESE ENTITIES IMPORTING WILD ANIMALS FROM SOUTH AFRICA.....	60
Anji Zhongnan Baicaoyuan Zoo Co. Ltd.	60
Beijing Johnsen International Trade Co. Ltd./Beijing Sun-Rising Technologies Co. Ltd./Jiangsu Johnsen Bioresource Co. Ltd.	62
Changsha Ecological Zoo	64
Changxing Taihu Longzhimeng Animal World Cultural Tourism Development Co. Ltd.	65
Chimelong Safari Park	70
Dalian Dragon-Leader Import & Export Co. Ltd. / Dalian Longyuan Wildlife Consulting Co. Ltd.	71
Dongying Kunpeng Import & Export Co. Ltd.	78
Eastern Sunrise (Beijing) Wildlife Services Co. Ltd.	78
Fujian Province Changtai Tianzhu Mountain Feilong Tourism Development Co. Ltd.	79
Foshan Nanhai Kaipeng Trading Company Ltd.	81
Golden Land Animal Trade Co. Ltd. & Green World Breeding Farm	81
Guangzhou Xiangkuan Biotechnology Co. Ltd.	83
Guizhou Forest Wildlife Zoo Co. Ltd.	83
Hainan Tropical Wildlife Park and Botanical Garden	85
Hangzhou Fuyan Rare Animal Breeding Farm/Hangzhou Safari Park	85
Heibi Ningbo Yinzhou Huayue Rarebird Breeding Co. Ltd.	87
Henan Xing Qin Import & Export Trade Co. Ltd.....	87
Henan Yinji Jiabao Amusement Park Management Co. Ltd.....	88
Heshan Longkou Jinfeng Animal Breeding Farm and Tianjin Ruishun Biological Technology Co. Ltd.	88
Institute of Medical Biology Chinese Academy of Medical Science	90
Jinan Paomaling Wildlife World Co. Ltd./Jinan Wildlife World/Jinan Zoo	90
Nanjing Jinniu Lake Wildlife Kingdom Co. Ltd.	93
Nanning Zoo.....	93
Nantong Forest Safari Park/Zoo Co. Ltd.	94
Neijiang Youlian Wildlife Breeding Co. Ltd.....	95
Ningbo Youngor Zoo.....	96
Pingnan Yongyuan Biological Technology Co. Pty (with Address Xionsen Wine Shop)	97
Quanzhou Haisi Wildlife Zoo	99
Qin Huangdao Huixin Import & Export Co. Ltd./Qin Huangdao Aoze Animal Breeding Co. Ltd.....	99
Shandong Shunyuan Tourism Development Co. Ltd./Baoshan Front Wildlife Park/Baoshanqian Wild Animal Park	101
Tangshan Zoo.....	105
Tianzhushan Mayangxi Ecological Garden/Tingxia State-Owned Forest Farm Ecological Tourist Area	106
Urumqi Zoo/Xinjiang Tianshan Wild Zoo.....	106
Wuhan West Lake Animal Kingdom Tourism Co. Ltd.	107
Wuhan Zoo	107
Xi'an Qinling Wildlife Park	108
Xiantao Tianle Zoo.....	109
Ya'an Dongfang Bifeng Gorge Tourism Co. Ltd.....	110
Zhengzhou Zoo	111

CONCLUSION	113
RECOMMENDATIONS	116
<i>ACTIONS.....</i>	<i>117</i>
<i>PROPOSED SOLUTION</i>	<i>118</i>

ACRONYMS

BAT	Ban Animal Trading
CAZG	Chinese Association of Zoological Gardens
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
CoP	Conference of the Parties
DEFF	Department of Environment, Forestry and Fisheries
EMS	EMS Foundation
IATA	International Air Transport Association
LAF	Legal Acquisition Finding
NDF	Non Detrimental Finding
NGO	Non-Governmental Organisation
NEMBA	National Environmental Management: Biodiversity Act
PAIA	Promotion of Access to Information Act
SANBI	South African National Biodiversity Institute
TOPS	Threatened or Protected Species Regulations
WAZA	World Association of Zoos and Aquariums
WPL	Wildlife Protection Law (China)

EXECUTIVE SUMMARY

OBJECTIVES

This report is the second instalment of the *Extinction Business* series. The first report exposed the criminality embedded in South Africa's legal captive lion breeding industry and the lion bone trade.¹

This report focuses on South Africa's so-called legal trade in live wild animals with China. It enriches the evidence base on such trade in wild animals and their derivative parts. We expose the myth that the legal trade somehow crowds out the illegal trade, or that because it is legal, the animals involved are somehow treated well. To the contrary, the legal and illegal trade are so intertwined as to be functionally inseparable. The research demonstrates that South Africa's live wild animal trade with China is riddled with irregularities that are exploited by traffickers. There are gaping loopholes in the global permitting, enforcement and oversight system. The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) is meant to govern the global trade but is failing dismally, imparting a false sense of security for those who believe that the international trade in wildlife is justified and sustainable. This report reveals that such security is wildly misplaced and, far from contributing to conservation, the legal trade is one of the single biggest factors currently undermining conservation objectives.

KEY FINDINGS

The report finds that illegal shipments of wild animals classified by CITES as 'threatened' with extinction (Appendix I) and 'endangered' (Appendix II) masquerade as legal exports. Brokering and wholesale companies, along with zoos, are heavily implicated in the trafficking of wild-caught Appendix I-listed species. CITES allows trade in Appendix I-listed species if the animals in question are captive-bred. The export addresses in the importing country (China) are often not verified. Under CITES, the exporting country is technically not obliged to check whether the export addresses are legitimate. Animals are traded into a range of theme and amusement parks, circuses, laboratories, zoos and 'safari parks', often untraceable. CITES permits still operate on a manual system, subject to pervasive fraud. False declarations by traders, agents and exporters are ubiquitous and yet, we discovered, that not a single offender has been prosecuted to date. Transparency and accountability, two of the most basic elements of governance, are notably absent from the regulatory system. Traceability, critical to monitoring and verification, is similarly absent or unreliable. In other words, identifying the true origin of any given animal is nigh impossible. Once animals leave South Africa, it is similarly impossible to identify where they will land up.

China is the dominant source of the global demand for wildlife products and South Africa actively supplies the market. Consumption is socially desirable in China and, in many respects, impervious to bans unless the bans are complemented by appropriate demand reduction messaging with associated political will at the highest level. While the 2016 domestic ivory trade ban has been effective, for instance, the banning of all trade in tiger products in 1993 has not. Tiger farming, China's

¹ <https://emsfoundation.org.za/wp-content/uploads/THE-EXTINCTION-BUSINESS-South-Africas-lion-bone-trade.pdf>

purported solution to wild tiger exploitation, did little to protect tigers in the wild and today there are only a handful left. The report makes clear that any captive breeding and trade legitimises and normalises consumption, which renders demand reduction campaigns incoherent and ineffective, and puts wild species at further risk of exploitation.

While CITES eventually published criteria in 2019 (at the 18th Conference of the Parties [CoP]) for ‘appropriate and acceptable destinations’, too much latitude is gifted to the trading partners to decide whether the criteria are met. The destinations listed on an overwhelming of South African export permits to China are pure fiction. CITES’ insistence that the trading partners be satisfied that the trade would promote *in situ* conservation is routinely ignored. Moreover, Appendix I-listed animals may only be traded as Appendix II-listed species if they are captive bred in a facility registered with CITES and the trade is for ‘non-commercial’ purposes. Compliance with the latter requires that the animals are not sold to a third party after import. We again found evidence that this requirement is routinely violated. Live wild animals are often sold on, by a middleman or company fronting as a legitimate importing entity, to other individuals, to laboratories for vivisection or to circuses for entertainment.

Through systematically analysing all available export permits, visiting many of the stated export destinations and performing online research in relation to the Chinese importers, we found that the majority of permits were in breach of CITES regulations. These breaches could have been easily detected by management authorities had they applied even minimal due diligence. This report thus finds that a number of exports of live wild animals that occurred during the period under study (2016 to 2019) were irregular and may well have been illegal.

The report begins with an assessment of the negative effects of South Africa’s (and the CITES Secretariat’s) ideological stance towards wildlife as ultimately existing for human use and consumption. South Africa’s courts have, on the other hand, ruled that it is rational to treat wild animals with respect as they are integrally connected to each other and the ecosystems on which all life depends. The report also makes the critical point that the continued trade in wildlife—a pursuit of South Africa’s ‘consumptive use’ doctrine—risks unleashing myriad COVID-type diseases. CITES cannot abrogate responsibility in this regard, as it is the only global treaty currently in existence to govern the trade in wildlife. COVID-19 is not an agricultural problem, as the CITES secretariat suggested; it is a problem emanating from treating wildlife as if they are merely commodities to be farmed.

Having established this, it summarises the particular violations of basic regulations, corroborating the point that CITES regulations currently serve little purpose other than box-ticking red tape. Moreover, the CITES secretariat’s endorsement of zoos as places of conservation education amounts to using them as a shield for absolving themselves of responsibility for animal welfare. Zoos are hardly exemplary protectors of welfare, and the report makes the vital point that animals confined to life in captivity are welfare-deprived to the point that we are eroding our own humanity by continuing to endorse this system. Moreover, zoos hardly contribute to *in situ* conservation.

The report finds that a minimum of 5,035 live wild animals were exported from South African to China between 2016 and 2019. This is likely an extremely conservative estimate. We painstakingly list the species that have been traded and the import destinations that have been listed on the available export permits we obtained. While the list is by no means exhaustive, it provides an instructive window into the sheer extent of the trade. The first example alone, of chimpanzees exported from South Africa to China in 2019, provides substantive evidence that the regulatory requirements for such a trade were not adhered to. The trade was clearly commercial in nature and

intent but the technical details allow the export if the importing country deems the sale to be ‘non-commercial.’ This is incoherent and irrational at best and unethical at worst. Notwithstanding this technicality, the trade of these chimpanzees violated a number of other regulations and yet there have been no repercussions.

After detailing a number of other exports of live animals, including a bewildering number of giraffe and meerkat, the report details the South African wildlife traders that are benefiting from commercial trade with China. Some have links with international organised criminal syndicates; these links are made explicit. *Letsatsi la Africa*, for instance, was one of the first facilities in South Africa to legally export lion bones to Laotian wild animal trafficker Vixay Keosavang. Local suppliers to these traders are also documented.

The next section explores Chinese legislation for the protection of wild animals. It finds that laws which attempt to prevent the trade in endangered species contain a myriad of exemptions so as to be essentially meaningless—scientific research, captive breeding and public exhibitions or performances are all loophole criteria under which animals can be traded. Moreover, wild animal welfare laws governing captive animals in China are non-existent.

A detailed exploration of Chinese destinations for South African-origin wild animals follows. Our investigation of theme parks and zoos revealed that nearly all trained primates are not bred in captivity, were wild-caught and illegally traded out of Africa and Indonesia. Primates are also intensively bred for use in biomedical animal research facilities in China. China also exports primates to the USA for this purpose. South African exotic primate breeders export hundreds of marmosets to Chinese laboratories each year or to breeding farms. The number of animals and species in breeding farms in China cannot be determined.

An alphabetical list of Chinese importing facilities is provided with matching photographs that tell their own story of animal welfare violation and naked greed. A cursory glance at these facilities provides ample evidence that they do not constitute CITES’ limited criteria for ‘acceptable’ destinations. A number of the listed facilities, as indicated earlier, are either non-existent or could not be found. South Africa has issued export permits for over 400 primates, for instance, to *Eastern Sunrise (Beijing) Wildlife Services Co. Ltd*, which used three different addresses, all suspicious. One address used in 2017 turns out to have been a building that has been owned by the Chinese government since 2015 and that has no businesses on the premises. More than 100 South African giraffes were exported to *Hainan Tropical Wildlife Zoo*, which boasts the world record for hosting the highest number of hybrid animals (which have zero conservation value and are only exploited for their commercial value). It is also clear from a number of Chinese import facilities that some animals which had been exported from South Africa had disappeared, implying either mysterious death or being sold on. This violates the ‘non-commercial purposes’ clause required by CITES, essentially making a mockery of the current regulatory system.

The report concludes by noting that it is impossible to determine the monetary value of the global legal trade in wild animals or its worth between China and South Africa alone. However, the data unequivocally indicates that the trade is expanding, ecologically unsustainable, welfare-destructive and intertwined with the illegal trade. Certainly there is no clear evidence that the legal trade somehow crowds out illegal trade. If anything, the presence of a legal trade—with zero conservation value—normalises consumption and triggers demand for wild-origin animals for commercial use and consumption. Moreover, the legal trade has become a political and ideological cover for proponents of ‘sustainable use’, chief among them current CITES Secretary-General Ivonne Higuero who argued in April 2020 that ‘well regulated, legal trade can help secure the conservation of

wildlife habitats and avoid land conversion and destruction of ecosystems that can drive zoonosis'. The report clearly demonstrates that the idea of 'well-regulated' markets is a myth at best, a smokescreen behind which deeply embedded interests exploit wild animals for purely commercial gain.

SUMMARY OF RECOMMENDATIONS

This report highlights that the health of humans cannot be disconnected from the health of the planet and that conservation issues are also necessarily, therefore, health issues. The promotion of 'sustainable use' is propagated by a myth that smart regulation is somehow achievable in practice. Transformative changes to the prevailing paradigm are therefore required to restore ecological systems and prevent the further exploitation of the wild animals that are integral components of those systems, the lifeblood of the planet we all share. The COVID-19 health crisis epitomises the character of our exploitative relationship with nature. Far from encouraging conservation, the wildlife trade deepens the exploitation and facilitates COVID-like diseases. Improved regulation is a far-fetched and myopic desire animated by sustainable use ideology and vested commercial interests. Bans have lower transaction costs than regulations and send clear signals that consumption is no longer socially and ecologically legitimate. Bans also undermine social desirability for certain products or experiences over time.

Nothing short of a global paradigm shift is necessary if we are to prevent further planetary disruption that unleashes COVID-type viruses. We require an integrative approach—seeing individual animals as essential and integral to the ecosystem in which they live and to other animals—if we are to avoid the destruction wrought by an aggregative view, which sacrifices animal welfare and ecological integrity on the altar of greed. Specific strategies are required to prevent further exploitation and ecological destruction. Our report specifically recommends the continued stigmatization of wildlife trade and consumption. Bans should be implemented to complement that stigmatization. All 'wet' markets, captive breeding of wild animals and the sale of live animals or their parts must be terminated. Rather, *in situ* conservation has to be prioritised and globally funded.

Because CITES is increasingly unfit for purpose and perpetuates the status quo, an alternative Global Agreement needs to be crafted in the spirit of the *Convention on the Prohibition of the Use, Stockpiling, Production and Transfer of Anti-Personnel Mines and on Their Destruction*, which entered into force in 1999. Such an agreement would replace CITES and have as its fundamental guiding principle that the trade in wild animals is inappropriate, counter-productive, unethical and fundamentally unsustainable.

INTRODUCTION AND CONTEXT



Image credit: Ban Animal Trading

Ban Animal Trading (BAT) and the EMS Foundation (EMS) have, over a number of years, been collecting information, doing fieldwork, undertaking research and analysing data on South Africa's international 'legal' trade in live wild animals.

The available evidence suggests that the coronavirus outbreak of SARS-CoV-2 (COVID-19), a zoonotic virus that has spilled over from non-human animals to humans and has rapidly spread around the world, originated from a wildlife 'wet market'² in Wuhan, China, and that the wildlife trade is responsible.³ The Coronavirus is the latest zoonotic disease in a growing list that includes MERS, Ebola and avian influenza strains. "Zoonoses are diseases transmissible between animals (domestic and wildlife) and humans. Around 60% of all human diseases and around 75% of emerging infectious

² A wildlife 'wet market' is where wild animals are crammed and stacked up in cages, slaughtered on demand and on site and the ground is wet with their blood.

³ Andersen, K.G., Rambaut, A., Lipkin, W.I. *et al.* The proximal origin of SARS-CoV-2. *Nat Med* 26, 450–452 (2020). <https://doi.org/10.1038/s41591-020-0820-9>

diseases are zoonotic (Taylor et al., 2001; Woolhouse and Gowtage-Sequeria, 2005). In aggregate, zoonoses have high impacts on human health, livelihoods, animals and ecosystems.”⁴

The COVID-19 pandemic, which has rapidly spread across the globe, has given impetus to this publication, which focuses on the trade in live wild animals between entities in the Republic of South Africa and the People’s Republic of China. BAT and EMS took the decision to publish the China⁵ related section at this point because there is now worldwide understanding and consensus that the exploitative trade in wild animals (whether wild-caught or ‘farmed’) cannot be separated from global human health and economic security issues. This is because it is “the intermixing of multiple species that occurs in the wildlife trade - species that don’t normally mix closely in the wild - that likely forms the pool for virus transmission, possibly with mutations from one species to another.”⁶

The trade in wildlife has triggered a global pandemic. It not only threatens the lives of wild animals, but also the lives of humans. Habitat loss, global travel and a persistent and growing appetite for wild tastes and exotic products have created the ‘perfect storm’ for the next human pandemic.⁷

Many of the animals in wildlife trading markets across China were not sourced in the country, but internationally, including from South Africa. Chinese media posted an article in January 2020, after the outbreak of the Coronavirus, about a vendor in the Guangzhou province who continued to transport, sell and slaughter wildlife species such as civet, giraffe and leopard to the public and also to zoos in China.⁸ These species are amongst the thousands of animals exported by mostly private zoo owners and dealers in South Africa to Chinese private and government-run zoos.

The trade in wildlife for Chinese consumption (in the literal sense), is no longer problematic only from an ethical point of view. It is dangerous to the health and safety of the people of China and elsewhere. China’s borders are known as hotspots for the smuggling of wild animals⁹, with ‘more than 90% of all products (both ‘legal’ and illegal) traded between China and Vietnam passing through illegal crossings’.¹⁰ In addition both South Africa and China are listed in the top five countries for wildlife trafficking seizures between 2016 and 2018 with China, as a key market for animal contraband, at number one and South Africa ranked number five.¹¹

Calls by animal protection NGOs and conservationists to ban the wildlife trade because of the severe cruelty of the trade, its impacts on individuals and on species and its clear links to human disease pandemics have been systematically ignored by the South African government (as the supplier) and the Chinese government (as the consumer). Within this context, there is therefore a need to try and unpack the nature of this trade. Moreover, given that trade is the second-biggest direct threat to species survival, after habitat destruction, particularly in Africa and Asia, it is important to examine South Africa’s live wildlife trade.

⁴ Grace, D., Infectious Diseases in Agriculture, in *Encyclopedia of Food Security and Sustainability*, Volume 3, 2019, Pages 439-447, 2019, <https://doi.org/10.1016/B978-0-08-100596-5.21570-9>

⁵ This Report excludes Hong Kong, which will be dealt with separately in a future BAT and EMS Report.

⁶ ‘How COVID-19 Took Hold and Why We Must End the Wildlife Trade. Here’s what we can do to make sure the critical mistakes made after the SARS outbreak won’t be made again’. Op-Ed., Trent, S., *The Revelator*, April 10, 2020 <https://therevelator.org/coronavirus-wildlife-trade/>

⁷ <https://www.smh.com.au/world/asia/how-does-an-epidemic-spread-and-what-does-the-wildlife-trade-have-to-do-with-it-20200129-p53vwm.html>

⁸ <http://hd.stheadline.com/news/realtime/chi/1691232/>

⁹ Stephens, S. and Southerland, M. *China’s Role in Wildlife Trafficking and the Chinese Government’s Response*. U.S.-China Economic and Security Review Commission Staff Research Report, 6 December 2018.

<https://www.uscc.gov/sites/default/files/Research/2018.12.06%20-%20Wildlife%20Trafficking%20-%20Final%20Version.pdf>

¹⁰ <http://www.thatismags.com/beijing/post/22812/tbt-china-s-role-in-the-international-illegal-wildlife-trade>

¹¹ Routes, *Runway to Extinction*, 2020. https://routespartnership.org/industry-resources/publications/routes_runwaytoextinction_fullreport.pdf

South Africa is the largest exporter of live wild animals in Africa to Asia.¹² Globally, the main players in wild animal trade, both nationally and internationally are Asia and Africa, followed by Central and South America. Within Asia, China is the principal consumer country and the main destination in international wildlife trade¹³ and is the world's largest market for trafficked wildlife.¹⁴

BAT and EMS are focussing on the 'legal' trade because there is a profoundly mistaken belief that the 'legal' trade protects species and individual animals. Nothing could be further from the truth. Animals caught up in the viciously cruel and miserable 'legal' trade suffer and die with unending impunity. It is not only organised criminal gangs and traffickers that are responsible for this or for driving wild animals to the point of extinction and decimating wild animal tourism in communities that rely on it. States Parties to the Convention on International Trade in Endangered Species (CITES) Parties are fundamentally failing to tackle the 'legal' trade and all that goes with it. The CITES regulatory system has created a false sense of security for those who believe the international trade in wildlife is justified, sustainable and educational, and that it contributes to conservation.

The 'legal' trade facilitates the illegal trade by enabling the laundering of animals, and by boosting demand for illegal wildlife and illegal wildlife 'products'.¹⁵ The 'legal' and illegal wildlife trade are fundamentally twinned and the 'legal' trade often provides a front for the illegal trade. As Trent has pointed out, "traders in 'wet markets'—like the one in Wuhan where this coronavirus is believed to have originated—sell live animals in deplorable conditions and are able to launder their products so that any illegality is extremely difficult to detect and prosecute, even when the authorities try. Cracking down effectively on illegal wildlife trading is almost impossible unless the 'legal' markets are dealt with."¹⁶

EMS and BAT's objective is to enrich evidence based data on the 'legal' trade in wild animals and their body parts through research, multi-sectoral policy engagement, awareness raising and advocacy. Our research fundamentally questions the efficacy and nature of current, regulatory wild animal trade interventions, both nationally and internationally. This report, which is based on our investigations in China, open source research and information obtained from governmental and non-governmental sources, hones in on South Africa's 'legal trade' in live wild animals with China.¹⁷ Our research demonstrates that South Africa's 'legal trade' with China is riddled with irregularities.

Drawing on hundreds of live animal export permits issued by South Africa's conservation agencies¹⁸, we examine and investigate substantial problems and gaping loopholes in the CITES permitting, enforcement and oversight system. In addition, our research clearly establishes that South Africa's current national policies and procedures, actively promote the convergence of the 'legal' and illegal trade in wild animals. This is exacerbated by systemic weaknesses in the international 'legal' wildlife trade permit regime, which not only adds to wildlife trafficking but also undermines any effort to address the illegal trade. It makes clear that transnational wildlife trafficking networks and crimes

¹² Outhwaite, W., & Brown, L., Eastward Bound. Analysis of CITES-listed flora and fauna exports from Africa to East and Southeast Asia, TRAFFIC, March 2018. <https://www.traffic.org/publications/reports/eastward-bound/>

¹³ Baker, S.E., Cain, R., van Kesteren, F., Zommers, Z.A., D'Cruze, N., and Macdonald, D.W., Rough Trade: Animal Welfare in the Global Wild animal trade. *BioScience*, Volume 63, Issue 12, 1 December 2013, Pages 928 – 938, <https://doi.org/10.1525/bio.2013.63.12.6>

¹⁴ Stephens, S. and Southerland, M. *China's Role in Wildlife Trafficking and the Chinese Government's Response*. U.S.-China Economic and Security Review Commission, 6 December 2018. <https://www.uscc.gov/sites/default/files/Research/2018.12.06%20-%20Wildlife%20Trafficking%20-%20Final%20Version.pdf>

¹⁵ Felbab-Brown, V., *The Extinction Market: Wildlife Trafficking and How to Counter It*. Oxford University Press. 2017:13.

¹⁶ 'How COVID-19 Took Hold and Why We Must End the Wildlife Trade. Here's what we can do to make sure the critical mistakes made after the SARS outbreak won't be made again'. Op-Ed. Trent, S., *The Revelator*, April 10, 2020 <https://therevelator.org/coronavirus-wildlife-trade/>

¹⁷ <https://jobsvacancy.in/coronavirus-now-unruly-animals-and-birds-also-come-in-grip-craving-for-food-and-drink-in-zoo/>

¹⁸ Gathered largely through responses to Promotion of Access to Information Act (PAIA) requests from the Gauteng province and data received from other provinces in South Africa.

perpetrated against wild animals cannot be disrupted without focussing on the entire supply and demand chain of the so-called 'legal' trade.

The permit system is the backbone of the legal trade in wild animals. In general, the export of live wild animals from South Africa to China is characterised by permit irregularities and lack of proper oversight. These irregularities are not benign administrative omissions, but rather permanent features of the regulatory system. Sourcing information about South Africa's trade in live wild animals has proven to be challenging. Essentially, our research shows that the wildlife trade between South Africa and China is characterised by:

1. Illegal shipments masquerading as legal exports of wildlife species classified as threatened by extinction (Appendix I) and endangered (Appendix II) by CITES;
2. Brokering and wholesale companies and zoos which are implicated in the trafficking of wild-caught CITES Appendix I-listed species;
3. The sale of CITES-listed species to theme and amusement parks, circuses, laboratories and zoos and so-called 'safari parks';
4. Untraceable destinations/importers/addresses – including hundreds of giraffes (a wildlife species also eaten in China);
5. Enforcement negligence particularly in relation to likely false declarations made by traders, agents and exporters. As far as we have been able to establish, no South African wildlife exporters have been prosecuted for false declarations;
6. The wild animals traded, including CITES-listed species, are frequently untraceable;
7. Largely absent verification measures, and
8. Lack of transparency and access to permits.

Theoretically, access to permits and permit data produced by the state should be open. South Africa has progressive legislation to afford access to information. Section 32(1) of the Constitution of the Republic of South Africa of 1996 provides that everyone has the right of access to records and information held by the state and any information held by another person which is required for the exercise or protection of any rights. The *Promotion of Access to Information Act* (better known as PAIA) was promulgated to give effect to these fundamental rights.¹⁹ The problem appears not to lie with the rights or the legislation encapsulating them, but with the interpretation given by officialdom to their statutory obligations. For instance, the Department of Environment, Forestry and Fisheries (DEFF) and its provincial offices at times act as if they are not accountable and as if they do not have to be transparent.

The application and issuing procedures for both CITES and non-CITES export and import permits are wrapped in secrecy and most PAIA applications by BAT and EMS have been refused. The refusals render the regulatory system opaque with the clear effect, even if this were not the intent, of protecting the vast financial interests of private entities (who often appear to be acting illegally) and keeping wilful or negligent administration secretive.

The use of wild animals in China for fur, so-called 'medicine', as 'food' and for vivisection is insatiable. According to the Chinese Academy of Engineering, the 'legal' wildlife 'industry' is valued at US\$74billion.²⁰ Most zoos in China have been closed temporarily to halt the spread of the Coronavirus, which reportedly also affects primates and civets. Temporary closure means a loss of income with less funding for veterinary treatment and food. The closures do however not mean that the human

¹⁹ <https://www.sahrc.org.za/home/21/files/Section%2010%20guide%202014.pdf>

²⁰ <https://multimedia.scmp.com/infographics/news/china/article/3064927/wildlife-ban/index.html>

consumption of wild animals and the use of traditional Chinese medicine have been suspended. China is a problem in this regard firstly because of the numbers of Chinese citizens who consume ‘legal’ and illegal wildlife and wildlife products²¹ and secondly because China exports its penchant for eating wildlife to other countries.²² Moreover, although the Chinese authorities may attempt to legislate against the consumption of wild animals, this does not translate into any real reduction.²³ A case in point is the tiger industry. In 1993, the Chinese government banned all trade in tiger products.²⁴ However, in 2018 an EMS and BAT investigation found tiger wine is still openly sold in shops in China.²⁵ The number of tiger farms and tigers born in captivity have also increased in China, yet the number of tigers in the wild in China remains in single digits.²⁶ Rhino horn continues to also be openly sold. South Africa is also very much an active participant in this problem because it is supplying wildlife and wildlife body parts directly into this highly contentious and cruel trade.

The CITES Parties coined a term—‘appropriate and acceptable destinations’—which to the ordinary person in the street may imply that CITES exporting Parties (such as South Africa) are obliged to give thoughtful consideration to where they are exporting wild animals to. To the layperson, ‘appropriate and acceptable destinations’ include places where the welfare of the animals is guaranteed and where these animals will be able to live out their natural life.

However, States Parties to CITES have never clearly or properly defined the meaning of ‘appropriate and acceptable destinations’. And besides, and outlandishly, it appears this amorphous CITES term, in true Orwellian form, may only relate to elephants and rhinos. At CoP18 (2019) the Parties noted “that ‘appropriate and acceptable destinations’ for live animals” should be those that ensure that the animals are humanely treated” and that, “where the term ‘appropriate and acceptable destinations’ appears in an annotation to the listing of a species in Appendix II of the Convention with reference to the trade in all live animals, this term shall be defined to mean destinations where: a) the Management and Scientific Authority of the State of import is satisfied that the proposed recipient of a living specimen is suitably equipped to house and care for it sustainably²⁷; and b) the Management and Scientific Authorities of the State of import and the State of export are satisfied that the trade would promote *in situ* conservation” (Resolution Conf. 11.20, Rev. CoP18).

Notwithstanding this understanding, and in spite of international disquiet about the cruelty of the international trade in wild animals, the ruthless ‘legal’ wildlife trade continues unaffected and unabated—including for elephants and rhinos.

Our analysis of a large numbers of export permits issued by South African authorities for wildlife to China reveal that the ‘destinations’ that appear on the CITES permits are often pure fiction. We have also established that the Chinese recipients of the animals usually do not keep them for so-called “educational” purposes but sell them on, either to individuals for possible consumption, to laboratories for experimentation (vivisection), to circuses for entertainment, and sometimes, they simply disappear.

²¹ Felbab-Brown, V., *The Extinction Market: Wildlife Trafficking and How to Counter It*. Oxford University Press: 2017:7.; <https://multimedia.scmp.com/infographics/news/china/article/3064927/wildlife-ban/index.html>

²² For instance, China is the main partner in the casino development in the Golden Triangle Special Economic Zone in Lao, a live meat market for endangered species through the person of Zhao Wei who is the owner of a number of wildlife related businesses, such as the Bear and Tiger Mountain Village in Guilin, China; the Xionsen Wine Shop and Tiger Bone Wine Factory; a primate breeding facility that supplies laboratories internationally and also in China; a new zoo that will open soon about a street block away from the Tiger Bone Factory Shop.

²³ <https://www.iccs.org.uk/blog/chinas-announcement-wildlife-trade-whats-new-and-what-does-it-mean>

²⁴ Felbab-Brown, V., *The Extinction Market: Wildlife Trafficking and How to Counter It*. Oxford University Press. 2017:146.

²⁵ <https://emsfoundation.org.za/wp-content/uploads/THE-EXTINCTION-BUSINESS-South-Africas-lion-bone-trade.pdf>

²⁶ Felbab-Brown, V: *The Extinction Market: Wildlife Trafficking and How to Counter It*. Oxford University Press. 2017:147.

²⁷ The use of language is important here. Using the term “living specimen” deliberately distances one from the victim who is referred to as a ‘thing’ (specimen), rather than what that individual animal is - a complex sentient being with agency and needs. CITES also fails to define or explain what is meant by ‘suitably equipped to house and care’.

This report, which forms part of a more comprehensive study on South Africa's wildlife export trade, is based on data and information EMS and BAT were able to obtain. It is limited in time and does not claim to be exhaustive of all transactions during the period under review. We have analysed all the available data, verified it and followed up on the importing destination claims. More than adequate evidence has been obtained to demonstrate the trends which we highlight herein.

In summary, this report explores South Africa's so-called 'legal' trade in live wild animals with China, a country without adequate enforcement of laws that govern the welfare of animals. The facts and statistics set out below were gleaned from the particulars stated on export permits that we had sight of.

When exporters apply for permits they must supply information that the relevant officials are obliged to verify, prior to the issuing of permits. We have checked the information - insofar as this was possible - by visiting the supposed export destinations as per the permits and performing online research in relation to the Chinese importers. We also endeavoured to verify information relating to the exported animals themselves. Our findings show that the majority of the permits were in breach of CITES regulations, and contained one or more false, vague or questionable declarations. Each breach or questionable declaration could have been detected by the CITES management authorities, had they applied due diligence and if adequate safeguards were in place. Thus, in most cases, in our view, the exports that have been permitted should never have been allowed to take place.



Image Credit: Ban Animal Trading, 2018

INNOCENT VICTIMS CAUGHT UP IN THE WEB OF THE ‘LEGAL’ TRADE



Tianjin Zoo. Image Credit: Ban Animal Trading, 2018

SMOKE AND MIRRORS: INEFFECTUAL CONTROLS AND LOOPHOLES IN THE PERMIT SYSTEM

DEFF encourages trade in wild animals and their body parts without scientific evidence and without properly assessing the impact this may have on free ranging populations of wild animals. Its core mandate is “providing leadership in environmental management, conservation and protection towards sustainability for the benefit of South Africans and the global community”.²⁸ In a reply to the EMS Foundation on the 24th of March 2020, the Minister of Environment Forestry and Fisheries, Barbara Creecy, confirmed in writing that her department understands their “legislative mandate for the regulation of the well-being of faunal biological resources in terms of NEMBA” and “accepts the recent judgement of the High Court of South Africa, Gauteng Division, Pretoria, namely that it has to consider the welfare of wild animals in decision-making processes”. Nonetheless, the Minister and her department seem steadfast in their defence and furtherance of the trade in wild animals as part of their politically crafted notion of “sustainable use” which underpins all their wildlife policies. As a result, DEFF ensures that sentient beings are cruelly exploited, transformed and treated as mere commodities and things.

Rather than taking an ‘integrative’ approach and defending ecological principles, true ecological sustainability, conservation, protection and welfare, the Department is, by default, assuming the mandate of the Department of Agriculture by actively supporting and encouraging the farming of wild animals and their increased commodification. The ‘integrative approach’, as used in a South African Constitutional Court judgment²⁹ and explained by Professor Bilchitz, “...requires the adoption of an attitude of respect for the individual animals that make up a species, an ecosystem or the components of biodiversity. In so doing, it also recognises the importance of relationships

²⁸<https://www.environment.gov.za/aboutus/department>

²⁹<http://www.saflii.org/za/cases/ZACC/2016/46.pdf>

between individual animals and the environment in which they live, including their connection with human beings. It insists that respect for individuals and their value is an essential component in ensuring the survival of the species as well as the protection of the environment more generally.”³⁰ To date, for all intents and purposes, government environmental law and policy, particularly in relation to wildlife, has been an ‘aggregative’ approach that sees ‘species’ as somehow divorced from its individual members. The aggregative approach – i.e. the ‘sustainable use’ paradigm, “focuses on achieving broad collective environmental goals such as the long-term survival of a species, the health of ecosystems or maintaining biodiversity”.³¹ A toxic mix of reductionist models inherited from the colonial and apartheid eras and hyper-capitalism, has meant that South Africa literally considers the natural environment as a type of farm to be exploited for material benefit.

This flagrant pro-utilisation, pro-consumptive stance is also clearly evident in South Africa’s oversight of the international trade in live wild animals. This same hierarchy—of humans at the top, ecosystems below, and individual animals at the bottom—is also implicit in international wildlife treaties such as the Convention on Biological Diversity (CBD) and CITES. Crucially, the unsustainable, cruel, and ever-expanding international trade in wild animals and their body parts is a threat to biodiversity conservation. As a Treaty, CITES provides almost no protection for the millions upon millions of animal victims caught up in the ruthless trade. Indeed, as is shown in this report, even at a very rudimentary level, CITES is in conflict with true ecological sustainability, animal welfare imperatives, protection and human well-being. At national level, in both source and destination countries, there are also wide-ranging governance failures.



