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Made in China

The Illicit Trade in Tiger Bone in China



International Fund for Animal Welfare
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I. Background

Wild tigers can only be found on the Asian continent. Few in number, they face increasing threats from habitat loss, prey reduction, poaching and the use of their body parts for traditional medicine, clothing and decoration. The human population explosion and the booming economic growth in Asia only aggravate the threats tigers are facing and speed the decline of tiger populations in the wild. Scientists and biologists warn that unless intensive conservation efforts are implemented, wild tigers risk extinction in this century. According to recent surveys, fewer than 5,000 tigers are left in the wild, less than 50 of which remain in China¹.

As a species critically endangered and threatened by international trade, tigers are listed on Appendix I of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), which bans the international trade of tigers and their tiger parts and derivatives.² In 1993, China's State Council issued a "notice" also banning domestic tiger trade and the use of tiger bone in traditional Chinese medicine (TCM).³ Since then, the Chinese government has removed tiger bone from the list of ingredients in the traditional Chinese pharmacopoeia, and made manufacturing or trading Chinese medicine containing tiger bone illegal. TCM products formerly containing tiger bone have been replaced with substitutes and carry a warning label stating that "tiger bone is banned from use." Traditional Chinese medicine doctors, researchers, educators and users worldwide, including those in China, support this ban, and have successfully adopted substitute ingredients to meet medical needs.

To implement CITES and China's domestic wildlife protection laws, relevant wildlife law enforcement agencies in China have worked diligently to combat the illicit trade in tiger bones and pelts. In October 2003, Chinese Customs officers made the largest-ever seizure of pelts from Asian big cats at a checkpoint in the Tibet Autonomous Region bordering India, where most of the world's remaining wild tigers live. The confiscation included skins of 31 tigers, 581 leopards and other wild species.

However, despite these international and national laws, recent investigations indicate that the illegal trade in tiger parts, both pelts and bones, is on the increase. Market demand for tiger products, left largely unchecked because of law enforcement deficiencies in tiger range and consumer states, could easily wipe out tigers in the wild.

This investigative report documents illegal trade in tiger bone in China and provides recommendations to enhance implementation of existing policies and laws.

¹ "Setting Priorities for the Conservation and Recovery of Wild Tigers 2005-2015". NFWF, WWF, WCS and NZP, 2006

² CITES Conf. 12.5 "Conservation of and trade in tigers and other Appendix-I Asian big cat species"

³ "State Council Notification on banning Trade of Rhino Horn and Tiger Bone" State [1993]No. 39 May 29,1993

II. Illegal trade of tiger products

Numerous zoos, wildlife parks and tiger farms in China breed and keep hundreds of tigers, often in abhorrent conditions. Although both international and domestic trade in tiger bone is banned, some facilities have openly marketed products containing tiger. Many of the facilities stockpile tiger carcasses in the hope that legalized tiger trade one day will be reopened.

Defying the domestic trade ban issued by China's State Council, several of these facilities have already started selling tiger bone wine. Some market their products to foreign tourists by using foreign languages on product leaflets and price tags.

Incidents of illegal tiger trade reported in the Chinese media:

- In 1997, CCTV reporter Junyi Shui exposed the fact that Shenzhen Wildlife Park was illegally selling tiger bone wine from its cellar to tourists and also to restaurants outside the park.⁴
- In December 2002, China imported 100 tigers from Thailand to stock a new wildlife park in Sanya, Hainan Province. Although the Wildlife Conservation Department of the State Forestry Administration contends that the tigers were imported for “non-commercial” purposes, a spokesperson at the wildlife park announced that the park intends to increase its tiger population to 1,000 so that consumers will be able to “taste tiger meat.”⁵ This controversial import was debated at the 50th Meeting of the CITES Standing Committee, where the CITES Secretariat concluded that “the importation of the tigers [did] not comply with the guidance on captive breeding that is contained in Resolution Conf. 5.10 (Definition of ‘primarily commercial purposes’).”⁶
- In 2003, Yunnan Liang He Medicine Co. Ltd. made tiger bone wine from confiscated “Bengal” tiger bone with permission from government authorities. The company even had a government-issued medicine retail permit. The wine was called “Bone Strengthening Wine,” and the company promoted it as tiger bone wine through a call center.⁷
- In October 2005, in response to western media reports of a possible lifting of China's tiger trade ban, the press office of the State Forestry Administration (SFA) publicly denied these reports as rumors and reiterated that China's ban on tiger bone trade would be maintained.⁸
- In February 2006, Shanghai Wildlife Park was found to be collaborating with a liquor factory to produce and sell a health- tonic wine made of bones from tigers killed by buses carrying tourists through the park. After verifying these sales, the Shanghai Wildlife Management Bureau confirmed it was an illegal operation.⁹

⁴ “Oriental and I”, Shui Junyi, Nanhai Publishing House

⁵ <http://archive.cn.news.yahoo.com/news/021231/72/1eai1.html>

⁶ <http://www.eia-international.org/cgi/reports/reports.cgi?t=template&a=49>

⁷ http://www.cccs.com.cn/column/jinwanbao/jinwanbao03_1106.htm

⁸ <http://news.sina.com.cn/o/2005-10-06/16257104000s.shtml>

⁹ “Shanghai Wildlife park accused of making liquor from tiger bones”, Beijing Times A18 China News. Focus, February 10, 2006

