

EIA Briefing for the 18th Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora

STOP THE SLAUGHTER:

Close Domestic Rhino
Horn Markets

August 2019





Source: Lisa Grossman

ABOUT EIA

For over 25 years as a nonprofit organization, EIA has pioneered the use of undercover investigations to expose environmental crime around the world. Intelligence reports, documentary evidence, campaigning expertise and an international advocacy network enable EIA to achieve far-reaching environmental protection by spurring changes in market demand, government policy and enforcement related to global trade in wildlife and environmental products.

ACKNOWLEDGMENTS

The Environmental Investigation Agency, Inc. wishes to thank The Tilia Fund and one private donor for their support.

Front cover and above: Southern white rhinoceroses (*Ceratotherium simum simum*) in Kruger National Park, South Africa. Source: Lisa Grossman

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INTRODUCTION

Domestic legal markets for rhinoceros parts and derivatives provide opportunities to launder illegal rhino products, increase the burden on law enforcement, send mixed messages to consumers, and stimulate demand thereby undermining years of demand reduction efforts.

Many Parties have already taken steps to close their domestic markets; however, recent policy pronouncements by China, signaling an intention to once again allow rhino horn use in traditional medicine, and the legalization of domestic trade in South Africa present new threats to all rhinoceros species.

The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) has prohibited international commercial trade in rhino horn since 1977. The international trade ban has been most successful when Parties affected by rhino poaching and illegal rhino horn trade have instituted and enforced their own supporting domestic trade restrictions. For example, the closure of China's and the Province of Taiwan's domestic rhino markets in the early 1990s had an enormous impact on the reduction of rhino poaching rates in Africa.

Unfortunately, the successes brought about by the CITES ban are currently being undermined by policies that encourage domestic trade in and use of rhino horn.

CONSERVATION STATUS

More than 9,200 rhinos have been poached across Africa since 2006 to meet demand for rhino horn primarily from China and Vietnam.¹ Both white and black rhinos are targeted for their horn, but white rhinos have borne the brunt of the killing since poaching rates began to escalate in 2006. The white rhino population has steadily declined for the past seven years, down to an estimated 18,067 today from 21,320 in 2012, due to unsustainable poaching rates, exacerbated by prolonged drought throughout much of the rhino's range in recent years.²

The continental black rhino population has been increasing gradually for the past several years although they remain Critically Endangered, according to the International Union for Conservation of Nature (IUCN). At an estimated 5,495 animals, the population remains far below the 850,000 rhinos that once roamed Africa a century ago before widespread poaching nearly wiped out the entire species.³

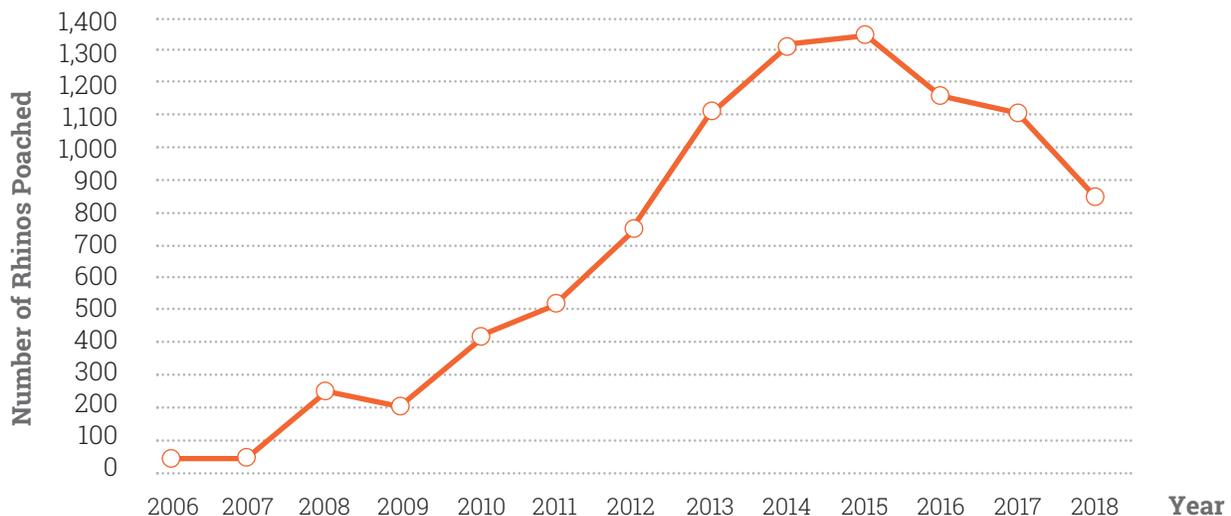
Of the three Asian rhino species, the greater one-horned rhino is the most numerous with an estimated population of 3,588. At least 141 greater-one horned rhinos have been poached since 2013, though some sub-populations have exhibited incremental increases in recent years. Both the Sumatran and Javan rhino are classified as Critically Endangered by the IUCN with dangerously low populations estimated to be between 40-78 and 65-68 rhinos, respectively.⁴

