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INTRODUCTION

This report takes a journey to a dark corner of north-west Lao PDR (hereafter referred to as Laos), in the heart of the Golden Triangle in South-East Asia.

The Environmental Investigation Agency (EIA) and Education for Nature Vietnam (ENV) have documented how the Golden Triangle Special Economic Zone (GT SEZ) in Bokeo Province, in Laos has become a lawless playground, catering to the desires of visiting Chinese gamblers and tourists who can openly purchase and consume illegal wildlife products and parts, including those of endangered tigers.

Despite being a part of Laos territory, the GT SEZ is run by the Chinese company Kings Romans Group. It has a 99-year lease and an 80 per cent stake in the operation. Clocks are run on Beijing time, all business is done in Chinese currency and businesses are Chinese-owned. With its 20 per cent stake in the GT SEZ, the Government of Laos is a complicit partner in what is a free-for-all illegal wildlife supermarket and has granted special benefits to the businesses in the SEZ by declaring it a duty-free area.

While Laos' wildlife laws are weak, there is not even a pretence of enforcement in the GT SEZ. Sellers and buyers are free to trade a host of endangered species products including tigers, leopards, elephants, rhinos, pangolins, helmeted hornbills, snakes and bears, poached from Asia and Africa, and smuggled to this small haven for wildlife crime.

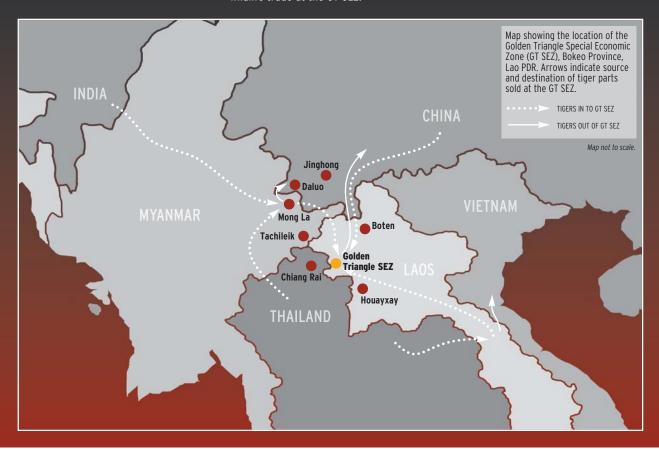
The unchecked illegal wildlife trade in the GT SEZ is illustrative of illegal wildlife trade across the region, largely catering to growing numbers of Chinese visitors. The casino-led set-up is a model exported from Mong La in Myanmar, one of the longest-standing illegal wildlife markets in the region.

The Government of China is acutely aware of the footprint of Chinese businesses and consumers in relation to poaching, trafficking and the consumption of illegal wildlife. If the Government of China is truly committed to ending illegal wildlife trade, there is much it can do to help end the illegal wildlife trade at the GT SEZ.

The blatant illegal wildlife trade by Chinese companies in this part of Laos should be a national embarrassment and yet it appears to enjoy high-level political support from the Laos Government, blocking any potential law enforcement. Cleaning up the GT SEZ, reversing Laos' role as the weak link in the regional wildlife crime chain and ending tiger farming throughout the country will require a major policy shift from the top.

The international community has a responsibility to stop fawning over lip-service commitments to combating organised wildlife crime and reducing demand. This is not a new phenomenon, but one that has persisted and escalated because of a failure to take bold action. Business-as-usual is a recipe for disaster for wild tigers and other endangered species.

Environmental Investigation Agency (EIA), March 2015





The Kings Romans Group brochure, available to guests at the GT SEZ hotel, openly promotes its own brand of tiger bone wine. The GT SEZ lies on the Laos bank of the Mekong River in The Golden Triangle region where Thailand, Myanmar and Laos converge, just south of China's Yunnan Province. The term 'Golden Triangle' was coined in the 1970s due to the area's role as a heartland for narcotics production and trafficking, a role it continues to play. A 2014 report by the United Nations Office on Drugs and Crime (UNODC) found that opium production in the area had trebled since 2006, with an upsurge in Laos and Myanmar, reaching an estimated value of US\$16.3 billion.¹

The Golden Triangle is also renowned for the trafficking of people and wildlife and for the laundering of proceeds of the narcotics trade through casinos.² In Myanmar and Laos, especially near the borders of Thailand and China where casinos are banned, gambling tourism is touted to attract Chinese and Thai visitors.^{3,4} The dark side of the casino industry includes human trafficking for the sex trade and wildlife crime.⁵

Over the past two decades, many of these casino-based towns have been established in the Golden Triangle, including Mong La and Tachileik in Myanmar's Shan State, and Boten and Ton Pheung in Laos' Luang Namtha and Bokeo Provinces, respectively.

These places are often found near the border checkpoints with China and are designed to cater for Chinese visitors. The extent of these trades – especially for illegal wildlife – has been widely reported in the international media over the years. The EIA/ENV's investigation findings suggest that illegal wildlife traders move between these places as new centres emerge to capitalise on business opportunities within the Golden Triangle.

In 2007, Hong Kong-registered Kings Romans Group (KRG), also known by its Laotian name Dok Ngiew Kham, signed an agreement with the Laos Government for the 99-year lease of a 10,000 hectare concession in the Ton Pheung district of Bokeo province in northern Laos. 10,11 Within this concession, 3,000 hectares are designated as a duty-free zone, known as the Golden Triangle Special Economic Zone (GT SEZ). 12

The stated aim of the agreement is to attract foreign investment in trade and tourism to drive local economic growth and alleviate poverty. Central to it is a casino to attract tourists, particularly from China. The Laos Government is reportedly a 20 per cent shareholder in the project while KRG holds the remaining 80 per cent.

Investors have reportedly put up to \$800 million into the project to date. 15

The casino opened in 2009, followed by a shopping and restaurant area called Chinatown in 2013. Both are located in the GT SEZ and so benefit from the duty free exemption. 16,17 Other developments in the zone included a private landing dock for boats, a hotel, massage parlours, museums, gardens, a temple, banquet halls, an animal enclosure, a shooting range and a large banana plantation.¹⁸ To access the area, a 30km road has been built from the nearest Laos town of Houayxay, while plans to construct an international airport have created conflict with local farmers over land rights.19

INVESTMENT IN THE GT SEZ

Despite the reportedly large investment in the GT SEZ, only sparse information on its investors exists. Chinese academics who were part of an official Chinese delegation which visited the GT SEZ in 2009 suggested that the "real investor is a drug cartel from Myanmar". ²⁰ Press reports have suggested that notorious Myanmar drug lord Lin Mingxian is among the investors. This has been denied by Zhao Wei, the owner of the Kings Romans Group. ²¹

Named investors, brokers and operators in the GT SEZ include the Chinese companies Beijing Jinsanguo International Investment,²² Yanyang (Holiday) Group,²³ Link Global Logistics Group,²⁴ Beijing Joseph Investment,²⁵ World Food and Agriculture Development Group Ltd and China City Construction Group.²⁶ All appear to be private enterprises, apart from China City Construction Group, a Chinese state-owned company commissioned to build the international airport.²⁷

A 'PROVINCE' OF CHINA

Despite being situated on land leased from the Government of Laos, the GT SEZ appears more like an extension of China. It is run on Beijing time, signs are in Mandarin, the majority of workers are Chinese nationals and Chinese yuan is the main currency used. All a Chinese national requires to check-in at the Kapok Garden Hotel opposite the casino is a Chinese identity card, rather than a passport.²⁸

Zhao Wei has publicly stated that a key concession in his company's agreement

with the Laos Government is KRG's independence to run its business operations, suggesting that apart from military, foreign relations and judiciary, KRG can decide its own legislation.²⁹

The GT SEZ benefits from high-level political patrons in the Laos Government. Officials who have taken part in Government visits include Laos President Choummaly Sayasone, Prime Minister Thongsing Thammavong, Deputy Prime Minister Somsavad Lengsavath, Deputy Prime Minister Asang Laoly and Bokeo Governor Khammanh Sounvilerth.

