



# PAPER TIGERS?

**O**ne of the world's largest populations of Tigers exists not in the wild in Asia, but in captivity in the United States. With an estimated 5,000 Tigers, the U.S. captive Tiger population is on par with the captive Tiger population of China (estimated to exceed 5,000) and well exceeds the approximately 4,000 individuals believed to exist in the wild today. Around six percent of the U.S. captive Tiger population resides in zoos and other facilities accredited by the American Zoological Association (AZA). The rest are found in other private hands, some regulated by the U.S. Department of Agriculture (USDA), some under state regulation, and some under virtually no regulation at all.

*The status and management of the U.S. captive Tiger population and its implications for conservation of remaining wild Tiger populations are the subject of **Paper Tigers?: The Role of the U.S. Captive Tiger Population in the Trade in Tiger Parts**, a new TRAFFIC report that sought to answer two central questions:*

- 1. Are Tigers or Tiger parts from the U.S. captive population entering the international Tiger trade?*
- 2. What implications might trade in this Tiger population have on conservation of the world's remaining wild Tigers?*

The report found no evidence that the U.S. captive Tiger population plays a significant role in the illegal trade in Tiger bone or other parts. However, the report does find critical flaws in the United States' management of its captive Tiger population. Left unaddressed, continuing lax management of the U.S. Tiger population could have global trade implications. The

Tigers are listed in Appendix I of CITES (Convention on International Trade in Endangered Species), which means they are banned from international commercial trade. Additionally, CITES has agreed to a series of decisions and resolutions for its 173 member governments to implement to help protect Tigers from illegal trade. Since 2000, Resolution 12.5 has urged governments to ensure that they have effective management and controls in place to stop captive Tiger parts from entering illegal trade. The United States' lack of a comprehensive management system for captive Tigers means that they have not implemented this resolution as agreed.

concern is that without tighter regulation, this large population of Tigers could become a "drip feed" of supply to fill demand for Tiger parts, thereby perpetuating this market and further threatening wild Tiger populations, as wild parts are always preferred in traditional medicines and as it is cheaper to poach a wild Tiger than to raise one in captivity. Any such activity could derail decades of efforts to suppress this market – efforts supported by many governments, traditional medicine practitioners, conservation organizations and others. The United States must do its part to ensure that its captive

Tiger population does not contribute to the endangerment of the world's remaining wild Tiger populations.

Most of the world's attention and attempts to resolve the Tiger conservation crisis have focused on key Tiger range and consumer states in Asia, but it is clear that a global effort is required to conserve this species in the long-term. The role of nations such as the United States that have significant captive Tiger populations may be a key piece of the puzzle. Paper Tigers analyzes the laws and regulations governing captive Tigers in the United States, assesses the status of this population, evaluates the role of the United States in domestic and

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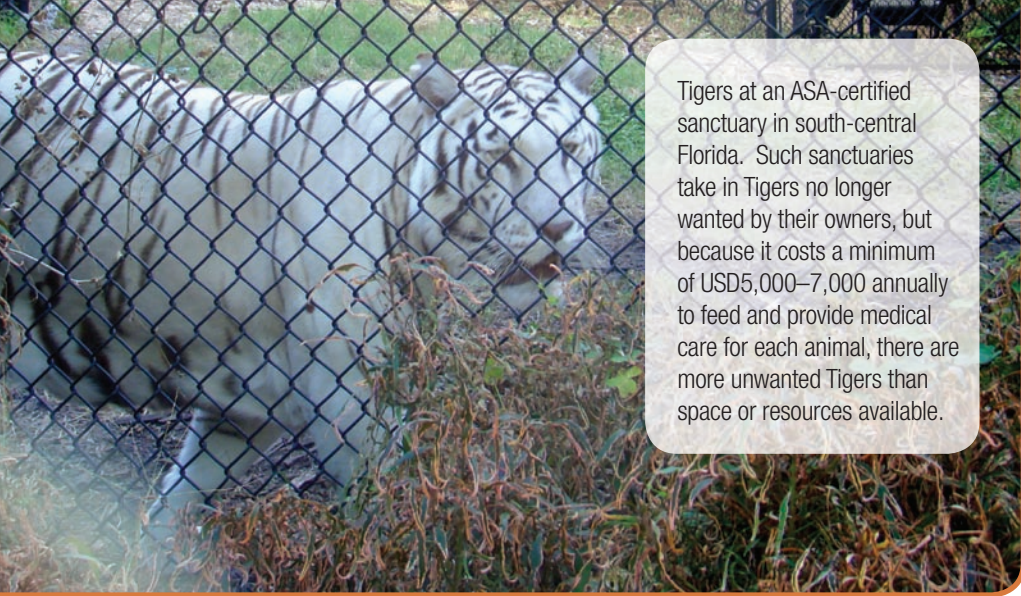