Jinan Zoo. Image Credit: Ban Animal Trading 2018

Wild animal voices, desperately pleading for fair and compassionate treatment, are being drowned out by the cacophony of ineffectual bureaucracy, unethical practices, doublespeak rhetoric and

³⁰ Bilchitz, D., Exploring the relationship between the environmental right in the South African constitution and protection for the interests of animals, South African Law Journal, Volume 134 Number 4, Dec 2017, p. 740 – 777.

³¹ *Ibid.*

obfuscation that fundamentally characterises the global wildlife trade and masks the true commercial nature and extent of the legal wildlife trade. As the global wild animal trade flourishes (with tacit support from governments and international treaties such as CITES) so the associated welfare impacts increase. Not only is the negative impact of the wild animal trade on conservation substantial and growing but from a cruelty, animal protection and welfare perspective the international wild animal trade profoundly and negatively impacts CITES-listed animals and those not listed in the CITES appendices. This is rarely articulated and plans to mitigate these consequences seldom, if ever, are discussed by states that have ratified the CITES treaty. As a result, the suffering of non-human animals caught up in the wild animal trade—both legal and illegal—is, for all extents and purposes, ignored by CITES.

In a statement on COVID-19, the CITES Secretariat said that, “Matters regarding zoonotic diseases are outside of CITES’s mandate, and therefore the CITES Secretariat does not have the competence to make comments regarding the recent news on the possible links between human consumption of wild animals and COVID-19”.³² This ‘business as usual’ and lack of accountability position by the CITES Secretariat is bewildering, particularly given the apparent links between the wildlife trade and COVID-19 and the fact that CITES is the only multilateral Agreement that is responsible for protecting species and regulating and enforcing international trade in wild animals. The CITES Secretariat and the CITES Parties are therefore bound up in and accountable for the nature of the wildlife trade, including the captive breed, trade and transport and their negative effects. The wildlife trade does not happen in a vacuum.

The wildlife trade has impacted everywhere pushing the flow of alien species into wild environments and spreading diseases to humans and non-human animals alike. As Professor Frank Pasmans has pointed out, it is not possible to have a pathogen free wildlife trade or to regulate it, “we are talking about hundreds if not thousands of possible diseases and also novel viruses, this means we DON’T know these pathogens yet and we cannot test them. There is potentially an unlimited range of pathogens we don’t know and we can import into our society ... there is always a risk of importation of pathogens either for humans or for wildlife”.³³ This information on its own, together with the COVID-19 pandemic, should compel the CITES Parties to ban the live wildlife trade and the trade in wildlife body parts in order to prevent future epidemics, pandemics and diseases and reduce threats to humans and the environment.

CITES apparently aims to ensure that the international trade in CITES-listed species is sustainable, legal and traceable. What we do know is that between 1975 and 2015 “the volume of reported trade in CITES-listed wildlife quadrupled, from 25 million whole-organism equivalents per year to 100 million”.³⁴ The legal wild animal trade is a considerable global activity involving wide and complex networks and having far-reaching political and economic impacts. Despite this, there are few, if any, comprehensive reports documenting the extent of global legal trade in wild animals. This is because the data is inherently incomplete and patchy and the largescale temporal and spatial patterns in wildlife trade are poorly understood. In addition, access to CITES permits is usually restricted, redacted or not made publicly available. This, together with the fact that the actual extent of the illegal

³² https://cites.org/eng/CITES_Secretariat_statement_in_relation_to_COVID19

³³ European Parliament Animal Welfare Intergroup meeting 23 April 2020: The Covid-19 pandemic: zoonotic diseases from wildlife trade and consumption and intensive livestock farming. Presentation by Professor Frank Pasmans, Expert for Veterinary Bacteriology and Mycology in Reptiles and Amphibians Diseases - University of Ghent in Belgium.
<https://www.facebook.com/eurogroupforanimals/videos/520920118513207/>

³⁴ Harfoot, M., *et al.* Unveiling the patterns and trends in 40 years of global trade in CITES-listed Wildlife, *Biological Conservation* 223 (2018) 47–57.

trade in wild animals is unknown, means that countries and States Parties to international treaties such as CITES need to urgently take a much more circumspect and precautionary approach. Such an approach to the trade in wild animals, is particularly prudent given the context of unacceptable, inappropriate or unknown destinations, conditions and problems in the countries of source (including largely unregulated 'canned' breeding) and the close association between the 'legal' and the illicit trade.



Delegates from South Africa (COP18). Image Source: <https://enb.iisd.org/cites/cop18/>

Our investigations show that unquestionably the local and global legal permit system is part of, and intertwined with, the 'illegal' trade in wildlife. The 'box ticking exercise' that defines CITES, is, in a very real sense, dangerous because it creates the illusion of a well-controlled system of compliance, efficiency and verification—and therefore protection. Our research has shown that this is certainly not the case. If this is the situation in relation to animals listed on the CITES Appendices, then one can only imagine what the situation is in relation to the non-listed CITES species.

It is assumed that CITES-listed animal species have more protection than species that are not on the CITES Appendices. More information about the animals is required, i.e. what is the purpose of the export, where have the animals been sourced from, are they micro-chipped, etc., before permits are issued. But, given the low levels of verification of the stated information, the information that has to be provided is no more than meaningless red tape. For instance, CITES I-listed non-human primates, like chimpanzees, are exported to China without the South African authorities confirming any information supplied by the exporter and the importer. Had they done so, the authorities would have picked up on the incomplete information and the permits would not have been issued.

Once the animals have been exported, South Africa has no jurisdiction and no means of monitoring them unless an agreement exists between the governments of the two countries trading.³⁵

³⁵ Personal communication. Albi Modise. Department of Environmental Affairs, Tipping Point Transnational organised crime and the 'war' on poaching, Global Initiative against Transnational Organized Crime, 2016:54.

South Africa has no such agreement with China. DEFF has publicly declared that its trade in wildlife is regulated. This does not accord with our observations. The main problem is that the measures that have been put in place to ensure the legal trade are not adequately enforced or policed. Moreover, there is no verification system in place through the CITES Secretariat. It is rather a free for all and a small number of South African and Chinese wildlife traders benefit from a trade that is iniquitous, in every sense of the word. South African authorities repeatedly fail to comply with the very basics of a regulated trade in wild animals.

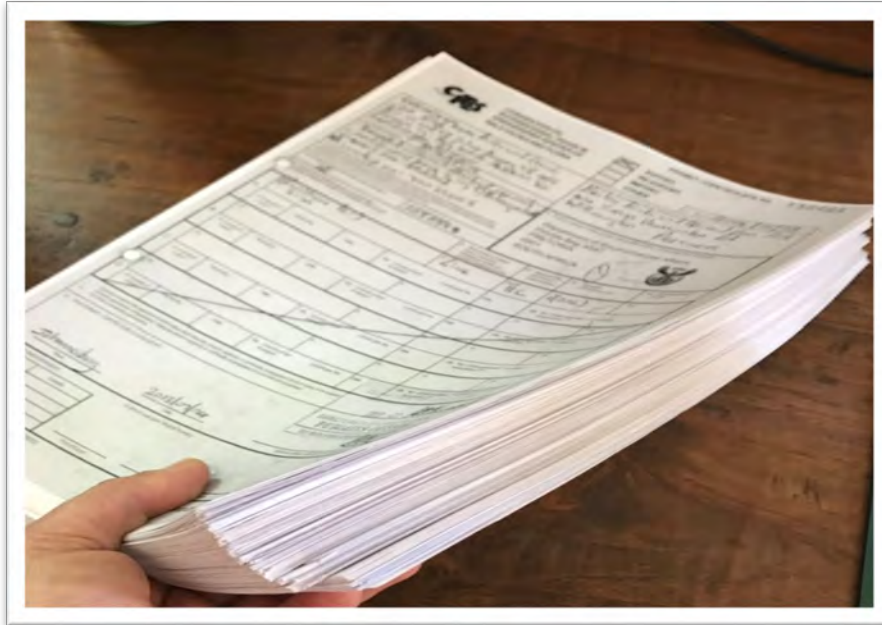


Image Credit: BAT and EMS 2019

Our analysis of hundreds of permits and shipments have identified—with monotonous regularity—the following ubiquitous and inherent weaknesses and anomalies which not only render the system ineffectual and impractical, but also point to lack of due diligence on the part of the officials responsible for implementing the permit system:

1. Compliance, enforcement and verification issues at government conservation and management authority offices and ports of export:
 - CITES import permits issued after or on the same date as CITES export permit, yet issued and stamped and signed off at the port of export by DEFF officials—including for CITES App. I species;
 - CITES import permits not signed or dated—including for CITES App. I species;
 - CITES permits not endorsed/cleared/stamped at ports of export - including for CITES App. I species;
 - CITES permits issued for x amount of animals but x+1 were actually shipped yet endorsed/cleared/stamped at port of export—including for CITES App. I species;
 - Ages of exported animals not present—including for CITES App. 1 species;
 - Source of so-called captive-bred animals not checked or properly verified;
 - Local and CITES legal wildlife trade monitoring systems are not transparent;
 - Local and CITES legal wildlife trade monitoring systems do not provide for the ability to track individual shipments and animals from where they were originally obtained

from, to intermediate local trading points, to the various international destination points and onward sale—i.e. the entire supply chain;

- Local and CITES legal wildlife trade monitoring systems contain extensive loopholes, gaps and opportunities to launder illegal items into the legal market, and
 - Local and CITES legal wildlife trade monitoring systems make it virtually impossible to reconcile and audit trade information or to cross-check information provided on waybills.
2. Keeping, Transport and Export permits issued without taking into account even the most basic 'duty of care' and welfare considerations of the animals caught up in the trade.
 3. Fragmented and failed enforcement and lack of competent and well-resourced investigative and intelligence gathering systems (this must apply to the legal as well as the illegal trade).
 4. No mandatory system or procedure in place to thoroughly vet and investigate so-called legal traders on both the exporting and importing side, particularly in relation to their bona fides, money flows, tax compliance, veracity of declarations, trading networks and possible links to illicit trafficking networks.
 5. Inherent failure in the CITES permitting system to ensure that national CITES Management Authorities exercise proper due diligence in the issuing and monitoring of CITES permits, particularly in the verification and vetting of importers and the appropriateness of destinations particularly from a legitimacy and animal protection and well-being perspective. It is a CITES requirement, and agreed to by States Parties, that the CITES permit must contain the complete name and address, including country, of the exporter and importer. However, a major loophole with this is that the name of the importer on the permit is very often not the actual destination or address that the exported animals will be sent to. The importer can be a broker or an agent. It is therefore extremely difficult to verify and substantiate permit information in relation to the animals themselves or to trace those specific animals. Moreover, even if the destination exists very often animals are sold on by that importer or zoo and it is, therefore, very difficult to track or trace where these animals actually are, if they are alive or dead, or what has happened to them.
 6. Inability of the CITES permitting framework to monitor and enforce the legal trade by CITES States Parties and Secretariat. There is no independent verification over the entire life cycle of permits and all supporting documentation at source and destination.
 7. Registered CITES Breeder/Exporter –*bona fides* and credentials inadequately investigated.
 8. It is not possible to differentiate between wild and captive animals.
 9. Microchip identification is rarely done at ports of export and import.
 10. Microchips can be removed.

11. DNA tests are rarely done and are too expensive to be used extensively so this is not a feasible solution.
12. In the legal trade it is also impossible to identify the source of baby animals—and often, not even of fully grown animals.
13. CITES Parties are obfuscating the real nature of the legal trade—whether Appendix I species or not. The legal trade is not about ensuring *in situ* conservation but rather about the commodification of wild animals for commercial purposes and profit (whether that entity is a purely commercial one or one that supposedly puts any profit from gate fees back into their operation). At the same time they say the “Trade in Appendix-I species must be subject to particularly strict regulation and authorized only in exceptional circumstances.”³⁶ We have not seen this applied to any of the exports we have analysed of CITES Appendix I animals from South Africa to China. The flawed nature of the permitting system which inherently provides loopholes, together with the lack of independent oversight and or verification, is a toxic mix indeed. Resolution Conf. 5.10 (Rev. CoP15) provides insight into these loopholes: *“The Conference of the Parties to the Convention Recommends that for the purposes of Article III, paragraphs 3 (c) and 5 (c), of the Convention, the following general principles and the examples in the Annex attached to the present Resolution be used by the Parties in assessing whether the import of a specimen of an Appendix-I species would result in its use for primarily commercial purposes:*

General principles

- *Trade in Appendix-I species must be subject to particularly strict regulation and authorized only in exceptional circumstances.*
- *An activity can generally be described as ‘commercial’ if its purpose is to obtain economic benefit (whether in cash or otherwise), and is directed toward resale, exchange, provision of a service or any other form of economic use or benefit.*
- *The term ‘commercial purposes’ should be defined by the country of import as broadly as possible so that any transaction which is not wholly ‘non-commercial’ will be regarded as ‘commercial’. In transposing this principle to the term ‘primarily commercial purposes’, it is agreed that all uses whose non-commercial aspects do not clearly predominate shall be considered to be primarily commercial in nature, with the result that the import of specimens of Appendix-I species should not be permitted. The burden of proof for showing that the intended use of specimens of Appendix-I species is clearly non-commercial shall rest with the person or entity seeking to import such specimens [emphasis added].*
- *Article III, paragraphs 3 (c) and 5 (c), of the Convention concern the intended use of the specimen of an Appendix-I species in the country of import, not the nature of the transaction between the owner of the specimen in the country of export and the recipient in the country of import. It can be assumed that a commercial transaction underlies many of the transfers of specimens of Appendix-I species from the country of export to the country of import. This does not automatically mean, however, that the specimen is to be used for primarily commercial purposes.”³⁷*

³⁶CITES Resolution Conf. 5.10 (Rev. CoP15).

³⁷ <https://cites.org/eng/res/05/05-10R15.php>

14. According to the CITES Secretariat, “CITES was [also] the first, and possibly remains the only, global legal instrument to address animal welfare”.³⁸ The CITES Secretariat is closely collaborating and partnering with zoos, on issues relating to animal welfare. In 2011 the CITES Secretariat signed a cooperative Memorandum of Understanding with WAZA (World Association of Zoos and Aquarium). According to the Memorandum, “WAZA and its members have expertise in the fields of animal care, the transport of live animals, conservation, sustainable use, education and research”.³⁹

Animal protection and welfare organisations and professional wild animal ethologists and behavioural specialists are highly critical of zoos particularly in terms of animal welfare. It is unfortunate that CITES States Parties are effectively using zoos as a shield to absolve themselves of any responsibility for animal welfare. They promote the trade under the guise that zoos have exemplary welfare standards, play an important role of conservation and are valuable spaces to educate the general public about wild animals, their habitats and the ways in which they can contribute to their preservation. Nothing can be further from the truth. Keeping wild animals in captivity and reducing them to mere objects and specimens is eroding our own humanity. Zoos are places of stress-inducing confinement and captivity and there is no conservation-education value to the use of wild animals in zoos. Zoos are not sanctuaries or places where wild animals can play their vital roles in ecological systems. Zoos are not places that can be held up as exemplary spaces where sentient wild animals have agency and can live out their socially complex lives in their natural habitats. Both parties thus benefit—the zoos benefit through endless access to wild animals for captivity and CITES States Parties are able to continue to facilitate trade while ignoring welfare concerns.

SPECIES EXPORTED FROM SOUTH AFRICA TO CHINA

At a minimum, 5,035 live wild animals, were sold and exported from South Africa to China between 2015 and 2019. This is almost certainly an extremely conservative estimate because this figure is based on limited permit and export data that was available to us. The animals caught up in this trade range from primates to predators and everything in-between. They include species listed on every CITES Appendix. Some of the airlines that fly live wild animals from South Africa to destinations in China are:

- Qatar Airways
- Egypt Air
- Singapore Airlines
- Turkish Airlines

List of Wild Animals Sold and Exported and Importers

The tables below show the species exported from South Africa to China, the date of export and the importer information. It was compiled from limited permit information made available to BAT and EMS. Although by no means a definitive list, it nevertheless provides a valuable window into the trade.

³⁸ https://www.cites.org/eng/news/pr/CITES_calls_on_zoos_aquariums_support_wildlife_trade_controls_18102017

³⁹ <https://cites.org/sites/default/files/common/disc/sec/CITES-WAZA.pdf>

SPECIES	YEAR TRADED				CITES	IMPORTERS					TOTAL
	2019	2018	2017	2015 & 2016		Zoo/ Amusement Park	Breeding Farm	Broker/ Wholesaler	Laboratory	Entity	
African Civet		2			III	2				Changxing Taihu Longzhimeng Animal World Cultural Tourism Development Co. Ltd.	2
African Penguin		25			II			25		Dalian Dragon-Leader Import & Export Co. Ltd.	25
African Wildcat		6			II	6				Changxing Taihu Longzhimeng Animal World Cultural Tourism Development Co. Ltd.	6
African Wild Dog	28	7 ⁴⁰			No		28			Green World Breeding Farm	35
							7			Heshan Longkou Jinfeng Animal Breeding Farm	
Bat-eared Fox		40			No			40		Henan Xing Qin Import & Export Trade Co. Ltd.	40
Black-backed Jackal			22		No		11			Heshan Longkou Jinfeng Animal Breeding Farm	22
								11		Tianjin Ruishun Biologic Technology Corporation Ltd.	
Black-Footed Cat		4			I	4				Changxing Taihu Longzhimeng Animal World Cultural Tourism Development Co. Ltd.	4
Black Spider Monkey	4				II	4				Anji Zhongnan Baicao Yuan Zoo	4
Caracal	86	41 ⁴¹	21	11	II	6				Changxing Taihu Longzhimeng Animal World Cultural Tourism Development Co. Ltd.	159
						6				Nantong Forest Safari Park	
						20				Tingxia State-owned Forest Farm Ecological Tourist Area	
						14				Destination could not be verified	
							63			Green World Breeding Farm	
							6			Hangzhou Fuyang Rare Animal Breeding Farm	
							15			Heshan Longkou Jinfeng Animal Breeding Farm	
								8		Dongying Kunpeng Import and Export Co. Ltd.	
								8		Eastern Sunrise Wildlife Services	
								13		Qin Huang Dao Aozhe Animal Breeding Co. Ltd	
Capuchin, white-throated	7				II			7		Qingdao Yushunda Tourism Investment	7
Cheetah	8	12 ⁴²			I	2				Wuhan Zoo	20
						10 ⁴³				Zhengzhou Zoo	
						8				Taiyuan Zoo	
Chimpanzee	18				I	18				Beijing Wild Animal Park	18

⁴⁰ Origin: Ann Van Dyke Cheetah Centre.

⁴¹ According to the CITES Trade Database China registered the import of 55 caracals from South Africa in 2018.

⁴² South Africa did not report any cheetah exports for 2018 according to the CITES Trade database. On the other hand China reported the import of 32 cheetah from South Africa.

⁴³ Via Eastern Sunrise Beijing Wildlife Services.

SPECIES	YEAR TRADED				CITES	IMPORTERS					TOTAL
	2019	2018	2017	2015 & 2016		Zoo/Amusement Park	Breeding Farm	Broker/Wholesaler	Laboratory	Entity	
Cotton-top Tamarin		8			I		8			Heshan Longkou Jinfeng Animal Breeding Farm	8
Genet		4	4		No	4				Changxing Taihu Longzhimeng Animal World Cultural Tourism Development Co. Ltd.	8
								4		Tianjin Ruishun Biologic Technology Corporation Ltd.	
Giraffe	66	192	183	156	No	60				Guizhou Forest Wildlife Zoo	597
						54				Hainan Tropical Wildlife Park & Botanical Garden	
						321				Jinan Wildlife World	
						132				Various zoos ⁴⁴	
						9				Pingnon Yongyuan Biological Technology Co. Ltd./Xionsen wine shop	
							21			Golden Land Animal Trade Co. Ltd.	
Hippo				2 ⁴⁵	II	2				Jinan Wildlife World	2
Hyena	41	4			No	8				Changxing Taihu Longzhimeng Animal World Cultural Tourism Development Co. Ltd.	45
						15				Henan Yinjiabao Amusement Park	
						10				Nanjing Jinniu Lake Wildlife Kingdom Co. Ltd.	
						12				Wuhan West Lake Animal Kingdom Tourism Co.	
Jaguar, Black ⁴⁶	2				I	2				Xiantao Tianle Zoo	2
Kudu				176 ⁴⁷	No	112				Jinan Wildlife World	176
						64				Hainan Tropical Wildlife Park & Botanical Garden	
Lemur, Brown		8			I			8		Dalian Dragon-Leader Import & Export Co. Ltd.	8
Lemur, Ring-Tailed	16				I	16				Henan Yinjiabao Amusement Park	16
Leopard, Black	2	12 ⁴⁸			I	2				Nantong Forest Safari Park	14
						12				Changxing Taihu Longzhimeng Animal World Cultural Tourism Development Co. Ltd.	

⁴⁴ This information has been gathered from media reports - none of them intersect with the permit information made available to us.

⁴⁵ 2014 only.

⁴⁶ According to the CITES Trade Database China registered the import of 18 jaguars from South Africa in 2018.

⁴⁷ 2015 only.

⁴⁸ According to the CITES Trade Database China registered the import of 24 leopards in 2018.

SPECIES	YEAR TRADED				CITES	IMPORTERS					TOTAL
	2019	2018	2017	2015 & 2016		Zoo/Amusement Park	Breeding Farm	Broker/Wholesaler	Laboratory	Entity	
Lion	122	22 ⁴⁹	18	20 ⁵⁰	II	20				Qinyang Swan Lake Ecological Park	182
						3				Jinan Wildlife World	
						10				Changxing Taihu Longzhimeng Animal World	
						13				Guizhou Forest Wildlife Zoo	
						4				Chimelong Safari Park	
						8				Zhengzhou Zoo	
						10				Shandong Shunyu'an Tourism Development Co. Ltd	
						6				Ningbo Youngor Zoo	
						20				Urumqi/ Xinjiang Tianshan Wild Zoo	
							16			Heshan Longkou Jinfeng Animal Breeding Farm	
								18		Tianjin Ruishun Biologic Technology Corporation Ltd.	
								16		Henan Xing Qin Import & Export Trade Co. Ltd.	
								10		Dalian Dragon-Leader Import & Export Co. Ltd.	
								18		Eastern Sunrise Wildlife Services	
								10		Fujian Changtai Tianzu Mountain Feilong Tourism Development Co.	
Marmoset, Common	820	100	330	330	II		430			Green World Breeding Farm	1 580 ⁵¹
							60			Heshan Longkou Jinfeng Animal Breeding Farm	
								520		Eastern Sunrise Wildlife Services	
								200		Golden Land Animal Trade Co. Ltd.	
									160	Jiangsu Johnsen Bioresource Co. Ltd.	
									40	Beijing Johnsen International Trade	
									40	Guaangzhou Xiangkuan Biotechnology Co. Ltd.	
									80	Institute of Medical Biology Chinese Academy of Medical Science	
									50	Beijing Sunrising Technologies Co. Ltd	

⁴⁹ According to the CITES Trade Database China registered the import of 68 lions from South Africa in 2018.

⁵⁰ 2016 only.

⁵¹ Also includes 90 common marmosets exported in 2014.

SPECIES	YEAR TRADED				CITES	IMPORTERS					TOTAL
	2019	2018	2017	2015 & 2016		Zoo/Amusement Park	Breeding Farm	Broker/Wholesaler	Laboratory	Entity	
Marmoset, Pencilled	240	10	50	30	II		80			Green World Breeding Farm	330
							10			Heshan Longkou Jinfeng Animal Breeding Farm	
								240		Eastern Sunrise Wildlife Services	
Meerkat	759	288	224	123	No	90				Changxing Taihu Longzhimeng Animal World	1 394
						10				Hangzhou Safari Park	
						50				Jinan Wildlife World	
						40				Nantong Forest Safari Park	
						30				Wuhan West Lake Animal Kingdom Tourism Co. Ltd.	
						20				Ya'an Dongfang Bifeng Gorge Tourism Co. Ltd.	
							255			Green World Breeding Farm	
							145			Heshan Longkou Jinfeng Animal Breeding Farm	
								100		Foshan Nanhai Kaipeng Trading Company Co. Ltd.	
								401		Golden Land Animal Trade Co. Ltd.	
								130		Henan Xing Qin Import & Export Trade Co. Ltd.	
								50		Qin Huang Dao Huixin Import & Export Co. Ltd.	
								73		Tianjin Ruishun Biologic Technology Corporation Ltd.	
Mongoose	40	66	28	14	No	60				Changxing Taihu Longzhimeng Animal World	148
							34			Heshan Longkou Jinfeng Animal Breeding Farm	
								26		Eastern Sunrise Wildlife Services	
								28		Tianjin Ruishun Biologic Technology Corporation Ltd.	
Puma	6	6			II	6				Nantong Forest Safari Park	12
						6				Changsha Ecological Zoo	
Rhino, White		11 ⁵²			II	5				Xi'an Qinling Wildlife Park	11
						2				Tangshan Zoo	
						4				Naning Zoo	

⁵² According to the CITES Trade Database, China imported 16 rhinos from South Africa, while South Africa did not report any exports at all. China also reported the import from South Africa of 14 rhinos in 2016 and 30 in 2017.

SPECIES	YEAR TRADED				CITES	IMPORTERS					TOTAL
	2019	2018	2017	2015 & 2016		Zoo/Amusement Park	Breeding Farm	Broker/Wholesaler	Laboratory	Entity	
Serval	36		42	14	II	6				Changxing Taihu Longzhimeng Animal World	92 ⁵³
							9			Heshan Longkou Jinfeng Animal Breeding Farm	
							24			Green World Breeding Farm	
								16		Eastern Sunrise Wildlife Services	
								12		Heibi Ningbo Yinzhou Huaye Rarebird Breeding Co. Ltd.	
								5		Tianjin Ruishun Biologic Technology Corporation Ltd.	
Tiger, Bengal ⁵⁴	22	23 ⁵⁵			I	35				Changxing Taihu Longzhimeng Animal World	45
						10				Henan Yinjiabao Amusement Park	
Wolf, Grey & Timber		23			II	10				Changxing Taihu Longzhimeng Animal World	23
							13			Dalian Dragon-Leader Import & Export Co. Ltd.	

The Trade in CITES Appendix I-Listed Species between South Africa and China

Trade in animal species listed on CITES Appendix I (i.e. species ‘threatened with extinction’) is only allowed when the breeding facility, as the source of the captive-bred animals, is registered with CITES. The trade is only allowed when a non-detriment finding (NDF) on the species being traded, has been made by the Scientific Authority of both the exporting and the importing country. An NDF takes into account scientific, trade and enforcement considerations determined by national circumstances⁵⁶ to determine whether the trade in a specific species will be detrimental to the survival of the species in the wild. In addition, CITES Appendix I-listed species should not be exported for commercial purposes and only in exceptional circumstances.

These requirements are seldom likely to be met when CITES Appendix I-listed animals are exported from South Africa to China. We fail to see what ‘exceptional circumstances’ apply to the examples of commercial trade provided below.

⁵³ Includes 20 to various individuals—seven with the same untraceable address.

⁵⁴ Includes white tigers.

⁵⁵ According to the CITES Trade Database China registered the import of 78 tigers from South Africa in 2018.

⁵⁶ https://www.cites.org/eng/prog/ndf/current_policies

Chimpanzees



Image Source: [https://www.iqknews.com/news/272839-Eighteen at a time! First large-scale import of chimpanzees by Beijing Customs.html](https://www.iqknews.com/news/272839-Eighteen%20at%20a%20time!%20First%20large-scale%20import%20of%20chimpanzees%20by%20Beijing%20Customs.html)

The export of 18 chimpanzees in August 2019 from Hartbeespoort Snake and Animal Park (North West province), with Christa Saayman/Mystic Monkeys and Feathers Wildlife Park (Limpopo province), as the exporting agent, to a zoo facility entitled 'Beijing Wild Animal Park' (also known as 'Beijing Wildlife Park'),⁵⁷ is a recent example of lax enforcement and inadequate due diligence, likely making the export of the chimpanzees unlawful, despite permits having been issued by both the South African and the Chinese authorities. This export was also confirmed in the Chinese media.⁵⁸

According to an informant at least two of the chimpanzees were heavily pregnant at the time of export and one of the males was over 50 years old.

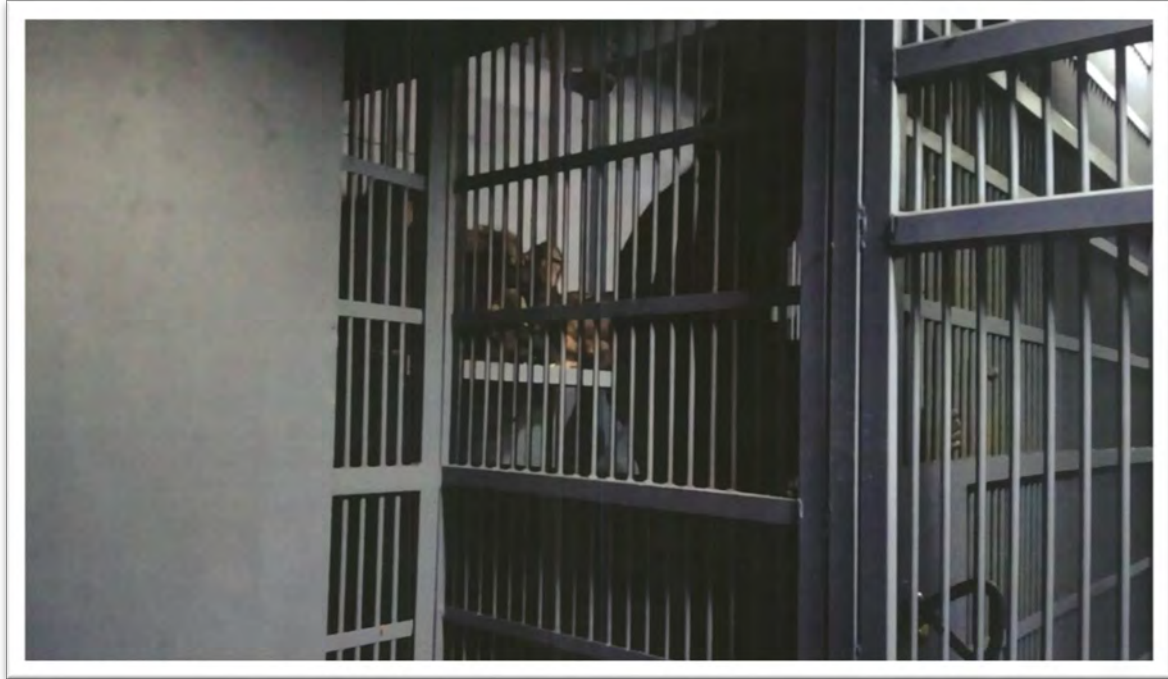
The CITES Regulations (including 20101) have been enacted into South African law under the National Environmental Management: Biodiversity Act, 10 of 2004 (NEM:BA). In terms of the Regulations, an export permit may not be issued unless:

- a) the CITES Management Authority (in this case, DEFF) is satisfied that the specimen the Scientific Authority (in South Africa, usually a designated official in the provincial government department responsible for the environment) has made a “non-detriment finding”;
- b) the Management Authority is satisfied that the specimen or specimens have been legally acquired, known as a “legal acquisition finding” (LAF);
- c) the Management Authority is satisfied that any living specimen will be prepared and shipped in accordance with the most recent edition of the Live Animals Regulations (LAR) of the International Air Transport Association (IATA), regardless of the mode of transport, so as to minimize the risk of injury, damage to health or cruel treatment; and
- d) an import permit has already been issued by the country of import.⁵⁹

⁵⁷ The zoo is registered under the company name: 'Beijing Green Landscape Zoo,' and belongs to the government of China.

⁵⁸ <https://news.sina.cn/gn/2019-09-16/detail-icezueu6071304.d.html?from=wap> ; [https://www.iqknews.com/news/272839-Eighteen at a time! First large-scale import of chimpanzees by Beijing Customs.html](https://www.iqknews.com/news/272839-Eighteen%20at%20a%20time!%20First%20large-scale%20import%20of%20chimpanzees%20by%20Beijing%20Customs.html)

⁵⁹ Regulation 6.



Some of the chimpanzees sold to China in August 2019. Image Credit: Karl Ammann, 2019

In our view there is insufficient evidence to show that the chimpanzees were bred in captivity or legally acquired. The words ‘legally acquired’ in this context mean that the chimpanzees were acquired by the exporter in a manner that complies with both South African law and CITES. The term does not have a legal definition in the Convention. However, the term has been the subject of discussion between CITES States Parties. Following COP18 in August 2019, a draft resolution on legal acquisition was issued by the CITES Secretariat.⁶⁰ As far as we are aware, the draft is the latest agreed position by the parties to CITES and will become a formal CITES Resolution at some stage. It does not create legally binding obligations but it provides guidance as to what is acceptable for National Management Authorities making non-detriment findings.

The draft resolution recommends that: “to the extent possible, the determination of whether a specimen was not obtained in contravention with the laws and regulations of that State for the protection of fauna and flora should take into account the whole series of actions through which the specimen is brought from its source into the possession of an exporter” and “Procedures to verify legal acquisition must be sufficiently flexible to allow for a risk assessment approach.” Risk assessment in this context means evaluating the risk that the specimen was not legally acquired. The information that the National Management Authority requires of an applicant for verifying the legality of acquisition “should be proportionate with the likelihood that a specimen of a CITES-listed species was not legally acquired.”

In terms of the draft resolution, the applicant for CITES export permit is responsible for providing sufficient proof of legal acquisition “such as statements or affidavits made under oath and carrying a penalty of perjury, relevant licenses or permits, invoices and receipts, forestry concession numbers, hunting permits or tags, or other documentary evidence...” In terms of practical steps to be taken by the national authority the draft resolution indicates as follows: “To verify legal acquisition, the Management Authority should review all the documentary and other information presented by

⁶⁰ COP18 Com. II. 4.

the applicant. The documentation should, to the extent practicable, provide information on the entire chain of custody back to the source of the specimen. Such information may include records demonstrating that the specimen or parental stock was removed from the wild in accordance with relevant laws (licences, collections permits, etc.), records identifying the specific specimen (band numbers or other marks, etc.) and documenting the history of transfers of ownership (sales receipts, invoices, etc.) and records showing that the specimen was reared at a particular facility, for example. Where a Management Authority considers that the evidence is incomplete, it should provide the applicant with an opportunity to produce additional information.”



A chimp kept in a separate part of the ‘park’ and also locked in a bare night room. Image Credit: Karl Ammann, 2019

There is no available evidence to confirm that the chimpanzees at the Hartbeespoort Snake and Animal Park were legally acquired and were not wild-caught and imported illegally into South Africa. This will be difficult to prove, since there is no chimpanzee ‘stud book’ available in South Africa that can be used to verify the origin of the animals.⁶¹ Zoos in South Africa should keep a ‘stock book’ to keep track of births and deaths, but this is not a legal requirement.

The only assurance that the chimpanzees were possibly captive-bred, comes in the form of a letter attached to the export documents, stating that the agent, Mystic Monkeys and Feathers/Christa Saayman, confirms that the chimpanzees were bred in captivity.

⁶¹ Confirmed by Executive Director of PAAZA, John Werth, in an email to Ban Animal Trading that there is no studbook for Chimpanzee in South Africa, dated 31/01/2020.