- On August 25, 2006, a special report in the *China Youth Daily* exposed the fact that Xiong Sen Bear and Tiger Farm in Guangxi Province was openly and illegally making tiger bone wine in its cellar. The cellar has over 400 vats of wine, each containing a tiger carcass. The staff at the farm told the reporter that the farm has special permits from the SFA to retail tiger bone wine.¹⁰ On the Xiong Sen Farm premises, bottles of six-year-old tiger bone wine were priced at RMB846 (USD106). Three year old wine was priced at RMB420 (US\$52). In the Xiong Sen retail store in the city of Pingnan, three-year-old wine was selling for RMB330 (US\$41) per bottle. However, at Nanning airport, a bottle of tiger bone wine without an age label sold for RMB1,080 (USD135). Farm officials estimated annual sales at more than 200,000 bottles, with profits in the millions of US dollars.
- The September issue of the magazine, *Beijing Technology*, confirms the *China Youth Daily* report about the Xiong Sen Bear and Tiger Farm. Furthermore, the article mentions that the farm's restaurant lists tiger meat on its menu under the name "meat of the king."

IFAW Investigation of Xiong Sen Bear and Tiger Farm and Xiong Sen Wine Industries Ltd.

The new factory of Xiong Sen Wine Industries Limited Company, situated in a suburb of the city of Guilin, officially started operation in November 2004 as the liquor production branch of the Xiong Sen Bear and Tiger Farm in Guilin. The main ingredients for its products come from wildlife species that have been captive bred and then have died on the farm.¹¹ The facility's main web page (<http://www.glsyj.com/Index.asp>) makes the following introduction (please note that the translation of the web page is as literal and close to its original language as possible):

"With support from relevant government agencies, Guilin Xiong Sen Tiger and Bear Farm has made significant progress in scientific research and captive breeding of tigers, bears and African lions in the past 15 years. The farm has over 1,100 Siberian, South China, Bengal and white tigers, over 400 Asiatic black bears, 300 African lions and 300 deer and other nationally protected wildlife species and has become an important tiger research and breeding center. To expand funding and better protect wildlife, with the permission of relevant government departments, the farm mandates its wine production company, Xiong Sen Wine Industries Limited, to produce a variety of "Xiong Sen" brand wines, utilizing animals which have died on the farm. Wines include "Nurture Bone Wine," "Bone Protection and Papaya Wine," "Bear Bile Wine," "Gecko Wine," and "Three Snake Wine." To prevent counterfeiting, each bottle of wine has a special marking for "wildlife utilization and management."

Why is the tiger a Class I protected animal in China?

Because the tiger's entire body has been regarded as a treasure chest for 5,000 years by traditional Chinese medicine practitioners, as represented by the old master Li Shizhen from ancient times. Tiger bone combined with other traditional medicinal herbs has the effect of nurturing the Yang, strengthening the bone and curing rheumatism. Its aphrodisiac qualities

¹⁰ China Youth Daily, <http://zqb.cyol.com/node/2006-08/25/zgqnb.htm>

¹¹ <http://www.glsyj.com/Index.asp>

create wonders. People's pursuit and nature's destruction pushed tigers to the brink of extinction. Therefore, the tiger is listed as a Class I protected animal in China's Wildlife Protection Law.

Why is Asiatic Black Bear a Class I protected animal internationally and a Class II protected animal in China?

Historically, bear bile is regarded in TCM as the king of bile. It is effective for poison elimination, liver nurturing and eye sight clearing. It treats heat fevers, strokes, internal injuries and hemorrhoids. People's pursuits pushed it to the brink of extinction. Therefore, it is listed as Class I and Class II protected animal."

The products use variations of the word "nurture," "strengthen," and "protect" to avoid using the word "tiger." However, staff on the farm and in the wine factory insisted that the wine is made with tiger bone.

http://www.gsyj.com/index.asp

国家虎种源繁育基地
欢迎您到桂林雄森熊虎山庄参观

网站首页 产品介绍 销售网点

熊森酒类广西总代理
桂林市神韵酒类贸易有限责任公司

桂林雄森熊虎山庄在国家有关部门的大力支持下，通过15年的努力，对老虎、黑熊、非洲狮等野生动物的科研、繁育、养殖取得一定的成果。现有东北虎、华南虎、孟加拉虎、白虎共有1100多头，黑熊400多头，非洲狮300多头，梅花鹿300多头等国家一二级保护动物，并且成为国家种虎源科研、繁育基地。为了多渠道筹集资金，更好的保护野生动物，经国家有关部门批准，利用该山庄正常老化、淘汰的动物为原料，由其下属企业雄森酒业生产“雄森牌”补骨酒、护骨木瓜酒、康胆酒、蛤蚧酒、三蛇酒系列产品，每瓶产品均有防伪的“中国野生动物经营利用管理专用标识”。



雄森牌护骨木瓜酒
Xionsen Hugu Mugua Jiu
Selenarctos tibetanus
Cervus nippon
CNWM 中国野生动物经营利用管理专用标识

虎:为什么是国家一级保护动物呢?
因为在5000多年的中医药文化和李时珍本草纲目中一致认定老虎全身都是宝，特别是虎骨加以名贵中药对人体具有温肾补阳、强筋健骨、填精益髓、通筋活络和陈年风湿、臂肢疼痛、腰腿不随、阳痿不举、房事虚损等症有着奇特的功效。人们大量的追求和大自然的破坏，导致老虎濒临灭绝，所以列为一二级保护动物。

黑熊:为什么是国际一级、国家二级保护动物呢?
因为从古至今一致认定熊之胆属于中药的胆中之王，它对人体是具有清除百毒、利肝明目、对大热症、中风、脑血栓、血脂过浓、内伤、痔疮等有着奇特的功效。人们的追求导致濒危灭绝所以被列为一、二级保护动物。

网站首页 产品介绍 销售网点

桂林雄森熊虎山庄 雄森酒业有限公司 荣誉出品

Xiong Sen Wine Industries Co. Ltd. has a brewing room, a filling room, and a cellar (Cellar No.1) with thousands of vats (small vats hold 250kg, and big vats have a 500kg capacity). The company manager proudly boasted that there are 400 vats, each containing an entire tiger skeleton. The tiger bone wines are sold at either three or six years old. In an effort to expand its production capacity, the company is building two additional cellars, a control center, and a production line that meets Good Manufacturing Practice (GMP), a standard supposedly required for the manufacture of medicine. Without the GMP, the products from the company can only be sold as wine, not as medicine.