CITES RHINO BACKGROUND

International commercial trade in rhino horn has been prohibited by CITES since 1977, yet it took nearly 20 years before the ban was widely implemented by the most affected source, transit, and destination countries on the rhino horn trade chain. Ten years after the ban was put in place, the inextricable link between domestic rhino horn markets and the continued rampant rhino poaching led the IUCN to call for the elimination of all domestic rhino horn trade at CoP6 in 1987.⁵ CITES Parties heeded this advice and adopted Resolution Conf. 6.10 *Trade in rhinoceros products*, which explicitly urged Parties to immediately establish a complete prohibition on all internal and international trade in rhino horn and other rhino parts and derivatives. The Resolution also recommended that Parties “use all appropriate means (including economic, political and diplomatic)” to pressure countries to enact and enforce domestic rhino horn trade bans.

After Resolution Conf. 6.10 was adopted, several major rhino horn consumer countries ignored the strengthened CITES regulations and continued to allow domestic trade in rhino horn.⁶ The Province of Taiwan, which had imported more than 7.2 tons of rhino horn between 1972 and 1985, refused to close its domestic market and was not enforcing the international trade ban. China's traditional medicine industry continued producing medicines containing rhino horn for internal sale and export years after the CITES ban on international trade in rhino horn was adopted, and ignored its CITES obligation to close its domestic rhino horn market until the early 1990s.⁷

Rhinos Poached Across Africa 2006-2018



Data Sources:

CoP18 Doc. 83.1 Annex 2

Xinhua. 2019. 57 rhinos, 26 elephants poached in Namibia last year. Available at: http://www.xinhuanet.com/english/2019-02/12/c_137813872.htm

South Africa Department of Environmental Affairs

The continued non-compliance with Resolution Conf. 6.10 compelled the CITES Standing Committee to warn China and the Province of Taiwan that Parties would suspend trade if actions were not taken to eliminate domestic trade in rhino horn.⁸ The United States subsequently enacted trade sanctions against the Province of Taiwan for its continued rhino horn trade.⁹

By 1993, China and the Province of Taiwan finally took the historic step to ban domestic trade in rhino horn. China instituted a comprehensive ban on the import, export, and domestic trade in all rhino horn, including in traditional medicine. Rhino horn was removed from the traditional Chinese medicine pharmacopeia and remaining stockpiles were ordered to be registered and sealed.¹⁰ Both China and the Province of Taiwan enforced their rhino horn trade bans and succeeded in significantly reducing demand, largely eliminating their domestic rhino horn markets.

The bans by China and the Province of Taiwan led to a dramatic decrease in rhino poaching rates.¹¹ Rhino populations worldwide began to stabilize, some at very low levels, and began to increase. By the time this poaching onslaught subsided in the mid-1990s, several African countries had lost their entire rhino populations and black rhino numbers had plummeted to less than 2,500 from a population numbering approximately 100,000 in 1960.¹² This relative calm would last for over a

decade until the situation began to deteriorate in South Africa. Poaching rates skyrocketed as mismanagement by the government agencies responsible for wildlife conservation and law enforcement, exemplified by the loss of control over the country's trophy hunting industry and the dismantling of the police's Endangered Species Protection Unit, incited new, fast-growing demand for rhino horn in Vietnam and renewed demand in China.