<p>e-mail: bloudulker@mweb.co.za website: www.mysticmonkeys.co.za Tel: +27 82 566 4929 Fax: +27 0866774020 Vat: 4310157740</p>		<p>Postnet Suite 27 Private Bag X1604 Bela-Bela Limpopo</p>
		<p>Portion 41 of the Farm Buffelsdrift 179JR, Rust de Winter, LIMPOPO</p>
22 August 2019		
<u>CHIMPANZEE EXPORT:</u>		
<p>Dear all,</p> <p>I Christa Saayman ID no: 6308130073084, owner of Mystic Monkeys & Feathers Wildlife Park hereby confirm that the Chimpanzees are Captive Bred and they are going to a Zoo in China as stated on the permits.</p> <p>Kind regards</p> <p> Christa Saayman Owner of Mystic Monkeys & Feathers Wildlife Park</p>		
<p>MYSTIC MONKEYS & FEATHERS WILDLIFE PARK CHRISTA SAAYMAN - OWNER CELL: (+27)82 566 4929</p> 		
<p>Proud member of PAZAA</p>		<p>LIMPOPO PROVINCIAL GOVERNMENT Dept. of Economic Development, Environment & Tourism Permit No: CP15-005-00001 (To Establish and Operate a Wild Animal Park)</p>

Image Source: Karl Ammann, 2019⁶²

⁶² Annexure 4 in letter of complaint from Karl Ammann through Advocates for Animals, to CITES Secretariat on 21 February 2020.

The draft CITES resolution recommends the following:

1. For the purpose of establishing the chain of custody, the Parties may make use of information systems and traceability tools.
2. In verifying legal acquisition, Parties may wish to consult existing international legal databases such as ECOLEX, FAOLEX, and the World Legal Information Institute.
3. Where Parties consider that more certainty is required to establish that a specimen was legally acquired, Parties may have recourse to request verification by the applicant using forensic tools such as DNA testing, stable isotope analysis, and radiocarbon dating.”

It therefore recommends that verifying legal acquisition (i.e. not accepting information provided by the applicant for the permit at face value) is necessary when issuing a permit for the export of an Appendix I-listed animal.

Saayman’s statement was not made under oath. If the statement is incorrect, it does not constitute perjury. Given that chimpanzees are an Appendix I species, the South African authorities were required by CITES to apply “particularly strict regulation” and in terms of the draft resolution should have verified the statement by investigating/requiring documentary evidence. In the light of the very detailed guidance on LAFs given by the draft resolution, a statement by the export agent does not comply with the draft resolution or with CITES itself with respect to providing sufficient proof of legal acquisition. We have seen no documentary evidence whatsoever to indicate the source of the chimpanzees and to indicate that the breeding facility has all the requisite permissions. There is not a good explanation for where the chimps might have originated. Applying the risk assessment approach required by the draft resolution, the CITES national management authority ought to have required further evidence that the chimpanzees were legally acquired.

The CITES management authority ought not to have made a LAF without, at the very least, documentary evidence that the breeding facility complied with all relevant laws and also evidence of the provenance of the chimpanzees going back to the original wild caught chimpanzees if relevant. To the extent that provision of actual documentation is not reasonably possible, a statement under oath should have been provided. Given that chimpanzees are an Appendix I species, the South African authorities were required by CITES to apply “particularly strict regulation” and should have verified the statement by investigating/requiring documentary evidence, which it appears they did not do.

The import facility is not suitably equipped to house and care for the chimpanzees. In terms of Article III(3)(b) of CITES, the State of import may not issue an import permit unless it is “satisfied that the proposed recipient of a living specimen is suitably equipped to house and care for it”. The facility in China had not been completed at the time of import. In terms of CITES regulations the import permit for CITES I-listed animals must be issued first and must confirm that ‘appropriate’ facilities are ready. This clearly was not the case. Undercover footage by wildlife photographer Karl Amman, showed that these chimpanzees had been kept in dark, over-crowded night cages for months on end with no access to the outside. The staff responsible for the care of the chimpanzees apparently also have minimal experience in managing chimpanzees specifically. This does not comply with the CITES findings “that recipients of living specimens of CITES Appendix-I species are suitably equipped to house and care for them”⁶³.

The strictly commercial component in the sale of these chimpanzees appears to be compelling. Hartbeespoort Snake and Animal Park is not registered as a CITES breeding facility for chimpanzees. Indeed, no zoo in South Africa is registered with CITES for the purpose of breeding

⁶³ <https://www.cites.org/eng/node/48592>

chimpanzees. No chimpanzees may therefore be exported from South Africa for commercial purposes, which was the case with this export and is the case with most exports to zoos of CITES Appendix I-listed species. According to Karl Ammann's sources, the chimpanzees were sold and transferred for the sum of R7 546 643.00 (South African ZAR).⁶⁴ Moreover, Beijing Wild Animal Park is part of a profitable government-owned company, the Beijing Tourism Group. In addition, if the chimpanzees were bred in captivity it was for commercial purposes and therefore requirements under Appendix II were not met.



Image Credit: Karl Ammann, 2019

This is Orwellian dystopia. Appendix I is designed to protect highly endangered species from being traded. One can, for example, breed chimpanzees (Appendix I) in captivity in South Africa (never mind whether the original parents of the 'stock' were extracted from the wild) for locally commercial purposes, and sell the chimpanzees to China as long as the buyer claims that the importing purpose is non-commercial (even if they pay a large sum of money).


The regulations here are ambiguous. At the very least, facilities breeding Appendix I species in captivity should be registered with CITES. Beyond that, a credible set of checks and balances needs to be implemented to ensure that the importing entity is legitimate and genuinely non-commercial. Even there, though, lies a rub. We are meant to believe that a local commercial entity has sold 18 chimpanzees to China for non-commercial purposes (but nonetheless for a lot of money). It may be technically within the bounds of this convoluted regulation, but it defies logic, coherence and rationality. It also seems unethical to exploit a loophole for commercial gain under the pretext of a 'non-commercial' transaction.

It is believed that two of the chimpanzees, reportedly in their last trimester of pregnancy, were transported violating both the International Transport Association (IATA) and CITES regulations.⁶⁵

⁶⁴ Letter of complaint from Karl Ammann through Advocates for Animals, to CITES Secretariat on 21 February 2020.

⁶⁵ <https://www.cites.org/eng/resources/transport/index.php>

PERMIT / CERTIFICATE **Nº 158114**



**CONVENTION ON
INTERNATIONAL TRADE IN
ENDANGERED SPECIES OF
WILD FAUNA AND FLORA**

☒ **EXPORT**
☐ **RE-EXPORT**
☐ **IMPORT**
☐ **OTHER**

ORIGINAL

Valid until **02/01/2020**

1. Exporter (name and address)
 BEIJING GREEN LANDSCAPE ZOO,
 LTD DAXING DISTRICT YUFA
 MILION MUOF FOREST, BEIJING

2. Country of origin
 CHINA

3. Special conditions
 INVALID WITHOUT ATTACHED
 CONDITION P3 2012 PERMIT MUST BE
 ENDORSED AT POINT OF EXIT. ALSO SEE
 AT TOPS SEE ATTACHED ADDENDUM WITH
 SECURITY STAMP #166397. SUBJECT TO CITES
 # 2012/16022/BJ. (uplicate PERMIT # 158114)
 For the purposes of this permit or certificate to only valid if the transport conditions conform to the
 conditions for Transport of Live Animals or in the case of all transport, to the CITES Live Animals
 Regulations. Permit / certificate valid for one consignment only.

4. Purpose of the transaction (see Annex 1)
 Z

5. Security stamp No.
 166396

6. Supplier / Re-exporter (name, address and country)
 SNAKE & ANIMAL PARK
 #1 SCOTT STREET, 0216
 BRITS, NORTH WEST
 SOUTH AFRICA (ZA) C/O
 CHRISTA SAAYMAN.

7. Name, address, national code / stamp and country of Management Authority
 Department of Environmental Affairs
 Private Bag X447
 PRETORIA
 0001
 SOUTH AFRICA

7.8. IDENTIFYING NAME (species and subspecies) AND COMMON NAME (if animal or plant)				8. Description of species (including identifying marks or numbers) (signature) if live		10. Appendix No. and source (signature)		11. Quantity (including unit)		11a. Total exported / units	
7.8. CHIMPANZEE (PAN TROGLODYTES)				8. LIVE		10. IC		11. (18)		11a. EIGHTEEN	
12. Country of origin				13a. Country of last re-export		13b. Country of last re-export		13c. No. of the operation " " or date of acquisition " "		13d. No. of the operation " " or date of acquisition " "	
12. Country of origin				13a. Country of last re-export		13b. Country of last re-export		13c. No. of the operation " " or date of acquisition " "		13d. No. of the operation " " or date of acquisition " "	
12. Country of origin				13a. Country of last re-export		13b. Country of last re-export		13c. No. of the operation " " or date of acquisition " "		13d. No. of the operation " " or date of acquisition " "	
12. Country of origin				13a. Country of last re-export		13b. Country of last re-export		13c. No. of the operation " " or date of acquisition " "		13d. No. of the operation " " or date of acquisition " "	

13. THIS PERMIT / CERTIFICATE IS ISSUED BY: *Rosi Dole*

14. EXPORT ENDORSEMENT:
 MAFFIKENS 03/07/2019

15. Sign of Management Authority

16. Sign of Export

PERMIT / CERTIFICATE **Nº 158114**

Image Source: Karl Ammann, 2019⁶⁶

Other violations include: no airway bill number on the CITES export permit, no signature of an inspection authority on the South Africa side (DEFF), and no customs stamps. Regulation 10 of the CITES Regulations, 2010 read with Appendix IV [sample permit] make it a legal requirement that a permit for the export of CITES listed species must contain, among other things: the waybill number; the signature, official seal and stamp of issuing official; and the signature and stamp of an enforcement official (a South African Police Service or customs official) [Regulation 10(8)]. Where the origin of the specimens is a captive breeding operation, the number of that operation must appear on the permit. To the extent that this information was not on the permit when the export took place, then the permit

⁶⁶ Annexure 1 in letter of complaint from Karl Ammann through Advocates for Animals, to CITES Secretariat on 21 February 2020.

did not comply with the Regulations. Failure to have an enforcement official stamp the permit is an offence (Regulation 10(10)). A permit which was issued on the basis of false or misleading information provided by the applicant must be revoked by the National Management Authority (Regulation 10(14)).

The chimpanzee glass faced 'exhibit' has now been completed at the Beijing Wildlife Park. The museum-type glass enclosure with its concrete trees is next to queues of visitors waiting take bus tours of the zoo. Apparently there is no outdoor section, only the very cramped night housing cage at one end which opens onto the exhibit. This means they will never be allowed to go outdoors.



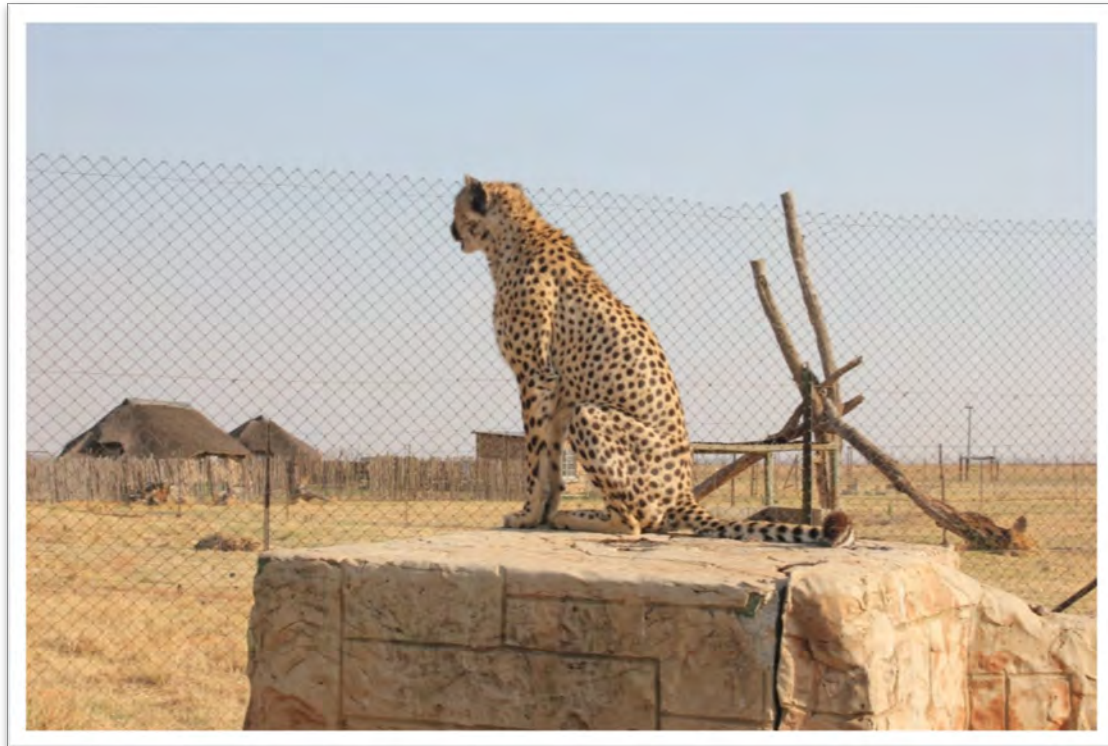
Image Credit: Karl Ammann, 2019

Given the documented history of unlawful imports of chimpanzees into China⁶⁷, South African authorities should have exercised additional due diligence. On 20 February 2020, EMS and BAT laid a formal complaint, through our attorneys, with the DEFF law enforcement division, providing extensive information and requesting an urgent investigation about the sale of these 18 chimpanzees to China. As of 25 April 2020, no response had been received. Wildlife photographer, Karl Ammann also laid an urgent complaint, through his solicitors, with the CITES Secretariat on 21 February 2020. The Secretariat replied on the 19 March 2020 saying that they would take this issue up with the "concerned Parties as soon as possible with a deadline of maximum one month".

For an advertising video and pictures taken of the chimps in April 2020 see:
<https://mp.weixin.qq.com/s/kb42f5Gg2rJ8MLPvS608aw>

⁶⁷ <https://www.theguardian.com/environment/2014/oct/14/china-main-destination-for-illegally-traded-chimpanzees>

Cheetahs



Cheetah at Letsatsi la Africa. Image Credit: EMS Foundation, 2017

In 2018, ten cheetahs, with CITES Source code D⁶⁸, were exported from South Africa to China. The cheetahs, in all likelihood came from the Hoedspruit Endangered Species Centre (HESC) in Limpopo, but were sold and exported through Christa Saayman of *Mystic Monkeys and Feathers Wildlife Park* to brokers, *Eastern Sunrise (Beijing) Wildlife Services*, with the importer on the permit being *Zhengzhou Zoo*. While HESC is registered with CITES as a captive breeding operation, *Mystic Monkeys* is not registered although the origin of the cheetahs was given as *Mystic Monkeys*. The cheetahs were five females and five males, between the ages of 3 and 6 years old. Article III. 2.(d) of CITES states that an export permit may be granted only when "a Management Authority of the state of export is satisfied that an import permit has been granted for the specimen". An export permit should not be given until an import permit has first been granted. This article is touted as being of major importance for implementing CITES on Appendix I species. In this instance, the import permit was issued *after* the export permit, which is a contravention of CITES regulations for the export of Appendix I animals. Despite these irregularities the shipment was stamped by the authorities at the port of export and went out.

We have also seen other examples of cheetah being sent to China from South Africa even during the height of the COVID-19 outbreak there. This shipment was also irregular because the import permit was unsigned and undated. According to the CITES Trade Database, from 2013-17, South Africa exported 49 cheetahs to China.

⁶⁸ Appendix-I animals bred in captivity for primarily commercial purposes in operations included in the Secretariat's Register, in accordance with Resolution Conf. 12.10 (Rev. CoP15), and Appendix-I plants artificially propagated for commercial purposes, as well as parts and derivatives thereof, exported under the provisions Article VII, paragraph 4, of the Convention.

Tigers

Our investigations reveal that there is a flourishing trade in tigers between South Africa and Southeast Asia, and China. In the 2018/2019 period, we verified that 45 tigers were sold and exported to China from South Africa. All these tigers were sent out by one dealer. According to the CITES Trade Database 78 tigers were imported into China from South Africa—South Africa however did not provide any export figure for 2018. If one is to believe the transactional values provided by the traders, in 2018/2019 tigers fetched between \$7 000.00USD – to \$11 000.00USD each.



Image Credit: Ban Animal Trading, 2018

South Africa is playing an increasingly relevant role in both the legal and illegal trade of tigers.⁶⁹ Exporting tigers to China has no conservation value whatsoever, indeed it has the opposite effect. There are thousands of tigers in captive breeding facilities (including in so-called zoos) in China. According to WWF, these are a direct and significant threat to wild tiger populations because “the movement (or leakage) of tiger products from tiger farms to consumer markets complicates and thus undermines enforcement efforts aimed at identifying and stopping the trade in wild tiger products” and “tiger farms help perpetuate (and grow) demand by legitimizing or normalizing the demand for tiger parts in a region currently experiencing profound and sustained growth of consumer classes.

⁶⁹ *Operation Ambush*. Wildlife Justice Commission. September 2016

Even a modest increase in the demand for tiger products could trigger immense poaching pressures on wild populations.”⁷⁰

In Southeast Asia and China there is a relationship between the live trade, tiger breeding farms, and the bone trade. It is of concern that South Africa is sending live tigers to countries that are not only the main destinations for ‘big cat’ bones but where there is also overt trade in tiger body parts driving their rapid decline. Chinese authorities, despite the wildlife trade bans since COVID-19, continue to allow the commercial trade in Traditional Chinese Medicine (TCM) products containing tiger bone.⁷¹ It is therefore possible that the live trade and the CITES export permit system could be a way to launder live tigers into the lion and tiger bone trade.



Guigang Tiger Wine and Bear Bile Shop. Image Credit: Ban Animal Trading, 2018.

The Trade in CITES Appendix-II and Appendix-III Species between South Africa and China

CITES-listed animal species seemingly have more protection than species that are not on the CITES Appendices. For the approval of the export of CITES Appendices-listed animals, more information is required than is the case with non-CITES listed animal exports, i.e. what is the purpose of the export, where have the animals been sourced from, are they micro-chipped, etc.? Given the low levels of verification of information stated on application forms, the required information that has to be provided is no more than meaningless red tape. Had the officials performed due diligence they would have discovered that the information given on many application forms was incorrect and incomplete. In those cases, the permits should not have been issued.

⁷⁰ <http://www.worldwildlife.org/stories/what-i-saw-at-a-chinese-tiger-farm-and-what-it-means-for-wild-tigers>

⁷¹ <https://www.express.co.uk/news/world/1264517/coronavirus-china-wet-market-covid-19-tiger-bone-wine-glue-trade-aldo-kane-law-rules-spt>

Animals listed on Appendix II of CITES are “species not necessarily threatened with extinction, but in which trade must be controlled to avoid utilisation incompatible with their survival.”⁷² An export permit may only be issued if the ‘specimen was legally obtained and if the export will not be detrimental to the survival of the species.’⁷³ CITES requires a non-detriment finding (NDF)—made by the Scientific Authority of the State, based on population status, distribution, population trend, harvest, other biological and ecological factors and trade information—prior to export of all species included in Appendix II.⁷⁴

It is unclear how South African authorities interpret the implementation of CITES for Appendix II-listed species. Nature Conservation officials very seldom check the source of the animals on the application form, i.e. bred in captivity or wild-caught, before export. This means that wild-caught animals can be laundered as captive-bred animals, but with a so-called ‘legally’ issued CITES permit. The main function of the South African Biodiversity Institute (SANBI) is to make non-detriment findings for indigenous species listed on CITES Appendix II.⁷⁵ SANBI has completed NDFs for the African elephant, the blue duiker, African penguins, the hippopotamus, Cape parrots, sungazer lizards and lions. Exotic species listed on CITES Appendix II, such as marmosets and capuchins, have little protection in South Africa. CITES export permits for these species are stamped and issued with little, if any, confirmation of the information given by the South African exporter on application forms.

BAT and EMS are aware of the export of 2,412 CITES Appendix II-listed individual animals from South Africa to China between 2016 and 2019 (with a few individuals from 2014 added). Notably, only 171 individuals were exported to zoos, while 2,242 were exported to brokering companies, breeding farms and laboratories for biomedical research, and 20 servals were exported to the same address used by seven different individuals, which we could not trace.

- 1,126 individual animals were imported by Chinese brokering and wholesale companies, without any indication of the final destination of these animals. Many animals were exported to offices in built-up cities in China.
- 728 individual animals were exported to breeding farms, and it is impossible to trace them.
- 370 non-human primates are now in laboratories or laboratory primate breeding farms, waiting to be shipped to international laboratories and to laboratories in China. The country is the world leading supplier of laboratory animals to companies and research facilities in Western countries.⁷⁶
- 20 other individual animals are untraceable, because the information on the CITES export permits was not verified.

Not one of these exports add value to conservation, nor do they contribute to education in Chinese zoos: Chinese zoos are essentially theme parks and entertainment venues with Ferris wheels, daily circuses and petting opportunities.

⁷² <https://www.cites.org/eng/disc/how.php>

⁷³ <https://www.cites.org/eng/disc/how.php>

⁷⁴ https://www.cites.org/eng/prog/ndf/index_new.php

⁷⁵ <https://www.sanbi.org/biodiversity/science-into-policy-action/science-authority/non-detriment-findings/>

⁷⁶ Cao, D. *Animals in China, Law and Society*. Palgrave Macmillan, 2015.

Rhinos

Since 1994, the population of white rhinos in South Africa has been classified as CITES Appendix II with an annotation for the exclusive purpose of allowing international trade in live animals to “appropriate and acceptable destinations” and hunting trophies.⁷⁷ Between 2006 and 2010 the Limpopo province alone sent 82 rhinos to China.⁷⁸ South Africa continues to sell live rhinos to Vietnam and China, despite the significant involvement of Chinese nationals in the illicit rhino horn trade. DEFF officials argue that they are reliant on the CITES Management Authorities of China and Vietnam to evaluate the suitability of the destination zoos and breeding facilities and cannot turn down an export permit without a compelling reason. The average declared transactional price per rhino is approximately R650,000.00 (2018).



Image Credit: Ban Animal Trading, 2018

Lions

If one is to believe the CITES Trade Database, South Africa exported 152 (number provided by import country) or 180 (the South African provided figure) live lions to China between 2016 and 2018.⁷⁹ EMS and BAT’s investigations, however, have verified the sale and export of at least 182 lions from South Africa to China between 2016 and 2019. 49% of these lions went to brokers (and a breeding farm

⁷⁷ <https://cites.org/sites/default/files/eng/cop/17/WorkingDocs/E-CoP17-40.pdf>

⁷⁸ Information provided by Limpopo Economic Development, Environment & Tourism (LEDET).

⁷⁹ Information for 2019 is not yet available on the CITES Trade Database at date of publication of this report.

which is part of a brokering company), and 51% went to zoos. A third of the lions were exported by one dealer based in the Free State. The average customs declared value is approximately R100 000.00.



Zengzhou Zoo; Image Source:

https://m.weibo.cn/p/index?containerid=2310360016B2094254D669A6FC429A_pic&luicode=10000011&lfid=2306570042B2094254D669A6FC429A&featurecode=newtitle%3Ffrom%3Dyn_cnxh#&qid=1&pid=1

Captive breeding of lions in their own home-range has been proven to have no conservational value and it goes without saying that sending lions to China certainly has less than zero conservation value. It is clear that South Africa has a burgeoning international trade in live lions and tigers to Southeast Asia and the number of live lions being sent to China, and Southeast Asia generally, is alarmingly high. Our 2018 Report, *The Extinction Business: South Africa's 'Lion' Bone Trade*⁸⁰ linked the 'lion' bone traders to the trade in live animals, including live lions and tigers and showed that these countries are the main destinations for 'Big Cat' bones. Moreover, our investigations into the legal wildlife trade from South Africa to a number of countries shows that the flaws and loopholes inherent in the CITES permit system are effortlessly aiding wildlife traffickers and allowing live wild animals to be sent to dubious dealers and middlemen. According to the international NGO, the Environmental Investigation Agency, "in China and South-East Asia, organised criminal networks involved in the lion trade are also trading tiger and other Asian big cats."⁸¹

⁸⁰ <https://emsfoundation.org.za/wp-content/uploads/THE-EXTINCTION-BUSINESS-South-Africas-lion-bone-trade.pdf>

⁸¹ *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>

A World Animal Protection study “of 1,200 people in eight Chinese cities found that more than 40% had used or purchased drugs and health products containing big cat ingredients. Big cat product consumption varied by region. Out of the cities surveyed, people in Guilin had the highest rate (60.5%) of purchasing or using big cat medicines and health products. This was followed by people in Beijing (46%); those in Chengdu with a purchasing rate of 45.7%. Overall, Harbin had the lowest level of consumption at 36.4%.”⁸²

There is therefore legitimate concern that:

- The captive lions exported from South Africa are at facilities holding other species such as tigers;
- China is a major consumer country for South Africa’s ‘lion’ bone trade;
- There may now be a relationship between the live trade and the bone trade, where the live trade and the CITES export permit system could be a way to launder live lions into the lion and tiger bone trade;
- The captive lions could be the source of the lion skeletons used in the ‘wine’;⁸³
- There is very little in-depth analysis of the money flows for this industry, and
- Much more research needs to be undertaken in order to understand the actors involved and their credentials; the structures of the industry; and mechanisms and physical movement of money along the supply chain.

Caracal and Serval

SANBI has not completed or published an NDF for either caracal or serval, which is a CITES requirement for the legal export of Appendix II-listed species.

Known exports of 145 caracals to China were ‘legally’ allowed without an NDF, without the signature of the recipient/holder of the permit, and with the incorrect purpose code. At least 92 servals were exported without the required NDF, with health certificates issued in a different province than where the animals were bred and exported from, and to an address that we could not trace.

Non-Human Primates

The biggest numbers of ‘legal’ exotic non-human primate exports from South Africa to China are sent to brokering and wholesale companies and breeding farms, most of which supply monkeys to laboratories, circuses, zoos and wealthy individuals, and also re-export the animals. We can, without fear of contradiction say that the majority of exotic monkeys exported to China—excluding the monkeys exported to zoos—are in primate breeding facilities that export monkeys internationally for biomedical research.

Interestingly, not a single permit issued to laboratories in China for the import of monkeys, seen as ‘desirable models for high priority research’,⁸⁴ indicate that the purpose of the export is scientific, i.e. vivisection – exporters provide fraudulent information by indicating the purpose as trade. Some CITES export permits were signed by the South African exporters before the permits had

⁸² <https://www.worldanimalprotection.org/news/lions-and-tigers-being-farmed-bone-wine-and-other-traditional-medicine>

⁸³ For a description of what tiger bone ‘wine’ is see: <http://wildtrust.co.za/tiger-bone-wine/>

⁸⁴ <https://www.nap.edu/read/25356/chapter/7#56>

been issued, some permits were not signed by the recipients or holders of the permits, and many of the Chinese importers of exotic monkeys from South Africa have been implicated in the trafficking of animals.

The Trade in Non-CITES Listed Species between South Africa and China

Wild animals not listed on the CITES Appendices means that no CITES trade data exists for them. The trade in these species is, to all intents and purposes, largely unregulated. Permits are issued without wildlife authorities establishing whether the animals have been bred in captivity, whether the number of animals being exported corresponds with the number given on the permit and whether the species being exported corresponds with the species on the permit.

In South Africa, the international trade in species not listed in the CITES Appendices, like African wild dogs, hyenas, meerkats, mongoose, etc. is regulated by a permitting system implemented by the nine provinces. The sources of the animals have to be disclosed in export permit applications and provincial nature conservation officials are required to verify the sources, i.e. whether the animals are captive-bred or have been caught in the wild. But the available evidence points to the fact that verifications are mostly not done. Issuing permits without the verification of the information supplied, puts form above substance and gives rise to every conceivable consequence of non-regulation. Lax regulation is no regulation.

The trade in wild animals is lucrative, e.g. declared transactional values reveal that 100 meerkat have been sold for more than R 600 000.00; 57 giraffes have fetched almost R 7 000 000.00; 18 African wild dogs have been sold for over R1 000 000.00; and, 12 hyenas have been sold for R 1000 000.00. Given the value of this natural 'resource' it would be fair to expect that the regulation of exports would be well managed. However, the source of the animals is left unchecked, and where they are sourced from, is anyone's guess, as is the final destination of the animals. For instance, out of 1,394 meerkat exported from South Africa to China which are included in this report, only 240 were sent to zoos. The destination of the other 1,154 or, put another way, three-quarters of the exported meerkat, is unknown: the animals could be in cages in breeding farms, sold to circuses or private individuals and laboratories, or again exported internationally by brokering and wholesale companies.

We are aware of the export of 2 465 individual, indigenous non-CITES listed animals from South Africa to China from 2014 to 2019. In South Africa they are indigenous, in China they are exotic. As exotic animals in China they have little protection in terms of welfare, breeding, sale and consumption:

- 1,101 individual animals were imported by Chinese zoos.
- That the South African authorities issued permits for the export of over 300 giraffes to one zoo, the Jinan Wildlife Park, (we found only 16 giraffes there) is an indication that no due diligence is done and that permits are uncritically approved and stamped. Where are the other giraffes that were exported to Jinan Wildlife Park?
- 501 individual animals were exported to Chinese breeding farms. As is explained below, breeding farms breed and sell animals to zoos, circuses, laboratories and individuals. The whereabouts of hundreds of animals will be impossible to trace, especially because they are exotic species in China.

- 863 individual animals were imported by Chinese brokering and wholesale companies, whose business in exotic animals is also unregulated. Where did these animals go?
- 270 of the total of 2 465 non-listed CITES animals were exported to businesses and addresses that we could not trace, with the untraceable address on the 'legally' issued South African export permits.

African Wild Dog/African Painted Dog

The indicated number of African wild dogs exported by South Africa to China in the table above, is not a true reflection of this trade. The reasons for this are discussed below.

African wild dogs are classified as an endangered species in South Africa. The species is listed in the Threatened or Protected Species Regulations (TOPS), and should have special protection in terms of NEMBA, the National Environmental Management: Biodiversity Act (10 of 2004).⁸⁵ African wild dogs are also listed as endangered on the International Union for Conservation of Nature (IUCN) Red List⁸⁶ with only about 1,409 mature individuals remaining in the wild. Despite this, the African wild dog has not been listed on any of the CITES Appendices.

A species assessment by the Endangered Wildlife Trust in 2016 found that the 'trade in captive and wild-caught animals [African wild dogs] from southern Africa is not believed to be significant.'⁸⁷ However, in 2009, a 4-year undercover investigation into the trade in African wild dogs⁸⁸—which started off as a documentary about the relocation of 24 African wild dogs from Pilanesberg National Park to Hwange National Park in Zimbabwe—highlighted the legal and illegal trade as a significant threat to the survival of the species in the wild. The so-called legal trade in African wild dogs masked the illegal trade in wild-caught African wild dogs to create new bloodlines for zoos. This probably still applies in 2020.

Manus and Marius Pretorius, owners of Mafunyane Game, an international dealer in 'quality wildlife,'⁸⁹ with permission from the South African authorities, kept the 24 African wild dogs in captivity for almost a year before their relocation to Zimbabwe. Pretorius released only 16 of the original 24 to Painted Dog Conservation. Seven had died and one female was reported to be pregnant. Painted Dog Conservation found that only two of the original 24 were from the Pilanesberg National Park. The rest had been switched and were all captive-bred. Pretorius has also sold African wild dogs to Chinese zoos where they were kept in horrific conditions: an undisclosed number to Dalian Zoo, 20 to Tianjin Junheng Trading Corporation (16 went to Changsha Zoo), 20 to Dalian Forest Zoo (where live sheep were fed to the wild dogs⁹⁰) and an unknown number of African wild dogs were sold to Urumqi Zoo. He admitted on camera that some of the African wild dogs bred on his farm had parents from the wild, while others had been sourced from an unnamed breeding centre.⁹¹ Pretorius is still doing business as a wildlife trader.

⁸⁵ <https://www.animallaw.info/sites/default/files/SAProtectedSpeciesList2007.pdf>

⁸⁶ <https://www.iucnredlist.org/species/12436/166502262>

⁸⁷ https://www.ewt.org.za/wp-content/uploads/2019/02/26.-African-Wild-Dog-Lycaon-pictus_EN.pdf

⁸⁸ <https://www.journeyman.tv/film/4643/zoo-business-the-search-for-the-missing-wild-dogs> ;

<http://currentafrica.blogspot.com/2008/09/endangered-african-wild-dogs-in-global.html>

⁸⁹ <http://www.mafunyane.com>

⁹⁰ http://www.china.com.cn/city/txt/2007-03/12/content_7943424.htm

⁹¹ <https://www.journeyman.tv/film/4643/zoo-business-the-search-for-the-missing-wild-dogs>

Mike Bester, who is the owner of the now closed Bester Birds and Zoo Farm, exported more than 100 African wild dogs to China in 2009. As far as is known, Bester still exports wild animals to international zoos.

Giraffe



Image Credit: Ban Animal Trading, 2018

Giraffes were listed on CITES Appendix II in November 2019.⁹² This means that the international trade in this species will from now on require a CITES export permit and that the regulation and monitoring of the trade in giraffes will hopefully be tightened. However, South Africa, together with Eswatini, Namibia, Zimbabwe, Botswana, Tanzania, the DRC and Zambia, filed a reservation with CITES about this amendment and the up-listing of giraffes to CITES Appendix II.⁹³ Through this reservation, the

⁹² <https://news.mongabay.com/2019/08/giraffe-trade-to-be-monitored-strictly-regulated/>

⁹³ <https://www.cites.org/sites/default/files/notif/E-Notif-2019-077.pdf>

countries declared themselves “independent of the controls exercised by CITES”⁹⁴ and refused to take the steps as proposed by CITES to ensure the survival of the species in the wild. BAT and EMS are not aware of the reservation having been withdrawn by any of the countries named above.

It is not surprising that South Africa has not withdrawn its reservation to the CITES agreement to list giraffes on Appendix II. The number of South African private game farms has increased significantly and giraffe populations have increased as well. In 2019, South Africa reclassified giraffes as farm animals.⁹⁵ DEFF stated that the amendment was necessary ‘due to changing farming systems in South Africa, game animals are included as these are already part of farm animal production systems in the country’.⁹⁶ However, game farm exploitation of wild animal species does not equate to the species being protected in the wild.⁹⁷

Sixty-six of the giraffes exported in one chartered flight to China at the end of July 2018 were described by the air carrier that transported them, AirBridgeCargo Airlines (ABC), as ‘baby giraffes’ that flew from South Africa’s O. R. Tambo International Airport to “various animal parks” in Zhengzhou, China, via ABC’s Moscow Sheremetyevo cargo hub.⁹⁸

South Africa’s trade with China in giraffes appears to be poorly regulated, if at all: permits were issued for the export of 321 giraffes to one zoo—Jinan Wildlife World between 2016 and 2019. During our investigations in China in 2018 and 2019, we only found 16 giraffes at this zoo. With no legal protection in China, it is impossible to trace the whereabouts of the 305 Giraffes no longer at Jinan Wildlife World or the 9 giraffes legally exported to a tiger-bone wine factory in Guigang, the 21 giraffes exported to Golden Land Animal Trade – a brokering company implicated in the trafficking of wild-caught chimpanzees—and 132 giraffes that were exported to various unnamed zoos.

Meerkat

It is illegal to breed and sell meerkat in all provinces in South Africa without the required permits from Nature Conservation. Accredited captive-breeding operations for this species in South Africa are mostly privately owned South African zoos. Due to South Africa’s poor enforcement of conservation laws, illegal meerkat breeders brazenly advertise these animals for sale on online platforms such as Junk Mail, OLX and Gumtree.