Ex-officials are involved in GT SEZ committees, namely Bounmy Souvannalangsy and Chantachone Wangfaseng as Chairs of the Executive Management and Economic Management Committees, respectively. 30,31 Souvannalangsy was previously the Head of Agriculture and Forestry Division of Bokeo Province, a branch within the Government responsible for upholding laws related to wildlife conservation. 32 Wangfaseng was previously an official in Bokeo in charge of trade and approved the business license of the Fantasy Garret restaurant at the GT SEZ Chinatown, where tiger bone wine is openly sold.33





TOP:

The GT SEZ may be dominated by Chinese businesses, but Laos law still applies.

ABOVE:

President of the KRG and Chairman of the GT SEZ with the President of Laos during a high-level delegation visit to the GT SEZ.

KINGS ROMANS GROUP

The primary activity of the Kings Romans Group (KRG), based on company records, is the raising of livestock other than dairy and poultry.³⁴ The company president is Chinese businessman Zhao Wei (also known as Chio Wai), the Chairman of the GT SEZ.³⁵

Originally from Heilongjiang province in northern China, Zhao started out trading timber before moving to Macau in the 1990s, where he currently holds permanent residency.^{36,37}

In Macau, Zhao invested in various casinos in the city's long-established gambling industry. Around 2001, he moved to Mong La in Myanmar where he set up and ran one of the largest casinos, Landun Entertainment. He reportedly established ties with the local militia, the National Democratic Alliance Army (NDAA) and its leader Lin Mingxian (also known as Sai Lin). Lin is said to have financed much of Mong La's casino industry using money he made from the drugs trade.

In 2005, following reports of Chinese officials gambling away state funds in Mong La, the Chinese Government imposed a travel ban on officials visiting the city.⁴³ This prompted the closure of many casinos. Soon afterwards, Zhao was invited by the Laos Government to invest in its northern province of Bokeo and in 2007 an agreement was reached between the Laos Government and the newly named Kings Romans Group.⁴⁴



Skins of wild tigers from across Asia are trafficked to the GT SEZ and sold alongside products derived from farmed tigers.

HALL AND TAIBAIZUI, GIFT SHOPS IN CHINATOWN

In June 2014, an EIA/ENV investigative

team travelled to the GT SEZ to document

the availability of illicit wildlife products,

the site's animal enclosure. A follow-up

number of tigers in the enclosure. The

of the growing role of the GT SEZ as a

as well as to probe the origin and

planned use of captive-bred tigers in

visit was made in February 2015 to confirm a rumoured increase in the

findings confirm previous reports45,4

The salesman in the Golden Triangle Treasure Hall runs the stores on behalf of a relative, who he claims is a major wildlife trader based in Mong La, Myanmar. Both are Chinese nationals and the trader confirmed the majority of customers are visiting Chinese. Tiger parts were clearly visible from the street. Inside were seven tiger skins, four stuffed tigers, bottles and jars of tiger bone wine, a leopard skin, two ivory tusks and numerous carvings, shavings of what was marketed as rhino horn, pangolin scales and carvings from helmeted hornbills.

The trader claimed the stuffed tigers had been processed in Yunnan and

Fujian Provinces in China and smuggled into Laos. He also claimed that all but one of the tiger skins had been trafficked from Mong La, but the original source was said to be Thailand and Malaysia. One skin came from a tiger raised in captivity at the GT SEZ. The ivory was apparently imported via Thailand and Myanmar, while the helmeted hornbill carvings and rhino horn shavings had been obtained in Fujian Province and smuggled into Laos. The seller spoke of arranging to transport the contraband over the border into China for a fee. He also mentioned Daluo, in Yunnan Province, as one of the routes used for direct smuggling of wildlife from Mong La to China.

The method of importing processed wildlife products from China, derived from contraband smuggled into the country, for sale to Chinese tourists in Laos indicates the role of GT SEZ as a safe place in which to trade high value wildlife products.

FANTASY GARRET, RESTAURANT IN CHINATOWN

This restaurant advertises "sauté tiger meat" and "tiger bone wine" in English and Mandarin on the menu board outside. Without testing, it cannot be verified that the meat was from a tiger but visible from the street was a tank of

"the main aim [of killing tigers] is not the meat, he is really after the skeletons to brew wine."

- chef at the Fantasy Garret restaurant claims that senior management in the KRG are responsible for overseeing the manufacture of tiger bone wine at the GT SEZ wine with "tiger bone wine" written across it and containing a near-complete big cat skeleton. The seller showed investigators footage on his phone of the tank being prepared in early 2014 with a complete tiger skeleton.

The seller and chef claimed the tiger products derived from tigers sourced as cubs from a tiger farm in Laos and raised at the GT SEZ. They alleged that Zhao Wei's "right hand man", Zhang Ming, kills the tigers when their bones are needed. Another trader in Chinatown who claimed to know Zhang revealed that the killing takes place at Zhang's nearby property. He is said to be the boss of Chinatown. The chef said: "The boss, actually, his main aim is not meat, he is really after the skeletons to brew wine."

GOD OF FORTUNE, RESTAURANT IN CHINATOWN

This restaurant specializes in *yewei*, Chinese for 'wild flavour' referring to the taste of wild and exotic animals. On the menu was a variety of *yewei*; bear paw, monitor lizard, pangolin, Tokay gecko, snake and turtle. The restaurant also had jars claimed to be tiger bone wine. Investigators observed a live python and a bear cub kept in cages by the restaurant entrance and the kitchen exit, respectively – both of which were available to eat on request.

LIVE ANIMAL ENCLOSURE

The GT SEZ's 'zoo', a short walk from the casino, had 26 tigers and 38 Asiatic black bears on display during EIA/ ENV site visits. The head keeper boasted of being an experienced tiger breeder and butcher, and claimed to have worked at a number of tiger farms in China, including one facility exposed several times for selling tiger bone wine. He was recruited by KRG and brought to Laos to help expand tiger breeding operations from a model based on buying and rearing tigers acquired from tiger farms elsewhere in the country to breed its own tigers. Throughout the exchange, he gave the impression that there were no restrictions on the keeping, breeding or trading of captive tigers in Laos.

