



**Response from 32 non-governmental organisations to solicitation of public opinion on the “National Catalogue of Livestock and Poultry Genetic Resources (draft)”**

**6 May 2020**

The undersigned organisations, comprising 32 wildlife conservation organisations from around the world plus conservation experts, have prepared the following comments and recommendations in response to the “Ministry of Agriculture and Rural Affairs Notification regarding solicitation of public opinion on the “National Catalogue of Livestock and Poultry Genetic Resources” of 8 April 2020. We appeal to you to take action that will protect global biodiversity and prevent future pandemics.

On 24<sup>th</sup> February, the Standing Committee of the National People’s Congress issued “Decisions relating to a total prohibition on illegal wildlife trade, eliminating the bad habit of excessive eating of wildlife, and effectively safeguarding the lives and health of the public” (hereafter referred to as “the Decisions”). This document is interpreted as a directive for more effective enforcement against illegal wildlife trade, and a prohibition on the breeding of and trade in most terrestrial wild animal species for the purposes of consumption as food, in the interests of biodiversity protection and human health. We commend the significant step forward represented by this move if it is implemented effectively and ethically, and the precautionary approach to wildlife trade represented in the Decisions.

However, we note with concern that commercial breeding of and trade in wild animal species, including species threatened by trade, continues to be permitted for non-food purposes such as traditional medicine, ornamental items and fur. We are concerned

that these exemptions risk undermining the coherence, ambition and likely effectiveness of the Decisions in addressing the global biodiversity crisis and risks to human health.

Wild animal species can be hosts of a broad spectrum of bacteria or viruses that can be pathogenic and could spill over to humans. There are potentially a large number of bacteria and viruses thus far unidentified that could cause the next pandemic. Existing disease control methods in the capture, trade and breeding of wild animal species are not necessarily effective for the identification and prevention of such risks, and so a precautionary approach is warranted. With any commercial breeding – whether for food or non-food purposes – animals housed in high densities will likely come into close, repeated contact with workers, risking the emergence of new diseases. This is not only a health risk for breeders, but also persons involved in other stages of the trade chain such as butchering and processing, and end consumers.

Meanwhile, overexploitation of wildlife, including trade in and consumption of wild animals, has been identified by IPBES as the second biggest driver of the current biodiversity crisis<sup>1</sup> which puts at risk the natural systems upon which all life and economies depend. Given the serious risk that commercial breeding and legal trade in wild animal species can enable the laundering of illegally or unsustainably sourced specimens, legitimise and perpetuate demand for wild animal products and complicate enforcement of wildlife protection laws, a highly precautionary approach to breeding and trade of wild animals for any purpose is also essential to avoid such activities exacerbating the current crisis.

We therefore recommend the following:

- **End commercial breeding and trade for production of fur**
- **Draw up an accompanying list of wild animal species which cannot be bred commercially for any form of trade**

We urge the Ministry of Agriculture and Rural Affairs and other relevant agencies to issue further notifications and revise relevant laws and regulations accordingly to prohibit commercial trade in the parts and derivatives of, at a minimum, all wild animal species which are threatened by trade, including all big cats, elephants, rhinoceroses, pangolins and bears, including captive-bred specimens, and restrict the keeping and breeding of these species to programmes and scientific institutions that are part of internationally recognised scientific conservation breeding initiatives, managed via studbooks. Such a move would better reflect the precautionary approach enshrined in the Decisions and help to lessen the risk of breeding and trade of wild animals in China posing a threat to biodiversity and human health.

We recommend defining “species which are threatened by trade” as wild animal species which are subject to special state protection, and/or species listed on CITES

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<sup>1</sup> IPBES (2019): Global assessment report on biodiversity and ecosystem services of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services. E. S. Brondizio, J. Settele, S. Díaz, and H. T. Ngo (editors). IPBES secretariat, Bonn, Germany.