Meerkat exports to China (at least 1,394 that we are aware of during the period 2016 to 2019) are seldom checked by the South African authorities. The possibility that more wild-caught meerkats than captive-bred meerkats are exported to China, cannot be ruled out.

The following are just two examples of so-called legal exports of meerkat to China:

- In 2020, 25 ‘meerkat’ were ‘legally’ exported to a small, concrete-caged breeding farm, i.e. the Heshan Longkou Jinfeng Animal Breeding Farm, with documents giving the scientific name of the meerkat as *Leptailurus Serval*, which is incorrect. The scientific name for the meerkat is *Suricata suricatta*. The documents consequently did not even identify the animals. It is impossible to establish whether serval or meerkat were

⁹⁴ <https://africageographic.com/blog/trade-elephant-giraffe-and-rhino-3-african-countries-take-on-cites-rulings/>

⁹⁵ <https://www.iol.co.za/news/south-africa/gauteng/lions-cheetahs-and-rhino-among-33-wild-species-reclassified-as-farm-animals-35911810>

⁹⁶ *Ibid.*

⁹⁷ <https://www.msuir.org/new-blog/2019/11/6/the-possible-exploitation-of-giraffes-through-the-cites-appendix-ii-listing>

⁹⁸ <https://www.cargonewswire.com/airbridgecargo-demonstrates-live-animals-expertise-abc-care-product-transporting-66-giraffes/>

exported, because the exports of 'insignificant' species like meerkat are seldom if ever checked by Nature Conservation inspectors at airports.

- 100 Meerkat were 'legally' exported in 2020 with a permit that had not been signed by the applicant or the holder of the permit. Permit conditions state very clearly that such a permit is invalid.

PERMIT CONDITIONS FOR THE NATIONAL/INTERNATIONAL IMPORT, EXPORT OR RE-EXPORT OF CITES AND NON-CITES SPECIES AND ANY PRODUCTS THEREOF; NON-CITES LIVE WILD ANIMALS, LIVE EXOTIC ANIMALS, HUNTING TROPHIES, WILD ANIMAL PRODUCTS, PROTECTED PLANTS AND LIVE FISH

These conditions will be applicable to all National/ International Imports, Exports and Re-Exports of CITES and Non-CITES species and any products thereof; live wild animals, live exotic animals, hunting trophies, wild animal products, protected plants and live fish by air, mail, rail and road within the Gauteng Province of which the first port of entry into and/ or the last port of exit out of the Province of Gauteng/ South Africa will be OR Tambo International Airport.

Import permits are not valid unless the imported consignment is accompanied by a valid (original) export permit from the country/ province of origin (if required), which must be handed to the authorized Environmental Management Inspector on inspection.

THE FOLLOWING CONDITIONS ARE APPLICABLE TO:
(A) ALL NATIONAL/ INTERNATIONAL IMPORTS, EXPORTS AND RE-EXPORTS OF CITES AND NON-CITES SPECIES AND ANY PRODUCTS THEREOF;
(B) LIVE WILD ANIMALS, LIVE EXOTIC ANIMALS, HUNTING TROPHIES, WILD ANIMAL PRODUCTS, PROTECTED PLANTS AND LIVE FISH (INCLUDING AIR MAIL, AIR, ROAD)

THIS PERMIT:

- Shall not be transferable;
- Shall be invalid until the signature of the holder/ Recipient thereof been appended thereto;
- This permit is not valid unless it has been endorsed and released by an authorized Environmental Management Inspector/ official prior to the import, export or re-export taking place. In cases of importation of live animals, which are to be quarantined at OR Tambo International Airport's Quarantine Station, the permit must be released prior to the animals leaving quarantine. Original import permits to be inserted into a sealed envelope and placed in the Environmental Management Inspector box that's provided at the quarantine station, no more than 14 working days after import;
- Shall be subject to the provisions of any other law and/or regulation;
- Shall be valid for one consignment only;
- The permit must be used in compliance with Veterinary and Agricultural requirements; and to the compliance with any Animal Regulations.

- The permit holder or his delegated agent must submit and pay for inspection by an authorized Environmental Management Inspector/ official, per telephone and confirm per fax a minimum of 48 hours prior to the import, export or re-export taking place to book an inspection (the inspection booking must be requested a minimum of 48 hours prior to the intended inspection), applicable for shipments done over weekends and public holidays, with the following information:
 - Name / Company Name of Importer / Exporter;
 - Name of Airline and Warehouse where intended inspection will take place;
 - Date and Time of Import / Export / Re-Export;
 - Date and Time of Intended inspection (subject to approval);
 - Agents particulars (if applicable), Carrier Name, Flight Number, Flight Time and Waybill Number;
 - The applicable permit number/s and relevant expiry dates; and
 - Detailed packing list as per condition 6.
- Inspections are by appointment only and early booking is necessary. An authorized Environmental Management Inspector/ official may be contacted at the following telephone numbers during office hours (07:00 – 16:30):
Office: +27 (11) 390-3687/ 2311
Fax: +27 (11) 390-1720
- All relevant documentation, including original permit/s (CITES permits must include original and coloured copy), Packing List/s, A photo copy of all these documents must also be handed to the Environmental Management Inspector/ official on inspection. The original permit/s, these conditions and packing list/s must accompany the consignment/s.
- All transport containers must be numbered and the numbers must coincide with the numbers on the packing list/s. The country/ province of destination as shown on the containers must coincide with the country/ province of destination as on the permit. The details on the packing list/s must coincide with the details on the permit/s.
- Detailed packing lists, that are signed and dated must accompany the consignment/s, with the following information:
 - Details of Importer and Exporter (Names, addresses and contact numbers);
 - Waybill number/s and name of carrier, flight number, date and time;
 - Transport container number/s;
 - Scientific name of species (in full) with relevant transporter / tag / ring numbers; a detailed description of specimen / product and the origin thereof;
 - Common name of species (in full);
 - Number per species per container (actual number exported / imported); and
 - Applicable permit number/s
- If this permit is not used, the original permit (CITES permits must include coloured copy) must be returned to the issuing authority within 14 working days after expiry thereof. Import permits must be returned to the issuing authority within 14 working days after use. Export permits must be handed to a Management Authority of the importing country/ province within 14 working days after use.
- The permit holder must make and retain photo copies of permit/s for audit inspections. Copies of import permits must be made and retained after endorsement, for Re-export permit applications. When applying for a Re-export permit, a copy of the endorsed import permit must be submitted to the Permit office with the application.
- A person authorized thereto by the Premier may only make any alteration on the permit.
- Failure to comply with any of the permit conditions renders the permit invalid and may result in criminal proceedings, cancellation of the permit/s and seizure of the consignment/s.
- The holder of the permit and / or his/ her delegated agent will be held responsible for any legal costs; costs incurred for delays and / or storage fees due to irregularities and / or due to the consignment being withheld due to incorrect documentation, and / or incorrect consignment/s and / or failure to comply with permit conditions.
- Permit holders or their delegated agents must inform the Environmental Management Inspector/ official when inspection is cancelled, or if they are late for an inspection, before a reasonable time before the inspection.

15 FEB 2019

Full Name _____ Date _____

Full Name _____ Date _____

Conditions to this permit have been issued subject to the provisions of section 400 (2), Ordinance 12 of 1983; the National Environmental Management: Biodiversity Act 2004; the Threatened or Protected Species Regulations, 2007 and the Convention on International Trade in Endangered Species 2000.

THE SOUTH AFRICAN TRADERS



Pictures Source: Airline Express Product (Pty) Ltd, Website Gallery - <http://www.flyinganimals.co.za/gallery.html>

Many of the live wild animals exported to China use Airline Express Products (Pty) Ltd, a customs clearance and cargo logistics company. According to their website—www.flyinganimals.co.za— their partners include Letsatsi La Africa, Mafunyane Game, Zoological Live Animals and Outspan Lions.

Only a handful of South African wildlife traders are benefiting financially through trading with China. Our investigations show that the entities listed below are/were some of the traders who are/were involved in selling live wildlife to Chinese importers.

AFRICAN PRIDE IMPORTS & EXPORTS – EDWARD COETZER

Edward Coetzer uses two company names: on LinkedIn he is known as *Eddco Wildlife Exports*,⁹⁹ but export permits are issued to him in the name of *African Pride Imports & Exports*. None of these businesses have websites and Coetzer appears to find buyers and importers on social media.¹⁰⁰ Coetzer has exported zebra to an unknown Chinese zoo,¹⁰¹ marmosets to a laboratory in the Conghua District of China and caracals to a Chinese brokering company.

⁹⁹ <https://za.linkedin.com/in/edward-coetzer-436372a0>

¹⁰⁰ <https://www.facebook.com/edward.coetzer>

¹⁰¹ <https://za.linkedin.com/in/edward-coetzer-436372a0>



Image Source: <https://www.facebook.com/edward.coetzer>

CATS FROM AFRICA – HENDRIK STEYN

Cats from Africa, on its Facebook page, claims to be an exporter of CITES Appendix I-listed species. However, the company, owned by Henrik Steyn, is not registered as a CITES-approved breeding facility.

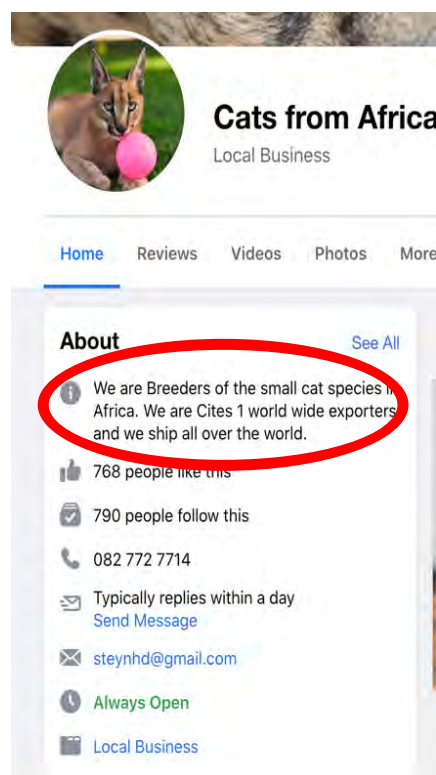


Image source: <https://www.facebook.com/catsfromafrica>

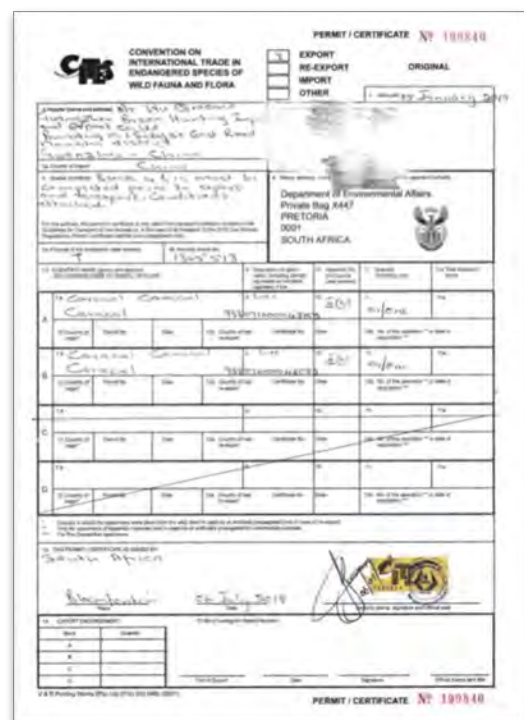
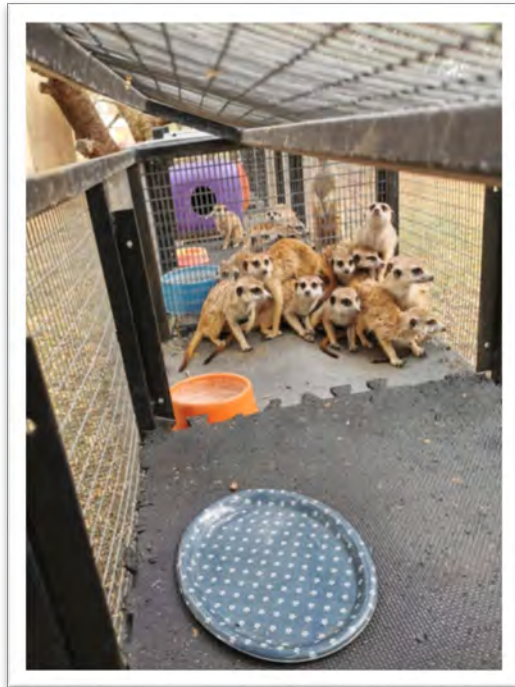


Image source:
<https://www.facebook.com/photo?fbid=965473636993701&set=pcb.965479563659775>



AIR MENNIES INTERNATIONAL AIR HOUSE, AVIATION PARK 18 FORNSA RD, FORNSA		PLEASE NOTIFY MR WU ON ARRIVAL TEL: +86 181 6297 0000	
Agent's IATA Code 77-4 5003/2004		*** KNOWN SHIPPER *** ** KNOWN CARGO ***	
Point of Issuance Address of First Carrier and Responsible Body O. R. TAMBO INTERNATIONAL		912 JAR 9920	
To DOR QATAR AIRWAYS (W.L PER QR		EAR PPK X X NVD HCV	
From BEIJING QZ1368/23 QMS96/22		XXX	
** ORIGINAL DOCUMENTS ATTACHED TO AIRWAYBILL ** ** PLEASE KEEP ANIMALS AT 16-24 DEGREES CELSIUS ** ** EMERGENCY CONTACT NO. +86 181 6297 0000 **			
No of Pkgs 3		Net Weight 131.5	
Gross Weight 130.0		Volume 131.5	
Species "A S A G R E E D"		Description LIVE ANIMALS 70 X MEERKATS (SURICATE SURICATE) DIMS: 150x50x35cm3	
Remarks ** THE AIRLINE DOES NOT TAKE ANY RESPONSIBILITY FOR MORTALITY DUE TO NATURAL CAUSES **		VOL: 131.5	
I, SEAN MICHAEL SPICE FOR RYS MENNIES INTERNATIONAL AS AGENTS FOR SHIPPER.			
2019-12-11 O. R. TAMBO INTERNATIONAL			

Images Source: <https://www.facebook.com/photo?fbid=965473636993701&set=pcb.965479563659775>

CLAASEN, GERT

Gert Claasen, a breeder of Big Cats, reported that in 2018 three lions on his farm were brutally butchered and that another three lions had disappeared. Previously, in 2013, five Lions had also disappeared from his farm.¹⁰² He exported meerkat to a brokering company that we cannot trace. Servals were exported to a breeding farm that specialises in bird species and the breeding of horses.

CUTHBERTSON, ROZANNE/VOGES, EDWIN

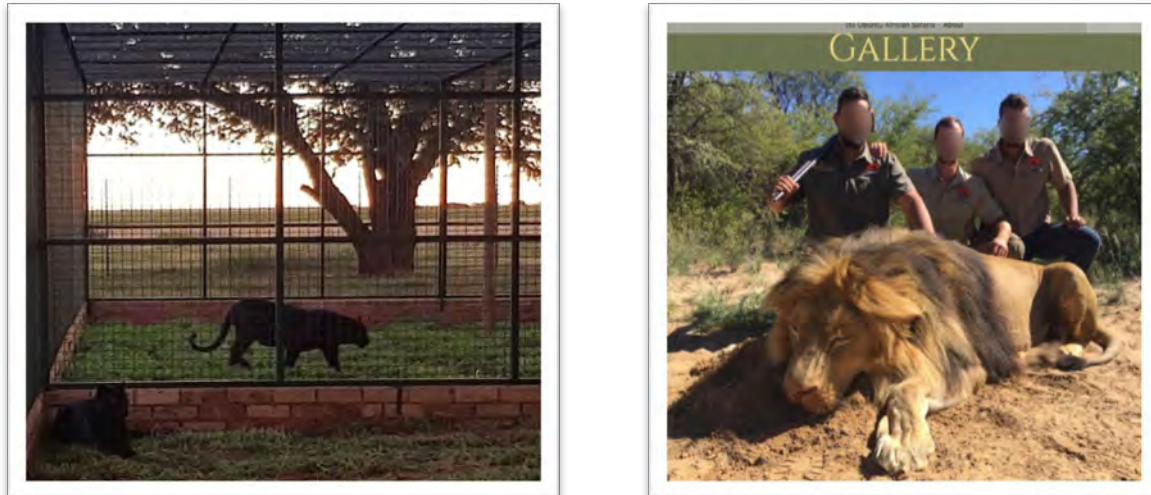
Edwin Voges is the manager or owner of Taung Place of The Lion in the North West province,¹⁰³ a farm where he breeds Big Cats and serval, caracal, etc. Interestingly, permits for the export to China of lions, which are a CITES Appendix II-listed species, were issued in the name of Rozanne Cuthbertson, his wife, while permits for non-listed CITES species were issued in the name Edwin Voges himself. Cuthbertson exported more than 10 lions in one year to a zoo and to a brokering company with no online information, in China.

Voges also manages or owns Ubuntu African Safaris¹⁰⁴ situated in the North West province. The business offers hunting safaris, and includes the hunting of captive bred lions.

¹⁰² <http://41.185.8.117/~farmingp/index.php/farminglifestyle/item/12930-lion-lover-is-heartbroken-after-gang-butcher-three-of-his-majestic-beasts-for-body-parts-to-be-used-in-black-magic-rituals>

¹⁰³ <https://www.facebook.com/groups/204714433288778/>

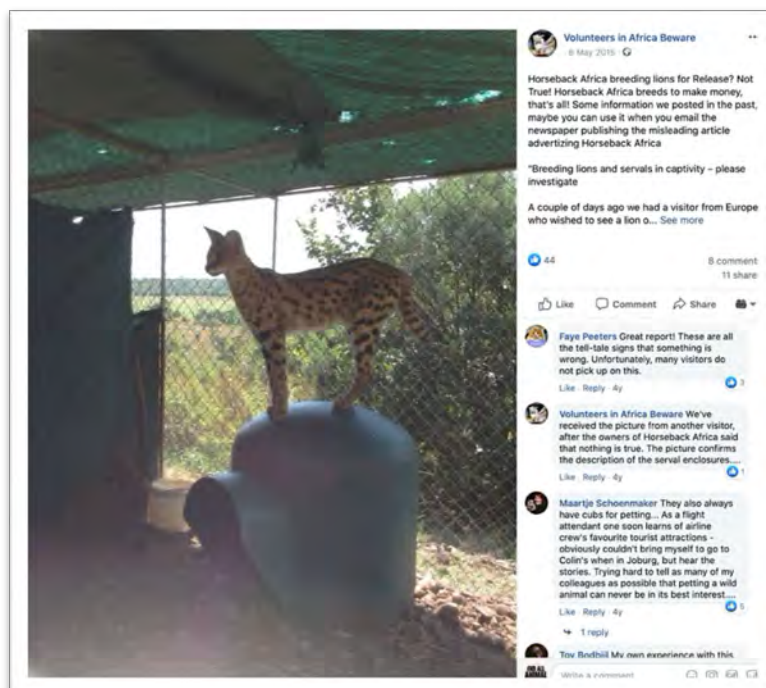
¹⁰⁴ <https://www.ubuntuafricansafaris.com/>



Images Source: <https://web.facebook.com/photo?fbid=10216270225210653&set=a.1610768231463>

HORSEBACK AFRICA – COLIN & THEONY MACRAE

Horseback Africa is a captive lion breeding facility that offers lion cub interaction.¹⁰⁵ It is also an African serval breeding facility.¹⁰⁶ At least two lions exported to Zambia¹⁰⁷ by *Horseback Africa* were in such poor health that they had to be euthanized.¹⁰⁸ The company sold lions to two South African facilities in the Free State Province implicated in canned hunting, i.e. Letsatsi La Africa and Puruma Lion Farm. Serval were exported to China to an address that we cannot trace.



Serval Breeding Facility in 2015. Image Source: <https://www.facebook.com/volunteersbeware/posts/horseback-africa-breeding-lions-for-release-not-true-horseback-africa-breeds-to-/852458851468279/>

¹⁰⁵ <http://www.walking-with-lions.za.net/tours.html> ; <https://www.facebook.com/volunteersbeware/posts/horseback-africa-breeding-lions-for-release-not-true-horseback-africa-breeds-to-/852458851468279/>

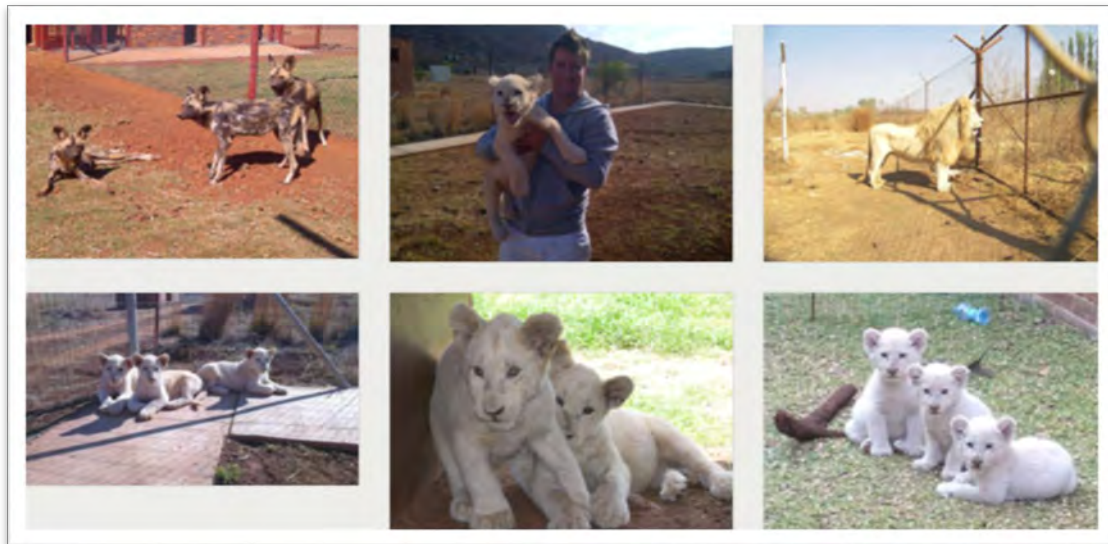
¹⁰⁶ <https://www.horsebackafrica.com/about-us/african-serval>

¹⁰⁷ <https://www.environment.gov.za/sites/default/files/question957.pdf>

¹⁰⁸ <https://911animalabuse.com/alert-lion-petting-walking/>

INDUNA PRIMATE & PARROT PARK T/A IMPEX WILDLIFE – ANTHONY WILBRAHAM

An online search shows that *Induna Primate & Parrot Park*, a private zoo, has been deregistered¹⁰⁹ but somehow now trades as Impex Wildlife.¹¹⁰ Over the years, the zoo imported seven colobus monkeys from Belfast Zoo,¹¹¹ a samango monkey from Dublin Zoo,¹¹² gibbons from Hong Kong,¹¹³ southern black howler monkeys from Twycross Zoo in the UK, and in 2018 two lions and five eland were sent to Bannerghatta Biological Park, Bengaluru as part of an exchange program.¹¹⁴ More than 15 lions were exported to a brokering company linked to a small breeding farm in China that sells animals to circuses, laboratories and zoos.¹¹⁵



Impex Wildlife Animal Exports. Image Source: <http://www.impexwildlife.co.za/impexwildlife-gallery.html>

JANSE VAN RENSBURG, JUDITH

Judith Janse Van Rensburg exports hundreds of marmosets to laboratories in China. We could not find any breeding facilities registered in her name, and she probably acts as an agent for marmoset breeders in South Africa.

LETSATSI LA AFRICA WILD ANIMAL & PREDATOR PARK – J. J. VAN DER WESTHUIZEN

Letsatsi la Africa states on its website that “*Letsatsi la Africa*, besides its predator park, is mainly active in breeding animals (we sell in South Africa and export worldwide)”.¹¹⁶ *Letsatsi la Africa*, situated in the Free State Province, has a long history of breeding animals for sale to zoos and safari parks around the world and was one of the first facilities in South Africa to ‘legally’ export lion bones to Laotian wild animal trafficker Vixay Keosavang.¹¹⁷ Letsatsi has been criticised by former volunteers at wildlife facilities in South Africa¹¹⁸ and was accused of allegedly selling two tigers and six lions to suspected

¹⁰⁹ <https://www.sacompany.co.za/companies/index/M2004033105>

¹¹⁰ <http://www.impexwildlife.co.za/>

¹¹¹ http://news.bbc.co.uk/2/hi/uk_news/northern_ireland/4742235.stm

¹¹² <https://web.facebook.com/media/set/?set=a.397138906974664.88760.151230364898854&type=3&rdc=1&rdp=1>

¹¹³ http://www.gibbons.de/main2/04zoogibbons/europ_nomascus/europ_nomascus2009.pdf

¹¹⁴ <http://cza.nic.in/uploads/documents/Exchange%20of%20Animals%20between%20India%20and%20foreign%20zoos.pdf>

¹¹⁵ http://zwgk.jiangmen.gov.cn/xxgk_gti/201904/t20190408_1868268.html

¹¹⁶ <https://lafrica.co.za/>

¹¹⁷ https://www.environment.gov.za/sites/default/files/parliamentary_updates/question1734.pdf

¹¹⁸ www.facebook.com/notes/volunteers-in-africa-beware/the-good-bad-and-ugly-lists-for-volunteering-places-in-africa/842278942486270/

wild animal smugglers who apparently used falsified permits to import some of the animals into Pakistan.¹¹⁹

Letsatsi la Africa in 2016 bought four lions and four tigers from captive Lion breeding farms in the North West Province and Limpopo Province, managed or owned by Johan Pio (implicated in the slaughter of captive bred lions for the lion bone trade and previous owner of Otavi Lion Park, now called Kimba Game Lodge),¹²⁰ infamous lion and tiger breeder and hunter of wild leopards, Walter Slippers,¹²¹ and from JFK Van Wyk. Van der Westhuizen was then issued permits to export 12 tigers to Voi Lodge¹²² in Klerksdorp. All the exports and imports described above happened over one weekend.

Van der Westhuizen has exported lions, tigers, black leopards, pumas, as well as African wildcats, black-footed cats, civets, genets, hyena, mongoose and grey wolves to zoos (some grey wolves were exported to a brokering or wholesale company) in China.



Lions and tigers transported To Letsatsi La Africa from Limpopo Province In 2016. On the same weekend, Letsatsi exported 12 tigers to Voi Lodge. Image Source: Provided

¹¹⁹ <https://www.dawn.com/news/274506>

¹²⁰ <https://conservationaction.co.za/resources/reports/the-extinction-business-south-africas-lion-bone-trade-2/>

¹²¹ <https://africageographic.com/stories/breaking-news-wild-leopards-captured-hunting-walter-slippers-farm/> ;

<http://www.tourismupdate.co.za/article/191395/Animal-cruelty-charges-laid-against-lion-farmer/156>

¹²² https://web.facebook.com/276640799057143/posts/voi-lodge-has-finally-been-busted-by-the-hawks-what-took-them-so-long-by-simon-bl/2614018278652705/?_rdc=1&_rdr

MAFUNYANE – MANUS PRETORIUS & MARIUS PRETORIUS

Mafunyane, on its website, is described as an ‘International Dealer in Quality Wildlife’ that ‘adhere(s) to all conservation societies rules and regulations, and through out (sic) this, to keep animal welfare our first priority.’¹²³ However, Manus Pretorius has reportedly contravened his own ‘ethics’ many times: sending wild-caught elephants to zoos in Mexico¹²⁴ and Poland and China,¹²⁵ and breeding with wild-caught African wild Dogs.¹²⁶ Manus Pretorius exported lions, rhinos, hyenas and giraffes from Mafunyane private game reserve in the Northwest Province to Chinese zoos.

MYSTIC MONKEYS AND FEATHERS WILDLIFE PARK – CHRISTA SAAYMAN



Image Source:

<https://www.howzit.co.za/a/monkeys-for-sale/rust-de-winter/11304/golden-capuchin-monkey.html>



Image Source: <https://mysticmonkeys.co.za/>

Mystic Monkeys and Feathers Wildlife Park, located in the Limpopo Province, claims to be a ‘true sanctuary.’¹²⁷ However, in stark contrast with the ethics of a true sanctuary, the park offers animal interactions and the owner, *Christa Saayman*, breeds and exports animals: marmosets to a Chinese breeding farm, as well as African Penguins, cheetah, brown lemurs, meerkat, bat-eared foxes, mongoose and white-throated capuchins to a wildlife brokering company in China. Saayman also exported chimpanzees, black spider monkeys, hyenas, lions, jaguars and ring-tailed lemurs to zoos in China. She also sells primates to individuals in South Africa.¹²⁸ She is accused of using Thailand as a transit point for the export of rhinos to Vietnam¹²⁹ and of selling 90 primates to a ‘fake company registered as a zoo to facilitate imports’¹³⁰ in Thailand.

¹²³ <http://www.mafunyane.com/>

¹²⁴ <https://mg.co.za/article/2003-04-25-ghiazza-sends-elephants-to-zoos/>

¹²⁵ <https://www.wti.org.in/news/british-airways-flies-deeper-into-controversy/>

¹²⁶ https://www.journeyman.tv/film_documents/4643/transcript/

¹²⁷ <https://mysticmonkeys.co.za/>

¹²⁸ <https://www.howzit.co.za/a/monkeys-for-sale/rust-de-winter/11304/golden-capuchin-monkey.html>

¹²⁹ <https://annamiticus.com/2012/08/15/rhinos-from-south-africa-to-vietnam-via-thailand/>

¹³⁰ <https://mg.co.za/article/2012-07-26-south-africa-at-core-of-illicit-ape-trade/>

NAAUWPOORT PARROTS / BUNDU BIRDS / P. F. DISTRIBUTORS – GIDEON FOURIE

Gideon Fourie, trading as *Naauwpoort Parrots*, *Bundu Birds* and *P. F. Fourie*, has no website. The previous webpage for Naauwpoort Parrots, www.birdsforafrica.co.za was taken down in 2014, after Fourie's suspected involvement in the trafficking of 500 rescued African grey parrots through a Kinshasa-based company, Byart Birds/Balkan Birds, came to light.¹³¹ Fourie reportedly established Byart Birds in the Democratic Republic of the Congo and acted as the company's agent and sales representative.¹³² The same company, i.e. Byart Birds, also sold 33 'bushmeat orphan' monkeys to controversial wildlife trader, Mike Bester, of Bester Birds and Animal Zoo Farm. Byart Birds has been involved in many illegal shipments of animals confiscated in the DRC.¹³³ Fourie exported marmosets to a brokering company that sells animals to laboratories, and black leopards to a zoo in China.

SAVANNA GAME SERVICES

Savanna Game Services was owned by Dr Chris Kingsley who died in 2018. The manager at Savanna, Terrence Anderson, is now trading as Anderson Wildlife Traders. Both companies, first under Savanna Game Traders and now under Anderson Wildlife Traders, exported hippos, meerkat, kudu and large numbers of giraffe to one zoo, and caracal to a breeding farm in China.



Image Source: <https://www.facebook.com/AndersonWildlifeT>

SNYMAN, ANDRE

Andre Snyman, also trading as BigEye Investments 663C, is a breeder of primates, Big Cats and other wild animals, in Vanderbijlpark. He exported caracal, meerkat, marmosets and African wild dogs to a breeding farm, servals to addresses we cannot trace, and meerkat and caracal to two brokering companies, both of which are questionable, in China.

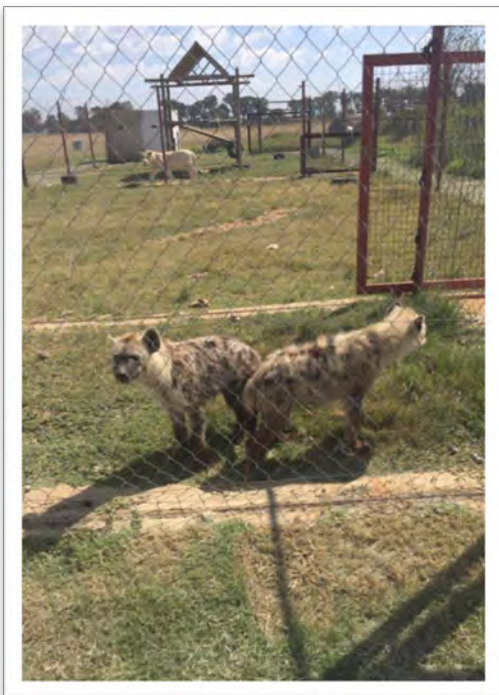
¹³¹ <https://www.pressreader.com/south-africa/saturday-star-south-africa/20110205/281612416872397>

¹³² <https://mg.co.za/article/2011-01-14-outrage-over-dead-parrots/>

¹³³ <https://africageographic.com/stories/african-grey-parrot-bust-in-the-drc/> ; <https://www.dailymaverick.co.za/article/2016-09-30-grey-area-the-illicit-parrot-trade-and-sas-captive-breeding-industry/> ; <https://www.bonoboincongo.com/2016/03/10/african-grey-parrot-bust-now-what/>



Image Source: Provided



Images Source: <https://www.facebook.com/photo.php?fbid=10209374040167198&set=pb.1209803552.-2207520000..&type=3>

VAN ZYL, THEUNS

Theuns van Zyl, also trading as TL Van Zyl CC, is a bird and primate breeder in Vanderbijlpark, Gauteng Province. His business does not have a website, but he is one of the biggest exporters of marmosets to a laboratory and a brokering company in China.

ZOOLOGICAL LIVE ANIMAL SUPPLIERS CC – JAMES MAGILL

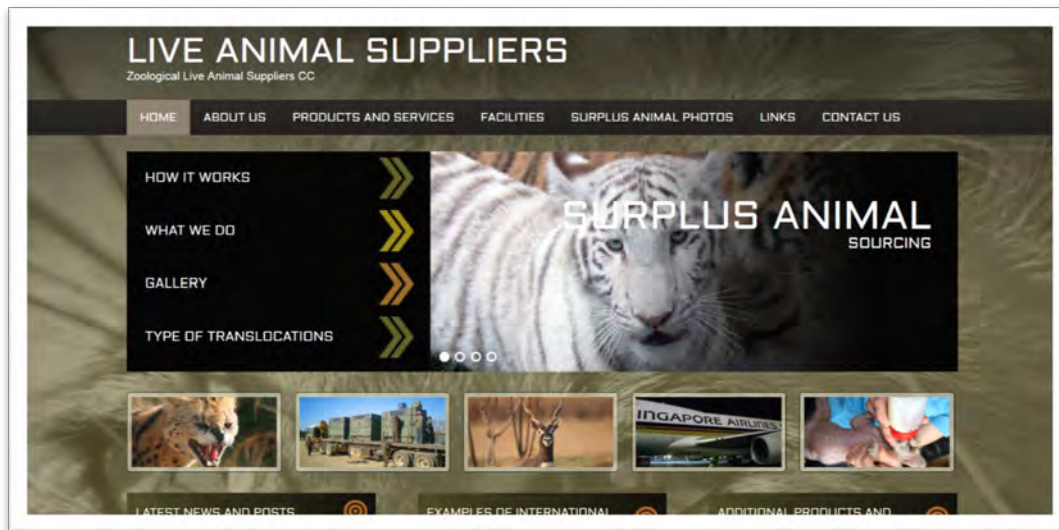


Image Source: <http://zoosupplies.co.za/>

Zoological Live Animal Suppliers CC is a private company/close corporation, that trades from Endofaun Zoo, which is a privately owned zoo. Both companies appear to have *James Magill* as managing director.¹³⁴ Magill is a well-known not only as an animal supplier to international zoos, but also for so-called dodgy rhino exports to China and Vietnam,¹³⁵ and for keeping and breeding animal species in horrific conditions at Endofaun Zoo.¹³⁶ At the time, the zoo was listed as an institutional member of the Pan African Association of Zoos and Aquaria (PAAZA). Endofaun Zoo was also investigated by the National Council of Societies for the Prevention of Cruelty to Animals (NSPCA) after two leopards died in the zoo in 2018.¹³⁷



Image Source: http://zoosupplies.co.za/?page_id=53

¹³⁴ http://zoosupplies.co.za/?page_id=261

¹³⁵ <https://www.pressreader.com/south-africa/sunday-tribune-south-africa/20120617/281685431920794> ; <https://lionaid.org/news/2012/11/south-african-wildlife-traders-and-their-vietnamese-and-chinese-clients-a-network-of-deception.htm> ; <https://akelley1191.wordpress.com/2013/06/13/rhinos-a-special-look/>

¹³⁶ <https://www.traveller24.com/News/PICS-Animal-cruelty-revealed-at-Gauteng-zoo-20150505>

¹³⁷ <https://www.netwerk24.com/Nuus/Omgewing/dieretuin-ondersoek-nadat-luiperds-vrek-20180130#loggedin>

A list of surplus animals for sale in 2017 by Zoological Live Animal Suppliers cc included more than 20 lion cubs and adults, leopards, tigers, hyenas, rhinos and 6 groups of African wild dogs. Magill exported marmosets to a laboratory and to a breeding farm that supplies laboratories in China, giraffes to an animal brokering company and meerkat, black-backed jackal, caracal, serval, mongoose and African wild dogs to a small breeding farm, and lions to a zoo.