According to the head keeper, before he arrived at the GT SEZ in mid-2013 there were 30 tigers acquired from another tiger farm in Laos. Poor husbandry reportedly led to the deaths of most and

by the time he arrived there were only six male tigers remaining. In mid-2014, investigators found four tigers in the enclosure. By February 2015, the number had risen to 26. The keeper revealed that in late 2014, a further 29 tigers were flown in by helicopter from a tiger farm in Laos (20 females and nine males, of which eight were juveniles). The remaining nine tigers were reportedly held in out-of-bounds locations at the GT SEZ.

The rise in numbers shows that the breeding expansion plan is underway. The keeper told investigators the plan is to acquire a total of 50 females for breeding, with the aim of producing 500 tigers within three years and up to 1,000 tigers in the long term. To accommodate the expansion, a much larger enclosure is planned 5km south-east of the casino. The ultimate intention is to produce tiger bone wine for consumption at the GT SEZ and for export to China, via Yunnan.

He claimed the Asiatic bears in the 'zoo' had been smuggled from Myanmar and the adults were destined to be eaten rather than milked for bile.

KINGS ROMANS GROUP CASINO

On the periphery of the gaming floor, investigators observed shelves full of ivory products, including carved whole tusks, bangles, beaded bracelets, pendants and other trinkets. There was also a pack of what was claimed to be ivory powder, often residue from the ivory carving process, with a label bearing Thai language characters. One of the retailers confirmed that the products were carved in Thailand and trafficked across to Laos.

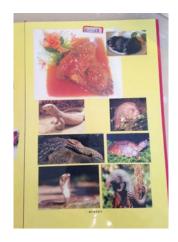


BELOW:

Menus outside the restaurants in the Chinatown area of the GT SEZ openly advertise exotic meat, including sauté tiger meat.

BOTTOM:

Breeding for bones, the tiger farming model from China is well-established in Laos. The plan is to farm 500 - 1,000 tigers at the GT SEZ.







Boten, on the Laos-China border. The GT SEZ is not the only well-established illegal wildlife trade hotspot in the region, towns at border crossing are particularly notorious. The role of lawless gambling centres located in border towns around the region in attracting other kinds of serious crime has been well documented. EIA/ENV investigations indicate the existence of networks of illegal wildlife traders operating between the different centres.

Mong La, Myanmar

Located on the border of China and Myanmar, the city is run by warlords where 24 gambling dens are found and trade in drugs and prostitution thrives. Mong La has been widely reported in the media as a centre for illegal and exotic wildlife. A recent survey found that the number of shops in Mong La selling

Asian big cat products, including tiger skins, trebled between 2006-14.47

Daluo, Yunnan Province, China

Located in the south-west of China's Yunnan province, Daluo is a frontier town within walking distance of Mong La. As an official border crossing between China and Myanmar, many Chinese visitors travel through the border gate to gamble in Mong La's casinos and buy illicit wildlife products. EIA's research on reported wildlife seizures in Yunnan province points to a high proportion of interceptions at the Daluo border checkpoint, including tiger skins and bones, pangolins, turtles and slow lorises. From Daluo, illegal wildlife

is known to be trafficked to Jinghong city, in Xishuangbanna Autonomous Prefecture before onward transportation to the rest of China. 49,50,51

Tachileik, Myanmar

Opposite Mae Sai in northern Thailand, the casino town has been reported in the media for its open display and sale of illegal and endangered wildlife products such as tiger and leopard skins and elephant ivory. 52,53

Boten, Laos

In June 2014, EIA/ENV investigators visited Boten, a Laos border town across from Mohan in Yunnan Province, where the former Chinese-owned Golden Boten City casino operated until it was forced to shut in 2011 following reports of murders and hostage-taking of Chinese nationals unable to pay their debts. ⁵⁴ The casino was part-owned by Huang Mingxuan, who used to operate a casino in Mong La. ^{55,56}

Investigators spoke with the Chinese owner of a wildlife restaurant selling pangolin and bear paws who confirmed his family moved from Mong La, where it operated a similar business serving mainly visiting Chinese tourists. Although business was slow since the casino shut, he believed that with tourism expansion plans and the proposed Kunming-Vientiane railway it would grow again. The owner of the nearby Xinlong bear farm told the investigators the bear bile is sold to Chinese tourists who take it back across the border to Yunnan.

Fujian Province, China

Traders from Mong La, selling stock in the GT SEZ, are connected to suppliers in Fujian Province, south-east China. Fujian is not only a key entry point of illegal wildlife into China, it is also an important processing hub where large amounts of illegal wildlife are turned into finished products.⁵⁷ In particular, the city of Putian is known for its large carving industry, where ivory, rhinoceros horn, pangolins and helmeted hornbill, as well as precious wood, are turned into finished products. Fujian is also home to a number of taxidermy companies, some of which have been found to use the skins of illegally acquired wildlife, including tigers.58



LEFT:

Frozen pangolins for sale at one of Boten's "wild taste" restaurants.

BELOW:

The nearby bear farm sells bear bile pills to people passing back and forth across Boten's border with China.

BOTTOM:

The value of ivory is such it is worth traders smuggling it from Africa to China, to centres for the carving industry in places such as Fujian Province, and then smuggling it out to Laos for sale to tourists and gamblers visiting the casino at the GT SEZ.





ILLEGAL WILDLIFE SUPERMARKET

What follows is a snapshot of wildlife parts and products documented by EIA and ENV during two short site visits between June 2014 and February 2015.

The UN Convention on International Trade in Endangered Species (CITES) is an international treaty which regulates trade in animals and plants listed in CITES Appendices I, II or III. All species listed under Appendix I are considered to be "threatened with extinction" and international trade is prohibited. Species listed on Appendix II can be traded under a controlled permit system. Appendix III contains species that are protected in at least one country and require the co-operation of other CITES Parties to regulate trade.



A number of shops and restaurants at the GT SEZ were well-stocked with bottles and jars of tiger bone wine that had been brewed on site.



Translation: "Tiger bone wine"

TIGER (Panthera tigris)



- fewer than 3,200 wild tigers across Asia
- · IUCN Red List: Endangered, CITES Appendix I
- over 1,500 tigers illegally traded since 2000⁵⁹
- · no recent signs of wild tigers in Laos
- almost every part of the tiger is valued for trade: skins for luxury home décor and gifts, bones for high-end wine and tonics, meat for consumption and tiger claws, teeth and whiskers for medicines. The main market is China, followed by Vietnam.

At the GT SEZ:

Eight tiger skins, four stuffed tigers, a tank of wine with partial tiger skeleton and bones, bottles marketed as tiger bone wine, meat marketed as tiger, tiger teeth. Between June 2014 and February 2015, the number of tigers at the fledgling GT SEZ tiger farm increased from six to 35, with plans to breed 500-1,000.

RHINOCEROS

(Rhinocerotidae spp.)