Appendix I, and/or species listed as Critically Endangered, Endangered or Vulnerable on the International Union for the Conservation of Nature Red List.

The Environmental Investigation Agency (EIA) has also [prepared detailed recommendations for the 2020 revision of the Wildlife Protection Law](#) (enclosed). We note that revising the Law to permanently prohibit the commercial breeding of and trade in wildlife species that are threatened by trade offers an invaluable opportunity for China to demonstrate conservation leadership as it prepares to host the 15th Conference of the Parties to the Convention on Biological Diversity.

The Decisions issued on 24 February 2020 did not prohibit the commercial breeding of and trade in wild animal species for non-food purposes, such as traditional medicines, ornamental items and fur. Moreover, we are greatly concerned that the NFGA Notification No. 42 (2020), "National Forestry and Grasslands Administration notification regarding reliable and proper follow-up work on the prohibition on eating wild animals" makes clear the intention that farming of wild animal species for use in medicine or exhibition will continue to be permitted.

For wildlife that is threatened by trade, captive breeding for any purposes other than conservation poses an unacceptable risk to the species. For example, in the case of tigers, and large-scale commercial breeding as is currently permitted has not lessened pressure on wild populations but has instead perpetuated and stimulated demand for big cat products, reduced the stigma of consuming such products, and has provided traders with opportunities to launder illegally sourced tiger specimens. The Wildlife Protection Law as currently implemented is not sufficiently restrictive to prevent breeding facilities from engaging in activities which are harmful to the conservation of protected species. For example, facilities such as the Siberian Tiger Park and Xiongsen Tiger and Bear Mountain Village, while sometimes described as scientific institutions, are offering for sale products marketed as derived from tigers and/or lions and are keeping tigers in conditions that are inconsistent with conservation breeding.

Current regulations are also of concern for other species such as pangolins and rhinoceroses. When evaluated against various biophysical, market and regulatory conditions, the use of captive breeding of pangolins to meet consumer demand for pangolins scales has been determined to not be commercially viable.<sup>2</sup> Any permitted breeding activities also risk offering means through which to launder pangolins and rhinoceros horn illegally sourced from the wild.

The undersigned organisations therefore strongly recommend that, in order to align with the precautionary approach to breeding and trade of wild animals in the interests of biodiversity and public health as represented by the Decisions, the Ministry of Agriculture and Rural Affairs and other relevant agencies should promulgate a notification to accompany the National Catalogue of Livestock and Poultry Genetic Resources. This notification should specify species which may not be bred or traded for

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<sup>2</sup> Challender et al. 2019. Evaluating the feasibility of pangolin farming and its potential conservation impact. *Global Ecology and Conservation* 20

any non-conservation purposes, including production of traditional medicines, fur and ornamental items, and including captive-bred specimens. At a minimum, this notification should cover wild animal species that are threatened by trade, and should further restrict the keeping and breeding of these species to programmes and scientific institutions that are part of internationally recognised scientific conservation breeding initiatives, managed through studbooks.

Signed:

Animal Defenders International  
Animal Welfare Institute  
Annamiticus  
BAAVAN - Bagh Aap Aur VAN  
Blood Lions  
Born Free Foundation  
Born Free USA  
CATCA Environmental & Wildlife Society  
Center for Biological Diversity  
Conservation Action Trust  
The Corbett Foundation  
David Shepherd Wildlife Foundation  
Elephant Reintegration Trust  
EMS Foundation  
Environmental Investigation Agency  
Flora & Fauna International  
Four Paws International  
Global Wildlife Conservation  
Humane Society of Canada  
Humane Society International  
International Aid For Animals Foundation  
Nature Conservation Society, Amravati  
Oceanic Preservation Society  
Panthera  
Panthera Africa  
Robin Des Bois  
Satpuda Landscape Tiger Programme – Saving India's Tigers  
Save Wild Tigers  
Species Survival Network  
Wildlife Conservation Trust, India  
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