Endofaun Zoo, founded by James Magill and used as an animal breeding facility, is not registered with CITES as a breeding facility for primates, yet Magill was issued CITES export permits for CITES Appendix I-listed cotton-top tamarins to a small breeding farm in China. In 2015, he kept and bred cotton-top tamarins and marmosets in small cages inside a room on the zoo property.



Image Credit: Ban Animal Trading, 2015

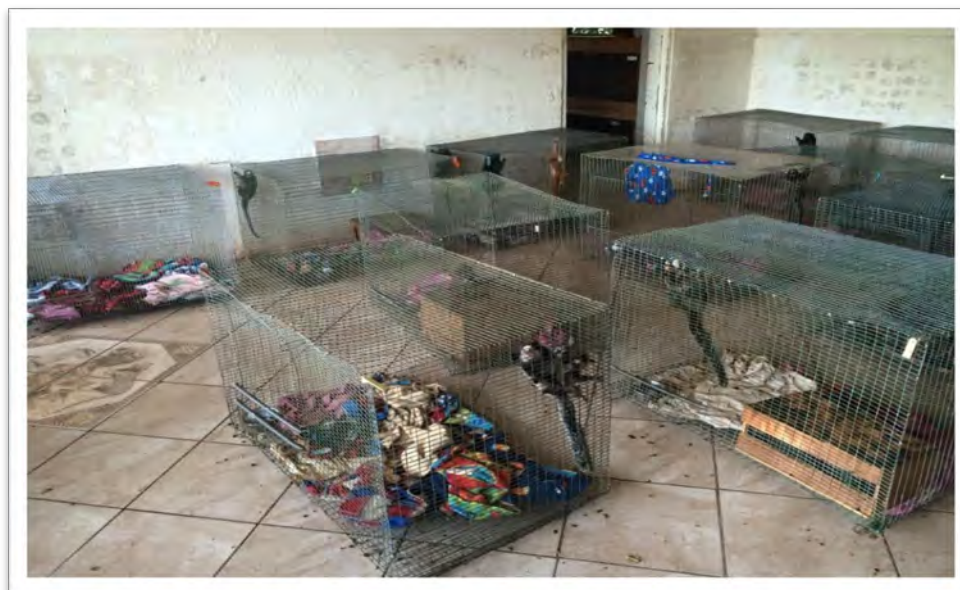


Image Credit: Ban Animal Trading, 2015

LOCAL SUPPLIERS TO SOUTH AFRICAN TRADERS

South African wildlife traders not only export the animals they breed at their own zoos and on farms, but often act as export agents for other zoos and breeders. They swop or buy/trade animals from other breeders and wildlife traders to either breed with or export internationally. Our investigations show that the businesses listed below are/were some of the suppliers to the traders who sell live wildlife to Chinese importers.

NAME	PROVINCE	WEBSITE (if available)
Ann Van Dyk Cheetah Centre	Northwest Province	https://dewildt.co.za
Botes, A.I.	Northwest Province	
Cheetau Lodge	Free State Province	https://cheetaulodge.com
Daniell Cheetah Project	Eastern Cape Province	https://daniellcheetahproject.com/our-cause/
Du Plessis, A.H.	Limpopo Province	
Engelbrecht, C	Northwest Province	
Eventiera Wildlife Park	Limpopo Province	https://eventiera.com
Feracare Wildlife Centre	Limpopo Province	https://www.facebook.com/Feracare/
Giraffe House Awareness Centre	Western Cape	http://www.giraffehouse.co.za
Hartbeespoort Dam Snake & Animal Park	Northwest Province	http://www.hartbeespoortsnakeanimalpark.co.za
Hoedspruit Endangered Species Centre	Limpopo Province	https://hesc.co.za
Imberba Rakia	Limpopo Province	http://www.imberba-rakia.com/
Johannesburg Zoo	Gauteng Province	https://www.jhbzoo.org.za
Kirby, E. L.	Free State Province	
Klein Buisfontein Ranch	Northwest Province	https://kleinbuisfontein.co.za
Kohra Lodge	Northwest Province	https://www.facebook.com/Kohra-Lion-Farm-1082300705161361/
Lampbrecht, W.W.	Northwest Province	
Lategan, J. B.	Free State Province	
Marques, Raul	Gauteng Province	
Moholoholo Wildlife Rehabilitation Centre	Limpopo Province	https://www.moholoholo.co.za
Pieterse, J.C.	Limpopo Province	
Pio, J.W.	Northwest Province	
Rhino & Lion Nature Reserve	Gauteng Province	https://www.rhinolion.co.za
Sebaka Private Game Lodge	Mpumalanga Province	http://sebakalodge.co.za
Slippers, Walter	Limpopo Province	
Snyman, Annell	Limpopo Province	
Vaalkop Game Ranch	Northwest Province	
Van Der Westhuizen, David	Eastern Cape	

LEGISLATION IN CHINA

INDIGENOUS ANIMAL SPECIES IN CHINA

The Chinese government purportedly protects its endemic wild animals by dividing them into two classes. This division is repeated in the legislation and management regulations relating to these

species.¹³⁸ The classification system is divided into first class and second class protection,¹³⁹ depending on the scarcity of the species in the country. The Class 1 and Class 2 lists of wildlife species are incorporated in the List of Wild Animals and Plants under State Priority Conservation, and the Red List of China's Biodiversity—both lists form part of the revised 2016 Wildlife Protection Law (WPL).¹⁴⁰ The first tier includes the giant panda, snow leopard, Asian elephant, the dugong, and—since 1993—other non-indigenous species such as rhinos and African elephants but excludes pangolins and black(moon) bears.

The WPL's purpose, is “protecting [wild] animals, saving rare and endangered species of wild animals, maintaining biodiversity and ecological balance, and advancing the building of ecological civilization.”¹⁴¹ This legislation, however, continues to refer to wildlife utilisation and commercialisation and allows for the captive breeding of wildlife for commercial purposes—with all the loopholes that come with it. Under this system there has been a proliferation of tiger farms, where the animals are kept in appalling conditions.¹⁴² Animal species not listed as requiring Class 1 or Class 2 protection due to the scarcity of the species, are not protected at all.¹⁴³ Implementation of the WPL has been devolved to provincial-level government authorities and this has made accountability more difficult and is an obstacle to the implementation of China's CITES obligations¹⁴⁴. In addition, local governments are incentivised to loosely regulate wildlife industries because they are seen to contribute to the local economy.¹⁴⁵

The WPL requires captive breeding of wildlife under special national protection to “be beneficial to the protection of the species and its scientific research”. It must be non-destructive of the species in the wild. It states that there must be necessary space for movement and conditions of living, breeding, health, and sanitation in accordance with the behavioural needs of the species. The licensed party has to ensure suitable sites, facilities, and technologies for breeding and developmental purposes, and the facilities have to comply with prescribed technical standards and disease prevention requirements. Wild animals in captivity may not be mistreated.¹⁴⁶

The WPL prohibits the sale, purchase, or use of rare or near-extinction wild animals, and their products that are under special national protection. However, as always, exceptions are made for the trade in these wildlife species and their products for certain purposes, including scientific research, captive breeding, and public exhibitions or performances involving wild animals.¹⁴⁷ Wildlife protection in China is affected by the implementation of conflicting legislation such as the laws administered by the Ministry of Housing and Urban-Rural Development. Moreover, there are competing administrative interests in wildlife management. Government-owned zoos and wildlife parks come under the remit of the State Forestry Bureau, while the Fishery Bureau, which falls under the Ministry of Agriculture,

¹³⁸ <https://www.sixthtone.com/news/1004408/chinas-wildlife-conservation-list-to-undergo-historic-revision>

¹³⁹ http://www.xinhuanet.com/english/2020-02/12/c_138777436.htm

¹⁴⁰ <https://www.loc.gov/law/foreign-news/article/china-new-wildlife-protection-law/>

¹⁴¹ http://www.xinhuanet.com/legal/2016-07/03/c_129110499.htm

¹⁴² <https://eia-international.org/wp-content/uploads/Cultivating-Demand-The-Growing-Threat-of-Tiger-Farms.pdf>

¹⁴³ <https://www.scmp.com/news/china/society/article/2100775/chinas-terrible-zoos-and-why-theyre-still-thriving>

¹⁴⁴ Stephens, S. and Southerland, M. *China's Role in Wildlife Trafficking and the Chinese Government's Response*. U.S.-China Economic and Security Review Commission, 6 December 2018. <https://www.uscc.gov/sites/default/files/Research/2018.12.06%20-%20Wildlife%20Trafficking%20-%20Final%20Version.pdf>

¹⁴⁵ *Ibid.*

¹⁴⁶ <https://www.scmp.com/news/china/society/article/2100775/chinas-terrible-zoos-and-why-theyre-still-thriving>

¹⁴⁷ <https://www.scmp.com/news/china/society/article/2100775/chinas-terrible-zoos-and-why-theyre-still-thriving> ; <http://www.sixthtone.com/news/1056/why-are-there-so-many-loopholes-in-chinas-wildlife-protection-law%3F>

is responsible for aquariums.¹⁴⁸ There are problems with local protectionism, low awareness of environment protection, and insufficient public participation.¹⁴⁹

The reality is that these lists do not protect China's wild animals, and offer no protection to captive animals (indigenous or exotic) in the country's zoos and so-called safari parks. Moon bears, despite being listed as a Class 2-protected species, which means that they cannot be hunted, killed or sold,¹⁵⁰ are farmed in horrific conditions and the animals are denied adequate and proper food to maximise bile extraction.¹⁵¹

Following the outbreak of the Coronavirus, the Chinese government has apparently fast-tracked the first revision in 30 years of the country's protected wildlife legislation, which it says it will publish at the end of 2020.¹⁵²

CAPTIVE WILD ANIMAL WELFARE LAWS IN CHINA

Chinese Zoos and Safari Parks/Wildlife Parks are managed by two national governing authorities, i.e. the State Forestry Administration and the Ministry of Housing and Urban-Rural Development (MHURD).¹⁵³ The Chinese Association of Zoological Gardens (CAZG), a sub-division of MHURD, is a non-profit organisation responsible for China's zoos and safari parks with animal exhibits.¹⁵⁴ Membership is voluntary. Its supposed role is to enhance the management of zoos and to promote conservation, breeding and research for endangered wild animals. The organisation manages the breeding and the loaning of Giant Pandas to international zoos. In 2018, the CAZG initiated a project to determine 'minimum welfare standards for captive wild animals,' but no update on the progress of these standards can be found.¹⁵⁵ CAZG is not a member of WAZA.

China's State Forestry Administration regulations, implemented in 2015, forbid close contact between wild animals and visitors in zoos and wildlife parks.¹⁵⁶ Similarly, animal circuses in China were banned in 2010, but have since flourished, with most zoos and safari parks offering at least one animal circus show every day.¹⁵⁷

Laws to protect the welfare of captive wild animals in China's zoos and safari parks, do not exist. In summary: although there is legislation regulating the trade in wild animals in China, the legislation is patchy and it is poorly implemented. Even animals kept in shocking conditions in shopping malls in China continue to make headlines.¹⁵⁸

¹⁴⁸ <https://www.scmp.com/news/china/society/article/2100775/chinas-terrible-zoos-and-why-theyre-still-thriving>

¹⁴⁹ www.mdpi.com/journal/sustainability: Sustainability 2019, 11, 3112; doi:10.3390/su11113112

¹⁵⁰ <http://www.sixthtone.com/news/1004212/the-people-protecting-bears-from-chinas-bile-farms>

¹⁵¹ <https://www.animalsandsociety.org/wp-content/uploads/2016/05/li.pdf>: P. J. Li, G. Davey / Society & Animals 21 (2013) 34-53

¹⁵² <https://www.sixthtone.com/news/1004408/chinas-wildlife-conservation-list-to-undergo-historic-revision>

¹⁵³ https://africageographic.com/wp-content/uploads/2018/04/African-elephant-import-raw-data_china.pdf

¹⁵⁴ <https://www.coursehero.com/file/pu6dl2/CAZG-Founded-in-1985-the-Chinese-Association-of-Zoological-Gardens-CAZG-is-a/>

¹⁵⁵ <https://http://www.cazg.org.cn/>

¹⁵⁶ <https://wildwelfare.org/tiger-cub-suffering-at-shanghai-wild-animal-park-china/>

¹⁵⁷ <https://www.animalsasia.org/vn/media/news/news-archive/chinese-government-releases-plan-for-better-zoo-care.html>

¹⁵⁸ <https://qz.com/734610/pizza-the-worlds-saddest-polar-bear-is-just-one-of-thousands-of-arctic-animals-living-in-malls-in-china/>

SO WHERE DO THEY GO?—THE DESTINATIONS

THEME PARKS AND ZOOS

The zoo, theme park and wildlife park industry in China has increased dramatically from 1,970 in 1990, to over 16,700 in 2018.¹⁵⁹ Government-run zoos are ubiquitous in Chinese cities, while wildlife parks (seen as attractive tourism resources,¹⁶⁰ most of which are privately owned and are run on commercial principles with little, if any, emphasis on conservation) have flourished in recent years in response to rising demand.¹⁶¹ Wildlife parks are generally built and owned in partnership with the investor and the local landowner. The operating expenses are defrayed by the income of selling the tickets which accordingly, are usually quite expensive.¹⁶²

While the majority of wildlife parks occupy large areas, these do not benefit the animals because there is normally very limited free-roaming open spaces. The animals are mostly kept in concrete enclosures, or small paddocks. The large spaces have been carefully planned and are perfectly manicured as leisure parks for the human visitors.

The majority of zoos and wildlife parks, or ‘safari parks’, as they are called in China, include large-scale animal circuses with performing animals, such as elephants, bears and primates. Investigations show that nearly all of the trained primates are not bred in captivity, but were wild-caught and illegally traded out of Africa and Indonesia, with destinations in China, Thailand and other Asian countries.¹⁶³

The marine park industry has also grown exponentially. This growth comes with a dangerous demand for threatened or endangered aquatic species. While marine shows and breeding programmes in the West are winding down as a result of intense regulations and pressure from animal protection groups, in China unregulated marine shows and breeding programmes are flourishing.¹⁶⁴

PRIMATE BREEDING FACILITIES AND BIOMEDICAL ANIMAL RESEARCH

China has positioned itself to be a global provider of medical research outsourcing. To this end, the country has been at the forefront of establishing primate breeding facilities to provide primates for China’s internal animal research, as well as establishing a primate export market to laboratories in the USA. More than 80% of primates used for scientific purposes in the USA are imported from China’s laboratory primate breeding farms.¹⁶⁵

Each primate breeding farm is allowed to provide a specific, limited number of animals for export and domestic use yearly. The laboratory animal science and biomedical animal research industry is said to be managed administratively by the People’s Congress and provincial People’s Congresses according to national and provincial laws, regulations, guidelines, and standards.¹⁶⁶

¹⁵⁹ <https://www.statista.com/statistics/279038/number-of-parks-and-zoos-in-china/>

¹⁶⁰ <http://www.zoocheck.com/wp-content/uploads/2015/06/Live-Feeding-in-Chinese-Zoos-Report-2005.pdf>

¹⁶¹ <https://www.scmp.com/news/china/society/article/2100775/chinas-terrible-zoos-and-why-theyre-still-thriving>

¹⁶² <http://www.zoocheck.com/wp-content/uploads/2015/06/Live-Feeding-in-Chinese-Zoos-Report-2005.pdf>

¹⁶³ <https://news.mongabay.com/2017/04/great-apes-in-asian-circus-style-shows-on-rise-so-is-trafficking/>

¹⁶⁴ <https://daxueconsulting.com/rising-zoo-aquarium-industry-in-china/>

¹⁶⁵ <https://www.inkstonenews.com/science/us-tariffs-china-monkeys-could-hurt-americas-biomedical-research/article/3023912>

¹⁶⁶ <https://academic.oup.com/ilarjournal/article/57/3/301/3796588>

The cosmetic industry has increased its presence in China, both in terms of sales to Chinese women, but also for safety testing purposes.¹⁶⁷ A new primate facility currently being established at the Kunming Institute of Zoology will be like a hospital, with separate departments for surgery, genetics and imaging, and a conveyor belt to move monkeys between departments.¹⁶⁸

In 2016, China released national guidelines on laboratory animal welfare and ethics.¹⁶⁹ However, no update on whether the draft guidelines have been adopted as a national standard in China, can be found online.¹⁷⁰ The guidelines, even if they have been adopted, offer little protection to the animals used in biomedical research. Dogs used in medical experiments in China are especially vulnerable, because they are not included in the definition of 'laboratory animals.' Their violent and inhumane treatment in laboratories falls outside the laws supposed to protect laboratory animals. Once dogs are no longer useful to scientists, they are eaten by humans.¹⁷¹

South African exotic primate breeders export hundreds of marmosets each year to Chinese laboratories and breeding farms that supply laboratories.

BREEDING FARMS

Despite indigenous wildlife protection laws in China, rare and endangered wild animal species are farmed in 'order to utilize and exploit them in disregard of their pain and suffering.'¹⁷² In the case of breeding farms in China, nothing could be more true. Indigenous animals like bears and tigers are farmed for bear bile and tiger bones for wine, and exotic animals, having little to no legal protection in the country, are forced to live in small, barren concrete cages and are sold off to circuses, individuals, zoos and laboratories. Brokering or wholesale agents often have their own breeding farms. The species and numbers of animals in breeding farms cannot be determined. There are no official or unofficial records and a cloak of secrecy hangs over these farms. It is obviously impossible to trace the animals once they have been sold by the breeding farms.

A ROOM WITH NO VIEW: ALPHABETICAL LIST OF CHINESE ENTITIES IMPORTING WILD ANIMALS FROM SOUTH AFRICA

Anji Zhongnan Baicaoyuan Zoo Co. Ltd.

Anji Zhongnan Baicaoyuan Zoo is located inside the Anji Zhongnan Baicaoyuan Garden, an amusement park¹⁷³ with some of the most daring rollercoaster rides in the world. The zoo was implicated in a scheme (devised and cancelled in 2018 after an international outcry)¹⁷⁴ to import illegally wild-caught gorillas, bonobos, chimpanzees, manatees and okapi from the Democratic Republic of the Congo.¹⁷⁵

¹⁶⁷ https://www.researchgate.net/publication/289864954_Oversight_of_Animal_Research_in_China

¹⁶⁸ <https://www.recherche-vie.ch/forschung-leben-de/assets/File/160420%20David%20Cyranski%20in%20Nature.pdf>

¹⁶⁹ https://www.chinadaily.com.cn/china/2016-03/18/content_23929714.htm

¹⁷⁰ <https://www.navs.org/monkey-cloning-cruelty-continues-in-china/#.XkAl0i2Q3RY> ;

<https://www.sciencemag.org/news/2020/01/animal-rights-conflict-prompts-leading-researcher-leave-germany-china>

¹⁷¹ Cao, D., *Animals in China: Law and Society*. The Palgrave Macmillan Animal Ethics Series. 2015:156.

¹⁷² *Ibid.*

¹⁷³ <https://www.trip.com/travel-guide/ANJI/zhongnan-baicao-garden-10524069/>

¹⁷⁴ <http://www.virungaprograms.com/china-drc-wildlife-export-deal-off-after-worldwide-pressure/>

¹⁷⁵ <http://www.environews-rdc.org/2018/06/10/conservation-10-okapis-et-8-bonobos-congolais-dans-le-zoo-de-taiyuan-en-chine/>

Anji Zhongnan Baicaoyuan Zoo offers animal circuses as ‘entertainment’,¹⁷⁶ with performances by bears, tigers, lions and crocodiles. The animals are mostly kept in concrete enclosures.¹⁷⁷ It is one of hundreds of unaccredited zoos in China that form part of amusement park developments popular amongst Chinese citizens and that contribute to large-scale animal abuse and suffering.

The Zhongnan Baicaoyuan Zoo uses Qindao Yushunda Tourism Investment Management Co. Ltd.,¹⁷⁸ an animal brokering company, to import wild animals. South Africa issued CITES export permits in 2019 for primates to the Qindao Yushunda Tourism Investment Management Co. Ltd., some of whom were sent to the Zhongnan Baicaoyuan Mini Zoo in 2019, while the final destination of the other primates imported by *Qindao Yushunda Tourism Investment Management Co. Ltd.*, is unknown. The Zhongnan Baicaoyuan Mini Zoo closed for business following the outbreak of the Coronavirus.¹⁷⁹



Image Source: https://www.tripadvisor.co.za/Attraction_Review-q644039-d1807927-Reviews-Zhongnan_Baicao_Garden-Anji_County_Zhejiang.html#photos;aggregationId=101&albumid=101&filter=7&ff=288618307



Image Source: <https://www.trip.com/travel-guide/anjizhongnan-baicao-garden-10524069/>

¹⁷⁶ <https://world.taobao.com/qingdan/200166874022.htm>

¹⁷⁷ <https://www.trip.com/travel-guide/anjizhongnan-baicao-garden-10524069/>

¹⁷⁸ <http://www.yushunda.cn/>

¹⁷⁹ https://k.sina.com.cn/article_1655444627_62ac149302000z5xk.html?from=local



Image Source: <https://www.trip.com/travel-guide/anji/zhongnan-baicao-garden-10524069/>

Beijing Johnsen International Trade Co. Ltd./Beijing Sun-Rising Technologies Co. Ltd./Jiangsu Johnsen Bioresource Co. Ltd.



Image Credit: Ban Animal Trading, 2018

Beijing Johnsen International Trade Co. Ltd.,¹⁸⁰ also known as *Beijing Sun-Rising Technologies*¹⁸¹ and *Jiangsu Johnsen Bioresource Co. Ltd.*, breeds and supplies laboratories in China, and also exports non-human primates, beagles and pigs to international laboratories for scientific purposes.¹⁸² *Beijing*

¹⁸⁰ <http://en.johnsen.net.cn/>; <https://www.lascn.net/SupplyDemand/Site/Index.aspx?id=219> ; https://www.octobot.fr/corporate_information/cne_0x1032f63cac53b00x5f641f9fe1fdac.html

¹⁸¹ <https://web.archive.org/web/20181111200212/http://www.sun-rising.net.cn/>

¹⁸² <http://en.johnsen.net.cn/class/view?id=11>; <https://groups.google.com/forum/#!msg/ar-news/SZDFypku5Wc/MGIhkcZ7vMJ>

Johnsen International Trade Co. Ltd. has two marmoset breeding facilities in China: one in Huli Town and another one in the suburbs of Beijing. South Africa issued CITES permits for the export of more than 400 Marmosets to this facility and its primate breeding farms from 2016 to 2019.



Image Credit: Ban Animal Trading, 2018

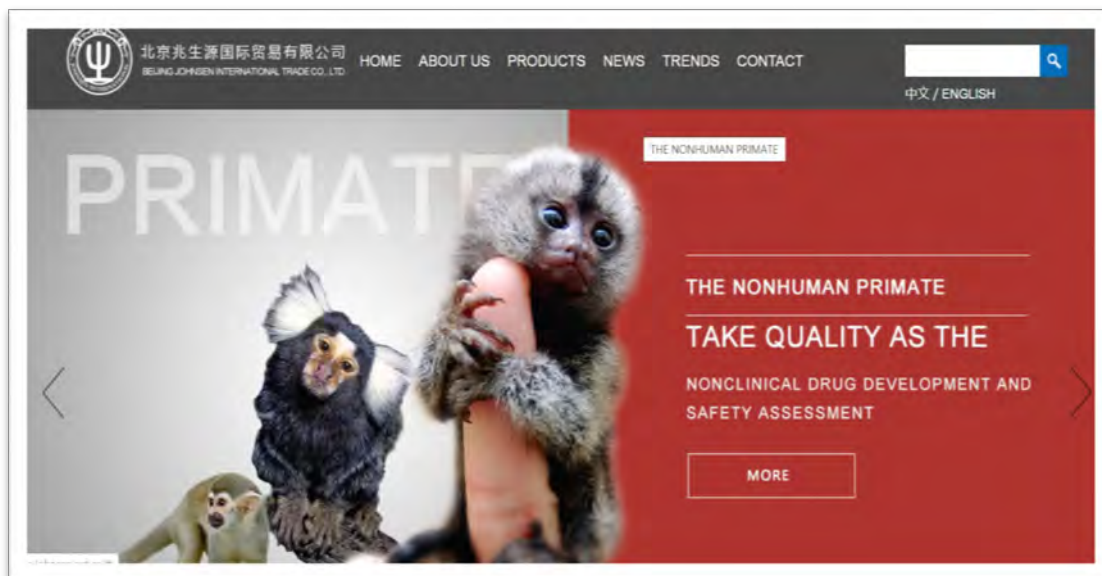


Image Source: <http://en.johnsen.net.cn/>

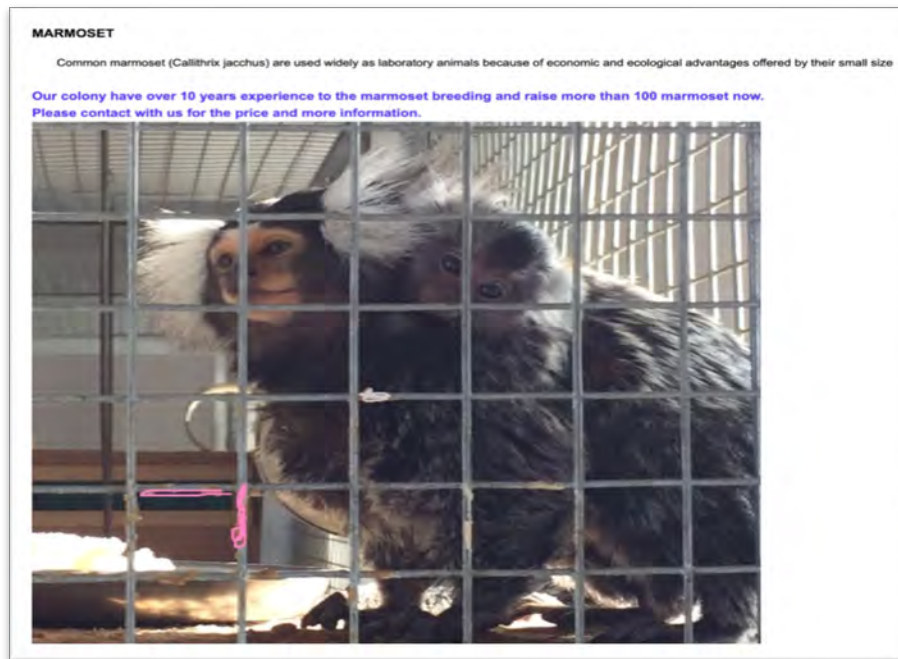


Image Source: <http://en.johnsen.net.cn/> - Advertisement for Marmoset

Changsha Ecological Zoo

*Changsha Ecological Zoo*¹⁸³ made headlines in 2019 when one of the zoo elephants trampled his keeper to death. All six elephants in this zoo have been cruelly trained to give massages, kick footballs and swing hula hoops.¹⁸⁴ Changsha Ecological Zoo, despite the fact that it trains animals for daily circus shows at the zoo¹⁸⁵ (zoo circuses were banned in 2010), is the only unit in Hunan province authorized by the Chinese Forestry Bureau and Agricultural department to keep first and second class wild animals.

Changsha Ecological Zoo illegally imported four 2-year old wild-caught chimpanzees from Guinea in 2011,¹⁸⁶ - the animals are now mostly 'employed in circus-type entertainment facilities'¹⁸⁷ at the zoo. Four gorillas, illegally imported from the Democratic Republic of Congo in 2010, were euthanized after a questionable diagnoses of hepatitis.¹⁸⁸ The zoo also illegally imported four elephants from Laos in 2016.¹⁸⁹

Amongst more than 100 giraffes exported from South Africa to China in 2015, were two baby giraffes who were taken to Changsha Ecological Zoo. No documentation on this specific export could be found, which means that in all probability, the giraffes were bought from either *Hainan Tropical Wildlife Park and Botanical Garden* or *Jinan Paomaling Wildlife World Co. Ltd.*, where giraffe exports from South Africa could be traced to. James Magill, of Zoological Live Animal Suppliers CC, exported four rhinos to this zoo,¹⁹⁰ and the zoo recently bought six pumas from South Africa.

¹⁸³ <http://www.cszoo.com.cn/>

¹⁸⁴ <https://www.thecitizen.co.tz/news/1840340-5402170-abcdbn/index.html>

¹⁸⁵ <http://tcfl.tingroom.com/2013/12/714.html>

¹⁸⁶ https://freetheapes.files.wordpress.com/2014/12/chimpanzees-in-china_jun141.pdf

¹⁸⁷ <https://conservationaction.co.za/recent-news/is-cites-turning-a-blind-eye-to-chinas-illicit-wildlife-imports/>

¹⁸⁸ *Ibid*

¹⁸⁹ <https://www.outsideonline.com/2405236/asian-elephant-trafficking-captivity-laos>

¹⁹⁰ <https://lionaid.org/news/2012/11/south-african-wildlife-traders-and-their-vietnamese-and-chinese-clients-a-network-of-deception.htm>



Image Source: <https://www.asianelephant.net/changsha/changsha.htm#>

Changxing Taihu Longzhimeng Animal World Cultural Tourism Development Co. Ltd.

The *Changxing Taihu Longzhimeng Animal World* entertainment centre in Huzhou—about a 90 minute drive from Shanghai—is one of the biggest animal entertainment parks in the world. It will host the biggest international animal circus¹⁹¹ and an oceanarium with belugas and dolphins.¹⁹² In June 2019, Changxing Taihu Longzhimeng Animal World had not yet been completed. Only the ‘safari park’ was open when we visited the site. The park creates the illusion that the captive animals are free to roam in big enclosures. This is far from the truth. More than half of the area in most of the enclosures is marked off with electrical fencing, limiting the movement of the animals and making the ‘safari park’ enclosures as big and barren as zoo cages.

Between 2016 and 2019 South Africa issued permits for the export of more than 200 animals to this amusement park, including: 35 bengal tigers, six black leopards, six leopards, ten lions, and an unknown number of wolves, black-footed cats, meerkat and hyenas.

For a link to a recent video of the circus at this zoo which was posted on 27th April 2020, see: <https://www.youtube.com/watch?v=MdRsHt23BD4>

In 2019 the zoo was also used as a holding facility for 32 wild-caught baby African elephants from Zimbabwe,¹⁹³ sold to China under a thick veil of secrecy and seemingly without the approval of CITES. No spectators were allowed to visit the elephants while they were being trained.

¹⁹¹ <https://blooloop.com/news/zooceanarium-consultant-taihu-longemont-animal-paradise/>

¹⁹² <https://www.trip.com/blog/city-things-to-do-1080790en/>

¹⁹³ <https://www.thestandard.co.zw/2019/11/10/zim-baby-elephants-comfort-jungle-steel-prisons-china/>



Image Source: <http://www.4006177878.com/website.index>



Circus under construction in 2019. Image Source: <https://mp.weixin.qq.com/s/yRhEoEtLIdQuwnFJZzsoMw>



Image Source: <https://www.trip.com/blog/city-things-to-do-1080790en/>



Image Source: https://www.ly.com/scenery/BookSceneryTicket_624577.html - 2019



Image Credit: Ban Animal Trading, 2019



Image Credit: Ban Animal Trading, 2019



Wild Dogs Confined to Concrete Paths. Image Credit: Ban Animal Trading, 2019



Image Credit: Ban Animal Trading, 2019



Image Source: https://www.ly.com/scenery/BookSceneryTicket_624577.html - 2019

Chimelong Safari Park

Chimelong Safari Park, also known as Giangjiang Safari Park in Gaungzhou, is the only zoo in China that is a member of the World Association of Zoos and Aquariums (WAZA).¹⁹⁴ It is one of several amusement parks owned and managed by the Chimelong Group.¹⁹⁵ The so-called safari park imported 24 young wild-caught elephants from Zimbabwe in 2015,¹⁹⁶ and apparently another 40 elephants, also wild-caught in Zimbabwe, in 2016.¹⁹⁷ Chimelong Safari Park has been accused of extreme animal abuse and cruelty,¹⁹⁸ and of using trafficked chimpanzees in circus performances.¹⁹⁹ Lions are also trained to perform in the circus at the park.²⁰⁰ South Africa sold lions to Chimelong in 2019.



Another elephant may have inflicted a tusk wound on this female in the Qingyuan quarantine facility, in China's Guangdong Province. The bulge on the inside of her left back leg is likely an abscess, says Scott Blais, of the Global Sanctuary for Elephants. In July, 24 young elephants were flown to China from Zimbabwe.