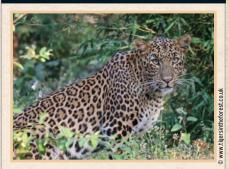
- distributed in Africa and Asia, with the population estimate of the largest sub species (white rhino) estimated as 20,170, mainly spanning four African countries
- IUCN Red List: sub-species includes Critically Endangered Javan and Sumatran rhinos, CITES Appendix I (except Southern White Rhinoceros of South Africa and Swaziland listed in CITES Appendix II)
- In 2014, 1,215 rhinos were poached in South Africa and 35 rhinos were poached in India⁶¹
- rhino horn used in traditional Asian medicines and for decorative carvings, and ground horn used in drinks for social occasions. Main markets include Vietnam and China.

At the GT SEZ:

Shavings of horn marketed as rhino horn.

LEOPARD

(Panthera pardus; within Asia)



- declining in large parts of their range due to poaching for trade, habitat and prey loss, human/leopard conflict
- IUCN Red List: Near Threatened, CITES Appendix I
- over 4,400 leopards identified in the illegal trade since 2000
- as with other Asian big cats, leopard body parts cater for the same demand as tigers.

At the GT SEZ:

One leopard skin.

HELMETED HORNBILL

(Rhinoplax vigil)



- confined to the Sundaic lowlands of Myanmar, Thailand, Malaysia, Indonesia and Brunei Darussalam
- in decline due to a combination of habitat destruction and poaching
- IUCN Red List: Near Threatened, CITES Appendix I
- distinctive solid head 'casque' is desired for luxury decorative carvings and beads in China.

At the GT SEZ:

Helmeted hornbill beads, bangles and carvings.



ELEPHANT

(Loxodonta africana; Elephas maximus)



 distributed in Africa and Asia, with estimated population of 419,000 (Africa) and 20,000-60,000 (Asia)

 IUCN Red List: Vulnerable (African elephant), Endangered (Asian elephant), CITES Appendix I (except populations of Botswana, Namibia, South Africa and Zimbabwe listed in CITES Appendix II)

• A 2014 study found 100,000 African elephants had been killed over three years⁶⁰

 ivory used for ornamental purposes, such carved statues and jewellery.

At the GT SEZ:

Numerous elephant ivory carvings, bangles, beads & pendants, several polished elephant ivory tusks, ivory powder.

PANGOLIN

(Manis spp.)



- found in Asia and Africa, all eight species of pangolin are in decline primarily due to poaching
- IUCN Red List: Asian pangolins sub-species are Critically Endangered and Endangered, African pangolins are listed as Vulnerable, CITES Appendix II
- one of the most heavily traded mammals, over a million taken from the wild in the past decade⁶²
- desired for their meat for consumption and scales for use in traditional medicine and the carving industry

At the GT SEZ:

One live pangolin outside restaurant, pangolin scales.

Helmeted hornbill carvings and beads for sale at the GT SEZ In addition to the numerous ivory carvings for sale in the Chinatown area and casino at GT SEZ, ivory powder from Thailand was also for sale



ASIATIC BLACK BEAR

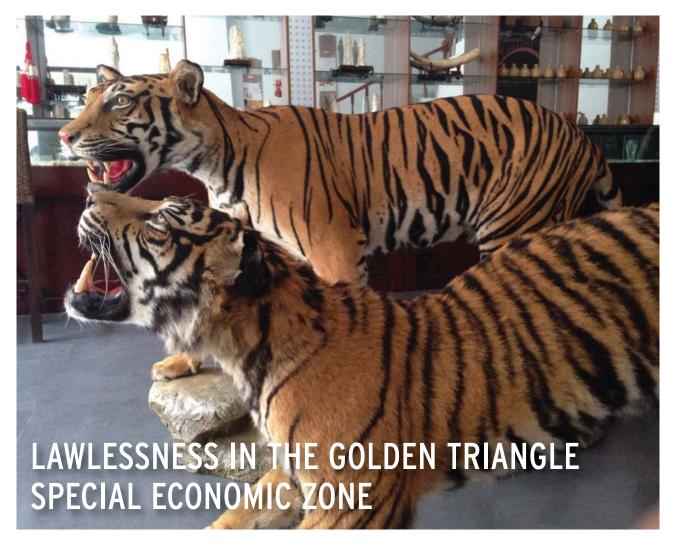
(Ursus thibetanus)



- declining across at least 60 per cent of its range, including all of South-East Asia, with local extirpations looming in Vietnam and Bangladesh⁶³
- IUCN Red List: Vulnerable, CITES Appendix I
- main demand is for bile from gall bladders, used to heal ailments and as a stimulant, bear paw soup, live cubs traded as pets or for farming. China is the primary consumer, followed by Vietnam.

At the GT SEZ:

39 live Asiatic black bears, bear gall bladder.



Stuffed tigers for sale at the GT SEZ have been smuggled in from China and are marketed to Chinese tourists and gamblers. A combination of weak laws, poor enforcement and official complicity in Laos allows the illegal wildlife trade to openly flourish in the GT SEZ.

As a party to CITES since 2004, Laos has a responsibility to ensure compliance with the provisions of the treaty regarding import and export of wildlife and the guiding resolutions, decisions and recommendations which often relate to matters of enforcement, demandreduction and internal trade. Most of the wildlife for sale at the GT SEZ has been obtained in contravention of CITES.

The same is true of the expanding tiger-breeding operation in the GT SEZ. In 2007, CITES Parties determined that "tigers should not be bred for trade in their parts and derivatives", for internal as well as international trade. Parties are required to report on steps being taken to phase out tiger 'farms'. 64 In particular, given the critical conservation status of tigers, CITES has called for strict measures, including an end to domestic as well as international trade in parts and products sourced from captive-bred tigers.

In 2013, Laos was visited by the CITES Secretariat to assess current enforcement activities relevant to illegal trade in wildlife. The Secretariat reported that Laos' national authorities faced a number of challenges in implementing CITES – related not only to enforcement matters but also "compliance issues, such as issuance of permits, the monitoring of significant levels of trade, regulation of the activities of captive breeding facilities and the making of Non-detriment Findings". Assessment of Laos' compliance with CITES is ongoing. 66

"Tigers should not be bred for trade in their parts and derivatives", CITES Decision 14.69. In 2007, Parties to CITES voted for "trade" in this context to include

"domestic trade."

NATIONAL LAWS OF LAOS

At the national level, the main pieces of legislation used to investigate and prosecute wildlife crime in Laos are the Wildlife and Aquatic Law 2007 and the Penal Law 2005. The 2007 Wildlife Law includes tigers, elephants, rhinoceros, bears and other species as part of the "prohibition category" of animals. Use of wildlife in the prohibition category requires Government permission.

Article 40 of the 2007 Wildlife Law addresses the trade in wildlife from breeding activities and provides that the prohibited category of wildlife specimens can be traded from the second generation and subsequent generations. The first generation or breeding stock cannot be traded.70 Further, the prohibition category of wildlife in captivity for "business purposes" is required to be registered with and reported to the agriculture and forestry office. 71 According to the live animal keeper at the GT SEZ, no such permissions were required for the keeping, breeding and trade in the live tigers and bears on the premises.

In another example of a major disconnect between policy and practice, in its reports to CITES the Government of Laos has strongly opposed commercial trade in parts and products sourced from captive tigers. In 2010, the Government of Laos stated in its report to the 15th CITES Conference of the Parties that "the potential threat to wild tigers caused by tiger farms is very high" and that "legalising trade in farmed tiger products allows smugglers to exploit the loophole and take opportunities to sell wild tiger products". 72 This stated policy position is blatantly at odds with the reality found by EIA/ENV investigators in the GT SEZ.

Under Laos' Law on Investment Promotion 200973 and Enterprise Law 2005,74 the businesses within the SEZ are governed by the regulations and laws of Laos. By holding a 20 per cent stake in the operation of the GT SEZ, the Government of Laos may be operating in contravention of Article 53 of the 2007 Wildlife Law prohibiting government officials from operating businesses in wildlife or "taking a share in such a business".

EVERY TIGER COUNTS

There are possibly as few as 3,200 tigers (*Panthera tigris*) remaining in the wild today, with over half in India. As many as 1,590 tigers have been traded since 2000;75 61 traded in 2014 alone.76 Since the start of 2000, at least a further 4,695 CITES Appendix I Asian big cats (leopards, snow leopards, clouded leopards and Asiatic lions), have been identified in trade globally.⁷⁷ With the wild tiger perilously close to extinction, every tiger counts.

As recently as the 1980s-90s, tigers were considered widespread in the region. Now, however, vast areas of South-East Asia have been found to be void of tigers and depleted of prey species. Government estimates put the population of the Indochinese sub-species of tiger (Panthera tigris corbetti) at 352, distributed in Thailand (200), Myanmar (85), Vietnam (20), Cambodia (20), Laos (17)⁷⁸ and China (40-50). These estimates are considered to be speculative and the number of tigers in confirmed protected populations in these countries is likely substantially lower.

The Indochinese tiger is listed as Endangered under the IUCN Red List but the extent of its recent decline has been so serious that it is likely it will be escalated to a Critically Endangered designation; a full assessment is being undertaken for the next IUCN Red List update. [79b] There is no evidence of breeding tigers in Cambodia or Vietnam. Myanmar has only one population of potential viability in the Hukaung Valley Wildlife Sanctuary and Laos just a single confirmed tiger population of fewer than 20 mature individuals in Nam Et-Phou Louey National Protected Area.80

According to traders at the GT SEZ, six of the tiger skins for sale were trafficked from Thailand and Malaysia via Mong La in Myanmar. Independent research indicates that tiger parts for sale in Mong La are also sourced from India.81a They claimed that one other tiger skin was from a captive-bred tiger that had been killed at the GT SEZ. Live tigers are trafficked into Laos from Thailand for the purpose of stocking tiger farms in Laos, which in turn sell tiger parts and products to Chinese and Vietnamese consumers. The stuffed tigers for sale at the GT SEZ were reportedly from Fujian Province of China, possibly from breeding operations or unregulated circuses.

According to EIA's tiger trade database during the period 2000-15, at least 379 tigers were seized in trade in China, Vietnam, Thailand and Laos⁸¹⁶. This figure is based on skins, live tigers and carcasses only. The number of tigers seized in trade throughout the region is likely to be higher.

While there is little available information regarding the status of arrests and prosecutions related to these seizures, an effective criminal justice response, including adequate deterrent sentencing, is rare.





Clouded leopard skin for sale at popular tourist destination, Ban Xang Hai or "Whisky Village", Laos. Laos has emerged as an illegal wildlife trade hub for many species due to its strategic location in South-East Asia and weak law enforcement. Laos is implicated in trafficking from both Africa and Asia, including rhino horn, elephant ivory, tiger parts, pangolins and turtles.⁸²

ILLEGAL TIGER TRADE

Laos' role in international illegal tiger trade is not confined to the GT SEZ. There is a burgeoning trade in captivesource tigers across South-East Asia, shown by analysis of seizure data, with Laos serving as both a source and transit country. In neighbouring Thailand, issuance of tiger-breeding permits and lack of implementation of CITES has led to unregulated tiger farming⁸³ and illegal international trade. In 2001, EIA interviewed the owner of a tiger 'zoo' in Ubon Ratchathani who was a politician at the time. He reported that up to 200 tiger cubs a year from unregulated breeders were being shipped out via Mae Sae on boats returning to China after delivering fruit.84 In 2011, one Thai tiger trader was cited as exporting 100 tigers a year for 10 years.85

For several years, Thai-based tiger traders have used the Mekong crossing from north-eastern Thailand to supply tigers to Laos. In this area in 2004, Thai Highway Police arrested a known tiger dealer attempting to cross into Laos with a bisected tiger carcass in his vehicle. ⁸⁶ He had been arrested just

months earlier following a raid on a wildlife processing operation in central Thailand.⁸⁷

Tigers have continued to be transported across the Mekong, both dead and alive, sometimes with other species. A significant seizure occurred in 2008 when Thai authorities intercepted a consignment of six tiger carcasses, three leopard carcasses and two clouded leopard carcasses, ⁸⁸ along with 275 pangolins. DNA analysis revealed the presence of non-native Siberian tiger, suggesting the tigers were captive-source and likely one of several connected shipments. ⁸⁹

In Thailand in 2013, 16 tiger cubs were seized from a vehicle⁹⁰ believed to be one of three travelling in convoy to Laos⁹¹ and the trend continued in 2014 with a seizure of five tiger cubs, monitor lizards, turtles and tortoises; a police spokesman commented that tigers would "normally" be kept in Laos for a year before being moved on.^{92,93}

Several crossing points on Laos' eastern border with Vietnam serve as wildlife smuggling routes. In Vietnam, tiger bones are used for medicinal purposes, boiled down into a 'glue' which hardens into a resinous substance, shavings of which are then dissolved in wine. A 2010 analysis of Vietnam's tiger trade found most tigers seized in Vietnam came from tiger farming operations in Laos. Vietnam's Cau Treo border gate with Laos is a key entry point into

Vietnam's Ha Tinh province, where major traders are located. The traders sell on frozen tiger carcasses and tiger bone to the glue processors.⁹⁴

Within Laos itself during the period 2010-12, 11 live tigers were seized, 95 eight under the INTERPOL-coordinated Operation Libra. 96 There is no available information on further investigations or prosecutions associated with these cases but analysis of the regional trade in tigers indicates that only a small proportion of the total volume moving through Laos is being intercepted in the country.

TIGER FACILITIES IN LAOS

Laos has at least three facilities holding captive tigers; GT SEZ, the Muang Thong tiger farm in central Laos and there were tigers on the compound owned by notorious wildlife trader Vixay Keosavang in Bolikhamsai province. 97,98

The largest of these facilities is the Muang Thong Tiger Farm, near the town of Thakhek in south-central Laos. The farm was established in 2002 with an initial stock of 20 breeding tigers, reportedly originating from Taiwan⁹⁹ yet by 2009 this had grown to over 250 tigers.¹⁰⁰ In 2014, it had approximately 400 tigers¹⁰¹ although, in the absence of reports the Laos Government is supposed to have provided to CITES, the official number is unknown.