To prepare for the day when tiger bone wine can also be sold as medicine in pharmacies and clinics, the company is recruiting wholesale outlets to distribute its products nationwide. Currently, it has wholesale outlets in Guilin and Nanning in Guangxi Province, as well as Changsha (Hunan Province), Hangzhou (Zhejiang Province) and Zhengzhou (Henan

Province), all of which are required to have a retail license for wine only. The retail stores in those cities are either the specialty stores for Xiong Sen products or cigarette and wine shops. Tiger bone wines were found for sale at Guilin and Nanning airports.

The company also has signed a wholesale contract with a company in the United States called Yat Chau USA Inc.,¹² located in Flushing, New York. The company manager claims that Yat Chau USA Inc. will be Xiong Sen's wholesale agency for selling tiger bone wine in Beijing and Tianjin.



The promotion literature states: “Nurture Bone wine is made of tiger bone and other natural herbs...”

The packaging for Xiong Sen's tiger bone wine is a wooden box containing a porcelain bottle in the shape of a tiger, and each tiger bone wine box has a special label (China Wildlife Sale and Utilization Management Special Marking) showing permission for sale from SFA and the State Industry and Commerce Administration (SICA).

¹² <http://www.yatchauusa.com/about/about.asp>



During an IFAW investigation in 2005, the price tag for this wine was displayed with Korean lettering. In 2006, price tags in foreign languages had been removed. Although the sales person claimed the tiger bone wine was only for domestic sale, investigators witnessed it being sold to foreign tourists.

IFAW's research confirms the prices for tiger bone wine reported in the *China Youth Daily* article.

The restaurant in the Xiong Sen Tiger and Bear Farm also sells dishes made with wildlife species from the farm. Tiger meat is listed on the menu as the "meat of the king" and is highly recommended by restaurant staff.

RMB30 million (USD3.75 million) has been invested in building the farm. Of the total, RMB7.5 million (USD937,500) came from SFA to finance the tiger breeding operation, according to farm officials. These officials argue that the expense of feeding 1,100 tigers their daily allotment of meat (and with tiger numbers increasing 200-300 per year) required establishment of a wine production company to increase profits. The estimated annual revenue from wine production and trade is RMB100 million (USD12 million).

To date, no tiger from this farm has been introduced into the wild. However, one of the entertainment shows on the farm places tigers and livestock together in a large coliseum to demonstrate how the livestock are killed by tigers. This show is what the farm calls putting tigers through "wildness training."

III. Conclusions

Illegal trade of products made from tiger parts and derivatives are rampant in China. Although this illicit trade is often disguised as domestic trade from captive bred species on farms, parks and zoos, it is being sold to tourists traveling from outside of China. CITES violations have already occurred.

Domestic trade of tiger products also violates the State Council ban that has been in place since 1993, undermining China's exemplary stricter domestic measures in compliance with CITES

resolutions. The State Council notice specifically bans the sale, purchase, transport, carrying and shipping of tiger bone, as well as the manufacture of medicine containing tiger bone.

Law enforcement to prevent illegal tiger trade is inadequate in China. Since SFA recently reiterated that selling tiger products is illegal, Xiong Sen Bear and Tiger Farm must have obtained its sales permit and the special stickers shown on the farm's website (allegedly issued by the SFA and SAIC) through illegal means. Although farm personnel all claim that their various varieties of wine all contain tiger bone, some of the wine labels claim lion bone as its content. This violates China's relevant laws against false advertising as well as against CITES if the lions came from international sources.

Large financial investments have gone into establishing these captive breeding facilities for CITES Appendix I species. However, none of these facilities has met international standards set for conservation breeding programs, and their operations are clearly aimed at commercial purposes, evidenced by the sales of entrance tickets, entertainment shows and products made from wildlife bred in the facilities.

Unfortunately, China's tiger farms pose a grave threat to the species they are purported to help conserve in the wild. While raising tigers in captivity by the hundreds is very expensive (as evidenced by the pleas from these farms to trade commercially), poaching a wild tiger costs as little as a few US dollars. Most criminals will not make the investment to captive breed tigers for trade, choosing instead to poach the last remaining wild tigers to supply any legal market allowed within China.