PHOTOGRAPH BY NATURE UNIVERSITY

Image Source: <https://www.nationalgeographic.com/news/2015/09/150925-elephants-china-zimbabwe-cites-joyce-poole-zoos-wildlife-trade/>

¹⁹⁴ <https://www.waza.org/news/waza-welcomes-new-members-2/>

¹⁹⁵ <https://www.thestreet.com/investing/stocks/the-10-most-alluring-amusement-parks-in-the-world-13255418>

¹⁹⁶ <https://www.animalsasia.org/us/media/news/news-archive/the-animal-welfare-review-june.html> ; <https://wildwelfare.org/zimbabwe-elephant-capture-why-its-a-concern/>

¹⁹⁷ <https://www.animals24-7.org/2016/09/19/zimbabwe-sells-wildlife-to-chinese-zoo-empire/>

¹⁹⁸ <https://www.youtube.com/watch?v=HVyEg12el78> ; <https://www.youtube.com/watch?v=vFDkS4DVUgQ>

¹⁹⁹ <https://freetheapes.files.wordpress.com/2014/11/cop17-report.pdf> ; https://www.boredpanda.com/photos-against-illegal-wildlife-trade/?utm_source=google&utm_medium=organic&utm_campaign=organic

²⁰⁰ <https://www.youtube.com/watch?v=sBfHMq5y0G8>

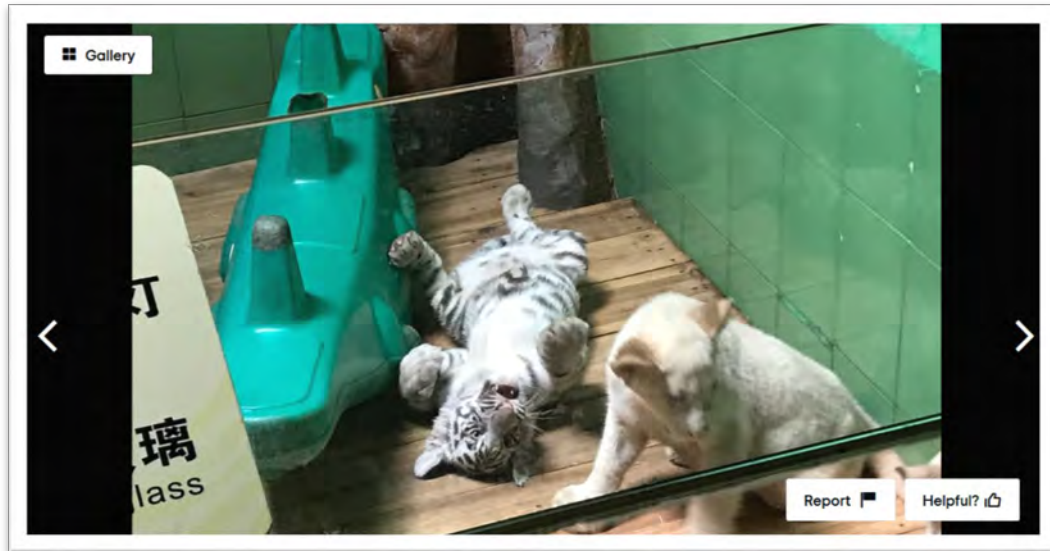


Image Source: https://www.tripadvisor.co.za/Attraction_Review-q298555-d1371635-Reviews-or5-Chimelong_Safari_Park-Guangzhou_Guangdong.html#photos;aggregationId=101&albumid=101&filter=7&ff=238930379

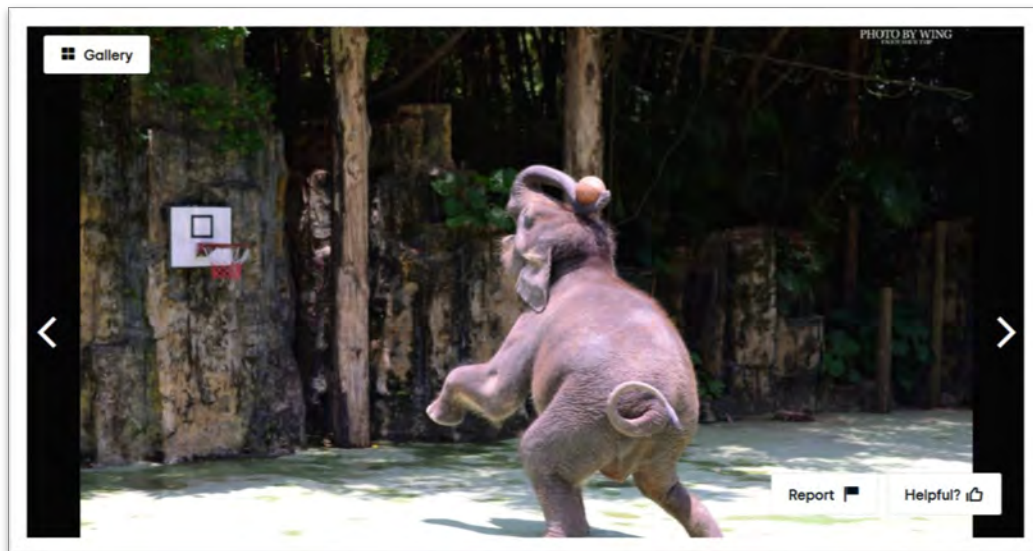


Image Source: https://www.tripadvisor.co.za/Attraction_Review-q298555-d1371635-Reviews-or5-Chimelong_Safari_Park-Guangzhou_Guangdong.html#photos;aggregationId=101&albumid=101&filter=7&ff=266888494

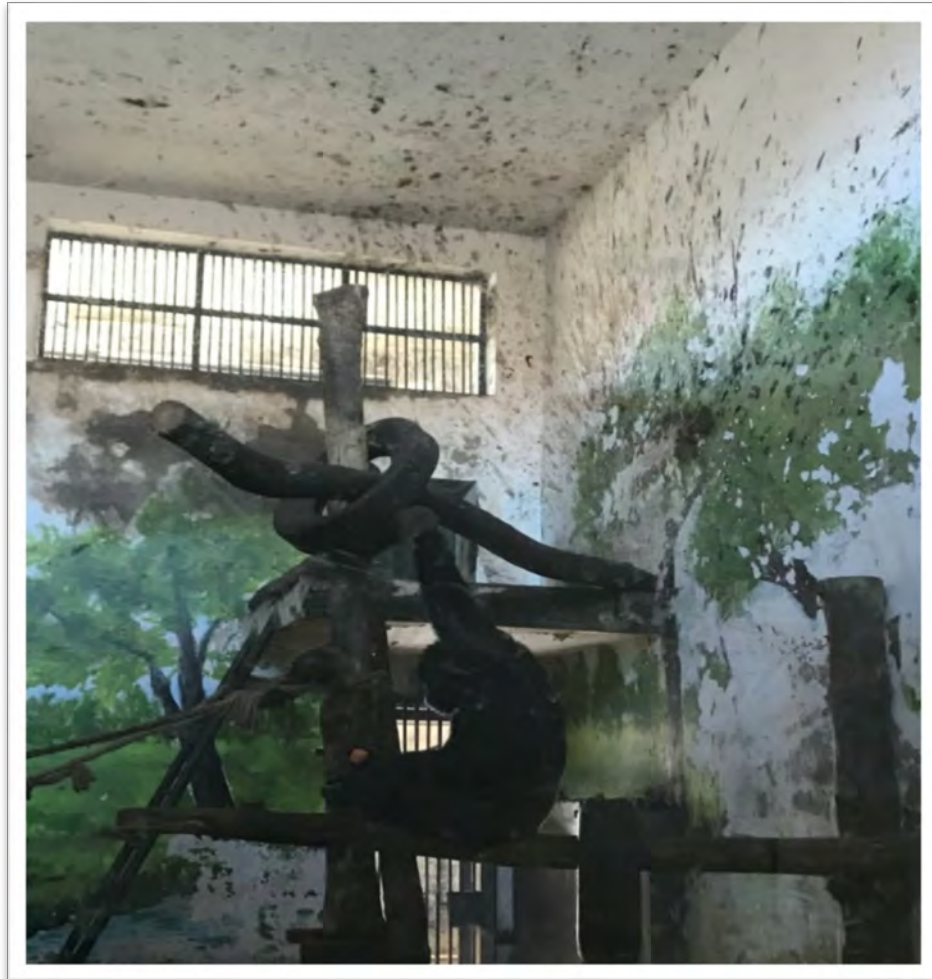
Dalian Dragon-Leader Import & Export Co. Ltd. / Dalian Longyuan Wildlife Consulting Co. Ltd.

Dalian Dragon-Leader Import & Export Co. Ltd. and *Dalian Longyuan Wildlife Consulting Co. Ltd.*, are registered as two companies, but phone numbers and addresses link the two companies and the general manager of *Dalian Longyuan Wildlife Consulting Co. Ltd.* Weibao Yuan,²⁰¹ appears to hold the same position in both companies. *Dalian Longyuan Wildlife Consulting Co. Ltd.* imports chimpanzees and other non-human primates.²⁰² Both companies are brokering and importing companies for Chinese zoos and safari parks and have imported wild animals from South Africa. They also appear to have a link to HK Botel Co. Ltd., a company registered in Hong Kong.

²⁰¹ <http://www.dllysw.com/news/news.php?class2=51&lang=en>

²⁰² <http://www.dllysw.com/product/showproduct.php?id=61&lang=en>

Dalian Dragon-Leader Import & Export Co. Ltd., also known as Dalian Longruida Import and Export Co. Ltd., was established in 2000 and now forms part of Hong Kong Ruier Investments Co. Ltd., which is registered in Hong Kong, and has been operational for about 3 years. Hong Kong Ruier Investments Co. Ltd., uses Dalian Dragon-Leader Import & Export Co. Ltd. as the importing agent of rare wild animals from South Africa and other parts of Africa for Chinese zoos.²⁰³



Solitary Chimpanzee, Tianjin Zoo. Image Credit: Ban Animal Trading, 2018

In some cases, CITES export permits issued in South Africa list the two companies as the recipients of the animals. The different addresses are all offices in Dalian City and cannot be the final destinations of the animals. In many cases, Hong Kong Ruier Investments is responsible for payment of the imported animals, even if the animals are destined for a specific zoo. Between 2016 and 2019, South Africa issued export permits for more than 200 animals, including African penguins, pumas, lions, caracals, meerkat and grey wolves to this company. Dalian Longyuan Wildlife Consulting Co. Ltd. also imported chimpanzees and elephants for Tianjin Zoo.²⁰⁴

²⁰³ <https://cocorioko.net/potential-chinese-investors-end-fact-finding-mission-in-sierra-leone/>

²⁰⁴ <http://www.dllysw.com/news/shownews.php?id=38&lang=en>



Dalian Dragon-Leader Main Office in Dalian City. Image Credit: Ban Animal Trading, 2019



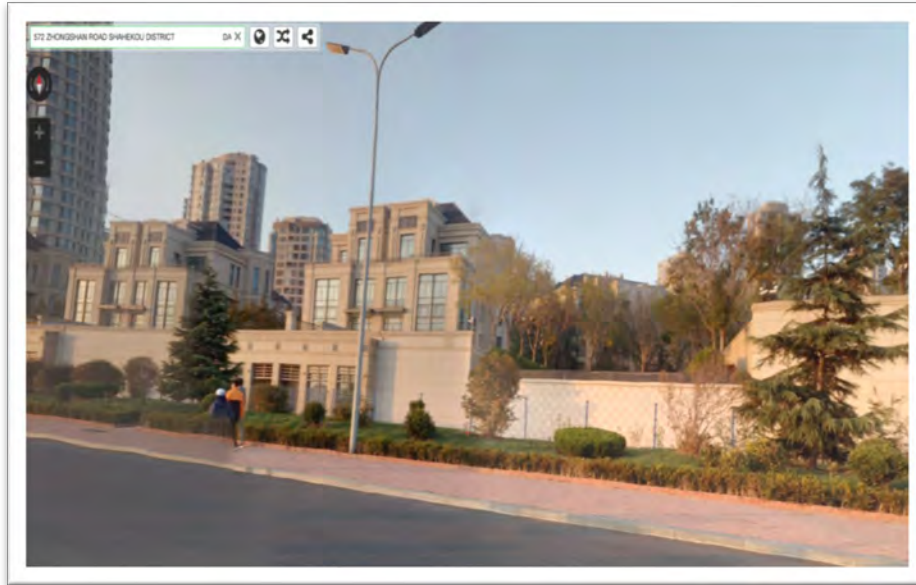
Inside Dalian Dragon-Leader Main Office, Dalian City. Image Credit: Ban Animal Trading, 2019



Inside Dalian Dragon-Leader Main Office, Dalian City. Image Credit: Ban Animal Trading, 2019



Dalian Dragon-Leader Second Office, Dalian City. Image Credit: Ban Animal Trading, 2019



Dalian Longyuan Wildlife Consulting Co. Ltd. Offices:

Image Source: <https://www.instantstreetview.com/@38.878282,121.579741,0.4h,5p,1z>

Aquatic wild-caught animals imported by these two companies include dolphins, beluga whales, orcas, seals, walruses and sea lions. There are more than 70 aquariums in China, and more than 870 cetaceans have been put into captivity from 2014 to 2018.²⁰⁵ According to a 2019 article, “China is the main driver of the captive marine mammal industry globally. Since 2014, 872 cetaceans have been put into captivity in China to satiate consumer demand for more marine species to be exhibited. Endangered species like orcas (killer whales) and beluga whales are common among the marine animals illegally caught and sold. At least 15 Russian orcas were imported to China between 2013 and 2017. As an endangered breed, the capture of any orcas is dangerous for the species – especially because once in captivity, their rate of mortality is extremely high. However, the prospect of high profits will continue to attract the capture of rare marine wildlife, legal or not. While China is not the only country fuelling demand for illegally-captured cetaceans, the nation is the world’s largest driver of demand.”²⁰⁶



Image Source: <https://app.emaze.com/mobile/%40aolifqifw?tqjs=0#/1>

²⁰⁵ <https://fingfx.thomsonreuters.com/gfx/rngs/CHINA-MARINEPARKS/0100805G0BL/CHINA-OCEANPARK.jpg>

²⁰⁶ <https://daxueconsulting.com/rising-zoo-aquarium-industry-in-china/>

Hong Kong Ruier Investments was registered in Hong Kong in December 2016, just after the Beijing Ruier/Rare Animal Breeding and Promoting Company was identified as the supporting business behind the controversial plan to capture at least 10 orcas, 100 dolphins, fur seals and sharks off the coast of Namibia in 2016 for export to China's growing aquarium entertainment industry.²⁰⁷ The application to capture the marine animals was eventually cancelled after an international outcry.²⁰⁸ It appears that the Beijing Ruier Animal Breeding and Promoting Company no longer exists. In 2018, Hong Kong Ruier Investments Co. Ltd. imported whales, dolphins, walrus, etc. from Russia.²⁰⁹ The diagrams below show the history of Hong Kong Ruier Investments:

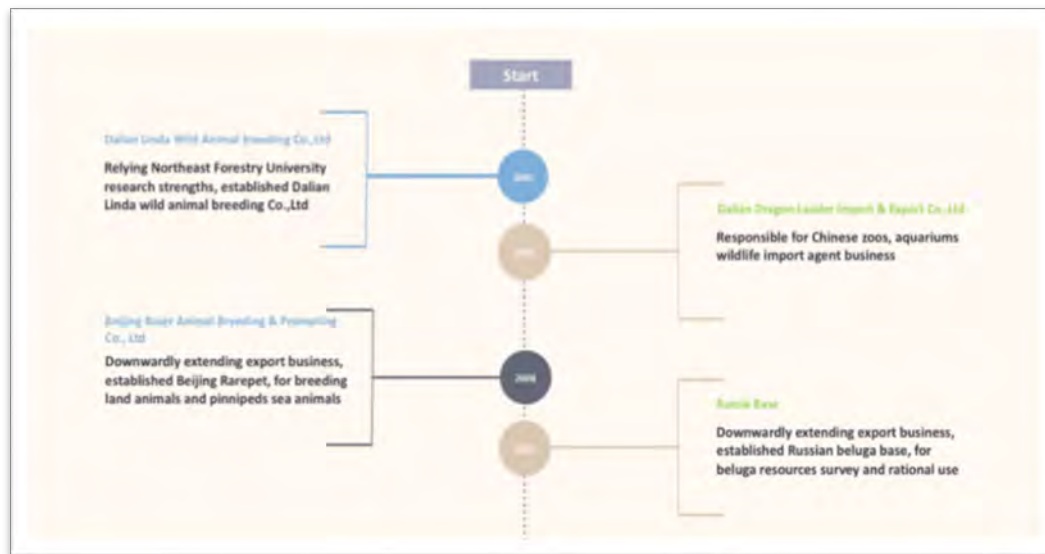


Image Source: <https://app.emaze.com/mobile/%40aolifqifw?tqjs=0#/3>

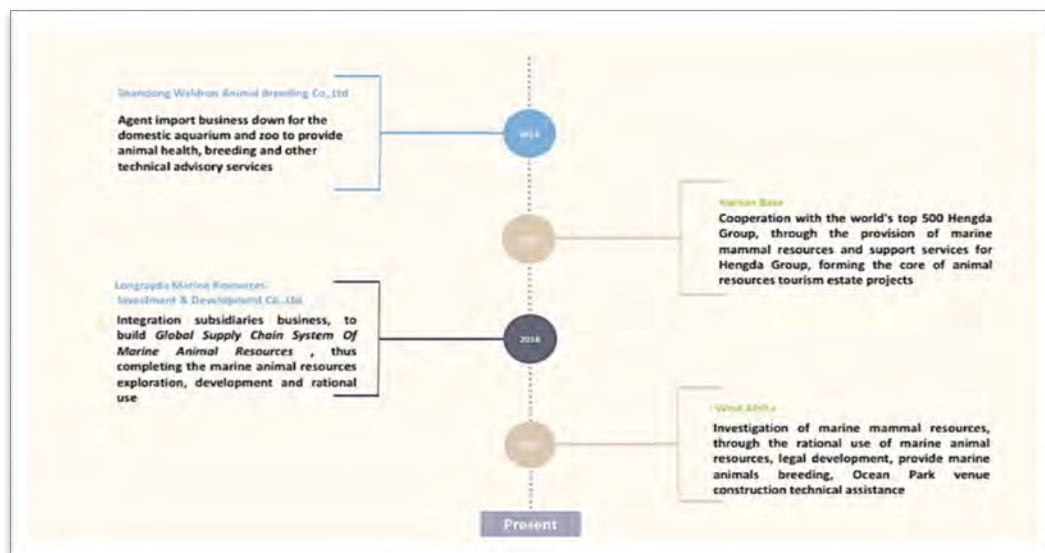


Image Source: <https://app.emaze.com/mobile/%40aolifqifw?tqjs=0#/4>

²⁰⁷ <https://africageographic.com/blog/chinese-company-seeks-capture-orcas-namibia/>; <https://iucn-csg.org/proposed-live-captures-of-cetaceans-seals-and-penguins-in-namibia/>; <http://www.ddlwildlife.com/en/dailiyinjindongwu/shuishengdongwu/index.html>

²⁰⁸ <http://savedolphins.eii.org/news/entry/success-company-withdraws-application-to-destroy-namibian-coastal-ecosystem>

²⁰⁹ <https://www.importgenius.com/russia/buyers/hong-kong-ruier-investments-co-ltd>

Dalian Dragon-Leader Import and Export Co. Ltd. was implicated in the illegal capture of almost 100 beluga whales and orcas in Russian waters in 2019, and was hired to transport the marine mammals to Chinese aquariums.²¹⁰ The marine animals have since been released from the 'Whale Jail' in Russia where they were held captive, and the companies involved have been fined. Dalian Dragon-Leader Import & Export Co. Ltd. has imported aquatic animals for Chinese aquariums from Sochi Dolphinarium LLC, also implicated in the Whale Jail illegal capture of marine mammals.

Other team

Our company has dozens of domestic and foreign industry experts, including marine animals, Capturing, medical, import & export business and other related personnel. Longrayda focus on personnel training have a sound recruitment, training system to protect the company's business professional and efficient conduct.

<div style="background-color: #f1c40f; text-align: center; padding: 5px; margin-bottom: 10px;">Capturing Team</div> <p>International professional capturing fleet</p> <p>With over 10 years of Capturing experience, to lead the team successfully captured killer whales, belugas, dolphins and sea lions</p>	<div style="background-color: #e67e22; text-align: center; padding: 5px; margin-bottom: 10px;">Medical Team</div> <p>Professional foreign domestication and medical team</p> <p>Technical Director with over 40 years of professional experience in Capturing, theme park design a former principal of Buenos Aires</p> <p>Veterinary authorities have 30 years of large cetacean, pinnipeds medical experience</p>	<div style="background-color: #e74c3c; text-align: center; padding: 5px; margin-bottom: 10px;">Domestic Team</div> <p>Prestigious university graduate students, undergraduates</p> <p>10 years of professional import & export business operations, known domestic and foreign trade related laws; improved the training, recruitment system, personnel system</p> <p>Personnel training programs to ensure that the companies explore overseas projects.</p>
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Image Source: <https://app.emaze.com/mobile/%40aolifqifw?tqjs=0#/7>



Whale Jail, 2019. Image Source:

<https://www.facebook.com/photo.php?fbid=10157068311179553&set=pcb.10157068311319553&type=3&theater>

²¹⁰ https://www.facebook.com/search/top/?q=dalian%20Dragon-Leader&epa=SEARCH_BOX ;
<https://www.nationalgeographic.com/animals/2019/06/russia-moves-orcas-and-belugas-from-whale-jail/> ;
<https://www.importgenius.com/russia/buyers/dalian-dragon-leader-imp-exp-co-ltd>



Whale Jail, 2019. Image Source:

<https://www.facebook.com/photo.php?fbid=10157068311209553&set=pcb.10157068311319553&type=3&theater>

Dongying Kunpeng Import & Export Co. Ltd.

Dongying Kunpeng Import & Export Co. Ltd., registered in 2017 at the same address as the Yicheng Hotel, is an importing agent of wildlife to Chinese zoos,²¹¹ and specifically to the Heshan Longkou Jinfeng Animal Breeding Farm²¹² and the Ordos Longsheng Wildlife Park Co. Ltd.²¹³ Dongying Kunpeng Import & Export Co. Ltd. has been affected severely by the Coronavirus outbreak. The Dongying District Forestry Development Service Centre instructed the company to restrict its workers from entering the business premises, suspend its trading of wildlife in farmers' markets, and it has been prohibited from buying and selling wildlife.²¹⁴ The fate of the caracal imported by this company from South Africa is unknown.

Eastern Sunrise (Beijing) Wildlife Services Co. Ltd.

Eastern Sunrise (Beijing) Wildlife Services Co. Ltd. is owned by Junwu Han²¹⁵, also known as Scott Han.²¹⁶ It appears to be a brokering company, importing animals on behalf of Chinese zoos. The company has been involved in some seemingly irregular imports of wild animals from South Africa. A 2019 import of 18 Chimpanzees sold to Beijing Wild Animal Park via Eastern Sunrise (Beijing) Wildlife Services supposedly originating from the Hartbeespoort Snake and Animal Park, with Christa Saayman of Mystic Monkeys and Feathers as the agent, has captured international attention.²¹⁷ The sale of 10 cheetahs, apparently originating from the Hoedspruit Endangered Species Centre (HESC) appears also

²¹¹ http://www.dycxx.com/wap/c_company-a_share-id_3786.html

²¹² <http://webcache.googleusercontent.com/search?q=cache:0xRUVLmPni8J:www.jtxpx.com/html/articlesch0003920170619ca5c8a-adbe-4c77-b8a4-a661400701bc.shtml.html+&cd=11&hl=en&ct=clnk&gl=z>

²¹³ http://www.ds.gov.cn/dsq_xxgk_new/zfbm/gq_dsq_1018/201804/t20180427_2135410.html

²¹⁴ https://k.sina.com.cn/article_7337379675_1b557875b02000pv5o.html?

²¹⁵ <https://web.facebook.com/junwu.han.7>

²¹⁶ https://cn.linkedin.com/in/scott-han-437b87b8/%7Bcountry%3Dus%2C+language%3Den%7D?trk=people-guest_people_search-card

²¹⁷ See section on The Trade in CITES Appendix I-Listed Species between South Africa and China.

to be problematic.²¹⁸ Eastern Sunrise (Beijing) Wildlife Services Co. Ltd. imported lions from South Africa. There are also wild animal exports from South Africa directly to this company without any zoo or breeding farm involved. CITES permits have been issued by South Africa for the export of over 400 non-human primates to Eastern Sunrise (Beijing) Wildlife Services Co. Ltd.

The company uses three different addresses. An address used in 2017, is in fact a business building that was reportedly taken back by the Chinese government before 2015 and turned into a learning centre. There are no business offices at this address. Another address in Beijing exists, but there is no corresponding room/office number and yet another address uses the same office number as the address in Beijing – but this time, the office is at the Xuhui Airport Center.



Learning Centre used, in 2017, as an import address by Eastern (Beijing) Wildlife Services. Image Credit: Ban Animal Trading, 2018

Fujian Province Changtai Tianzhu Mountain Feilong Tourism Development Co. Ltd.

Fujian Province Changtai Tianzhu Mountain Feilong Tourism Development Co. Ltd. is a company involved in the development of tourism, real estate and so-called ecological resorts.²¹⁹ The company opened its first resort, Fujian Tianzhu Mountain Happy World Resort in 2017.²²⁰ Its focus was marine tourism,²²¹ which included dolphin and sea lion performances, but the resort has since been upgraded to include a land animal zoo, a primate zoo and elephants.²²²

At least 22 dolphins²²³ were imported from Russia²²⁴ and many more from wild dolphin captures in Taiji, Japan.²²⁵ The company imported more than 30 lions from South Africa in 2019.

²¹⁸ See section in this Report on the Trade in CITES Appendix I-Listed Species between South Africa and China.

²¹⁹ <https://baike.baidu.com/item/>; <https://m.liepin.cn/company/9114561/>

²²⁰ <http://www.fishrc.com/company.asp?CorpID=78193>

²²¹ <http://www.taihainet.com/news/fujian/yghx/2019-01-01/2220379.html>

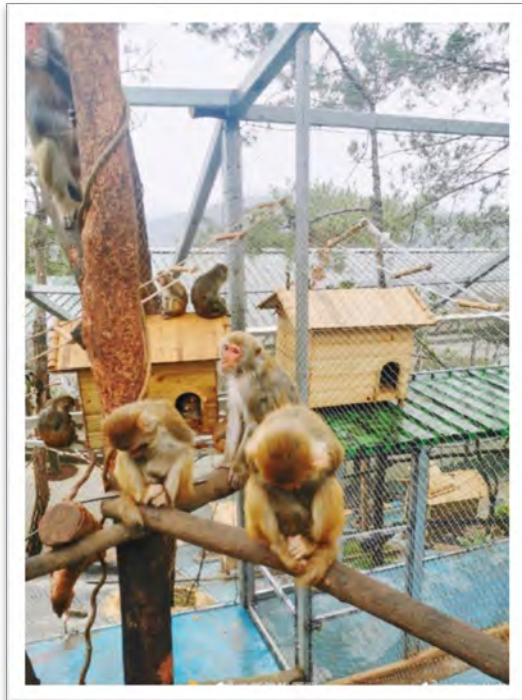
²²² <http://www.chctimes.com/index.php?m=content&c=index&a=show&catid=151&id=30004;>

<http://dy.163.com/v2/article/detail/F3BG5PGK055038XV.html>

²²³ https://www.worldanimalprotection.org/sites/default/files/media/int_files/behind_the_smile_-_dolphins_in_entertainment_report_final_011019.pdf

²²⁴ <https://www.importgenius.com/russia/exporters/ooo-возрождение-ввц>

²²⁵ <https://www.cetabase.org/?s=tianzhushan&submit=Search>



Images

https://m.weibo.cn/search?containerid=231522type%3D1%26t%3D10%26q%3D%23%E7%A6%8F%E5%BB%BA%E5%9C%A8%E7%AD%89%E4%BD%A0%23&extparam=%23%E7%A6%8F%E5%BB%BA%E5%9C%A8%E7%AD%89%E4%BD%A0%23&luicode=10000011&lfid=231522type%3D1%26t%3D10%26q%3D%23%E5%8E%A6%E9%97%A8%E6%97%85%E8%A1%8C%23&featurecode=newtitle%3Futm_source%3DBaidu#&qid=1&pid=9



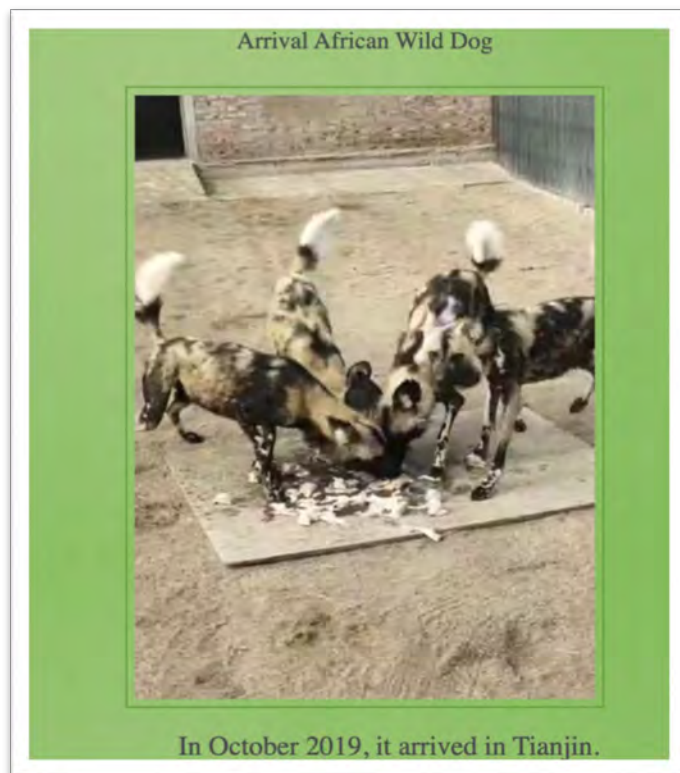
Image:https://commons.wikimedia.org/wiki/File:%E7%A6%8F%E5%BB%BA%E9%95%BF%E6%B3%B0%E5%A4%A9%E6%9F%B1%E5%B1%B1%E6%AC%A2%E4%B9%90%E5%A4%A7%E4%B8%96%E7%95%8C_%E6%B5%B7%E8%B1%9A%E5%89%A7%E5%9C%BA-%E6%B5%B7%E8%B1%9A%E8%A1%A8%E6%BC%94_06.jpg

Foshan Nanhai Kaipeng Trading Company Ltd.

There is no evidence to show that *Foshan Nanhai Kaipeng Trading Company Ltd.* in China exists, unless the company name was spelt incorrectly and it in fact refers to Foshan Nanhai Qipeng Trade Co. Ltd.²²⁶ – a company whose business is unclear. Foshan Nanhai Kaipeng Trading Company Ltd uses a telephone number that is registered in the name of Will Trading Export. South Africa issued permits for the export of one hundred meerkat to this company.

Golden Land Animal Trade Co. Ltd. & Green World Breeding Farm

Golden Land Animal Trade Co. Ltd. is an animal brokering company that imports animals on behalf zoos, aquariums and individuals. The company has its own breeding farms, i.e. Green World Breeding Farm in Tianjin and Haiku Swan Lake Animal Breeding Co. Ltd.²²⁷ The company claims on its official website that it has imported over 10 000 animals, including elephants and chimpanzees, for zoos and aquariums in China.



African Wild Dogs at the Green World Breeding Farm. Image Source: <http://www.glanimaltrade.com/show.asp?id=438>

Golden Land Animal Trade Co. Ltd. was implicated in the trafficking of 138 chimpanzees from Guinea to China between 2007 and 2012²²⁸—at the time, Golden Land Animal Trade Co. Ltd. was linked to the Northern International Group Co. Ltd. that was involved in the smuggling of eight

²²⁶

https://www.google.com/search?q=%E4%BD%9B%E5%B1%B1%E5%B8%82%E5%8D%97%E6%B5%B7%E5%BC%80%E9%B9%8F%E8%B4%B8%E6%98%93%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8&sa=X&ved=2ahUKEwiqlPmSrZ3pAhX1ZxUIHaqcBS0QvS4wAHOECAsQCA&biw=1680&bih=939&dpr=2&npsic=0&rflfq=1&rlha=0&rlag=23110293,113140922,13467&tbm=icl&rldimm=10142164517611799112&lq=i=CifkvZvlsbHluLljZfmbfiviDpuY_otLjmmJPmnInpmZDlhazlj7giBBgBaAl&rldoc=1&tbs=lr:1,3sIAE,lf:1,lf_ui:2&rlst=f

²²⁷ http://www.sohu.com/a/297483345_116897? f=index_pagerecom_15

²²⁸ <http://www.globaltimes.cn/content/883220.shtml>; <https://www.gfintegrity.org/wp-content/uploads/2018/10/GFI-Ilicit-Financial-Flows-and-the-Illegal-Trade-in-Great-Apes.pdf>

chimpanzees to Shanghai Zoo. It is also named as one of the biggest of three animal wholesale companies in China that act as intermediaries for traffickers and final buyers.²²⁹

Many exports to Golden Land Animal Trade Co. Ltd. do not show the final destination of the animals. The offices of the company, which are in a residential area, cannot be their final destination, which means that many animals imported by Golden Land Animal Trade Co. Ltd. can probably not be traced. South Africa has issued CITES permits for the export of more than 1 200 wild animals to Golden Land Animal Trade Co. Ltd.

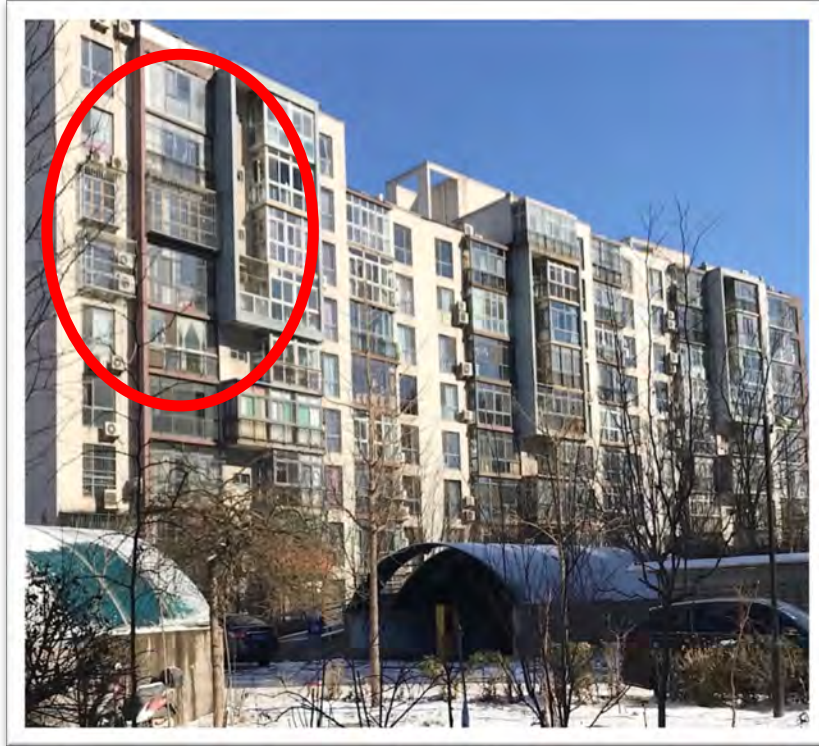


Green World Breeding Farm, Tianjin. Image Source: <http://www.glanimaltrade.com/show.asp?id=400>



Green World Animal Breeding Farm, Tianjin. Image Credit: Ban Animal Trading, 2018

²²⁹ <https://www.gfintegrity.org/wp-content/uploads/2018/10/GFI-Illicit-Financial-Flows-and-the-Illegal-Trade-in-Great-Apes.pdf>



Golden Land Animal Trade Business Address. Image Credit: Ban Animal Trading, 2018

Guangzhou Xiangkuan Biotechnology Co. Ltd.

Guangzhou Xiangkuan Biotechnology Co. Ltd. is a research contract company that supports the medical and pharmaceutical industries by providing outsourced services such as clinical trials, which include invasive procedures performed on animals.²³⁰ Common marmosets were exported from South Africa to this facility in 2019.

Guizhou Forest Wildlife Zoo Co. Ltd.

The *Guizhou Forest Wildlife Zoo*, like most safari parks in China, is an entertainment venue where kick-dancing bears, elephants playing football, monkeys doing summersaults, tigers jumping through fire rings and baby sea lions provide amusement. It also serves as a so-called 'rescue station' for animals, but no details of rehabilitation facilities and release programmes are available.²³¹

In 2017, Guizhou Forest Wildlife Zoo imported 12 elephants from Laos,²³² in a commercial transaction that was apparently carried out without the required CITES import and export permits. Laos does not have any records of the more than 30 elephants exported from Laos to China in 2017.²³³

More than 70 wild animals were exported from South Africa to this zoo between 2016 and 2019, including giraffes and lions.