A 2009 media profile of the business reported the farm's intention to breed tigers "for export in the future" in the interest of conservation; ¹⁰² A representative from the farm attended Laos' 2009 workshop to develop its National Tiger Action Plan. ¹⁰³ Yet in contravention of the 2007 CITES decision that tigers should not be bred for trade, the Muang Thong tiger farm is a purely commercial venture and has been repeatedly exposed for engaging in trade in tigers and tiger parts. ¹⁰⁴

A 2008 report cites the facility's "regular dealings" in illegal international tiger trade with Thailand's "Tiger Temple" (Wat Pha Luang Ta Bua). ¹⁰⁵ Experts have commented on the mysterious disappearances of tigers from the Thai temple ¹⁰⁶ and the facility was raided in early 2015. ¹⁰⁷ In 2010, Vietnamese undercover journalists visited the Thakhek facility and obtained testimony from Vietnamese workers of cross-border trade in tiger parts with neighbouring Vietnam. ¹⁰⁸



THE XAYSAVANG NETWORK AND INTERNATIONAL ILLEGAL WILDLIFE TRADE

Laos-based Xaysavang Import-Export Company has gained notoriety as a major international wildlife trading syndicate, with affiliates in South Africa, Mozambique, Thailand, Malaysia, Vietnam and China.¹¹²

In 2009, Kenyan authorities identified Xaysavang as the recipient company for a consignment of ivory and rhino horn concealed in coffins and shipped by air from Mozambique to Laos via Thailand.¹¹³ The company has also been investigated for primate trading¹¹⁴ and in 2013 the compound of the company director, Vixay Keosavang, contained tigers, bears and pangolins.¹¹⁵

The extent of the Xaysavang network came to further international prominence in 2012 with the arrest and trial of its self-confessed agent, Thai national Chumlong Lemthongthai, in South Africa. A repeat offender, Lemthongthai originally arrived in South Africa to source lion bones and turned to rhino horns for export to the lucrative Asian black market.¹⁶ At his trial, he pleaded guilty to 52 counts, including illegally obtaining hunting permits, trading in rhino horn, breaching the Customs and Excise Act and tax fraud.¹⁷ Successive appeals have reduced his original sentence of 40 years' imprisonment to 13 years with a fine of R1 million (US\$ 90,000).^{18,119}

In November 2013, the US Government announced a US\$1 million reward for information leading to the dismantling of the Xaysavang network, ¹²⁰ yet Lemthongthai remains the only member to be convicted. One of his associates, Punpitak Chunchom, remains an international fugitive sought by the South African authorities for dealing in rhino horns. ¹²¹

The Thakhek farm has been referred to as a wildlife 'safehouse' for onward export of tigers and other species to Vietnam and China; 109 aerial photos of the facility from 2013 revealed the presence of at least 32 cages. 110 In 2014, another exposé showed employees offering to deal with the documents needed to get tigers out of the country, stating that transport in Laos was not a problem. 111

IVORY TRADE IN VIENTIANE

A 2011 survey of ivory trade in Laos found an increasing number of shops selling ivory in the capital of Vientiane (22 shops) compared to 2002 (nine) with a growing diversity of ivory products on offer.¹²⁸

Vientiane's Sanjiang Chinatown is a hub for Chinese traders based in Laos and engaged in all manner of business, including the lucrative rosewood trade. Ivory is openly displayed for Chinese buyers and other products on offer include supposed rhino horn. In 2014, EIA investigators found traders were well aware of the booming ivory market in China, with one mentioning the large amount of ivory available in China's Fujian Province, a well-known trafficking and processing hub.

TRADE IN BEARS AND OTHER SPECIES IN LAOS

A study of bear trade in Laos found that the number of captive bears in Laos farms increased from about 40 animals in 2008 to 122 by 2012. As with other species, Laos' Wildlife and Aquatic Law 2007 allows trade in second or further generation captive-bred bears, making it likely that in the absence of breeding facilities and legal procurement paperwork, the bears were acquired and kept illegally. The bears are used for trade in bear bile and trade in parts, with an increase in the price for wild-sourced bear bile and bear cubs. 130

The international community has expressed concern about Laos' role in the exports of CITES-listed species such as macaques¹³¹ and snakes. ^{132,133} From 2009, trade information indicated a surge in the exports of python skins, declared as captive-bred. ¹³⁴ Only one python farm is said to exist in Laos but commentators found no evidence that pythons are bred there; verification visits in both 2012 and 2013 were not able to access the facility. ^{135,136}

BELOW LEFT:

Ivory is openly for sale in Chinese retail outlets in the capital Vientiane.

BELOW RIGHT:

Bears are not just poached and farmed for their bile, paws are soaked in liquor or cooked in soup.





CORRUPTION & A LACK OF CAPACITY

The illegal wildlife trade in Laos is facilitated by weak legislation and a lack of law enforcement capacity which is further impeded by corruption. These conditions exacerbate the country's inability to combat other forms of transnational organised crime such as narcotics and human trafficking. 137

Laos is a signatory to international conventions on criminality and corruption, namely the UN Convention Against Corruption (UNCAC) and the UN Convention on Transnational Organised Crime (UNTOC), yet there is uneven implementation of the commitments¹³⁸ which in some cases has given rise to international concern.

The relevant legislation for implementing UN agreements in Laos is weak, providing loopholes that can be exploited by criminal groups. For example, regarding recent reports identifying a large market for the sale of ivory in Laos different Government agencies have expressed conflicting opinions on the legality of such ivory sales. 139 Further, the 2007 Wildlife Law permits the legal trade in the parts and products of second generation specimens of captive animals such as tigers and bears. Such a parallel legal trade provides an avenue for laundering wild specimens. In addition, the 2007 Wildlife Law does not contain a specific provision dealing with arrest, search or seizure or money-laundering.

Even the existing laws, however inadequate, are not adequately enforced. 140,141 Between 2011-14, the Department of Forest Inspections (DOFI), the focal point for the Laos Wildlife Enforcement Network investigated only 18 wildlife-related cases and none were referred for criminal prosecution.

The UNODC, in a 2014 study into the criminal justice response to wildlife and forest crime in Laos, concluded that DOFI needs significant improvement in the area of wildlife crime investigations. For example, it was found to lack trained enforcement officers and capacity to use advanced investigative techniques such as controlled deliveries and forensic analysis. 142

Wildlife crime is not a priority for the other Laos Government enforcement



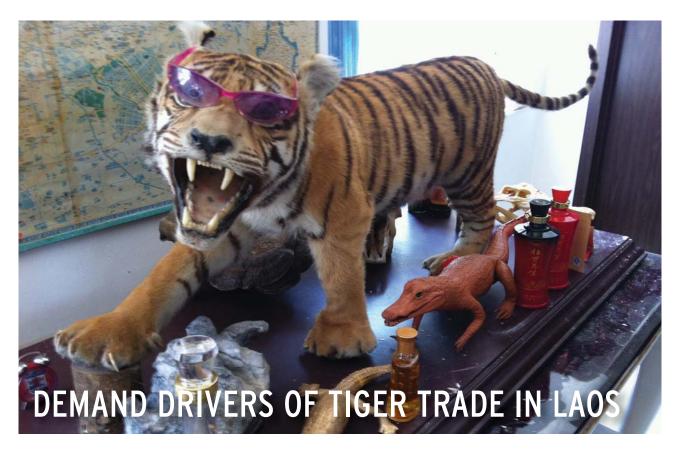
agencies such as the Environmental Police Department, Economic Police Department and Customs Department. According to the Department of Criminal Case Monitoring and Inspection, no-one has ever received a custodial sentence for wildlife or forestry offences in Laos.