In 1994, Resolution Conf. 6.10 was repealed and replaced by a much weaker and ineffective Resolution Conf. 9.14, *Conservation of and trade in African and Asian rhinoceroses*, at CoP9. While Resolution Conf. 9.14 (Rev. CoP17) has since benefited from some useful revisions by Parties, it still lacks the critical provision on domestic rhino horn trade as set out in Resolution Conf. 6.10, and in its current form does not provide the legal mandate to CITES Parties to close domestic rhino horn markets.

RENEWED CHINESE DEMAND FOR RHINO HORN

Today, global seizure data emphasizes the continued significant demand for rhino horn in China. China, including Hong Kong SAR, is the primary destination for poached rhino horn, with more than 1.9 tons (representative of up to 693 rhinos) from seizures made in China and around the world linked to the country since 2006.¹³ Much of the demand for rhino horn in China today is for carved trinkets and jewelry.¹⁴ A 2018 USAID study on Chinese consumer attitudes toward illegal wildlife products found that 15 percent of the general population believed buying rhino products to be socially acceptable.¹⁵ Eight percent of those surveyed had purchased rhino products in the past year.

While carved objects may be the most coveted rhino horn products in China, the demand for traditional medicine products containing rhino horn was never completely eliminated. After the 1993 ban, Chinese pharmaceutical companies switched to buffalo horn as a substitute for rhino horn used in traditional medicine products. However, according to the head of a pharmaceutical plant in Shanxi province, some companies continued to illegally use rhino horn as an ingredient after the Chinese ban was instituted.¹⁶ Some Beijing drugstores are even buying back medicine containing rhino horn produced before 1993 and reselling it for a major profit.¹⁷

A NEW POLICY FOR RHINO HORN AND TRADITIONAL CHINESE MEDICINE?

In October 2018, China's State Council repealed the ban on domestic rhino horn and tiger bone trade that had been in place for a quarter century and replaced it with a new policy allowing the use of rhino horn and tiger bone from farmed animals for medicinal purposes.¹⁸

Precedent for Addressing Domestic Trade

There is a strong CITES precedent for addressing domestic trade in specimens of species at risk from heavy trade in their parts and derivatives, such as Tibetan antelope, Asian big cats, rhinos, and elephants.

For instance, before it was replaced by Resolution Conf. 9.14 (Rev. CoP17), Resolution Conf. 6.10, *Trade in rhinoceros products*, urged "a complete prohibition on all sales and trade, internal and international, or rhinoceros parts and derivatives, especially horn..." At CoP17 (Johannesburg, 2016), Parties acknowledged the role domestic ivory markets play in the ongoing slaughter of the world's elephants and agreed to amend Resolution Conf. 10.10 (Rev. CoP17), *Trade in elephant specimens*, to recommend "that all Parties and non- Parties in whose jurisdiction there is a legal domestic market for ivory that is contributing to poaching or illegal trade, take all necessary legislative, regulatory and enforcement measures to close their domestic markets for commercial trade in raw and worked ivory as a matter of urgency."



Source: General Administration of Customs, P.R. China

Six suspects arrested and 25.95 kg of rhino horn seized on January 19, 2018, by the Guangzhou Customs Anti-Smuggling Bureau. The suspects are believed to be part of a criminal syndicate that smuggled more than 300 kg of rhino horn from South Africa to China.

Despite purported safeguards, implementing this policy could be disastrous for the world's rhinos. As the primary market for rhino horn, China's decision to roll back its domestic trade ban could lead to a surge in demand causing poaching and illegal trade to skyrocket. A parallel legal market in parts and derivatives of farmed specimens will provide opportunities to launder illegal rhino products, increase the burden on law enforcement, send mixed messages to consumers, and undermine years of demand reduction efforts. Without DNA analysis it is impossible for authorities to distinguish between legal and illegal rhino horn powder.

When the change in policy was announced, it was quickly and widely condemned by government officials, conservation organizations, and members of the public in China and around the world. Three weeks later, State Council Executive Deputy Secretary-General Ding Xuedong announced that implementation of the policy would be postponed while the "three strict bans" (import/export, domestic trade, and use in medicine) would continue to be enforced. The government also committed to organizing "special crackdowns" on the illegal trade in rhino and tiger parts.¹⁹

Despite this announcement the October 2018 State Council order has never been legally repealed and continues to be listed on the State Council website as a valid policy. At least one Chinese province has taken subsequent action to implement the new policy. In March 2018, the Shaanxi Provincial Government issued a notice entitled "Strengthening the Supervision of the Operation and Utilization of Rhinoceros and Tigers and Their Products" to implement the October State Council order.²⁰ The Shaanxi notice states that the sale, use, import, and export of rhino products shall be allowed under "special circumstances" subject to an administrative permit. There was no mention of the 1993 policy that banned domestic rhino horn trade. A day after the notice was posted, the state-run press agency, Xinhua, published an article covering the policy

that reiterated this notion of "special circumstances" for horn utilization and trade.²¹

Article 27 of China's Wildlife Protection Law (WPL) details some of the exemptions under which protected species may be traded, including "for scientific research, captive breeding, public exhibition or performances, heritage conservation or other special purposes".²² China's National Forestry and Grassland Administration (NFGA) is the agency responsible for issuing permits for the breeding, sale, and use of rhinos and their parts and derivatives in accordance with Article 27 of the WPL.²³ Article 28 of the WPL further outlines a mechanism for commercial trade in captive-bred specimens of a protected species, without a need to meet one of these exemptions, if the species is added to a "utilization list".

While it is unclear exactly what prompted the State Council to amend the 25-year ban on rhino horn trade in October 2018, what is clear is that elements of the traditional medicine industry have planned to reintroduce rhino horn medicine onto the market for years and invested significant resources toward achieving this goal. At least one pharmaceutical company began importing rhinos from South Africa in 2001 to establish its own private rhino farm to produce rhino horn for traditional medicine products. Based in Yunnan, the Shilin Longhui Wildlife Research Center now houses more than 100 rhinos, at least 49 of which have been born at the facility.²⁴ In the months leading up to the announcement of China's new rhino horn policy, the company's registered capital increased from RMB10 million (USD1.5 million) to RMB90 million (USD13.4 million), and the major pharmaceutical conglomerate Topsun Group (Xi'an Dongsheng Group Co., Ltd.) acquired a 20 percent stake in the company.

SOUTH AFRICA LEGAL TRADE

Although there is no traditional market for rhino horn in South Africa, domestic trade in rhino horn is legal in the country. A moratorium on domestic rhino horn trade was previously put in place in 2009 as rhino poaching levels were starting to spiral out of control and the existing regulatory framework for rhino management and trade was increasingly exploited. Pro-trade advocates responded by suing the government, and in April 2017 the South Africa Constitutional Court made a ruling that resulted in the repeal of the domestic trade ban based on the finding that the Department of Environmental Affairs (DEA) made a procedural error during the process of adopting the moratorium.²⁵

Before the moratorium was enacted, legal domestic rhino horn trade in South Africa provided opportunities to launder illegally sourced rhino horn onto the legal market and eventually make its way to consumers in Asia. The DEA itself recognized this in a 2014 analysis it conducted on the viability of legalizing domestic trade in horn, which ultimately recommended leaving the moratorium intact.²⁶ South Africa's permit system for



82.5 kg of rhino horns from South Africa destined for Malaysia seized by Hong Kong Customs. Several of the horns exhibit physical characteristics associated with re-growth after a de-horning procedure, suggesting they could have been sourced from a private stockpile.

possession and sale of rhino horn was taken advantage of by dealers who would sell multiple horns under the same permit, sometimes for weeks or months at a time. In one of South Africa's most high-profile rhino horn poaching and trafficking cases, Dawie Groenewald, together with his network of accomplices dubbed the "Groenewald Gang", is believed to have sold nearly 400 illegal rhino horns into trade aided by the falsification of permits, including using expired permits, applying for fraudulent rhino translocation permits, and reusing the same microchip numbers on multiple permits. Groenewald also organized dozens of illegal hunts on his farm to obtain rhino horn before attempting to hide the evidence by destroying or selling the rhino carcasses.²⁷

Half of the continental white rhino population (more than 9,000 rhinos) are privately owned, primarily by South Africans.²⁸ Many private rhino owners regularly dehorn their rhinos as a security precaution and/or to stockpile the horn for eventual sale.²⁹ As a result, a significant volume of rhino horn has been stockpiled throughout the country, though the total amount of rhino horn sitting in privately-held stockpiles is unknown as rhino owners are reluctant to share this information. An unofficial estimate from 2016 put the total weight of all private stocks at around 10 tons, and South Africa reported that an additional 5.65 tons were added to private stockpiles in 2017.³⁰ Without accurate, regularly updated estimates of privately held stockpiles, it is impossible to ensure stockpiled horn does not enter illegal trade and prevent illegal horn from being laundered through legal stockpiles.

As of February, 2019, the DEA had issued 15 permits for the sale of 1,342 rhino horns. Nineteen permits were issued to purchase rhino horns, though the amount of horn actually purchased has not been publicly disclosed.³¹ Some private citizens are actively marketing

their stockpiles to potential buyers in Vietnam and China by touting rhino horn's investment potential and suggesting buyers work raw horn into products like jewelry to increase its value.³² A high-profile online rhino horn auction held in 2017 made no secret that Asian nationals were a target consumer base by providing Chinese and Vietnamese language options on the auction website.³³

Proponents of rhino horn trade argue that South Africa has sufficient regulatory safeguards in place to prevent the laundering of illegally-sourced rhino horn into trade. However, the Government of South Africa has so far failed to adopt domestic rhino horn trade regulations more than two years after the repeal of the moratorium. Moreover, recent seizures in China and South Africa appear to indicate that South Africa's legal market is contributing to illegal trade in rhino horn, and South African nationals have been arrested in China attempting to smuggle rhino horn into the country.³⁴

For instance, on 5 April 2019, Hong Kong customs seized 82.5kg of rhino horn from a flight originating from South Africa.³⁵ The horn shipment was reportedly destined for Malaysia, though it is unlikely this would be its final destination. Images of the seizure show dozens of rhino horn pieces with the physical characteristics of horn that has re-grown after a dehorning operation.

Recent seizures in China and South Africa appear to indicate that South Africa's legal market is contributing to illegal trade in rhino horn.

On 13 April 2019, South Africa's Directorate for Priority Crime Investigation arrested two men in North West province in possession of 167 rhino horns, which were destined for "South East Asian markets" according to the official police statement.³⁶ The horns originated from the private stockpile of John Hume, a rhino breeder and ardent rhino horn trade advocate who possesses the largest privately-owned herd of rhino in the world, who sold the horns to an unnamed buyer in Eastern Cape. The men were allegedly bringing the horns to the buyer, but lacked the required transport permits to do so. Under the sales agreement between Hume and the buyer, Hume was supposed to receive payment after the buyer re-sold the horns, presumably to clients in Southeast Asia based on the allegations made by the police. Because the buyer never received the horns, Hume was never paid and is claiming the horns are still his property.³⁷

CONCLUSION

History has demonstrated that domestic prohibitions on the trade in rhino horn are essential to disrupt illegal international trade. Domestic markets for rhino horn severely crippled the CITES international trade ban for 15 years after it entered into force and facilitated the slaughter of thousands of rhinos in the 1970s and 1980s.

Only after CITES Parties called for the closure of domestic markets and consumer countries took meaningful action to eliminate internal trade did rhino poaching rates eventually subside.

The demand for rhino horn traditional medicine products played a central role in the previous rhino poaching crisis. If elements of the traditional medicine industry in China prevail in their push to revive the use of rhino horn, this could trigger a new wave of rhino poaching fueled by intensified consumer demand. Recent seizures in Africa and Asia suggest that South Africa's legal domestic market may be contributing to the illegal international trade in

rhino horn. It is incumbent upon authorities in source, transit, and destination countries to work collaboratively to thoroughly investigate these cases and utilize South Africa's comprehensive rhino DNA database to identify the source of the seized horn.

CITES Parties must demonstrate a unified front against all trade in rhino horn by amending Resolution Conf. 9.14 (Rev. CoP17) to urge the closure of all domestic markets for rhino horn as a matter of urgency thereby ensuring effective implementation of the international ban on rhino horn trade and providing critical protections for the world's rhinos.

RECOMMENDATIONS

FOR PARTIES AT COP18

- Adopt the proposed revisions to Resolution Conf. 9.14 (Rev. CoP17) presented in CoP18 Doc. 83.2 to urge Parties to close all existing domestic markets for trade in raw and worked rhinoceros horn or other rhinoceros parts and derivatives as a matter of urgency
- Reject CoP18 Prop. 8, which seeks to remove the existing annotation for Eswatini's population of southern white rhinoceros to allow international commercial trade in rhinoceros horn

FOR CHINA

- Issue a new State Council notice that comprehensively bans all trade in rhino and big cat parts, products, and derivatives, including from captive sources
- Shut down all facilities that breed rhinoceroses for any purpose other than solely for conservation
- Ensure rhinoceros horn is not added back to the traditional medicine pharmacopeia
- Audit and publicly declare private and government-held stocks of rhinoceros horn
- Continue and enhance law enforcement operations to dismantle rhinoceros horn trafficking syndicates, cooperating with all relevant national and foreign authorities
- Utilize the form for rhinoceros horn sample collection contained in the Annex to Resolution Conf. 9.14 (Rev. CoP17) and institute a standard protocol to share samples of seized horn with the South African authorities for analysis using the RhODIS database
- Implement rhinoceros horn demand reduction campaigns that incorporate carefully targeted behavior change interventions

FOR SOUTH AFRICA

- Close the domestic market for rhinoceros horn
- Conduct a mandatory audit of private rhino horn stockpiles and institute a policy of random, unannounced stockpile inspections by the DEA
- Formally adopt and implement the National Integrated Strategy to Combat Wildlife Trafficking
- Continue and enhance law enforcement operations to dismantle rhinoceros horn trafficking syndicates, cooperating with all relevant national and foreign authorities

REFERENCES

1. CITES 18th Conference of the Parties 2019. CoP18 Doc. 83.1 Annex 2 African and Asian Rhinoceroses – Status, Conservation and Trade
2. Id.
3. Emslie, R. 2012. *Diceros bicornis*. The IUCN Red List of Threatened Species 2012: e.T6557A16980917. <http://dx.doi.org/10.2305/IUCN.UK.2012.RLTS.T6557A16980917.en>.
4. CoP18 Doc. 83.1 Annex 2
5. CITES 6th Conference of the Parties 1987. CoP6 Doc. 6.25 Annex 1 Status of Rhino Populations and Associated Trade in Rhino Products
6. Song, C., & Milliken, T. (1990). The rhino horn trade in South Korea: still cause for concern. *Pachyderm*, 13, 5-11.
7. Id., Vigne, L., & Martin, E. B. (1989). Taiwan: the greatest threat to the survival of Africa's rhinos. *Pachyderm*, 11, 23-25.
8. CITES 29th Standing Committee. 1993. Summary Report. Available at: <https://www.cites.org/sites/default/files/eng/com/sc/29/E29-SumRep.pdf>
9. Kenworthy, T. 1993. U.S. Pressures China, Taiwan on Animal Trade [Washington Post]. Available at: https://www.washingtonpost.com/archive/politics/1993/06/10/us-pressures-china-taiwan-on-animal-trade/d4b27f5b-641a-4019-8647-644b8a6dfba6/?utm_term=.5c7a2f02214e
10. Circular of the State Council on banning the trade of rhinoceros horn and tiger bone. 1993. Available at: https://eia-international.org/wp-content/uploads/State-Council-Ban-on-Tiger-Bone-and-Rhino-Horn_1993_ENG1.pdf
11. Reeve, R. (2014). Policing international trade in endangered species: the CITES treaty and compliance. Routledge.
12. Emslie, R. 2012. *Diceros bicornis*. The IUCN Red List of Threatened Species 2012: e.T6557A16980917. <http://dx.doi.org/10.2305/IUCN.UK.2012.RLTS.T6557A16980917.en>.
13. EIA calculation. Data available upon request. Includes seizures made in China and seizures made in other countries involving Chinese nationals or where China has been identified as the intended destination.
14. Rademeyer, J. (2016). Tipping Point: Transnational organised crime and the 'war' on poaching. Part 1 of a 2-part investigation into rhino horn trafficking in Southern Africa. Global Initiative against Transnational Organized Crime, Geneva, Switzerland.
15. USAID Wildlife Asia (2018). Research Study on Consumer Demand for Elephant, Pangolin, Rhino and Tiger Parts and Products in China (English): USAID Powerpoint presentation of Globescan study results. 12 June 2018. https://www.usaidwildlifeasia.org/resources/reports/usaaid_china_wildlifedem-and-reduction_english_presentation_june12_2018_final.pdf/view.
16. Han, Z. and Yuqiao, J. 2019. Auctioned rhino horn-filled pill priced much more than medicinal value: insiders [Global Times]. Available at: <http://www.globaltimes.cn/content/1136903.shtml>
17. Id.
18. Notice of the State Council on Strictly Controlling the Operation and Utilization of Rhinoceros and Tigers and their Products. 2018. Available at: http://www.gov.cn/zhengce/content/2018-10/29/content_5335423.htm
19. 2018. State Council Executive Deputy Secretary-General Ding Xuedong Answers Media Questions [China.org.cn]. Available at: http://www.china.org.cn/china/Off_the_Wire/2018-11/12/content_71941870.htm?from=groupmessage&isappinstalled=0
20. EIA. Chinese Government document signals decision to open tiger trade is quietly going ahead. Available at: <https://eia-international.org/chinese-government-document-signals-decision-to-open-tiger-trade-is-quietly-going-ahead/>
21. Yunfei, E. 2019. 陕西将加强对犀牛老虎及其制品经营利用活动的监管[Xinhua]. Available at: http://www.sn.xinhuanet.com/2019-03/30/c_1124304850.htm
22. EIA. China's Wildlife Protection Law. Available at: <https://eia-international.org/our-work/wildlife/tigers/tiger-farming/chinas-wildlife-protection-law>
23. SFA announcement No. 14, 2017 (informal EIA translation). Available from: <https://eia-international.org/wp-content/uploads/SFA-announcement-No.-14-2017.pdf>
24. AC30 Doc. 16 (Rev. 2) Annex I
25. Bale, R. 2017. Breaking: Rhino Horn Trade to Return in South Africa [National Geographic]. Available at: <https://news.nationalgeographic.com/2017/04/wildlife-watch-rhino-horn-ban-overtuned-south-africa/>
26. Department of Environmental Affairs. 2014. The viability of legalising trade in rhino horn in South Africa. Available at: https://www.environment.gov.za/sites/default/files/docs/rhinohorntrade_south_africa_legalisingreport.pdf
27. Hübschle, A. (2016). A game of horns: transnational flows of rhino horn (Doctoral dissertation, Universität Köln Köln).
28. CoP18 Doc. 83.1 Annex 2
29. Private Rhino Owners Association. Frequently Asked Questions about the rhino trade. Available at: <https://www.rhinoalive.com/rhino-horn-trade-faq/>
30. Somerville, K. 2016. Rhino horn and conservation: to trade or not to trade, that is the question [The Conversation]. Available at: <https://theconversation.com/rhino-horn-and-conservation-to-trade-or-not-to-trade-that-is-the-question-65172>; CoP18 Doc. 83.1 Annex 2
31. Department of Environmental Affairs. 2019. Minister of Environmental Affairs Highlights Progress on the Implementation of the Integrated Strategic Management of Rhinoceroses. Available at: <https://www.environment.gov.za/progressonimplementationofintegratedstrategicmanagementofrhinoceros>
32. Bega, S. 2018. Muted response to rhino horn trading site [The Independent on Saturday]. Available at: <https://www.pressreader.com/south-africa/the-independent-on-saturday/20180602/281552291542553>
33. <http://rhinohornauktion.com/web/#>
34. BJ News. 2019. 海关总署发布打击象牙等濒危物种及其制品走私十大案例. Available at: <http://www.bjnews.com.cn/news/2019/04/15/567788.html>
35. Leung, C. 2019. Customs seizes HK\$16.5 million record haul of rhino horns in Hong Kong [South China Morning Post]. Available at: <https://www.scmp.com/news/hong-kong/law-and-crime/article/3004956/customs-seizes-hk165-million-record-haul-rhino-horns>
36. South African Police Service. 2019. <https://www.saps.gov.za/newsroom/msspeechdetail.php?nid=20103>
37. Beega, S. 2019. SA's largest private rhino breeder, John Hume, says seized horns are his property [Saturday Star]. Available at: <https://www.iol.co.za/saturday-star/sas-largest-private-rhino-breeder-john-hume-says-seized-rhino-horns-are-his-property-22221195>



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