The trade of tiger bone from farmed tigers provides cover for poaching tigers in the wild, as well as opportunities for criminal "laundering" of parts from poached wild tigers. Forensic analysis to distinguish farmed from wild tiger parts is technologically and financially prohibitive for any law enforcement agency. Therefore, allowing tiger bone trade from captive breeding facilities ultimately creates tremendous law enforcement difficulties and challenges the implementation of the new *Regulations for Import and Export of Endangered Species of Wildlife*, recently announced by China's Premier Wen Jiabao. China's enactment of the new regulation was hailed by conservation organizations worldwide as a commitment to better implementation of CITES. Yet these organizations warn that lifting the tiger bone trade ban would compromise its implementation and enforcement.¹³

Lack of law enforcement to crackdown on the current illegal tiger trade by these captive breeding facilities will likely be interpreted by the general public as government endorsement of the trade, compromising China's extensive public awareness efforts since 1993 to discourage trade in tiger parts and derivatives. Experience has shown that when both are available to the public, parts from wild animals are always preferred, as wild ingredients are recommended in the tenants of traditional Chinese medicine. This preference yields premium pricing to motivate poachers and smugglers, hastening the disappearance of tigers from the wild.

Trade of tiger bone wine in China, conducted in the name of traditional Chinese medicine, contradicts the wishes of the TCM community in China and around the world.¹⁴ Reputable TCM practitioners, educators and researchers support the ban on the use of tiger bone in medicine, and successfully use alternative ingredients to meet medical needs. The TCM community wishes to

¹³ Joint Letter to China's Premier Wen Jiabao from conservation organizations, CI, IFAW, STF, TRAFFIC, WCS and WWF

¹⁴ ACTCM, Letter to China Premier Wen Jiabao, September 2006

protect the reputation of TCM, and promotes the industry's global development, free of tiger bone and other highly endangered species of wildlife.¹⁵

The illegal trade in tiger bone and its derivatives compromises the extensive efforts invested by China, all tiger range and consumer countries, and CITES in conservation of this highly endangered species. Ultimately, trade of any kind will jeopardize the survival of tigers in the wild.

IV. Recommendations

IFAW recommends that the Chinese government:

- Reiterate the total and complete ban on the trade of tiger parts and derivatives from all sources and for any purpose.
- Coordinate multi-agency law enforcement action to shut down the tiger bone market.
- Initiate public awareness campaigns to reverse the damage already caused by the tiger trade in captive breeding facilities and join the TCM industry in promoting the development of TCM without the use of endangered species.
- Promulgate legislation that will make the trade of products claimed to contain endangered species a prosecutable offence no matter whether the product contains the said contraband. The burden of proof should not be put on law enforcement agencies.
- Stop the breeding of tigers on farms, safari parks, and zoos, and revoke operating permits for those facilities that have conducted illegal tiger trade.
- Accept technical guidance from the IUCN/SSC Cat Specialist Group in developing a comprehensive strategy for the restoration of viable wild tiger populations in China.
- Redouble efforts to enforce existing hunting bans to restore prey base for wild tigers in China.

Furthermore, IFAW recommends that other tiger range and consuming countries enhance law enforcement within their own borders and also across international borders to stop illegal tiger trade from all sources.

IFAW supports the documents submitted to the CITES Standing Committee by both the CITES Secretariat (SC54 Doc 25.1) and the United States (SC54 Doc 25.2) to generate political will from the highest levels of relevant governments, so as to ensure more effective and specialized enforcement efforts to stop the trade of tiger parts from all sources and for any purpose.

IFAW requests the Standing Committee to encourage other Parties and international organizations to provide financial assistance to support the recommended high-level diplomatic meeting and any further missions that might be required to eliminate the threats that trade poses to wild tigers.

¹⁵ Call, Elizabeth, *Mending the Web of Life—Traditional Medicine and Species Conservation*. IFAW and AHPA, 2006

Attachment 1

English summary translation

China Youth Daily Special Report

August 25th, 2006

ZHANG Kejia
Staff Reporter

Chinese online copy at the following address: <http://zqb.cyol.com/node/2006-08/25/zgqnb.htm>

National Ban Cannot Stop Tiger Bone Sales

Editor's Note:

As early as 1993, China's State Council issued a notice banning trade in tiger bone. On September 1, 2006, the new *Regulation on the Import and Export of Endangered Species* will be enacted. However, an investigation in Pingnan County, Guangxi Province, found that tiger bone wine sales are booming.

The State Forestry Administration claims that encouraging and supporting the trade of wildlife species from captive breeding facilities reduces and lessens the pressure on the same species in the wild. However, experts point out that lifting the tiger trade ban would seriously threaten the survival of wild tigers.

“This is a whole tiger carcass”, said a manager of Xiong Sen Wine Industries Limited Company as he lifted a skeleton from a huge vat of wine in an underground brewery on August 9, 2006.

Xiong Sen Wine Industries Limited Company is based in Pingnan County, Guangxi Zhuang Autonomous Region of China and is a production company within the famous Guilin Xiong Sen Tiger and Bear Farm. According to the factory's promotional literature, the main ingredients for its products are from wildlife species that have died at Xiong Sen Tiger and Bear Farm. It claims that it sells these products under special permission from the State Forestry Administration, the National Technical Inspection Bureau (formerly the Quality Control Bureau) and the district health bureau. The products include Xiong Sen brand bear bile wine, gecko wine and protect bone wine.

Pick any vat, you will find a tiger carcass

It is common knowledge that China joined the Convention on International Trade in Endangered Species of Fauna and Flora (CITES) in 1981. The tiger, one of the most endangered species, is listed on CITES Appendix I, which bans the international

commercial trade of tiger parts and derivatives. In 1993, the Chinese government issued the “Notice Banning Trade of Tiger Bone and Rhino Horn”. Since then, international and domestic trade of tiger products have been completely banned.

Yet, why is this company openly selling tiger wine?

The reporter showed surprise and skepticism about tiger wine, asking, “Are you sure this is made of genuine tiger bone?”

“Of course”, the manager replied. “I will open any vat you pick, and you will see that there is a whole tiger carcass inside.”