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Tigers at an ASA-certified sanctuary in south-central Florida. Such sanctuaries take in Tigers no longer wanted by their owners, but because it costs a minimum of USD5,000–7,000 annually to feed and provide medical care for each animal, there are more unwanted Tigers than space or resources available.

international Tiger trade, and, finally, discusses the overall implications for conservation of Tigers in the wild.

The conclusions and recommendations of *Paper Tigers* are summarized below.

## Conclusions

➤ Markets continue to exist in Asia and elsewhere for a variety of Tiger products and derivatives. While most genuine Tiger products likely come from the poaching of wild cats at present, many are concerned about the potential impact of China's proposal to re-open a domestic market for Tiger derivatives from commercial farms. With well over 5,000 animals, China now likely holds the world's largest captive Tiger population. Re-opening of any legal trade in Tiger parts carries potential implications not only for wild Tigers but also for captive Tigers held in other countries, as a large legal market in China could result in an increase in poaching of wild Tigers and smuggling of Tiger parts from captive sources outside China.

➤ With a rough estimate of 5,000 Tigers in captivity, the United States likely ranks second behind China as the country with the single largest Tiger population. Although the United States has no commercial Tiger farms, all of these cats are held in captivity. Unfortunately, U.S. laws and regulations governing the keeping of these Tigers are not

adequate to foreclose the possibility that parts or derivatives from these animals could enter illegal trade.

➤ The United States has a strong legal framework at the federal level governing international trade in Tigers or their parts through the *Endangered Species Act*, the *Lacey Act*, and the Criminal Code. The *Rhino and Tiger Conservation Act*, as amended in 1998, further prohibits any domestic sale of Tiger parts, as well as the sale of any products labeled or advertised to contain Tiger parts.

➤ Through the *Animal Welfare Act*, the *Captive Wildlife Safety Act*, and the U.S. Fish and Wildlife Service (USFWS) registration and permit system for captive-bred wildlife, the United States also has a federal legal framework governing the interstate movement of captive Tigers, rules for the sale, trade, or exhibition of live Tigers, and conditions for their confinement.

➤ All of these laws and regulations, however, have exceptions or exemptions that mean, in practical terms, that the majority of private owners of Tigers in the United States need to simply keep records of Tigers held. While such records must be made available upon request, federal agencies charged with implementing these laws and regulations do not have a mandate to maintain a current inventory of how many Tigers may be in the country, where they are, who possesses them, when they die, or how they are disposed of.

➤ At the state level, laws and regulations governing the keeping of Tigers in private possession vary widely:

- **26 states** have laws **banning** the possession of Tigers in private collections;
- **16 states** allow for the keeping of Tigers by individuals but **require a state permit or registration** (Washington has both a ban on future private possession of Tigers as well as a law governing private possession of Tigers already in the system); and
- **9 states** have **no laws** on the subject.

➤ Given that the vast majority of U.S. captive Tigers reside in private hands (individual or other), and that many of these cats reside in states that do not have laws or regulations requiring close monitoring or scrutiny, it proves impossible to account for all captive Tigers in the country. Furthermore, there is no comprehensive legislative or regulatory system in existence at the federal or state level to document how many Tigers are being bred or born each year, how many may die (naturally or otherwise), or what happens to Tigers or their parts when the animals do perish.

Despite some progress in conservation efforts, the number of Tigers remaining in the wild has continued to dwindle in recent years, from an estimated 5,000–7,000 in the late 1990s to around 4,000 currently. Expanding human populations, habitat loss and degradation, and depletion of the prey base all pose ongoing threats to the survival of wild Tigers in Asia. Especially dire, however, is the threat posed by commercial poaching and trade for medicinals and other parts and derivatives used for traditional medicine, clothing, and ornamentation.

- This lack of comprehensive accountability is consistent among all of the primary U.S. captive Tiger populations—AZA facilities, USDA-regulated Tigers, sanctuaries and refuges, and individual collections or pets. In some cases, even these categories can be deceptive. Depending on the activities of the Tiger owners, sanctuaries or refuges may be USDA-regulated, and in some cases have actively engaged in the breeding and/or selling of Tigers or their parts, legally or illegally.
- There exists a potential supply of Tiger parts being generated within the United States that could reach illegal markets. To date, there is no evidence that parts from such Tigers are entering illegal international trade.
- USFWS seizures data and research by TRAFFIC show that there is an illegal U.S. domestic market for Tiger parts that is being fed by imports from Asia—and China in particular—and consists mostly of manufactured medicinal products, be they real or fake.
- There have been cases of U.S. Tigers in illegal domestic trade, but these have been fairly rare and involved primarily parts such as skins and meat rather than Tiger bone for medicinal purposes.
- TRAFFIC’s findings indicate that there are potentially hundreds of mature unwanted Tigers in private possession or captive U.S. facilities in any given year, as adult Tigers can become prohibitively expensive to care for.
- Should demand for Tiger parts rise to a level where the U.S. captive Tiger population becomes a serious target for individuals involved in smuggling and trade, the potential implications for conservation of remaining wild Tiger populations could be grave. Preventing such an outcome needs to be raised as a priority, including the following steps.

## Recommendations

TRAFFIC recommends that the United States take steps on the legal, regulatory, and law enforcement

fronts to better track the U.S. captive Tiger population and ensure that these animals or their parts cannot enter illegal trade.

### Federal level:

- **Exceptions to laws that exempt certain categories of captive U.S. Tigers from regulation need to be rescinded.** USFWS should issue new regulations removing the exemption for “generic” Tigers under the agency’s Captive-Bred Wildlife (CBW) Registration system. Most Tigers in the United States are generic, or cross-bred, and thus exempt from the CBW registration system. Rescinding the exemption would require that many more persons and facilities holding captive Tigers would have to annually report their year-end inventory of Tigers and activities conducted with the cats, thereby exponentially adding to current knowledge of the U.S. captive Tiger population.
- **USDA, through the APHIS (Animal and Plant Health Inspection Service) Animal Care program, should also require that all persons or facilities holding USDA licenses for exhibition or breeding/dealing in Tigers report annually on the number of Tigers held, births, mortality, and transfer or sale.** This information should be kept in a distinct database and made available for public review.

### State level:

- **All U.S. states that allow private citizens to keep Tigers must enact laws or regulations that require a comprehensive accounting of the number and location of all captive Tigers in their jurisdictions.** Record-keeping should include information on the number of Tigers, their locations, owners, births, and deaths. State laws should also ban any breeding of Tigers in facilities that are not USDA-licensed and registered under the USFWS CBW system.
- Agencies tasked with regulating U.S. Tigers (federal or state) should require that all Tiger deaths be immediately reported and the carcasses be disposed of through cremation by a licensed facility. The documentation of the incineration should be provided to the appropriate regulatory body to help ensure that the Tigers’ parts do not disappear into illicit trade.
- State and/or federal agencies tasked with regulating Tigers should further require that:
  - All Tigers in the United States be implanted with microchips containing relevant identifying information, including license or permit number.
  - A DNA hair sample also needs to be provided from every Tiger as a reference should analysis need to be performed.

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- Tiger owners periodically provide a digital photograph to visually confirm each Tiger's identity. