



SUMMARY OF EIA RECOMMENDATIONS TO THE 62ND STANDING COMMITTEE

International Consortium On Combating Wildlife Crime (ICCWC) (SC62 Doc. 14.7)

- SUPPORT the Secretariat's appeal for increasing funds for ICCWC Projects and URGE all Parties and donors to contribute to the funding of ICCWC Projects and Partners
- ENDORSE the ICCWC Toolkit and URGE Parties to use it to enhance CITES enforcement

Special Reporting Requirements (SC62 Doc. 24.2)

- DIRECT the Secretariat to send a Notification to all Parties reminding them, first and foremost, to complete Ecomessages and send them to INTERPOL for collation and analysis
- SUPPORT the WG proposal for Parties to include non-sensitive fields of data from Ecomessages in annual reports and against species-specific resolutions
- ENDORSE the ICCWC indicators of effective enforcement (as and when available) and URGE Parties to use these indicators when reporting on implementation of species-specific Resolutions

Asian Big Cats (SC62 Doc. 43)

- REMIND Parties that their reporting obligations under Res. Conf. 12.5 (Rev. CoP15) applies to *all* Asian big cats (ABCs) on Appendix I and CALL for range States to report to the CITES Secretariat by October 4, 2012 (in time for CoP16), on all ABCs under the Resolution; and to further DIRECT the Secretariat to issue a notification reminding ABC range States of these requirements
- URGE Parties with tiger breeding operations that are not restricted to the purposes of conservation to report in full to the CITES Secretariat by October 4, 2012 on actions taken to implement Dec. 14.69 and phase out tiger farms
- NOTE that China is failing to implement Dec. 14.69 and URGE China to comply with the letter and spirit of Res. Conf. 12.5 (Rev CoP15) and Dec. 14.69 by withdrawing the scheme for trade in skins of captive bred tigers as a sign of its commitment to ending tiger trade and reducing demand
- SET a new deadline under Dec. 15.46 by which all range and consumer Parties of ABCs provide the information required in order for INTERPOL to conduct a full analysis of trade in not only tigers, but all ABCs

Elephants (SC62 Doc. 46.4)

- REJECT any further proposals from any Party for ivory sales under CITES
- NOTE that the report submitted by the CITES consultants on a Decision-Making Mechanism for a Future Trade in Ivory does not address core issues identified in the terms of reference or the fundamental reasons for the failure of the current legal ivory trade
- CALL for an independent review and analysis of the enforcement failures, corruption and criminality factors impacting the illegal ivory trade
- REVOKE 'Approved Buyers' status for ivory, and CALL for the closure of the domestic ivory market in China
- EIA urges the Standing Committee to reject SC62 Doc. 46.2 and direct Thailand to submit a more comprehensive written report by October 4, 2012 (in time for CoP16); failure to do so should result in a suspension of trade.

Rhinos (SC62 Doc. 47)

- SUPPORT the CITES Secretariat's call for greater emphasis on targeted and effective enforcement
- SUPPORT the WG's recommendations that its mandate be extended and that Vietnam submit its report on implementation of Res. Conf. 9.14 (Rev. CoP15) by September 2012
- ADOPT the ICCWC set of indicators of effective enforcement (as and when available) and URGE rhino range and consumer States to report against them as a meaningful way to assess progress

1. Indicators Of Effective Enforcement (SC62 Doc. 24.2)

Wildlife crime was officially recognised as a form of serious transnational organised crime by the UN General Assembly in 2000. A sophisticated and coordinated response from enforcement agencies is required to combat it and Parties to CITES appear to have acknowledged this, making reference to their commitments to “intelligence-led enforcement,” “multi-agency enforcement,” “international cooperation” and “intelligence sharing.” These are welcome commitments, yet there is insufficient reporting to confirm that these approaches are institutionalised, widespread and consistently practiced.

There is a difference between ‘enforcement’ and ‘effective enforcement’ and at present there are limited ways of assessing the effectiveness of enforcement efforts. For example, while seizures of illegal wildlife products constitute enforcement, seizures without secured convictions accompanied by punitive actions is not effective in suppressing and reducing incidence of such crimes.

Indicators of effective enforcement are critical to ensure that enforcement actions are delivering the required results and present the best possible deterrent to environmental criminals through meaningful sentences, fines and the recovery of assets and proceeds of crime. Measuring enforcement actions against appropriate indicators which focus on international communication and cooperation will encourage the intelligence-led approach necessary to intervene and disrupt transnational criminal networks.

In February 2012, the partners of the International Consortium on Combating Wildlife Crime (ICWC) – INTERPOL, CITES Secretariat, World Customs Organisation, UN Office on Drugs and Crime and World Bank – met at the sidelines of the INTERPOL Environmental Crime Committee meetings in Thailand and agreed that INTERPOL should lead on developing a set of enforcement indicators, on behalf of ICWC. EIA recommends that the Standing Committee endorse these indicators (currently in draft), and direct Parties to use these indicators when reporting under CITES.

The broad scope of the indicators address whether:

1. detection and conviction rates are monitored and have developed favourably over time;
2. advanced investigation methods are utilised;
3. pro-active operations are conducted;
4. intelligence is systematically managed and utilised;
5. multi-disciplinary cooperation, collaboration and exchange of information exists in a tangible form; and
6. proceeds of crime and asset recovery legislation is applied.

Reporting under these indicators would identify existing enforcement gaps and enable the consequent development of appropriate strategies to address them. In addition, by providing a focused, standardized framework for reporting, enforcement indicators may relieve some of the reporting burden on Parties who often report on a wide range of activities under CITES, and would also address the comments made in the report of the Working Group on Special Reporting Requirements (SC62 Doc. 24.2) concerning the need to streamline reporting to ensure the burden on Parties is minimised.

EIA recommends that the Standing Committee adopt a set of indicators of effective enforcement, such as those being developed by ICWC, and direct Parties to report against them when reporting against species-specific resolutions.

2. International Consortium On Combating Wildlife Crime (SC62 Doc. 14.7)

EIA supports the request of the Secretariat for Parties and the donor community to contribute to the funding of ICWC to ensure sustained collaboration and joint projects. The *ICWC Wildlife and Forest Crime Analytic Toolkit* in particular will assist Parties with national enforcement gap analysis and the development of national strategies to improve enforcement capacity, infrastructure and to identify funding needs. EIA also welcomes ICWC’s role in formulating indicators of effective enforcement as described above.

EIA supports the Secretariat’s appeal for increasing funds for ICWC Projects and requests the Standing Committee to urge all Parties and donors to contribute to the funding of ICWC Projects and Partners.

EIA welcomes the launch of the ICCWC Toolkit and recommends that the Standing Committee endorse it and urge Parties to use it as a means to assess enforcement needs and to develop strategies to deliver more effective enforcement operations, infrastructure and capacity to combat wildlife crime.

3. Special Reporting Requirements - Gathering And Analysis Of Data On Illegal Trade (SC62 Doc. 24.2)

With regard to the comments on “Reporting on Illegal Trade” in the Report of the Working Group on Special Reporting Requirements, EIA believes it is a matter of priority that Parties improve their reporting of intelligence to INTERPOL. Actionable and sensitive information should be communicated swiftly and securely using Ecomessage. Information from completed Ecomessages enters the INTERPOL I24/7 database, enabling INTERPOL to offer confidential analyses of nominal criminal intelligence that can be shared with law enforcement authorities, as well as sanitized analyses that can be shared with CITES Parties and the general public.

Further, EIA supports the suggestion in the report of the Working Group that Parties should include the non-sensitive fields of data from Ecomessages (e.g. what was seized, where and date) both in their annual reports and when reporting in accordance with species-specific Resolutions.

EIA recommends that the Standing Committee direct the Secretariat to send a Notification to all Parties reminding them, first and foremost, to complete Ecomessages and send them to INTERPOL for collation and analysis.

EIA supports the recommendations of the Working Group that Parties should include information from the non-sensitive fields of Ecomessage in their annual reports and reports under species-specific Resolutions.

4. Asian Big Cats (Agenda Item No. 43)

Tigers and other Asian big cats (ABCs) remain critically endangered throughout their range, with poaching for trade in their parts and derivatives remaining one of the greatest threats. Since the start of CoP15 in March 2010, poaching and seizure incidents account for the loss of at least 560 ABCs.¹ Urgent measures need to be taken to end all trade in ABC parts and derivatives from all sources.

The report of the CITES Secretariat, SC62 Doc. 43, notes the outcomes of the Global Tiger Recovery Programme (GTRP) Stocktaking Conference, New Delhi, May 2012 and the reports provided by tiger range States to the Global Tiger Initiative (GTI). These reports are substantial but EIA urges the Standing Committee to note that they do not necessarily equate to reporting on implementation of Res. Conf. 12.5 (Rev. CoP15) and related Decisions under CITES. With regard to paragraphs 18 (a) & (c) of SC62 Doc. 43, EIA supports the adoption of a set of enforcement indicators of effective enforcement and draws attention to those under preparation by ICCWC as described above.

EIA urges the Standing Committee to endorse the ICCWC indicators of effective enforcement and direct Parties that are reporting on implementation of CITES species-specific resolutions, including but not limited to Res. Conf. 12.5 (Rev. CoP15) on Conservation of and trade in tigers and other Appendix-I Asian big cat species, to report against such indicators by October 4, 2012 in time for review at CoP16. In the context of Res. Conf. 12.5 (Rev. CoP15), reports against the enforcement indicators can be copied to the Global Tiger Initiative to minimise duplication of effort and the burden of reporting.

4.1 Reporting Under Res. Conf. 12.5 (Rev. CoP15) Must Include All Asian Big Cat Species

EIA notes that at the time of writing, no ABC range State has provided reports on implementation of Res. Conf. 12.5 (Rev. CoP15) and associated Decisions to the Secretariat for this meeting of the Standing Committee. To date reporting under Res. Conf. 12.5 (Rev. CoP15) has been focused largely on tigers and has omitted other ABCs. It is important to recognize that the requirements under Res. Conf. 12.5 (Rev. CoP15) are applicable to all ABCs listed in Appendix I; leopards, snow leopards, clouded leopards and Asiatic lions, and range States are required to report on actions taken to implement Res. Conf. 12.5 and associated Decisions to the Secretariat ahead of CITES Standing Committee meetings and meetings of the Conference of the Parties. Not all ABC range States have tigers and thus not all ABC range States are reporting to the GTI.

EIA recommends that the Standing Committee remind Parties that their reporting obligations under Res. Conf. 12.5 applies to all ABCs on Appendix I and call for range States to report to CoP16 by October 4, 2012 on all ABCs under

the Resolution, and to further direct the Secretariat to issue a notification reminding ABC range States of these requirements.

4.2 Implementation Of Dec. 14.69 On Tiger Farms

EIA remains concerned that Dec. 14.69 remains largely unimplemented. Tiger parts and specimens from captive bred sources have been documented in illegal international trade, with operations and traders in Thailand, Viet Nam and Lao PDR implicated.² This undermines law enforcement efforts and campaigns to reduce demand for tiger parts and products. Meanwhile in China a domestic trade in farmed tiger and leopard skins is proactively encouraged through a registration and labelling scheme (see 4.3).

In 2007 at COP14, the CITES Parties adopted Dec. 14.69, aimed at preventing the farming of tigers for their parts and derivatives, which states that (emphasis added):

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

During the debate prior to the adoption of Dec. 14.69, Parties voted to reject language which would have restricted the Decision to international trade only. It was the clear will of the Parties, including many tiger range States, that Dec. 14.69 should apply *to both domestic and international trade*. Subsequently, in 2008 the Secretariat provided guidance to Parties in Notification 2008/059 further emphasizing that the term “trade” in Dec. 14.69 refers “to both domestic and international trade.”

While some relevant Parties have provided information on steps taken to inspect tiger farms, no Party has reported on or provided evidence of measures to phase out tiger farming. Further, significant stockpiles of tiger body parts held by tiger farms in China is a cause for concern. It is not clear what the purpose of these stockpiles is but it does add to the uncertainty over the intentions of future government policy regarding use, and undermines the prospect for effective demand reduction.

EIA recommends that the Standing Committee urge Parties with operations that are not restricted to the purposes of conservation, to report in full to the CITES Secretariat by October 4, 2012 on actions taken to phase out farms under Dec. 14.69.

Further, EIA requests the Standing Committee to urge all Parties, where stockpiles of captive bred or confiscated tiger parts and derivatives are held, to declare the volume of all parts and derivatives and explain the actions proposed to consolidate and destroy them – or declare the purpose of retaining the stocks.