²³⁰ <http://www.xkbiotec.com/>; <https://m.zhaopin.com/company/CZ467936630>;
http://www.cimif.cn/en/canguandengji/wangshangzhanting/11_2guan/2018/0719/380.html

²³¹ <http://govt.chinadaily.com.cn/s/201811/14/WS5bebbe82498ebfcd07bef67b/guizhou-forest-wildlife-zoo.html>

²³² http://www.guizhou.gov.cn/2017-01/23/content_28036171.htm

²³³ <https://www.traveller24.com/Explore/Green/shockwildlifetruths-cites-ignores-illegal-import-to-china-of-hundreds-of-wild-elephants-from-laos-and-zimbabwe-20180220>

Outrage After Zookeeper Filmed Dragging Tiger By Tail in China

By Rachel Deason, February 20, 2017

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Image Source: <https://www.thatsmags.com/china/post/17718/animal-trainer-livestreams-tiger-abuse>



Image Source: <https://www.traveller24.com/Explore/Green/shockwildlifetruths-cites-ignores-illegal-import-to-china-of-hundreds-of-wild-elephants-from-laos-and-zimbabwe-20180220>

Hainan Tropical Wildlife Park and Botanical Garden

Hainan Tropical Wildlife Zoo, also called 'Liger Zoo'²³⁴ claims to hold the world record for the highest number of hybrid animals, in this case 12 ligers, born to one mother as well as 13 tigers.²³⁵ Hybrid animals have no conservation value. Their only value lies in the entertainment and the financial opportunities they provide to private zoo owners. Hainan Tropical Wildlife Park, like most zoos in China, has been accused of animal cruelty.²³⁶ South Africa allowed the export of over a hundred giraffes to this zoo.



Image Source:

<https://www.google.com/maps/uv?hl=en&pb=!1s0x315183973bd8fb73%3A0xe89037f5a70d9fe!3m1!7e115!4shttps%3A%2F%2Ffh5>

Hangzhou Fuyan Rare Animal Breeding Farm/Hangzhou Safari Park

Hangzhou Fuyan Rare Animal Breeding Farm, Co. Ltd., also known as *Hangzhou (Fuyan) Wildlife World*,²³⁷ has been temporarily closed following the Coronavirus outbreak.²³⁸ It is yet another commercial theme park, with animal circuses to entertain visitors. Several reports of animal abuse that have been recorded, i.e.²³⁹ a trainer whipping a tiger whose teeth had been pulled²⁴⁰ and chained

²³⁴ <https://www.ligerzoos.com/liger-zoo-hainan-tropical-wildlife-park-haiku-china>

²³⁵ https://www.aazv.org/page/znd_nov_dec_2010 ; <http://haikoulahore.com/2017/05/10/hainan-tropical-wildlife-park/>

²³⁶ <http://guobo0.com/nr/article12/119467.html>

²³⁷ http://www.sohu.com/a/167855782_732517

²³⁸ https://www.hzsp.com/News/New_609.shtml?temp=0.24357437346942978

²³⁹ http://www.xinhuanet.com/2017-01/24/c_1120372459.htm

²⁴⁰ <https://www.dailymail.co.uk/news/peoplesdaily/article-4147686/Animal-trainers-whip-endangered-tiger-circus-show.html>

elephants.²⁴¹ *Hangzhou (Fuyan) Wildlife World* imported African elephants from Zimbabwe in 2016.²⁴² South Africa exported caracal and meerkat to this zoo.



A scene from the video of recently imported elephants from Zimbabwe, taken at Hangzhou Safari Park in China. Photograph: Chunmei Hu

Image Source: <https://www.theguardian.com/environment/2017/apr/06/secret-footage-obtained-of-the-wild-elephants-sold-into-captivity-in-chinese-zoos>



Hangzhou Wild Animal Park

Imported 6
African elephants
in December
2016

Photo taken in
May 2017, park
staff confirmed
all six were still
at the facility

Image Source: https://africageographic.com/wp-content/uploads/2018/04/African-elephant-import-raw-data_china.pdf?

²⁴¹ <http://finance.qianlong.com/2017/0124/1348278.shtml>

²⁴² <https://www.theguardian.com/environment/2017/apr/06/secret-footage-obtained-of-the-wild-elephants-sold-into-captivity-in-chinese-zoos>

Heibi Ningbo Yinzhou Huayue Rarebird Breeding Co. Ltd.

Heibi Ningbo Yinzhou Rarebird Breeding Co. Ltd. is a privately-owned facility that imports animals for zoos and individuals.²⁴³ Servals from South Africa have been sold to this zoo.

Henan Xing Qin Import & Export Trade Co. Ltd.

No online information is available on *Henan Xing Qin Import & Export Co. Ltd.* The address for this company is in the same street as the *Swan Lake Zoo*, also known as the *Qinyang Swan Lake Ecological Park*,²⁴⁴ which may be the final destination of imported animals. South Africa issued CITES permits for the export of at least 36 lions to *Qinyang Swan Lake Ecological Park* between 2016 and 2019, some of which were imported by Henan Xing Qin Import & Export Trade Co, Ltd., which we could not trace.

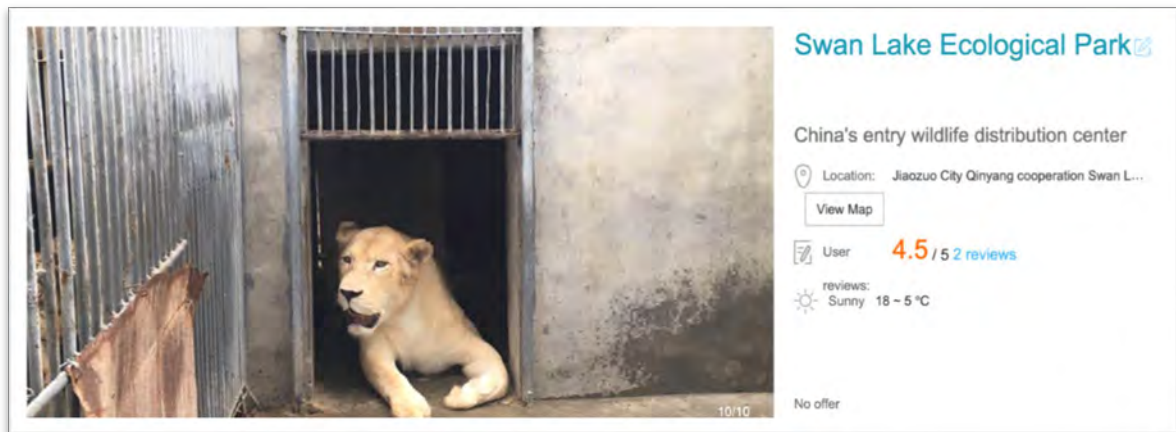


Image Source: http://piao.qunar.com/ticket/detail_2569781647.html



Image Source: <https://piao.ctrip.com/dest/t2509645.html>

²⁴³ <http://huayue.mo2.900114.cn/English/>

²⁴⁴ <http://www.wzxmy.com/m/tiyuhuodong/7100.html>

Henan Yinji Jiabao Amusement Park Management Co. Ltd.

Henan Yinji Jiabao Amusement Park Management Co. Ltd., also known as the *Henan Yinji International Tourism Resort Management Co. Ltd.*,²⁴⁵ was expected to open in May 2020. The resort will be made up of theme parks, cultural tourism resorts, pet parks and a so-called safari park, which account for the smallest space in the resort.²⁴⁶ Tigers (CITES Appendix I) from South Africa were already imported in the first quarter of 2019, even though the zoo has not been completed.

Heshan Longkou Jinfeng Animal Breeding Farm and Tianjin Ruishun Biological Technology Co. Ltd.

Heshan Longkou Jinfeng Animal Breeding Farm uses *Tianjin Ruishun Biological Technology Co. Ltd.* as the importing agent for animals from South Africa.

Heshan Longkou Jinfeng Animal Breeding Farm was difficult to find, as there are no signs showing that this is a zoo (as indicated on some of the CITES export permits issued by South Africa). It is, in fact, a small and basic breeding farm, built of tin sheeting. The concrete enclosures for the animals are very small. As with many animals exported to China, it is impossible to determine the final destination of the animals bred at this facility, which sells animals to zoos, biotechnology businesses and private individuals.

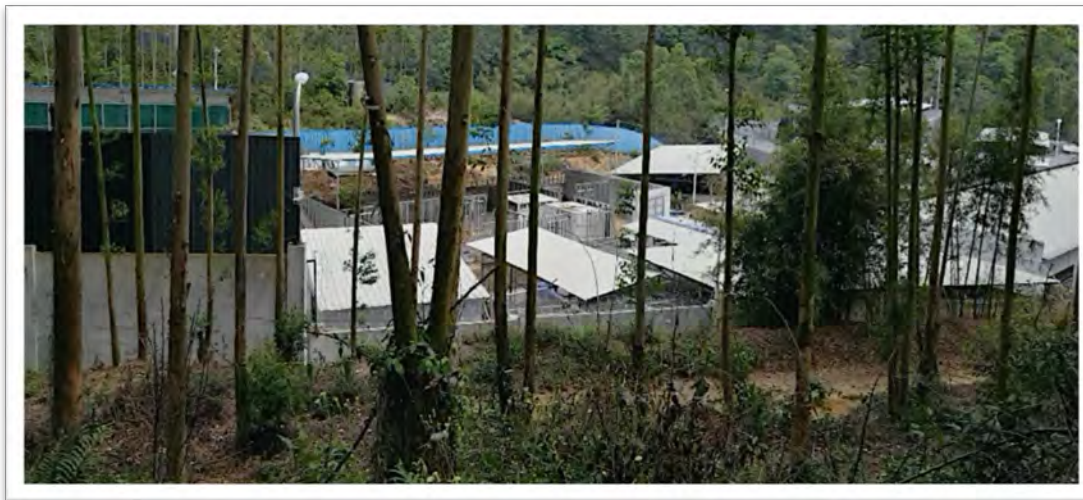


Image Credit: Ban Animal Trading, 2018

Permits issued²⁴⁷ by national authorities in China show that some monkeys are moved from Heshan Longkou Jinfeng Animal Breeding Farm to a biotechnology business that uses marmosets for artificial breeding purposes.²⁴⁸ Permits²⁴⁹ also show that exotic animals bred at this facility were sold to Jinan Zoo for artificial breeding and exhibition purposes; to an unnamed business in Suzhou City²⁵⁰, and to Yangyun Grand Circus.²⁵¹

²⁴⁵ <https://company.zhaopin.com/CZ403101030.htm>

²⁴⁶ <https://www.0311xue.com/tuwen/4397597.html>

²⁴⁷ http://zwgk.jiangmen.gov.cn/xgk_gti/201904/t20190408_1868268.html

²⁴⁸ <https://www.scmp.com/news/china/science/article/2183807/china-has-tweaked-genes-create-five-mad-monkeys-ethical> ;

<https://www.technologyreview.com/s/613277/chinese-scientists-have-put-human-brain-genes-in-monkeysand-yes-they-may-be-smarter>

²⁴⁹ http://zwgk.jiangmen.gov.cn/xgk_gti/201904/t20190408_1868267.html

²⁵⁰ *Ibid*

²⁵¹ http://www.jiangmen.gov.cn/szdwzt/zrzyj/ztzl/xzzf/xzxk/201812/t20181218_1779913.html

South African authorities issued permits to one wildlife traders for the export of almost 300 animals to Heshan Longkou Jinfeng Animal Breeding Farm, which included lions in 2019 and African wild dogs from the Ann Van Dyk Cheetah Centre in 2018.

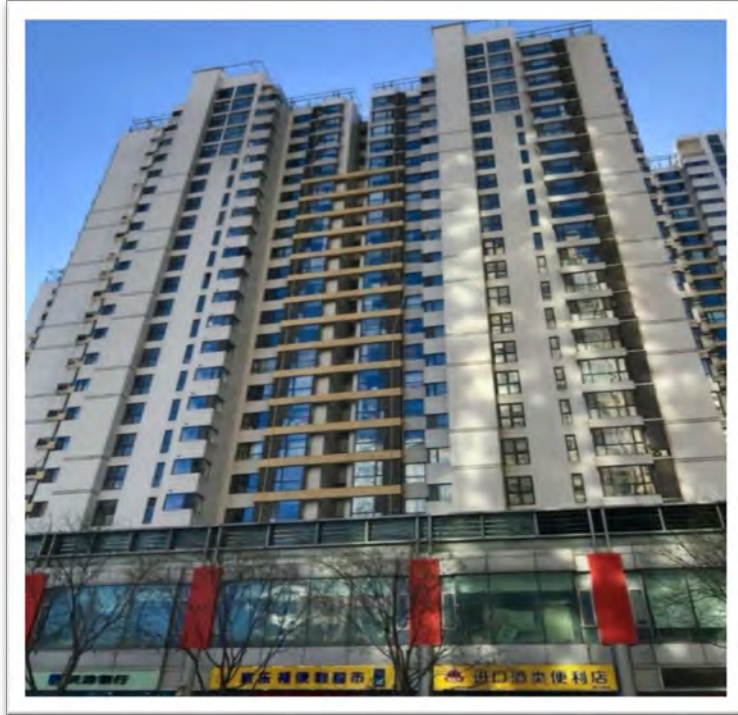


Image Credit: Ban Animal Trading, 2018

Tianjin Ruishun Biological Technology Co. and *Tianjin Junheng International Trade Corporation* use the same address and both are managed by Mr. Liu Min Heng. Tianjin Junheng International Trade Corporation attempted to import wild-caught chimpanzees, gorillas and other animals from the DRC in 2018. The same company was implicated in the export of eight live chimpanzees, called the Shanghai Eight, from Guinea to China in 2011:

- Eight chimpanzees arrived in China in 2011 from Guinea;
- They were imported by Shanghai Wild Animal Park, a safari park that appears to have top level government connections and backing;
- Shanghai Wild Animal Park made arrangements initially with Tianjin Junheng International Trade Co. Ltd. to import wild animals like chimpanzees under the purpose of displaying and breeding them in zoos. This changed and arrangements were made with a state-owned company, Northern International Group, to import the eight chimpanzees;
- Shanghai Wild Animal Park had only two chimpanzees in 2011;
- The whereabouts of the other six chimpanzees is unknown;
- Even though there are no captive breeding facilities for chimpanzees in Guinea, the CITES permit for the eight chimpanzees lists them as 'C', i.e. Bred In Captivity, and
- The same permit indicated the purpose as 'Z', i.e. for display and breeding in a zoo.²⁵²

²⁵² www.karlamann.com/docs/shanghai8



Building in Tianjin where the offices of Tianjin Ruishun Biologic Technology/Tianjin Junheng International Trade are located.
Image Credit: Ban Animal Trading, 2018

Institute of Medical Biology Chinese Academy of Medical Science

The *Institute of Medical Biology Chinese Academy of Medical Science* offers medical and biological research services such as laboratory animal experiment techniques, immunology, medical genetics, etc. Its affiliation to the 'National Medical Primate Research Center' makes the Institute of Medical Biology Chinese Academy of Medical Science the largest primate research base that 'plays a leading role in breeding, reproduction, disease control, genetic background studies of primate and animal experimental standardization' in China. In addition, the Institute is constructing a national key project – "Kunming National High-level Biosafety Research Center for Non-human Primate" approved by the National Development and Reform Commission, which will become an important basic research platform for discovering, monitoring and controlling and preventing infectious diseases in China.²⁵³ South African authorities issued permits for the export of almost 100 marmosets to this laboratory.

Jinan Paomaling Wildlife World Co. Ltd./Jinan Wildlife World/Jinan Zoo

*Jinan Paomaling Wildlife World*²⁵⁴ was implicated in the smuggling of chimpanzees from Guinea in 2011.²⁵⁵

South Africa exported more than 250 giraffes to this specific zoo (not counting the 114 the zoo imported for *Weihai Lanke International Trade Co. Ltd.*, whose business is unclear), but only 16

²⁵³ <https://www.bloomberg.com/profile/company/0348752D:CH>; https://www.chinadaily.com.cn/m/yunnan/kunmingsciencepark/2014-07/15/content_17785842.htm; <https://www.devex.com/organizations/institute-of-medical-biology-chinese-academy-of-medical-sciences-141670>; http://www.imbcams.ac.cn/Category_2143/Index.aspx

²⁵⁴ <https://www.scmp.com/video/china/3032035/rare-white-lion-twins-born-china-after-national-day>

²⁵⁵ <https://whogivesamonkeys.com/2012/11/07/mining-by-china-fuels-great-ape-trafficking-from-guinea/>

are still in the zoo, six of whom were juveniles at the time. At least 250 giraffes were captured at iHlanzi Ranch Karkloof Spa, Falaza Game Park in the False Bay district, and Farm Gerhardminnebron and 'game' pens in the Potchefstroom district. The export of so many giraffes to one zoo in China is an example of a dereliction of duty by South African authorities that have been appointed to conserve and protect the country's wild animal species. There are seven rhinos in the zoo, an African elephant, one Asian elephant and one hippo. Although South Africa exported kudus to this zoo, we did not see any when we visited the zoo in 2018. An animal circus with brown bears roller-skating, performing tigers and an old goat with a terrified monkey chained to his back walking across a thin bar a few feet off the ground, entertain visitors. South African also sold lions to Jinan Wildlife World.

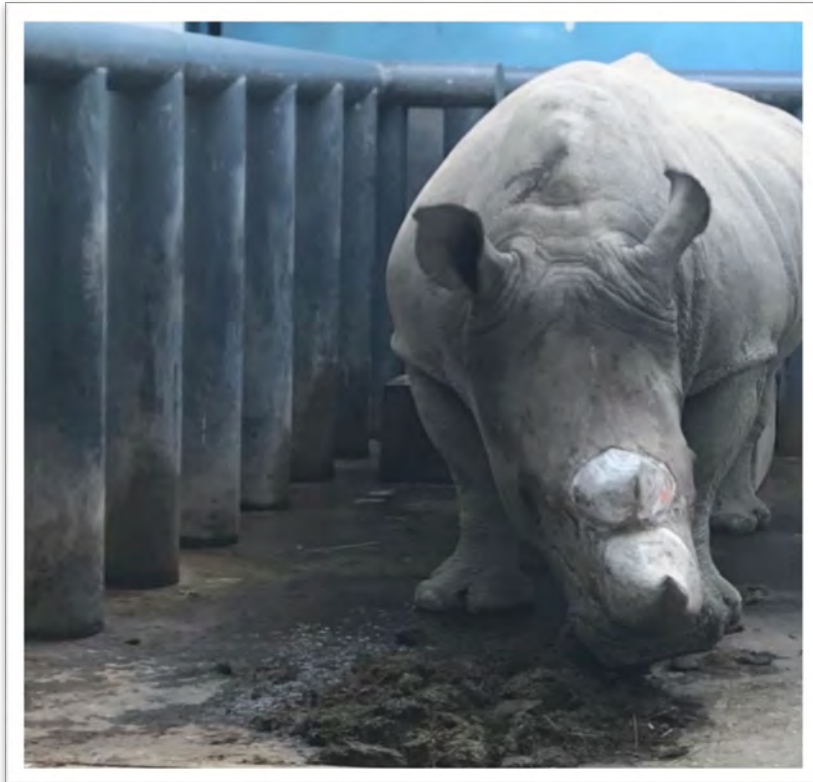


Image Credit: Ban Animal Trading, 2018



Image Credit: Ban Animal Trading, 2018



Image Credit: Ban Animal Trading, 2018



Image Credit: Ban Animal Trading, 2018

Nanjing Jinniu Lake Wildlife Kingdom Co. Ltd.

Nanjing Jinniu Lake Wildlife Kingdom is not yet open to the public. The aquarium is expected to open this year (2020).²⁵⁶ It is unclear where the hyenas exported from South Africa to this zoo, are being held.

Nanning Zoo

A quick online search shows that *Nanning Zoo* is one of the worst zoos in China in terms of animal welfare: a rescued Chinese white dolphin (first level protected animal in China) with half an upper jaw is forced to perform,²⁵⁷ a basket for donations is glued onto an endangered tortoise's back,²⁵⁸ animals display stereotypical behaviour,²⁵⁹ four wild-caught chimpanzees were received as a 'gift' from a German woman,²⁶⁰ and of course there is the ever-present animal circus. South African authorities, however, believe that Nanning Zoo is an acceptable and appropriate destination²⁶¹ for white rhinos exported in 2018.

²⁵⁶ <https://cetacousin.org/facilities/jinniu-lake-wildlife-kingdom>

²⁵⁷ https://www.thepaper.cn/newsDetail_forward_1914738

²⁵⁸ <http://baijiahao.baidu.com/s?id=1646975602049139421>

²⁵⁹ <http://gongyi.sinaimg.cn/2013-03-26/20/U6618P650T20D797F458DT20130327174123.pdf>

²⁶⁰ https://freetheapes.files.wordpress.com/2014/12/chimpanzees-in-china_jun141.pdf

²⁶¹ <https://cites.org/sites/default/files/document/E-Res-11-20-R18.pdf>



Image Source: https://www.thepaper.cn/newsDetail_forward_1914738



Image Source: <http://baijiahao.baidu.com/s?id=1646975602049139421>

Nantong Forest Safari Park/Zoo Co. Ltd.

Nantong Forest Safari Park is an entertainment venue where tigers are forced to jump through fire rings, monkeys ride bicycles,²⁶² and live ponies are tethered to a carousel in a paddock so children

²⁶² <https://www.trip.com/things-to-do/detail/20670293/>

can ride them.²⁶³ In 2018, several animals died due to heatstroke.²⁶⁴ Black leopards, pumas and meerkat have been imported from South Africa to Nantong Forest Safari Park.



Image Source: <https://www.scmp.com/news/china/society/article/2184496/watch-ponies-chinese-safari-park-are-tortured-name-entertainment>

Neijiang Youlian Wildlife Breeding Co. Ltd.

Ten lions from South Africa arrived in 2019 at the East Sichuan Ecological Zoo—which is also known as the *Neijiang Youlian Wildlife Breeding Co. Ltd.*—in China, where they will be used “for domestication, breeding and research and strengthening the popularization and education of wildlife protection science, enriching the animal population in the park”.²⁶⁵ However, just after the outbreak of the Coronavirus, Neijiang City officials closed down two zoos in the city, and investigated six cases of illegal wildlife breeding.²⁶⁶ Unfortunately, the names of the zoos are not mentioned, and the fate of the ten lions is unknown.



Image Source: <https://www.zuineijiang.com/article/fzsqjlc.html>

²⁶³ <https://ph.news.yahoo.com/ponies-chinese-safari-park-tortured-092240653.html>

²⁶⁴ <http://www.yidianzixun.com/article/OJoVBcYq>

²⁶⁵ <https://www.zuineijiang.com/article/fzsqjlc.html>

²⁶⁶ <https://www.cqdydy.cn/guonayaowen/20200203/3726.html>

Ningbo Youngor Zoo

Ningbo Youngor Zoo is one of the worst ten zoos in China for elephants.²⁶⁷ Elephants illegally exported from Laos were sent to this zoo in 2017.²⁶⁸ In 2005, gorillas were put on display at Ningbo Youngor Zoo.²⁶⁹ The CITES Trade Database does not show any legal imports of gorillas to China before 2007.²⁷⁰ A male tiger was shot dead after he mauled a man to death at Ningbo Youngor Zoo in 2017.²⁷¹ This zoo, like most Chinese zoos, has an animal circus and sea lions, bears and birds are forced to perform humiliating tricks to entertain visitors.²⁷² The zoo imported lions from South Africa.



Image Source: <https://Mp.Weixin.Qq.Com/S?>



Image Source:

<https://www.facebook.com/photo.php?fbid=528547037892866&set=pcb.528547474559489&type=3&theater>

²⁶⁷ <https://www.weibo.com/ttarticle/p/show?id=2309404139856090506374>

²⁶⁸ <https://www.outsideonline.com/2405236/asian-elephant-trafficking-captivity-laos#close>

²⁶⁹ <https://www.eningbo.info/fjms/001.html>

²⁷⁰ <https://trade.cites.org>

²⁷¹ <https://www.bbc.com/news/world-asia-china-38793011>

²⁷² <http://www.nbzoo.com/zone.php.htm>

Pingnan Yongyuan Biological Technology Co. Pty (with Address Xionsen Wine Shop)

Pingnan Yongyuan Biological Technology Co. Pty. is a wildlife breeding, scientific research and slaughter business.²⁷³ The company apparently also owns a primate breeding farm and supplies laboratories with macaques and cynomolgus monkeys.²⁷⁴ *Xionsen Wine Shop* in the town of Guangxi, is a factory where tiger bone wine is made. According to a staff member at the wine 'shop', the tiger bone wine distilled on the premises is for medicinal purposes. The so-called wine shop is a wholesaler and it does not sell wine on the distillery premises, but it distributes the product to shops throughout China that sell tiger bone wine.



Image Credit: Ban Animal Trading, 2018

A staff member inside the Xionsen Wine Shop informed us that the tiger bones were sourced from The Bear and Tiger Mountain Village in Guilin, quite a distance away from the factory. This is also confirmed in a media report from 2006: “On August 25, *China Youth Daily* carried a report about tiger skeletons seen soaking in alcohol, and the resulting wine being sold, at the Xionsen Distillery in Guangxi, southern China. The Xionsen Distillery is a subsidiary of Guilin’s Xionsen Bear and Tiger Park, located in Pingnan county. It produces tiger bone wine and bear bile wine. The distillery has a storage capacity of 8,000 tonnes; it has already used over 400 skeletons from farmed tigers—and plans to expand. A company spokesperson confirmed that Xionsen’s “bone-restoring wine” is indeed made with tiger bones.”²⁷⁵

The Bear and Tiger Mountain Village in Guilin has apparently been closed to the public since September 2017. Information is that it will not open again, because the tycoon owner of this zoo, Zhou Weisen - who is also the owner of Xionsen Wine Shop, where South Africa exported 9 giraffes

²⁷³ <https://www.qixin.com/company/182417fb-e7f4-467a-ac29-29d47072b8c6>

²⁷⁴ http://www.gxst.gov.cn/gxkit/bsfw/20170120/003003006_d759c90d-57f9-4874-b3a2-66003aad7cd4.htm ; <http://tiger99999.com/nd.jsp?id=3>

²⁷⁵ <https://www.chinadialogue.net/article/show/single/en/552-China-s-trade-in-tiger-bones>

to – is in the process of moving the animals to the new zoo in Guangxi. The new zoo is around the corner from the Xionseng Wine Shop, where tiger bone wine is made.²⁷⁶



Bear and Tiger Mountain Village. Image Credit: Ban Animal Trading, 2018



The new zoo in Guigang. Image Credit: Ban Animal Trading, 2018

²⁷⁶ <https://www.scmp.com/magazines/post-magazine/travel-leisure/article/1937522/why-1800-tigers-are-rundown-china-park-be>

Quanzhou Haisi Wildlife Zoo

Quanzhou Haisi Wildlife Zoo was opened 4 years ago, and recently it added two orangutans to its 'animal collection'. It is an amusement park for children that includes two animal circuses: one with sea lions as performers and another circus that uses tigers, bears, monkeys and goats to perform.²⁷⁷ We are aware of approximately 18 lions exported from South Africa to this amusement park in 2017.



Image Source: <https://www.trip.com/travel-guide/quanzhou/quanzhou-wildlife-zoo-31049167/>

Qin Huangdao Huixin Import & Export Co. Ltd./Qin Huangdao Aoze Animal Breeding Co. Ltd.

Qin Huangdao Huixin Import & Export Co. Ltd. is an animal brokering company that imports animals for zoos in China. The company focuses on importing marine mammals, such as beluga whales, for China's ever-growing aquarium industry.²⁷⁸ The company imported 50 meerkats, but the final destination of these animals is unknown. We could only find one or two online links²⁷⁹ to this entity but no substantial information on this company. There is a zoo/safari park in Qin Huangdao and the photographs below were taken there in July 2018.

²⁷⁷ <https://travel.qunar.com/p-oi9629777-quanzhouhaisiyeshengdong>

²⁷⁸ <http://qhdhuixin.com/list.asp?sortid=56>

²⁷⁹ <https://top.tianyancha.com/tc-bd1476255391/hebei>; https://www.ubaike.cn/show_1532303.html



Picture Credit: Nikki Botha, July 2018



Picture Credit: Nikki Botha, July 2018



Picture Credit: Nikki Botha, July 2018

Shandong Shunyuan Tourism Development Co. Ltd./Baoshan Front Wildlife Park/Baoshanqian Wild Animal Park

Shandong Shunyuan Tourism Development Co. Ltd. developed the *Baoshan Front Wildlife Park*, also known as the *Baoshanqian Wild Animal Park*.²⁸⁰ It was built to mimic the Great Wall of China, and visitors looking down from the walkway onto the animal enclosures,²⁸¹ will see lions, exported from South Africa in 2019, in concrete cages. It is an amusement park that offers zip-lining, rafting and rides on Ferris wheels.



Image Source: <https://www.trip.com/travel-guide/lanling/baoshan-front-wildlife-park-53563332/>

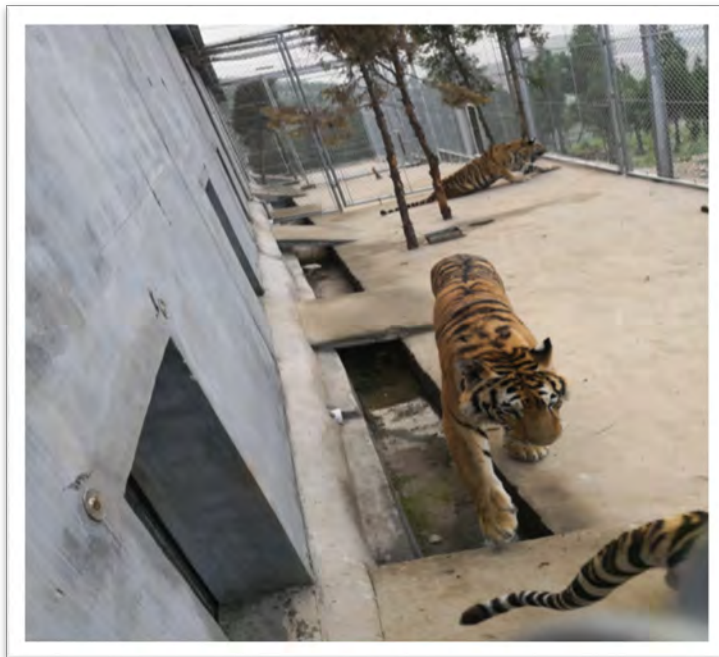


Image Source: https://www.ly.com/scenery/BookSceneryTicket_461363.html

²⁸⁰ <https://www.sdta.cn/scenic/10a72d047ed64fab9b3a64f4171d1126.html#>

²⁸¹ https://k.sina.com.cn/article_6961618200_19ef1dd1800100il18.html?from=travel



Image Source: https://www.ly.com/scenery/BookSceneryTicket_461363.html



Image Source: https://www.ly.com/scenery/BookSceneryTicket_461363.html

Taiyuan Zoo

Taiyuan Zoo imported baby African elephants from Zimbabwe in 2013. It was reported in the media that one of the elephants, who were all kept in poor conditions, died after showing signs of abdominal swelling.²⁸² This zoo was also identified as one of the destinations for the wild-caught gorillas, bonobos and chimpanzees from the DRC in 2018.²⁸³ Conditions at the zoo are poor. There are many media reports of animal cruelty at the *Taiyuan Zoo*: underfed and malnourished white lions, one with half his tail missing,²⁸⁴ reptiles kept in buckets of water²⁸⁵ and elephants being housed in dark and small inside enclosures. *Taiyuan Zoo* imported eight cheetahs from South Africa.



Image Source: <https://twitter.com/katiequo/status/998314309414404096/photo/2>

²⁸² https://www.facebook.com/search/top/?q=TAIYUAN%20ZOO&epa=SEARCH_BOX ; https://www.thedodo.com/in-the-wild/mountain-gorillas-sale-chinese-zoo?fbclid=IwAR3Y2LKeDabRf5tCfuLsKN1_sFL5JXnuLro2GZ6Vx3PxxPqX4e_0KZM-tUI ; <https://www.theguardian.com/environment/2017/apr/06/secret-footage-obtained-of-the-wild-elephants-sold-into-captivity-in-chinese-zoos> ; <https://africageographic.com/blog/victory-for-animal-welfare-zimbabwe-releases-captured-baby-elephants/>

²⁸³ <https://www.theguardian.com/environment/2017/apr/06/secret-footage-obtained-of-the-wild-elephants-sold-into-captivity-in-chinese-zoos> ; <https://africageographic.com/blog/victory-for-animal-welfare-zimbabwe-releases-captured-baby-elephants/>

²⁸⁴ <https://www.mirror.co.uk/news/world-news/starving-zoo-lion-chewed-tail-12051268>

²⁸⁵ <https://twitter.com/katiequo/status/998313926939967489?lang=en>



Starving lion at Taiyuan Zoo who chewed his tail off at. Image Source: <https://www.mirror.co.uk/news/world-news/starving-zoo-lion-chewed-tail-12051268>

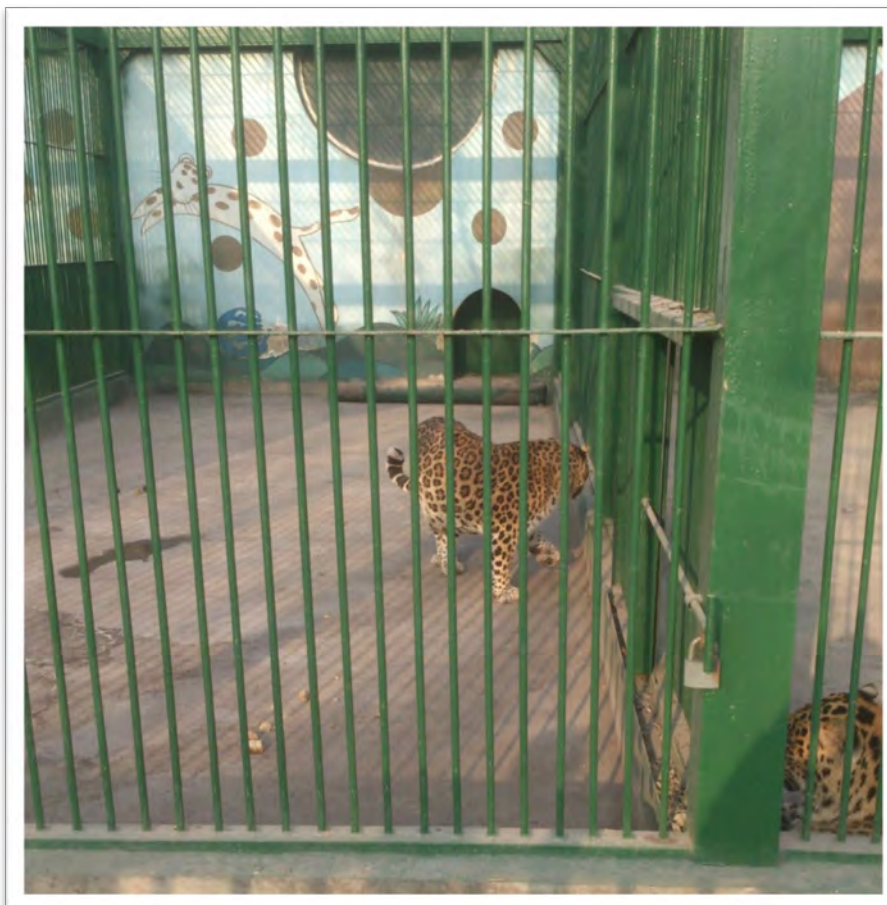


Image Source:
<https://www.facebook.com/photo.php?fbid=1583959018589832&set=pcb.1583963171922750&type=3&theater>

Tangshan Zoo

Tangshan Zoo was built in 2016²⁸⁶ and the animals from the Dachengshan Zoo were relocated to Tangshan.²⁸⁷ The zoo is reported to have imported two chimpanzees through Golden Land Animal Trade Co. Ltd. from South Korea in 2017/2018.²⁸⁸ South Africa exported rhinos to this zoo in 2018.