The underground brewery is dark and damp, ideal environment for brewing wine. The factory has three breweries, with a total capacity of 8,000 tons. Stopping halfway through the long room, the manager lifted the cover of one vat. The strong smell of wine hits the nostrils. The vat is chest high, much smaller than several rows of large vats in the room. The liquid inside is black and shiny. “Why is it this color? Isn’t it brewed with rice?” this reporter asks.

“These shorter vats contain older tiger bone wine — at least three years old. Those taller vats are brewed more recently. The color would be lighter.” The manager lifted a rope hanging on the edge of the vat, and a black carcass emerged. “See,” he said, “this is the tiger’s foot, its front leg and knuckles.”

The fur on the tiger paw and leg is vaguely visible. “Does each vat have one tiger carcass?”

“Yes”, the manager said as he lifted the carcass higher. “This is the tiger’s head and its teeth.” The tiger teeth are white, in contrast with the pitch black color of the other parts of the tiger body.

“How can you distinguish these are tiger bones from those of some other animal?”

“Tiger teeth are pointed, see, different from other animals,” the manager explained. “Every tiger has a tag put on its ear at birth. These are endangered animals. The tag references are kept in an archive, so the identity is unmistakable.”

“How old is this tiger?”

“I don’t know about that” he answered. “Feel the top of its mouth — quite rough.” He ladled up some wine and offered it for tasting.

This reporter declined.

“Don’t worry” he said. “It helps men to be strong, vigorous and to live longer. It helps women to have healthy bodies and skin. It cures illness and tones the body.” Noticing

the reporter is still hesitating, he added, “The director of the district always asks for this wine every time he visits. This vat has been brewing for eight years.”

According to the manager, the older the wine, the more effective it is. Wines currently on the market are at least three years old.

Deeper into the cellar, we stopped in front of another vat of about the same size. The manager explained that the vat contained more than 5,000 geckos, which are good for illnesses of the joints. “We have 400 vats each containing a tiger carcass in this cellar. Another cellar is being completed, which will increase our production capacity.”

Farm has special permission to sell tiger bone wine

According to the manager of Xiong Sen Wine Industry Limited Company, each tiger bone wine box has a special label documenting permission for its sale from the State Forestry Administration (SFA) and the State Industry and Commerce Administration (SICA). The products are sold in many places in China as well as Hong Kong, he said.

The packaging consists of a wooden box cradling a porcelain bottle made in the shape of a tiger and containing 500ml of wine. Some bottles are paired with a bottle of bear bile wine. Bear bile wines also carry labels from SFA and SICA.

The same wine was seen for sale at the Science Education Museum on the premises of the Xiong Sen Farm, at retail outlets in Nanning, Guilin, and Pingnan and at airports in Nanning and Guilin. They all carried labels saying “China Wildlife Sale and Utilization Management Special Marking”. However, the label listed the contents as “*panthera leo*”. The name of the wine also is called “Nurture Bone Wine”.

When a sales person opened the screw cap of a tiger-shaped bottle, the smell of wine was strong. On the Xiong Sen Farm premises, each bottle of six-year-old wine was priced at RMB846 (USD106). Three-year-old wine was priced as RMB420 (US\$52). In the Xiong Sen’s retail store in Pingnan, three-year-old wine carried a price of RMB330 (US\$41). However, at Nanning airport, a bottle of wine without an age label was priced at RMB1080 (US\$135).

The owner of Xiong Sen Farm and wine factory is named ZHOU Weisen. He set up the farm at China’s premier tourist attraction, Guilin, and placed the factory in his hometown, Pingnan, 300 km from Guilin.

“Boss Zhou has the only permit to sell tiger bone wine,” confirmed an official from Quangxi Autonomous Region Forestry Bureau, who also told us that the State Forestry Administration had given Zhou RMB7.5 million (US\$940,000) to help him with tiger breeding and brewery construction. He said that the farm sends its annual report directly to the SFA.

In a third floor office at the farm, the reporter saw a list of people from China and foreign countries who were invited by the State Forestry Administration in June 2006 to visit the farm. The visit was an effort to demonstrate the success of tiger breeding on the farm and the financial difficulties in developing the farm. The authorities reportedly are preparing to ask CITES for permission to lift the international tiger trade ban.

Earlier in 2006, this reporter heard of a document permitting limited trade in tiger bone in China. However, the document was kept a secret. No one has seen this permission document except officials of provinces that are home to large tiger farms.

“The ‘Nurture Bone Wine’ we are selling actually is tiger bone wine,” according to sales Xiong Sen sales personnel. “We have government permission to sell tiger bone. Who would dare to sell tiger bone without permission from relevant authorities?”

On the farm, this reporter saw a man who had just purchased a box of “Nurture Bone Wine” (eight bottles to a box) and was resting under a tree. He said that he got a volume discount of RMB500 per bottle.

“Did you buy the wine for yourself?” this reporter asked.

“No, it is for gifts,” the man replied. “When our company needs to make connections, the wine is a great door opener. The wine is really good.” H said a friend of his had rheumatism and was cured after drinking six bottles.

A passerby asked, “Can you get tiger meat at the restaurant?”

“Yes”, the man answered, “However, you have to pre-order. It is not served to everyone”.

“Is it expensive?”

Later, when *China Youth Daily* staff identified themselves at the restaurant and ordered tiger meat, they were told the restaurant did not have any.

Annual sale of 200,000 bottles of wine for profit in the millions

The promotional literature at Xiong Sen Tiger and Bear Farm and tour guides claim that the farm has more than 1,100 tigers of three tiger species (Amur, South China and Bengal), 400 Asiatic black bears and 250 African lions.

The brewery manager, however, claimed that the farm has more than 1,500 tigers, of which over 300 are “rented” to zoos in other cities to generate money to sustain the farm. He was very proud of the figures, saying, “We may not be the largest tiger farm in the world but I am sure this farm is the largest in the country.”

Everywhere this reporter went, farm employees reiterated that the farm does not have enough funds to feed its tigers.

Established in 1993, Xiong Sen Tiger and Bear Farm has 500,000 square meters of land. It has breeding, farming, “re-wilding,” tourism and exhibition activities. The farm’s original breeding stock of 60 tigers came from overseas, and it claims to have perfected tiger breeding with success rate of 96 percent. Its tiger numbers are set to exceed 1,500 in 2006.

The farm’s promotional poster depicts the tiger as a treasure chest. Quoting the ancient traditional Chinese medicine pharmacopoeia and renowned TCM doctor LI Shizhen, the poster claims that 5,000-year-old TCM uses tiger bone to treat numerous illnesses, from relieving the pain of rheumatism to strengthening muscles and bones.

The tiger bone wine can only be found in limited places in China, according to the brewery manager, and most buyers are Chinese. He claims that his facility sells 200,000 bottles a year, making in at the hundred million RMB level. “Because tiger trade is a sensitive issue internationally,” he said, “we will have to wait until after the 2008 Olympics to take the wine to the markets in Beijing and other cities.”

Still, the farm complains of not meeting expenses. “A thousand tigers eat about four tons of beef a day,” according to a tour guide. “We have to spend thousands of yuan to feed the tigers, let alone the other animals. The money earned from ticket sales, hundreds of tigers rented to other zoos for performances and the thousands of monkeys exported for experiments are not enough to sustain the expenses of the farm.” Said another employee, “The farm does not even have money to pay us”.

What smart businessman would make the mistake of breeding thousands of tigers that he can not afford to feed?

Why couldn’t an international treaty and State Council ban stop the tiger trade?

Would the tiger trade ban really be lifted after the 2008 Olympics?

Animal Experts: Tiger Conservation Does Not Need Captive Breeding

Bearing questions about the relationship between tiger farming in China and the conservation of tigers in the wild, the reporter interviewed well known biologist George Schaller, professor ZHOU Fang from Guangxi University and Dr. XIE Yan from China Academy of Science.

Wildlife conservation is not for profit and cannot be combined with development

“The Chinese term to describe ‘forestry administration’ is ‘forestry industry’”, according to Professor Zhou. “It is the word ‘industry’ where it goes wrong. Ecological conservation and wildlife protection are not for profit. They can never be connected with industry and development. Many wildlife nature reserves are promoting development yet

claiming wildlife conservation. As a result, the wildlife species and wild land they are supposed to protect are dwindling in population and size.”

Professor Zhou insisted that the key to tiger conservation is maintaining the ban on tiger products. This goal is obviously in contradiction with the goal of the businessmen who own tiger farms.

In fact, for many years, the discussion about whether conservation and development should be managed by different government entities has been ongoing. Because it involves the interests of many government agencies, the advice of conservation experts has been ignored.

Genetic purity of tigers on the farm is compromised

Xiong Sen Tiger and Bear Farm claims it carries the responsibility of being a rescue center for endangered and rare species.

According to Professor Zhou, after evaluating the tiger species at the farm, Chinese cat expert Professor WANG Yingxiang concluded that the genetic purity of tigers on the farm is compromised, as cross breeding of various tiger species has occurred there.

Professor Zhou downplays the so called ‘success rate’ of breeding tigers on the farm. “Tigers breed like cats,” he said. “In the wild, cubs usually stay with their mother for several years to learn essential skills. However, on farms, tiger cubs are taken away from their mother as early as within a few months so that the mother can breed again.”

Releasing captive bred tiger into the wild is dangerous

Dr. XIE Yan from China Academy of Science sees some merit in studying tiger behavior in captivity. However, she dismisses the conservation benefit of plans to “reintroduce” farmed tigers into the wild. Instead, she points out the dangers it creates.

Captive bred tigers lack basic skills such as killing prey, avoiding people, seeking partners, etc., needed to survive in the wild. If these captive tigers are ever released into the wild, they will be a threat to local people and livestock, who are much easier to catch than wild prey. Furthermore, captive bred tigers are more used to people and if they innocently approached people, it could be misinterpreted as a threat. This could lead to people killing tigers.

Dr. Xie also said that introduction of captive tigers could potentially introduce diseases for which tigers in the wild have no immunity. She points out that South China Tiger is already extinct in the wild and that introducing some of the many Siberian tigers on farms into the wild will do nothing to revive South China tiger populations.

Instead, Dr. Xie said, “the best way to protect wild tigers in China is to enhance habitat protection. The South China tiger has become extinct, but about 20 Siberian tigers still

roam at the border area between China and Russia. If we leave enough space for them and protect enough prey, their population will bounce back quickly.”

Re-introduction of South China tiger from captivity is not possible

Dr. George Schaller of the Wildlife Conservation Society has studied large predator species such as tiger, leopards and lions for several decades. He points out there is limited evidence for successful introductions of captive-born felids into the wild.

Both Dr. Schaller and Dr. Xie point out that the genetic background of the great majority of tigers in Chinese farms is not known, and it is not possible to trace them back to undiluted wild founder stock. Dr. Xie said, “If the need truly existed to reintroduce captive-bred Amur tigers, there is a large and genetically diverse population already held in the world's zoos.