4.3 China’s System For The Registration And Sale Of Tiger and Leopard Skins

China allows domestic trade in skins from farmed tigers and leopards. As per Notification No. 206 issued by China’s State Forestry Administration (SFA) and State Ethnic Affairs Commission on September 29, 2007, the Government of China has established a mechanism for registering and trading tiger and leopard skins and the products thereof.³ Specimens processed under this scheme have been found for sale online as taxidermy and luxury home décor items along with SFA government permits authorizing trade.⁴

In brief, the government notification establishes a mechanism for:

- a) verifying and registering tiger and leopard skins from legal origins, including skins from farmed tigers and leopards,
- b) obtaining an administrative permit for such skins from the SFA, and
- c) authorizing trade, sale, public displays and exhibitions of tiger and leopard skins that have a permit.

In addition to allowing domestic trade in skins of captive bred tigers and leopards, China has enabled the registration, labelling and sale of tiger and leopard skins of other “legal origin” such as those skins “whose origins are hard to check.” The scope of the term “legal origin” is not defined and it’s unclear if it includes (1) skins that constitute a CITES pre-Convention specimen,⁵ and (2) skins that were obtained from a domestic (wild or farmed) tiger within China prior to March 1, 1989 when China’s Law on Protection of Wildlife came into force.

China has failed to respond to requests for clarification of the definitions used in the Notification, and for details of the verification process for skins of “legal origin”. China has also declined to share information on the number of skins registered, labelled and sold under the scheme to date.

In light of the ongoing poaching of tigers and leopards in other ABC range States and the absence of reports of enforcement in specific areas in China that are known for high levels of illegal trade in wild-sourced ABC parts, EIA is concerned that this registration scheme provides a mechanism to launder illegally-acquired skins. Investigations from 2005-2011⁶ reveal that known offenders selling ABC parts and derivatives in Tibet Autonomous Region, Qinghai and Gansu Province have still not been subject to enforcement action and may already have taken advantage of the registration scheme.

EIA calls upon the Standing Committee to note that China is failing to implement Dec. 14.69 and to urge China to comply with the letter and spirit of Res. Conf. 12.5 and Dec. 14.69 by withdrawing the scheme for trade in tiger (and leopard) skins as a sign of its commitment to end tiger trade and reducing demand.

4.4 Submitting Relevant Information To INTERPOL Under Dec. 15.46

Exchange of intelligence is vital to combating the illegal wildlife trade, and has been repeatedly identified as a need by range States, both through CITES, as well as the Global Tiger Initiative and Global Tiger Forum. Dec. 15.46 required all Parties, but particularly tiger range States, to submit intelligence on tiger crime to INTERPOL for analysis by June 30, 2010. Dec. 15.46 states (emphases added):

*All Parties, but particularly tiger range States, should submit, by 30 June 2010, information relating to incidents of **poaching of and illegal trade in tigers** that have occurred within their territory since the beginning of 2007. Information should be submitted using the Ecomessage format distributed in Notification to the Parties No. 2009/028 of 22 July 2009. Ecomessage forms for each incident should be submitted to the CITES Secretariat or to the General Secretariat of ICPO-INTERPOL via INTERPOL National Central Bureaus.*

The CITES Secretariat reported to SC62 that this exercise had not been successful because the overall response had been poor (SC61 Doc. 41) and during SC61 explained how vital it was that nominal criminal intelligence be shared via INTERPOL swiftly and securely, so that transnational criminals can be better targeted by enforcement efforts. There was no further action agreed at SC61, so EIA recommends that a new deadline be set by Standing Committee to fulfil this Decision and to extend it to data on all Appendix I ABCs.

EIA urges the Standing Committee to set a new deadline by which all source and consumer Parties of ABCs must provide the details required in order for INTERPOL to conduct a full analysis of trade in not only tigers, but all ABCs.

5. Elephants (Agenda Item No. 46)

EIA firmly believes that there should be no further trade in ivory. Over the period 2008-2011, ETIS reports that ‘large seizures’ alone represent over 53 tonnes of ivory.⁷ 2011 was the worst year on record for large international seizures,⁸ with most of the illegal ivory heading to East Asia, primarily China. This rapid increase in demand for illegal ivory has taken place despite the two CITES authorized legal sales that were designed to ‘flood’ the market with legal ivory and reduce demand for illegal ivory. The first sale was to Japan in 1999; the second in 2008 to Japan and China (more than 100 tonnes). The two legal sales have failed to achieve their intended objective of reducing illegal trade, and there are indications that these sales have exacerbated the situation by creating legal ambiguity and fostering perceptions among poachers, traffickers and consumers that trade is indefinitely open.