Image Source:

http://blog.sina.cn/dpool/blog/s/blog_4d94c2b70102yxzq.html?cre=blogpagew&mod=f&loc=4&r=0&rfunc=42&tj=none



Image Source: <https://line.17qq.com/article/dmkoggpvcv.html>

²⁸⁶ <https://www.theparkdb.com//results/in/name/5171>

²⁸⁷ <http://tangshan.huanbohainews.com.cn/system/2016/08/23/011710685.shtml>

²⁸⁸ http://www.cggp-hebei.gov.cn/ts/ts/cggg/dylyAAAS/dylygsAAAS/201801/t20180103_661006.html



Image Source: https://line.17qq.com/article/dmkogqpcv_p3.html

Tianzhushan Mayangxi Ecological Garden/Tingxia State-Owned Forest Farm Ecological Tourist Area

In 2019 lions and caracals were exported from South Africa to this entity, which seems to be inside the Fujian Changtai Tianzu Mountain Happy World— an ocean park with sea lion and dolphin shows.²⁸⁹

Urumqi Zoo/Xinjiang Tianshan Wild Zoo

Urumqi Zoo is now known as the *Xinjiang Tianshan Wild Zoo*. Together with the *Taiyuan Zoo*, this zoo imported four wild-caught baby African elephants from Zimbabwe in December 2012.²⁹⁰

According to a 2013 article in the Zimbabwe newspaper, *The Standard*, one of the four elephants exported to China died and the remaining three were in bad health.²⁹¹ The little elephants had been deliberately taken from their mothers in the Hwange National Park solely for the purpose of selling them to zoos. According to the Asia Animals Foundation, two elephants went to the *Taiyuan Zoo* (one died) and the other two reportedly went to *Xinjiang Tianshan Safari Park*.²⁹² *Xinjiang Tianshan Wild Zoo* was also implicated in the smuggling of wild-caught chimpanzees from Guinea in 2007.²⁹³

Twenty lions from South Africa were sold to this zoo.

²⁸⁹ <http://www.happyworlds.cn/list/id/213261/>

²⁹⁰ https://www.facebook.com/permalink.php?story_fbid=10151237261826305&id=268430511304

²⁹¹ <https://www.thestandard.co.zw/2013/01/06/elephants-exported-to-china-in-danger/>

²⁹² *Ibid.*

²⁹³ https://freetheapes.files.wordpress.com/2014/12/chimpanzees-in-china_jun141.pdf

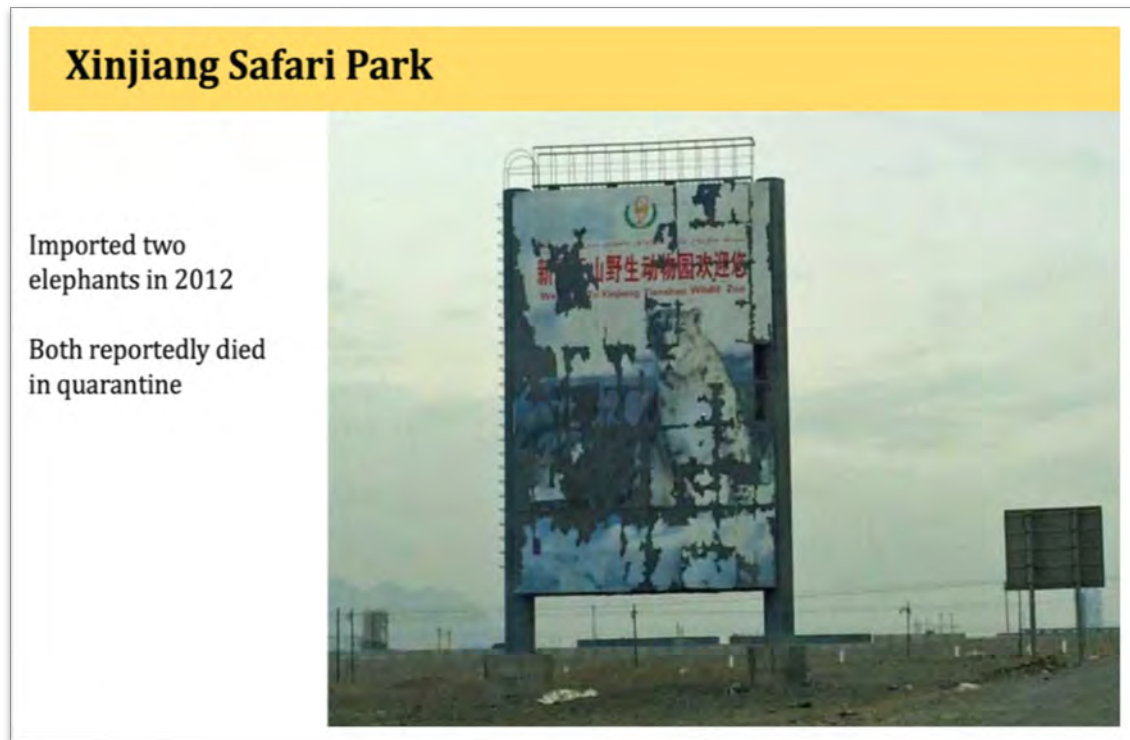


Image Source: https://africageographic.com/wp-content/uploads/2018/04/African-elephant-import-raw-data_china.pdf

Wuhan West Lake Animal Kingdom Tourism Co. Ltd.

Wuhan West Lake Animal Kingdom Tourism Co. Ltd., a business registered four years ago lists as its business scope the reproduction of wild species, exhibitions, performances and tourism development.²⁹⁴ It is also responsible for the import of animals for Wuhan Wildlife Kingdom, which was apparently set to open in May 2020.²⁹⁵ South Africa issued permits for the export of meerkat and hyenas to *Wuhan West Lake Animal Kingdom Tourism Co. Ltd.*

Wuhan Zoo

Two cheetahs were sold to Wuhan Zoo by South Africa in 2018. Wuhan is the epicentre of the Coronavirus, and the Wuhan Zoo has been closed indefinitely.²⁹⁶ For a video taken of one of the cheetah in 2019 see: <https://www.youtube.com/watch?v=ES0WnchWERk>

²⁹⁴ <https://baike.baidu.com/item/>. Accessed in November 2019. Now no longer available.

²⁹⁵ <https://kknews.cc/society/rlgagpv.html>

²⁹⁶ <https://www.dtnext.in/News/World/2020/02/07162950/1213800/Coronavirus-lockdown-disrupts-food-supplies-for-birds-.vpf>



Image Source: <http://news.seehua.com/?p=520946> – February 2020

Xi'an Qinling Wildlife Park

Sick pandas,²⁹⁷ tigers being beaten,²⁹⁸ a disappeared lion,²⁹⁹ bleeding sika deer,³⁰⁰ and the selling of tigers and lions to travelling circuses³⁰¹ all form part of the business dealings at *Xi'an Qinling Wildlife Park*. Ten rhinos were exported from South Africa to this 'park' in 2018.



Image Source: <https://www.trip.com/travel-guide/xi-an/qinling-wildlife-park-89229/> - 2020

²⁹⁷ <http://www.globaltimes.cn/content/1069891.shtml>

²⁹⁸ http://blog.sina.com.cn/s/blog_4dcf939d0100awzd.html

²⁹⁹ <http://roll.sohu.com/20160226/n438544533.shtml>

³⁰⁰ <http://xa.bendibao.com/news/2014818/44762.shtm>

³⁰¹ <http://webcache.googleusercontent.com/search?q=cache:NTn-091esbQJ:www.yidianzixun.com/article/0HtrjtEa+&cd=47&hl=en&ct=clnk&gl=za>



Image Source: <https://www.trip.com/travel-guide/xi-an/qinling-wildlife-park-89229/> - 2019

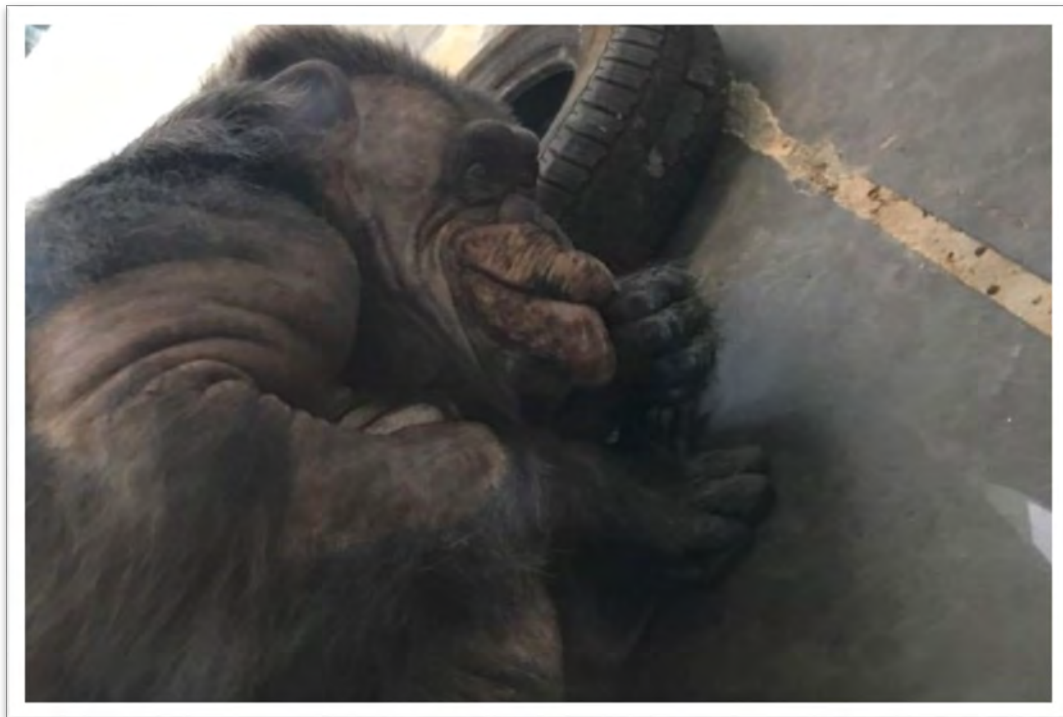


Image Source: <https://www.trip.com/travel-guide/xi-an/qinling-wildlife-park-89229/> - 2017

Xiantao Tianle Zoo

Xiantao Tianle Zoo is a mini zoo and home to jaguars imported from South Africa in 2019. A children's themed park called Happy Valley is located inside the facility.³⁰²

³⁰² http://blog.sina.com.cn/s/blog_beb3301d0102vqgh.html

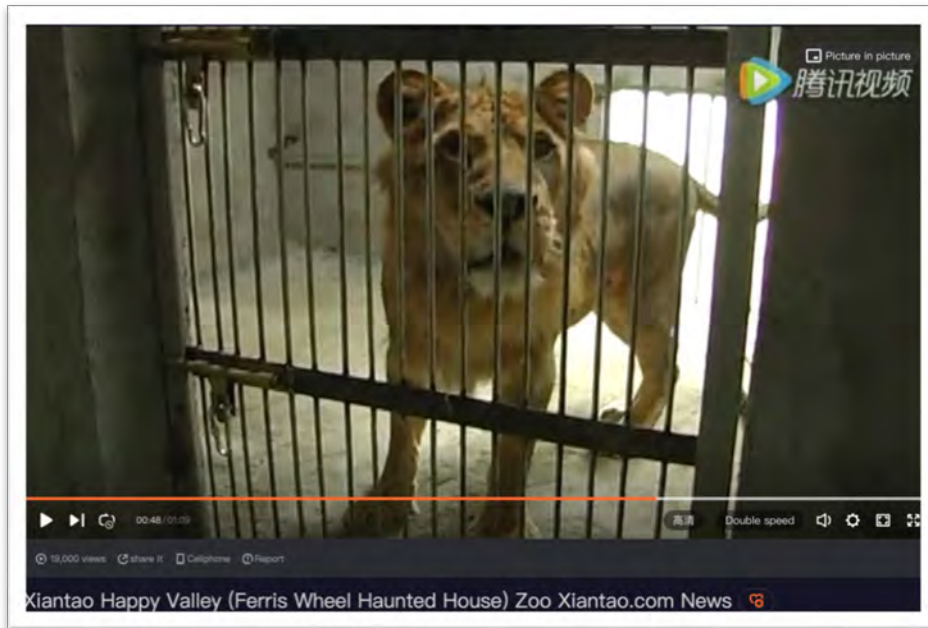


Image Source: <https://v.qq.com/x/page/p0641wt5mk8.html>

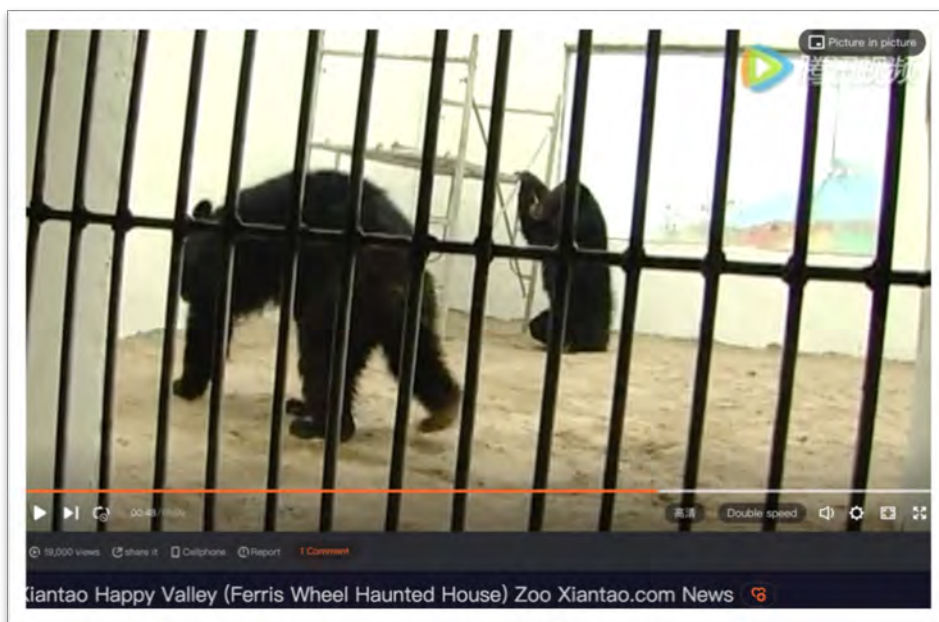


Image Source: <https://v.qq.com/x/page/p0641wt5mk8.html>

Ya'an Dongfang Bifeng Gorge Tourism Co. Ltd.

Ya'an Dongfang Bifeng Gorge Tourism Co. Ltd. manages parks and tourist attractions, passenger transportation services, hotels, tea houses, Chinese food production and sales, cigars, department stores, tourism products sales; wild animal domestication performances, viewing; tourism project investment; wedding etiquette services.³⁰³ The company also manages the Bifengxia Ecological Zoo, which is a member of the Chinese Zoo Association. As always, tigers and elephants perform in an animal circus. Meerkat were exported from South Africa to this zoo.

³⁰³ <https://www.qixin.com/company/e30a5d10-543f-4b5d-b4fd-f99df102504e>



Image Source: <https://www.westchina.go.com/2days-yaan-bifengxia-wild-life-park-panda-base-tour.html#images-39>

Zhengzhou Zoo

South Africa exported mongoose, ten cheetahs in 2018 through *Eastern Sunrise Beijing Wildlife Services*³⁰⁴ and white Lions to *Zhengzhou Zoo*. Three white Lions were displayed at the zoo in September 2019.³⁰⁵

Zhengzhou Zoo is also 'home' to African elephants. The zoo, accused of mistreatment and abuse of its animals,³⁰⁶ tried to cover up the death of a panda in 2014, claiming she had been sent away for breeding purposes when she had in fact died from organ failure after bleeding from gastroenteritis.³⁰⁷

The zoo illegally imported two elephants from Laos in 2016.³⁰⁸ ³⁰⁹ CITES acknowledged this importation as problematic,³¹⁰ but did not address it in any meaningful way. The elephants remain captive in Zhengzhou Zoo. A second zoo/wildlife park is in the process of being constructed.³¹¹

³⁰⁴ See section on Eastern Sunrise Beijing Wildlife Services for more information on this sale.

³⁰⁵ https://orientalhmzhengzhou.zainanjiang365.com/siteapp/gdmm/jsp?service_name=gdmmArticle&method_name=shareJsp&id=8190&appscheme=gdmm-huimianzhengzhou

³⁰⁶ <https://medium.com/umduplex/pandas-death-raises-questions-at-zhengzhou-zoo-619e8b9731c6>

³⁰⁷ <https://edition.cnn.com/2014/02/18/world/asia/panda-zoo-death-china/index.html>

³⁰⁸ <https://www.outsideonline.com/2405236/asian-elephant-trafficking-captivity-laos>

³⁰⁹ <https://www.theguardian.com/environment/2017/jul/25/dozens-of-laotian-elephants-illegally-sold-to-chinese-zoos>

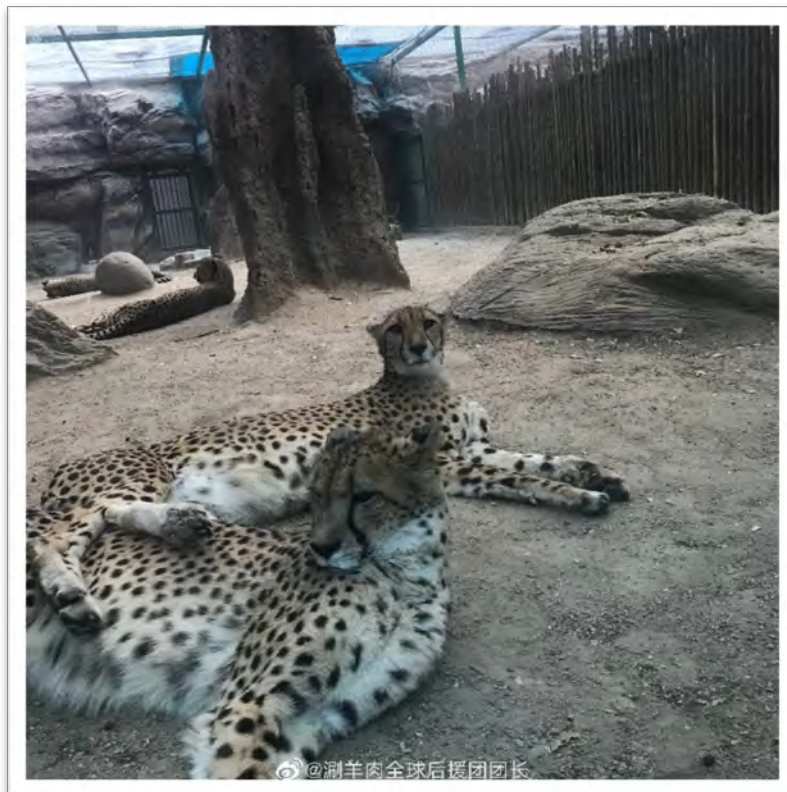
³¹⁰ <https://cites.org/sites/default/files/eng/com/sc/69/E-SC69-29-02-01.pdf>

³¹¹ <https://new.qq.com/omn/20200107/20200107A05HYZ00.html>



Image Source

https://m.weibo.cn/p/index?containerid=2310360016B2094254D669A6FC429A_pic&luicode=10000011&lfid=2306570042B2094254D669A6FC429A&featurecode=newtitle%3Ffrom%3Dyn_cnxh#&qid=1&pid=1



Images source:

https://m.weibo.cn/p/index?containerid=2310360016B2094254D669A6FC429A_pic&luicode=10000011&lfid=2306570042B2094254D669A6FC429A&featurecode=newtitle%3Ffrom%3Dyn_cnxh#&qid=1&pid=1



Image Source

https://m.weibo.cn/p/index?containerid=2310360016B2094254D669A6FC429A_pic&luicode=10000011&lfid=2306570042B2094254D669A6FC429A&featurecode=newtitle%3Ffrom%3Dyn_cnxh#&qid=1&pid=1

CONCLUSION

It is impossible to determine the actual monetary value of the global legal trade in wild animals (or for that matter the monetary value of the wildlife trade between South Africa and China). This in and of itself should send alarm bells ringing, particularly in relation to monitoring and verification. What we do know is that it is massive, ever-expanding, ecologically unsustainable, damaging and closely intertwined with illegal activities.³¹² There are, therefore, powerful vested interests involved, both politically and commercially, to ensure that it continues with as little interference as possible.

South Africa's wildlife conservation reputation is effectively in tatters because DEFF has misinterpreted Section 24 of the South African Constitution and is, instead and expediently interpreting the notion of 'sustainable use' as a catchall justification for rampant exploitation of wild animals. In addition, in 2016, the Constitutional Court ruled against an aggregative³¹³ (i.e. 'sustainable use') position and in favour of an integrative³¹⁴ approach, saying that: "Animal welfare is connected with the constitutional right to have the environment protected (Section 24) through legislative and other means. This integrative approach correctly links the suffering of individual animals to conservation and illustrates the extent to which showing respect and concern for individual animals

³¹² Members of the European Parliament have also seen the clear link between the legal and illegal trade in wildlife and the need to investigate the legal trade. "... it is difficult to separate out legal and illegal trades in particular species, because they are often deeply inter-twined," according to a 2016 report produced for the European Parliament's trade committee. (source: <https://www.politico.com/news/2020/04/13/coronavirus-fuels-calls-to-clamp-down-on-eu-wildlife-trade-183221>)

³¹³ For a definition of this concept see: Bilchitz, D., Exploring the relationship between the environmental right in the South African constitution and protection for the interests of animals, South African Law Journal, Volume 134, Number 4, Dec 2017, p. 740 – 777.

³¹⁴ *Ibid.*

reinforces broader environmental protection efforts. Animal welfare and animal conservation together reflect two intertwined values.”³¹⁵

The narrow view, taken by DEFF and its Minister, which places profit above suffering and elevates unequal and perverse support for extractive industries that trade in wild animals and/or their body parts, is also responsible for the expansion of the captive Big Cat industry, the ‘lion’ bone trade, canned hunting, the farming of wild animals for consumption, and South Africa’s pro-ivory position, to name a few. The Minister of Environment has recently set up a panel supposedly to advise her on policy issues in relation to lions, elephants, rhinos and leopards, but as Pinnock³¹⁶ and Harvey³¹⁷ have pointed out, the scientific information she is requesting is already conclusive and the establishment and composition of the panel has likely been created and designed to only get the kind of one-sided answers those vested interests pushing for the trade in wildlife want. In 2018 the South African Parliament gave an unambiguous instruction³¹⁸ to the Minister to review legislation with a view to shutting the industry down, yet this has not been done and the terms of reference of the panel do not even refer to it.

South Africa’s standpoint on, and role in, the international trade of live wild animals has not, until now, been adequately exposed. However, our analysis of the available data and the investigations into the importing destination clearly shows that South Africa’s international live wildlife trade is large, poorly enforced, indefensible and shameful. A moratorium on this trade needs to be put in place immediately.

The COVID-19 pandemic and its intrusive impact on every global citizen has exposed deep-seated problems in global institutional arrangements, particularly in relation to wildlife, and has placed a glaring spotlight on the consequences of the wildlife trade— whether legal or illegal—for both human and non-humans. Ordinary citizens are demanding that the wildlife trade be investigated and shut down. They are beginning to understand, as author of *Spillover*, David Quammen has pointed out that “what underlies this whole issue [COVID-19] is our relationship with nature and the way we keep pushing more and more into wildlife habitat and increasing human contact with wild animals” and that “our relationship with wild animals and nature is consumptive, and intrusive, and disruptive”³¹⁹. Wildlife is not responsible for the COVID-19 pandemic—we are. It is not the dark side of nature that is responsible, but rather the dark side of human nature.

Currently national and international policies in relation to wildlife are stacked in favour of the aggregative (‘sustainable use’) view³²⁰. We are now at a crossroads. Countries must turn their backs on this approach which has caused the unleashing of COVID-19, or it must choose the integrative view³²¹, which the South Africa Constitutional Court advocates. One thing is certain, it can now never be back to ‘business as usual’ when it comes to the trade in wildlife. Nevertheless, those promoting ‘sustainable use’ and managing the legal trade are now scrambling to defend it.

In a very real sense, the legal trade is not just a cover for the illegal trade but a political and ideological cover for those supporting the highly contested wildlife framework of ‘sustainable use’. One cannot conveniently and disingenuously blame the current pandemic solely on the illegal trade.

³¹⁵ <http://www.saflii.org/za/cases/ZACC/2016/46.pdf>

³¹⁶ <https://www.dailymaverick.co.za/opinionista/2020-04-29-is-the-environment-minister-captured-by-vested-interests/>

³¹⁷ <https://www.dailymaverick.co.za/opinionista/2020-04-30-why-sas-courts-place-ecological-sustainability-ahead-of-governments-reductionist-sustainable-use-part-2/>

³¹⁸ <https://cer.org.za/wp-content/uploads/2018/11/Final-PCEA-Captive-Lion-Breeding-Colloquium-Report-13112018.pdf>

³¹⁹ <https://e360.yale.edu/features/spillover-warning-how-we-can-prevent-the-next-pandemic-david-quammen>

³²⁰ For a definition of this concept see: Bilchitz, D., Exploring the relationship between the environmental right in the South African constitution and protection for the interests of animals, South African Law Journal, Volume 134, Number 4, Dec 2017, p. 740 – 777.

³²¹ *Ibid.*

Astonishingly the CITES Secretariat put out a press statement essentially washing its hands of any responsibility for the negative consequences of the wildlife trade, saying “Matters regarding zoonotic diseases are outside of CITES’s mandate”.³²² As a direct result of zoonotic spillover, billions of people have been impacted by COVID-19. The only international instrument that is supposed to have oversight of the trade in wildlife, and which has put mechanisms and processes in place to supposedly regulate the trade and protect species is CITES. Yet, it now takes no responsibility for the consequences of the trade in wildlife including the fact that novel zoonotic infectious diseases are spilling over into humans.

The EMS and BAT research strongly points to exactly the opposite: the entities established to oversee the international ‘legal’ wildlife trade—the States Parties to CITES Parties (made up of most governments in the world), their “national management authorities”, and the CITES Secretariat—are actively facilitating a situation where, in fact, the legal wildlife trade is not well regulated, monitored, transparent or accountable.

Moreover, although States Parties spend millions on CITES and on attending CoP meetings to discuss and vote on definitions, changes to resolutions and proposed resolutions etc., the biggest weakness with CITES is the Convention itself because absurdly, only the text of the Agreement is legally binding on States Parties. Resolutions and decisions are not.

What is needed is a total ban on wildlife trade. A ban—which must include incentives and deterrents to be effective—will ensure a clear legal framework and the avoidance of interpretations and loopholes. A total ban is easier to implement and police whereas trying to control, enforce and independently verify a complex and layered set of technical, resource intense and problematic regulations and permitting system is unworkable. Little wonder that the current CITES permit process is open to corruption.³²³ CITES and ‘effective regulation and enforcement’ are not phrases that should be put in the same sentence. It is also very difficult to make a case against the illegal trade in wild animals while at the same time promoting the exploitation, commercialisation, commodification and use of wild animals—which is at the very core of CITES’ operations. This Convention is also not able to address the abuse and cruelty that characterises this trade. The exploitation, commercialisation, commodification and (ab)use of wild animals are the very reasons that created the COVID-19 pandemic in the first place. Moreover, many of the species caught up in the international trade are not even listed by CITES. As Ian Redmond pointed out in his response to Higuero’s tweet, “to a virus jumping species, the difference between legal, regulated and illegal trade is academic”.

CITES as an international treaty is weak, untenable, impracticable, unfeasible and irreparable. Just as crimes against humanity committed by the apartheid state could not have been addressed by keeping the apartheid state and merely trying to tweak it, if we are to address the trade in wildlife, and its abhorrent and deadly consequences on human and non-humans alike, we cannot use an Instrument that is broken, inappropriate, biased and out of step with our current realities.

For over a decade scientists have been warning governments that zoonotic spillover is a ticking time bomb that will have devastating consequences for humanity. Human commodification of nonhuman animals—including trade—is quite literally imperilling human existence. The COVID-19 crisis has meant that the world has changed profoundly. Possibly forever. Billions of people have been forced into lockdown, lives have been lost and millions of people have lost their livelihoods. It has confirmed that, not only are we all interconnected, but that our relationship with nonhuman animals has to urgently and fundamentally change—and it is not just about the preservation of human life or

³²² https://cites.org/eng/CITES_Secretariat_statement_in_relation_to_COVID19

³²³ <https://www.traffic.org/publications/reports/new-study-lifts-the-lid-on-addressing-corruption-in-cites-documentation-processes/>

biodiversity it is also very much about compassion, ethics and justice. Governments can no longer continue with their *laissez-faire* policies and frameworks. The lockdowns have shown us that if there is the political will, decisive measures can be taken to address a critical threat. Novel resolve and swift action is now needed to tackle and end the wildlife trade.

RECOMMENDATIONS

Understanding and recognising that:

1. The health of humans, non-humans, plants and our shared environment is interconnected.
2. Transformative changes are needed to restore and protect nature and wild animals. We need to fundamentally alter our paradigms, goals and values.
3. Conservation issues are also public health issues.
4. Opposition from vested interests and the commercial sector can be overcome for public good;
5. 70% of 'Emerging Infectious Diseases', and almost all recent pandemics, originate in animals (the majority in wildlife).³²⁴
6. Infectious zoonotic disease outbreaks have increased dramatically in the last 30 years and the most likely causes are anthropogenic commercialisation drivers such as: the exploitation of wildlife by humans through hunting, trade in and transport of wild and farmed animals; habitat degradation; an increase in the number of farmed animals—including wild animals; increased agricultural activities; and expansion of agricultural land.³²⁵
7. The COVID-19 health crisis is a wake-up call for us to radically change current trajectories and to rethink our relationship with nature and non-human animals, for the health of future generations and the planet.
8. Humans need to have respectful social distance from the other species we share the planet with.
9. Future pandemics are likely to happen more frequently, spread more rapidly, kill more people and have more devastating impacts if we do not carefully consider the impacts of the choices we make today.
10. COVID-19 has opened up the political space to bypass institutional constraints, framework problems and undue and perverse incentives that maintain the status quo. It is an opportunity to mobilise support for an entirely different global agreement/treaty.
11. The legal trade is defined by loopholes and precludes accountability and transparency.
12. There is a lack of transparency and accountability with regard to the wildlife trade by CITES States Parties.
13. CITES, as the key legal structure regulating the trade (through a system of permits) is toothless and has an unworkable, corrupt and irreparable regulatory framework which cannot comprehensively monitor trade or ensure compliance and is not fit for purpose.

³²⁴ S. S. Morse et al., Prediction and prevention of the next pandemic zoonosis. *Lancet* 380, 1956–1965 (2012)

³²⁵ <https://royalsocietypublishing.org/doi/10.1098/rspb.2019.2736>; his according to infectious disease experts: Professor Thijs Kuiken Professor of Comparative Pathology at the Department of Viroscience of the Erasmus University Medical Centre in Rotterdam, The Netherlands and Di Marco et al. Moreno Di Marco et. al., Sustainable development must account for pandemic risk, *PNAS* February 25, 2020, 117 (8) 3888–3892; <https://doi.org/10.1073/pnas.200165511>

14. The response from existing international wildlife trade instruments, such as CITES, are hopelessly insufficient.
15. There will never be enough enforcement capacity and funding to guarantee partial restrictions such as CITES regulations and national pro-trade policies and legislation.
16. Bans are easier and cheaper to enforce than poor and unreliable regulations.
17. The scale of the global trade in wild animals, although enormous, is poorly documented and the extent not fully known.
18. The global legal trade in wild animals is unsustainable.
19. The wildlife trade is stimulating the killing of wild animals in their natural habitats which is leading to their extirpation, biodiversity loss and ecosystem collapse.
20. The wildlife trade is purely financially motivated.
21. The legal market for wild animals and their body parts stimulates endless demand and fuels the illegal market.
22. The legal and illegal trade in wild animals—including laundering and trafficking—are conjoined.
23. The only way to stop illegal wildlife markets is to stop the wildlife trade completely.
24. Attempting to make a distinction between the legal and illegal will not address health risks.
25. To allow wildlife trade to continue in the hope it will one day be properly regulated is not acceptable.
26. The illegal trade exploits the loopholes in the legal trade system.
27. The legal trade and the captive breeding and farming of wildlife stimulate demand and facilitate and encourage the exploitation of wildlife.
28. Countries involved in the trade in wild animals at source and on the demand side often have weak and/or corrupt regulatory institutions.
29. Trade decisions cannot be divorced from welfare, health and ethical considerations.
30. Zoonotic diseases represent a real and present largescale threat to human populations as a result of the trade in, and consumption of, wild animals.

ACTIONS

We therefore urgently need to:

1. Move from an anthropocentric to a more ecocentric system of values.
2. Halt the destruction of nature, and its damaging consequences for wild animals as species and individuals.
3. Apply an 'integrative'³²⁶ rather than an 'aggregative'³²⁷ approach to our national and international legislative and policy frameworks in relation to wildlife.
4. Launch progressive, innovative strategies and standards and creative and compassionate policymaking and practices to ameliorate the adverse effects of an inappropriate and unworkable treaty such as CITES.
5. Stigmatize the wildlife trade from a scientific and ethical perspective.
6. Ban the live trade of wild animals, including captive-bred wild animals.
7. Ban the captive breeding and farming of wildlife for trade.

³²⁶ For a definition of this concept see: Bilchitz, D., Exploring the relationship between the environmental right in the South African constitution and protection for the interests of animals, *South African Law Journal*, Volume 134 Number 4, Dec 2017, p. 740 – 777.

³²⁷ *Ibid.*

- 8 Ban the consumption of wild animals.
- 9 Ban 'wet markets' and wild animal markets.
- 10 Prohibit the international commercial legal trade and sale of wildlife and their body parts.
- 11 Support *in situ* conservation and a precautionary and compassionate approach in relation to wildlife.

PROPOSED SOLUTION

A comprehensive Global Agreement must be crafted, as a matter of extreme urgency, to tackle the dangerous, inhumane and indiscriminate trade in wild animals. A number of global precedents already exist that can be drawn on, including for example, the *Convention on the Prohibition of the Use, Stockpiling, Production and Transfer of Anti-Personnel Mines and on Their Destruction*. Considered impossible only a decade before it entered into force in 1999, this Convention recognised the need for a more humanitarian, preventive and precautionary approach. It consequently marginalised Protocol II³²⁸ of the 1983 *Convention on Certain Conventional Weapons* (CCW) which was problematic because, similar to CITES, it only imposed some restrictions without effectively dealing with the issue. To date, over 80% of the world's countries are States Parties with 164 States having formally agreed to be bound by the total ban.³²⁹

The ban on anti-personnel landmines creates a model and a strategy that could be used to establish a new legally binding international agreement for universal adherence to, and implementation of, a comprehensive and complete ban on the wildlife trade. Such an agreement would replace CITES and have as its fundamental guiding principle that the trade in wild animals is inappropriate, counter-productive, unethical and fundamentally unsustainable.

³²⁸ Protocol on Prohibitions or Restrictions on the Use of Mines, Booby-Traps and Other Devices as amended on 3 May 1996 (Amended Protocol II).

³²⁹ <http://www.icbl.org/en-gb/the-treaty/treaty-status.aspx>