At the international level, Laos is significantly failing to comply with its international commitments related to illegal wildlife trade. Failure to adopt urgent measures to come into compliance with CITES requirements puts Laos at risk of CITES trade suspensions.

Corruption and the use of influence also pose major obstacles for effective enforcement in Laos. 143,144 Transparency International's Corruption Perceptions Index ranks Laos at 145th out of 175 countries, making it one of the most corrupt countries in the Asia Pacific region after North Korea, Afghanistan, Myanmar and Cambodia. 145 The Head of the Government Inspection Authority announced last year that more than Lao Kip 1.2 trillion (US\$149 million) has been misappropriated from 2012-14 through corruption and that the main forms of corrupt activity include bribery and abuse of power for personal benefit.146

ABOVE:

Businesses and consumers buy and sell illegal wildlife products without fear of law enforcement action at the GT SEZ.



China's domestic trade in skins of captive-bred tigers for vanity and luxury products is stimulating demand. demand for domestic consumption by Chinese and Vietnamese buyers and for export to China and Vietnam. The major market and demand-driver is China. China's 1993 domestic 'ban' on the use

The tiger trade in Laos is driven by

China's 1993 domestic 'ban' on the use of tiger bone in medicine significantly reduced the availability of packaged and patented tiger bone pills, plasters and other products. ¹⁴⁷ However, the poaching and trafficking of wild tiger parts for skin, bone and other body parts continues, as indicated by seizure information, due in part to the failure to eliminate demand.

In April 2014, a wealthy businessman from Guangxi was prosecuted, together with 14 others, for commissioning the killing of at least 10 tigers for their body parts. ¹⁴⁸ Killing tigers for food and as a health supplement is reported to have become a status symbol ¹⁴⁹ in the past decade in one part of southern China. EIA's investigations in China during the past 10 years have documented a shift in demand towards the use of tiger skins as a decadent status symbol and, sometimes, as a non-financial bribe.

Demand for tiger parts is entrenched in China's domestic policies and sends a confusing message to consumers, implying that use of tiger parts is acceptable. The current Wildlife Protection Law of China encourages the "utilisation" of wildlife in general

and its subsequent regulations have effectively set up a wildlife utilisation industry comprising wine manufacturers, taxidermists, the catering and food industry, circuses and many others. Openly available Government records show there are over 100 companies licenced to trade products made of nationally protected species, including the skins of captive-bred or "farmed" tigers. ¹⁵⁰

In 2014, an unregistered Siberian tiger was confiscated in Wenzhou, Zhejiang. Police investigation found the tiger belonged to a private circus and had been illegally sold through a chain of five buyers, some of whom run legitimate businesses such as circus entertainment, catering and tortoise trade.151 In the same year, Chinese authorities seized four stuffed tigers which had been purchased from a Beijing taxidermy shop and a further two stuffed tigers were seized from the postal service. 152 A police spokesman cited the "huge market demand" responsible for traders using illegal means to produce, purchase and sell products.153

The availability of tiger skins from registered and unregulated tiger breeders is stimulating demand for wild tigers and other Asian big cats sourced from other countries. In a 2012 case, authorities in eastern China uncovered a significant cache of five snow leopard

At the Towards Zero Poaching Symposium in February 2015, the Secretary General of the Global Tiger Forum called for zero demand to support zero poaching.

skins, two tiger skins and one leopard skin which were traced to sellers in western Gansu Province, ¹⁵⁴ a wellestablished trading hub for wild Asian big cat skins sourced from India. ^{155,156} In India, which has no domestic market for Asian big cats, 23 tigers and 115 leopards were poached and seized during 2014. ¹⁵⁷

At the beginning of 2014, eight Chinese nationals were arrested with three Bengal tiger skins and a tiger cub carcass in Yunnan. The group had repeatedly sourced tigers, ivory and rhino horns in Vietnam and Myanmar. A year earlier, another Chinese national was arrested with two Bengal tiger skins and tiger bones; he confessed to purchasing them in Vietnam. 159

Court records in China also show that at least one tiger skin, one tiger skeleton, four leopard skins, seven clouded leopard skins and one clouded leopard skull were smuggled from Myanmar in 2009-10. ¹⁶⁰ In early 2015, police in Bangladesh arrested a group of poachers who claimed to have smuggled tiger parts to China. ¹⁶¹

China's expanding overseas business and tourism footprint is an important factor in understanding the shifting dynamics of the illegal wildlife trade such as connections with border town casino developments and increased availability of ivory in places such as Vientiane, where tourism numbers are growing.

The Chinese Government is reportedly considering setting up a database of unruly tourists to ban individuals from travelling abroad if necessary. ¹⁶² Similar accountability mechanisms should also be established for Chinese businesses operating overseas and for Chinese banks lending to and dealing with such companies. Ultimately, in order to change the conduct of Chinese tourists and businesspeople abroad, the Government should send a clear message by amending domestic policy towards zero demand for tiger parts.

TIGER FARMS IN CHINA

The factory-scale breeding of tigers and production of tiger bone wine planned at GT SEZ can be traced back to the business model adopted by tiger farms in China. The two biggest farms in China, Guilin Xiongsen Bear and Tiger Mountain Village and Harbin Siberian

Tiger Park, both intensively breed tigers for their body parts to be made into products such as tiger bone wine. These two farms alone are estimated to keep 1,760¹⁶³ and 1,100¹⁶⁴ tigers, respectively. Both have been exposed for selling tiger bone wine on numerous occasions. ¹⁶⁵

In 2012 and 2013, the owners of Beijing Longying and Changsha Sanhong Biotechnology, two other tiger breeders in China, revealed to EIA investigators that the State Forestry Administration (SFA) had issued a 'secret' notification in 2005 enabling the pilot use of captive-bred tigers for medicine. The owner of Beijing Longying, who claimed to have seen the notification, suggested that such permission would only be granted to farms with 500 or more tigers.

Subsequently, Changsha Sanhong Biotechnology revealed to EIA that it is one of three companies (the two others being the Guilin and Harbin farms) to be granted the permission. Despite having only six live tigers in 2013, Sanhong had already been producing its trademark 'Real Tiger Wine'. In January 2015, the company made public its intention to keep "500 tigers in the future".

Conversation with the live animal keeper at the GT SEZ revealed he had previously worked as a breeder at Xiongsen and Yunnan Wild Animal Park before being head-hunted by KRG. It is clear that the GT SEZ is planning to bring the Chinese model of industrial tiger farming to Laos.

BELOW:

There is no sign of a phase-out of tiger farms in Laos or China. In the latter there are over 5,000 tigers in captivity, with tiger bone wine documented for sale at several facilities, including the Xiongsen Bear and Tiger Village.

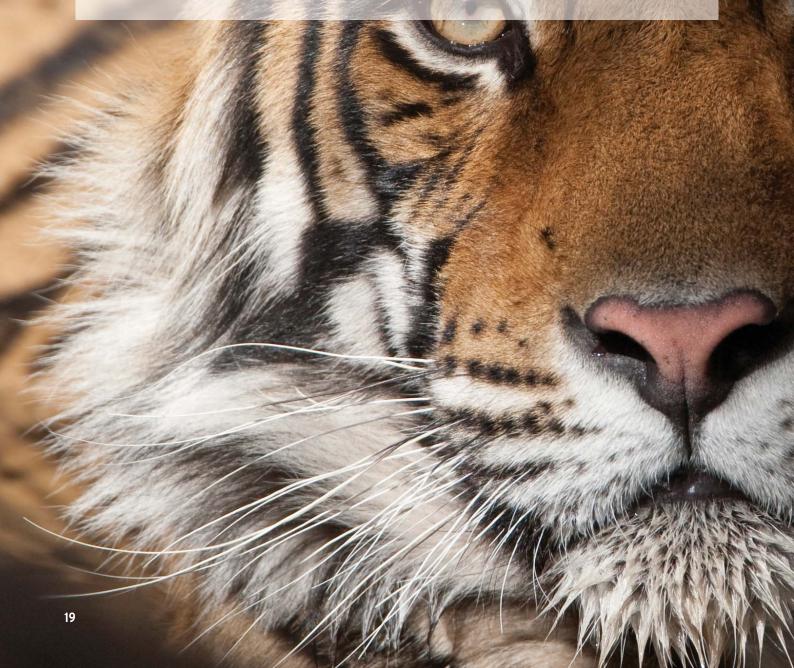




CONCLUSIONS

- Illegal tiger and wildlife trade at the Golden Triangle
 Special Economic Zone (GT SEZ) takes place openly
- Buyers are primarily Chinese gamblers and tourists, consuming wildlife on site and smuggling it back in to China
- Wild tiger and other wildlife parts are sourced by criminals with connections to Myanmar and China, although tiger skins likely originate from India, Thailand and Malaysia
- Captive tigers sourced from other tiger farms in Laos are intended for breeding and the manufacture of tiger bone wine
- Despite being the owner/lessor of the land and a 20 per cent stakeholder in the GT SEZ, the Government of Laos has failed to ensure any enforcement of Laos national law with regard to illegal wildlife trade, despite previous exposés
- The Kings Romans Group (KRG), being an 80 per cent stakeholder in the GT SEZ, is a well-established operation with international connections to legitimate business concerns as well as the criminal underworld

- The tiger farming and trade business model from China is well-established in Laos, operating in contravention of commitments under CITES and the Global Tiger Recovery Program
- Laos is routinely used by transnational organised criminal networks as a base to avoid law enforcement and criminal justice
- Laos' laws, law enforcement capacity and political commitment are inadequate to end illegal wildlife trade and to work towards zero demand for tigers
- There are several well-established wildlife trade hotspots and trafficking routes in the region that do not appear to have been subject to law enforcement, despite previous exposés
- China, Laos, Thailand and Vietnam have had more than a decade to take action and report on measures to comply with CITES Resolution Conference 12.5 (Rev CoP15) and Decision 14.69 regarding tigers and other Asian big cats.



RECOMMENDATIONS

THE GOVERNMENT OF THE LAO PDR SHOULD:

- immediately establish a multi-agency law enforcement task force, including prosecutors, police, customs, DOFI and forensic specialists, to tackle illegal wildlife trade at the GT SEZ and across the country;
- ensure illegal wildlife products at the GT SEZ are seized and that forensic and specialist investigations are conducted to determine origins of specimens, to map the criminal networks involved and cooperate with international counterparts;
- confiscate and rehouse unregistered live animals from the GT SEZ in non-commercial wildlife sanctuaries;
- strengthen legislation to ensure that wildlife crime is treated as serious crime, amend it to prohibit domestic trade in the parts and products of captive-bred tigers and phase out commercial tiger breeding centres;
- implement the recommendations of the UNODC in its October 2014 report on Criminal Justice Responses to Wildlife and Forest Crime in Lao PDR, including:
 - establishing a centralised computerised database for wildlife crime intelligence and records of cautions, arrests and prosecutions for use by law enforcement agencies;
 - improve training, capacity and equipment for prosecutors, police, customs and DOFI to fight against wildlife crime, including use of specialist investigative techniques;
 - create an Environmental Court;
- direct the National Committee for Special Economic Zones to withdraw all investment, support and benefits provided to the GT SEZ until all activities in the SEZ are investigated and appropriate penalties are imposed;
- request the International Consortium on Combating Wildlife Crime (ICCWC) to undertake a full national assessment of the law enforcement and criminal justice response to wildlife and forest crime, including a review of implementation of the UNODC's short- and mid-term recommendations, using the ICCWC Wildlife and Forest Crime Analytic Toolkit.

THE GOVERNMENT OF CHINA SHOULD:

- investigate connections between Chinese businesses and traders operating at the GT SEZ and wildlife criminals operating between Laos, Myanmar and China, including financial investigations and cooperate with international counterparts to disrupt criminal networks;
- enhance border enforcement at key crossing points opposite major trade hubs in Laos and Myanmar;
- adopt regulations to allow for criminal and financial sanctions against Chinese companies engaged in illegal wildlife trade abroad;
- amend national legislation to fully implement CITES commitments to end the breeding of tigers for trade, including domestic trade, in parts and derivatives;
- declare a domestic policy of zero tolerance for any trade in tiger parts and derivatives, and a commitment to work towards zero demand.

THE PARTIES TO CITES SHOULD:

- call for CITES trade suspensions until such times that the governments of Laos and China demonstrate that adequate law enforcement, criminal justice and policy measures are being applied towards ending illegal wildlife trade associated with operations at the GT SEZ;
- ensure that China, Laos, Thailand and Vietnam provide evidence that demonstrates compliance with Resolution Conference 12.5 (Rev CoP15) and Decision 14.69.

ICCWC SHOULD:

 offer support to the Government of Laos by reviewing implementation of the UNODC 2014 report recommendations and proposing further capacity-building or needs assessment if required, using the ICCWC Wildlife and Forest Crime Analytic Toolkit to develop a time-bound action plan.

THE INTERNATIONAL DONOR COMMUNITY SHOULD:

 support the Government of Laos in taking immediate steps to enhance law enforcement, criminal justice capacity and training in relation to illegal wildlife trade and, in the event Laos invites ICCWC assistance as per above, to provide funding for implementation of the subsequent national action plan.

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