Today China has a flourishing illegal ivory market. Investigations by EIA in Guangzhou, China in November 2010 documented a thriving and growing illegal trade in ivory where the perception of both legal and illegal traders was that up to 90% of the ivory available on the market came from illegal sources.⁹ The findings, supported by subsequent surveys and reports, also show that prices have escalated as much as tenfold since 2005.¹⁰

EIA supports a complete ban on all international ivory trade and recommends that the Standing Committee reject any proposals from any Party for future authorized sales.

5.1 No Further Action on *Decision-making Mechanism for Authorizing Ivory Trade* (SC62 Doc. 46.4)

EIA is concerned that any more 'legal' sales of ivory will further stimulate the market, supporting the perception that trade has resumed, and increasing demand for illegal ivory. In addition, the availability of ivory from both legal and illegal sources further challenges law enforcement agencies in their efforts to tackle the criminal networks behind the trade. In light of mass poaching of African elephants, the increase in illegal trade in ivory, and the fact that the legal sales have clearly failed to reduce illegal trade, EIA urges the Standing Committee to table any further discussion on a future international trade in ivory. **CITES must recognize that in the current climate of poor enforcement, apathy, failure of political will and corruption, there is no likelihood that any form of regulated trade is workable.**

Consequently, with regard to the report submitted by the CITES consultants on Decision-Making Mechanism for a Future Trade in Ivory (SC62 Doc. 46.4), EIA recommends that the Standing Committee note that the report fails to address the core issues identified in the terms of reference and the fundamental reasons for the failure of the current legal ivory trade system. EIA strongly supports a complete ban on international ivory trade and urges the Standing Committee to take no further actions on this issue. Instead, the Standing Committee must examine the reasons for the failure of Parties to implement the existing trade mechanisms before devising new trade mechanisms that will likely be plagued by the same problems and enforcement challenges. First and foremost, EIA requests that the Standing Committee conduct a review of the enforcement gaps and needs that have led to the failure of the current ivory-trade control and regulation system. Parties must be able to demonstrate that national investment and commitment to professional law enforcement is adequate for combating transnational organised wildlife crime and corruption.

EIA recommends that the Standing Committee note that the report submitted by the CITES consultants on a Decision-Making Mechanism for Future Trade in Ivory fails to address core issues identified in the terms of reference or the fundamental reasons for the failure of current legal ivory trade systems and controls.

EIA urges the Standing committee to call for an independent review and analysis of the enforcement failures, corruption and criminality factors impacting the illegal ivory trade. Discussion of any future trade in ivory prior to a comprehensive and thorough analysis of these failures would be both injudicious and potentially fatal for some elephant populations.

5.2 Review Of *Approved Buyers* For Ivory

A number of surveys and studies have established the failure of the system of ivory registration and trade that was put in place as a pre-condition for the 2008 legal sale. Recent investigations in China carried out by a number of independent researchers show that the majority of the trade in ivory being conducted does not conform to the rules established by CITES, with reports estimating that up to 90% of the ivory on sale in China is illegal.¹¹

EIA urges the Standing Committee to revoke the 'Approved Buyers' status for ivory, and call for the closure of the domestic ivory market in China and a thorough investigation of the failure of China's domestic ivory trade controls.

5.3 Ivory Trade Control in Thailand (SC62 Doc. 46.2)

EIA urges the Standing Committee to reject this document and direct Thailand to submit a more comprehensive written report to CoP16; failure to do so should result in a suspension of trade.

Thailand is highlighted as a key destination or transit point for illegal ivory (SC62 Doc. 46.1) and despite repeated commitments to address existing domestic legislation, remains non-compliant with CITES requirements under Res. Conf. 10.10 (Rev. CoP15). Doc 46.2 does not inspire confidence that Thailand has made sufficient, if any, progress to regulate internal trade and combat illegal trade in ivory: there is no definite time frame for the implementation of the 'protected species' listing, and no articulation of how Thailand intends to implement it or how it will improve effective enforcement. EIA remains concerned that there is no adequate authority to ensure that ivory dealers confine their operations to the domestic market, a concern raised in SC61 Doc. 44.1. Further, the document fails to address how Thailand's newly acquired capacity to identify ivory from different elephant species would contribute to improved enforcement of the ban on commercial trade and possession of African elephant ivory. No information has been provided by Thailand on the procedures for inspections or how such inspections would address illegal trade, and the penalties that would be imposed on dealers found to be acting illegally.

EIA urges the Standing Committee to reject SC62 Doc. 46.2 and direct Thailand to submit a more comprehensive written report by October 4, 2012 (in time for CoP16); failure to do so should result in a suspension of trade.

6 Rhinos (Agenda Item 47) - Review of Enforcement Gaps (SC62 Doc. 47 Annex)

In its report to the Standing Committee, the Secretariat notes that organized crime syndicates are involved in rhino poaching and smuggling. EIA supports the recommendations of the Secretariat that increased international cooperation and a well-coordinated law enforcement response is required to address this threat effectively. Further, EIA is deeply concerned that, besides reporting on seizures, there is currently insufficient reporting from Parties against more meaningful indicators of enforcement. Reporting on arrests, convictions, sentences, fines, the recovery of proceeds of crime, investigation of criminal networks and international cooperation, including with INTERPOL, would generate a better profile of enforcement capacity and needs. As discussed above, these enforcement gaps can be identified through ensuring reporting against effective enforcement indicators, which are currently being developed by INTERPOL on behalf of ICCWC, enabling appropriate and focused enforcement responses to be developed.

EIA requests the Standing Committee to commission a review of the enforcement gaps and challenges that have allowed the rhino horn trade to spiral out of control and to require reporting against effective enforcement indicators.

¹ EIA and WPSI records until June 25, 2012

² EIA intelligence records. See also: Education for Nature – Vietnam (ENV), *Summary of Tiger Trade Investigation Findings Vietnam, 2010* (2010); ENV, *Wildlife Crime Vietnam Bulletin* (February 2011); Guardian, *Trip to 7-Eleven leads Bangkok police to tiger butchers* (February 12, 2012); FREELAND, *Police Arrest “Wildlife Butchers of Bangkok”* (February 6, 2012); FREELAND, *Big cat trafficking investigation widens* (May 17, 2012).

³ Specifically the Notification translates as follows (emphases added): “Starting 1 Jan 2008, owners of tiger pelts, leopard pelts and the products thereof that have been verified and registered to be from legal origins may apply to the State Forestry Administration via the local provincial responsible forestry department for the relevant administrative permits ... (hereinafter known as the ‘special mark’) for their tiger pelts, leopard pelts and the products thereof from legal origins. **For tiger pelts, leopard pelts and the products thereof approved with the ‘special mark,’ the owners of such articles can sell within the applicable range based on the administrative permit with the mark.**”

⁴ EIA and WPSI Briefing Document for the 61st Meeting of the CITES Standing Committee - *Enforcement and Asian Big Cats*.

⁵ With regard to international trade, under CITES tiger skins can be imported or exported if it has been certified as a “pre-Convention specimen,” *i.e.*, it was acquired before July 1, 1975 when all tiger sub-species were listed on CITES Appendix I (or in the case of the Siberian tiger, if it was acquired before October 22, 1987 when the Siberian tiger was listed on CITES Appendix I).

⁶ EIA Briefing <http://www.eia-international.org/key-features-of-asian-big-cat-skin-and-bone-trade-in-china-in-2005-2011>

⁷ Table 2. Number of large-scale ivory seizures and volume of ivory represented in raw ivory equivalent by year, 2000-2012 (ETIS, April 17, 2012) in SC62 Doc. 46.1

⁸ TRAFFIC, *“Annus horribilis” for African Elephants, says TRAFFIC* (December 29, 2011)

⁹ EIA and WPSI Briefing Document for the 61st Meeting of the CITES Standing Committee – *Elephants*; EIA, *Blood Ivory: Exposing the Myth of a Regulated Market* (March 2012).

¹⁰ Esmond Martin and Lucy Vigne, *The Ivory Dynasty: A Report on the Soaring Demand for Elephant and Mammoth Ivory in Southern China* (2011); IFAW, *Making a Killing: A 2011 Survey of Ivory Markets in China* (2012).

¹¹ EIA and WPSI Briefing Document for the 61st Meeting of the CITES Standing Committee – *Elephants*.