The genetic breeding strategy in farming is in complete opposition to the breeding strategy for conservation. Farming aims to produce maximum amount of ‘product’ by breeding as much as possible, breeding continually and breeding preferentially from animals that are “high yielders”. In contrast, conservation breeding programs aim to conserve the maximum genetic diversity with exactly the opposite approach — keeping the interbirth interval as long as possible and breeding equally from all genetic lines. The first deliberately aims to narrow the gene pool, while the second to conserve it. Hence, any population farmed for generations is genetically compromised and severely handicapped for wild survival.”

State Forestry Administration: Encourage and Support Trade of Captive Bred Species

According to Xinhua News Agency report, the State Forestry Administration (SFA) spokes person CAO Qingyao said the Chinese government encourages and supports the trade of wildlife species from captive breeding facilities to reduce the pressure on wild species.

Cao proclaims that a series of books have been published and regulations promulgated to control trade of endangered species.

Lifting the Tiger Trade Ban Will Seriously Threaten the Survival of Wild Tigers

The reappearance of tiger bone wine on China’s domestic market after disappearing for over a decade has caused grave concerns within the country and internationally.

Asia Regional Director for the International Fund for Animal Welfare (IFAW), Grace Ge Gabriel said, “After 20 years of tiger conservation and trade prohibition, tigers in the wild are still in a precarious situation. At this time, lifting the tiger trade ban will inevitably

stimulate market demand and push them closer towards extinction. It will also cause great damage to China's image.”

Director of the Campaign Against Tiger Trafficking (CATT) Judy Mills said, “The world human population is dramatically increasing while the wild tiger population is now reduced to possibly fewer than 4,000. Lifting China's trade ban will satisfy the greed of a few tiger farmers yet destroy years of effort by the world to save tigers in the wild.”

The reason why is simple. Most people believe that bones from wild tiger are more effective than bones from captive tigers whose genetic diversity is greatly compromised. While it costs thousands of dollars to captive breed a tiger, it costs as low as a dollar to get a bullet or a trap to kill a tiger in the wild. This dead wild tiger can bring thousands to the poacher.

President of American College of Traditional Chinese Medicine Lixin Huang has long been concerned about tiger conservation. She said the TCM community has removed tiger bone and tiger penis from its Materia Medica and found alternatives to treat patients. She told this reporter that the World Federation of Chinese Medicine Societies is working with various Chinese government agencies and the conservation community to prepare a gift to the 2008 Olympics — a declaration that TCM does not need tiger bone.

Some tiger farmers argue that tiger farming is the same as farming cows and pigs. Captive breeding is for utilization, they say. Since trade from farms is within China, it is not violating CITES.

However, conservation groups like WWF and IFAW recently brought to light the precarious situation for wild tigers in India. Among the 24 tiger reserves in India, Sariska Tiger reserve has completely lost its tiger population. Many others have seen dramatic reductions of tiger numbers due to poaching. At the same time, the Indian government admits that at least 122 tigers have been killed by poachers since 1999.

One other problem is that it is not possible to distinguish tiger bone from captive bred tigers from that of wild tigers. The domestic trade in China will inevitably stimulate the market demand, motivate tiger poaching and create law enforcement difficulties.

Rumor has it that relevant government agencies last year considered allowing limited legal trade of tiger bones from captive tigers (a maximum 30 carcasses per year). However, that was dismissed as just a rumor, although farms have already put 400 tigers into wine vats for commercial sale. The attraction of huge profit is obvious.

Relevant Laws and Regulations about Tiger Bone Use in China

In 1993, China's State Council promulgated the “Notice Banning Trade of Tiger Bone and Rhino Horn”, making it very clear that any manufacturing or trading of tiger bone or medicines containing tiger derivatives was illegal.

1995, China's Health Ministry removed tiger bone from the list of ingredients in the official traditional Chinese pharmacopoeia.

2001, China established a tiger conservation strategy.

Attachment 2

Joint Statement on China's New Regulation for Import and Export of Endangered Species of Wildlife

September 1, 2006

Dear Honorable Premier Wen Jiabao,

We, representing conservation NGOs and researchers, wish to congratulate the People's Republic of China on implementation of its new *Regulations for Import and Export of Endangered Species of Wildlife*. This step greatly enhances China's ability to control wildlife trade, implement the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and reduce trafficking in endangered species regulated by CITES.

China, which has been a CITES Party since 1981, has gone beyond the requirements of the Convention in notable ways. One of China's most commendable actions was its decision in 1993 to ban all domestic trade in parts and derivatives of the highly-endangered tiger. In this way, China established itself as a leader in CITES efforts to save dwindling wild tiger populations hit hard by commercial demand for their bones for use in medicines and health tonics.

The most comprehensive scientific study of tiger habitats ever done, released in July 2006, concluded that tigers now occupy 40 percent less habitat than they were thought to inhabit a decade ago. Meanwhile, some experts estimate that tiger numbers may have dipped well below 5,000 in the wild. In China, it is estimated that fewer than 20 wild tigers remain in the north-east and about 30 roam a corner of China's south-west along its borders with Myanmar and the Lao PDR. With fewer than 50 wild tigers in China, any poaching will drive the species quickly to extinction.

The recent proposal by China's tiger farms to legalize trade in tiger parts and derivatives will jeopardize the great efforts that the Chinese government and the world have invested to save wild tigers. Given that bones of wild tigers cannot be distinguished from those of farmed tigers, legal trade of any kind would open opportunities for criminals to "launder" the parts of wild tigers and sell them to hapless consumers as farmed parts. Consequently, legalizing trade in tiger parts and derivatives sends a wrong message to the public and might stimulate the increase of consumption, which will seriously challenge China's success in public education on wildlife conservation in past decades. Furthermore, it will also create enormous difficulties for wildlife law enforcement agencies in their implementation and enforcement of the new CITES regulation.

We hope that China, in the spirit of its new CITES implementing law and the upcoming 2008 Green Olympics, will discourage the consumption of endangered wildlife in general, reiterate its commitment to the 1993 ban of trade in all tiger derivatives from all sources,

and thereby continue to play a responsible leadership role in protecting the world's few wild remaining tigers.

Sincerely,

Conservation International
International Fund for Animal Welfare
Save The Tiger Fund

TRAFFIC
Wildlife Conservation Society
World Wide Fund for Nature

Cc: American College of Traditional Chinese Medicine
Beijing Organizing Committee for the Games of the XXIX Olympiad
CITES Management Authority of China
CITES Secretariat
CITES Standing Committee
The Endangered Species Scientific Commission of China
IUCN-Cat Specialist Group
IUCN-Species Survival Commission
IUCN-World Conservation Union
Olympic Sport & Environment Commission
Ministry of Foreign Affairs
Ministry of Science and Technology
State Administration of Customs
State Administration of Traditional Chinese Medicine
State Environmental Protection Administration
State Forestry Administration
World Federation of Chinese Medicine Societies

Attachment 3



AMERICAN COLLEGE OF TRADITIONAL CHINESE MEDICINE

August 27, 2006
2006年8月27日

Dear Honorable Premier Wen Jiabao:
尊敬的温家宝总理:

On behalf of the Council of Colleges of Acupuncture and Oriental Medicine (CCAOM) in the United States and the American College of Traditional Chinese Medicine (ACTCM), I wish to congratulate the People's Republic of China on its new wildlife trade-control regulation, which came into effect on September 1. China also deserves praises for its existing ban on trade in derivatives from the tiger, one of the most endangered species in the world.

我谨代表美国针灸与东方医药学院理事会以及美国中医药学院，对中国九月一日颁布的《中华人民共和国濒危野生动植物进出口管理条例》表示衷心的祝贺。多年以来，中国打击野生动植物非法贸易的决心有目共睹，尤其是现行的对老虎及其制品的国内贸易禁令为保护这一世界最濒危的物种之一发挥了至关重要的作用，得到国际舆论高度称赞。

Since the 1993 prohibition was put in place, the Chinese government has removed tiger bone from the list of ingredients in the traditional Chinese pharmacopoeia and has made it very clear that any manufacturing or trading of Chinese medicine containing tiger bone is illegal. Traditional Chinese medicine doctors, researchers, educators and the public, in China and throughout the world, support this ban and successfully use substitute ingredients to meet medical needs. In 1999, the U.S. traditional Chinese medicine education community and wildlife conservation community, working together with the State Administration of Traditional Chinese Medicine and several other Chinese government agencies, held an international symposium entitled "Healthy People, Healthy Planet", an effort to address the development of TCM and the conservation of endangered species, such as tigers in the wild.

自从1993年虎制品贸易禁令颁布之后，中国政府将虎骨从《中国国家药典》中删除，明令宣布所有与虎骨相关的中药加工与销售为非法行为。中国和世界各地的中医学、科研人士、教育人士以及广大群众纷纷响应拥护该禁令，转而使用虎骨替代品以满足医疗需求。1999年，美国中医药学界、野生动物保护界与中国国家中医药管理局以及若干相关政府机构携手举办了题为“健康人类，健康星球”的国际研讨会，旨在探讨中医药发展与保护濒危物种（例如野生虎）的生存和谐并进的策略。

Traditional Chinese Medicine is a treasure of China, and is accepted by many countries in the world. TCM promotes balance and harmony, which is reflected in both medicine and nature. We work together with the conservation community to protect tigers and other endangered species from disappearing in the wild. China's 1993 trade ban ensured the world that the TCM industry would not create any threats to wild tigers. Traditional Chinese Medicine educators and practitioners fully support continuation of the tiger trade ban.

中医学是中华文明的瑰宝，在世界各地广为流传，影响深远。无论医疗还是自然中，中医均强调平衡与协调的理念。我们携手与全球保护领域的专家共同为保护老虎以及其他濒危物种而不懈努力。

中国 1993 年的虎制品贸易禁令的颁布，更是确保了中医不成为驱使野生老虎走向灭绝的原因。中医药届的广大教育工作者和医疗工作者一致拥护并呼吁重申该贸易禁令。

As China approaches the 2008 Olympics, the TCM education community in US wishes to offer a gift to the Green Olympics by stating, strongly and without condition, that we support China in enforcing its wildlife trade-control laws, in particular the existing ban on trade in tiger derivatives from any and all sources. We wish China take a lead in promoting healthy people and healthy planet.

随着 2008 年奥林匹克运动会的日益临近，在美国的中医药业界秉承绿色奥运精神值此郑重承诺，我们将坚定不移地支持中国政府贯彻加强野生动植物贸易管理政策，尤其是现行老虎及其制品的贸易禁令。我们衷心希望中国继续成为倡导“健康人类，健康星球”的主导力量。

Sincerely,

此致

敬礼！

Lixin Huang, MS

黄立新

President, Council of Colleges of Acupuncture and Oriental Medicine (US)

美国针灸与东方医药学院理事会主席

President, American College of Traditional Chinese Medicine (US)

美国中医药学院院长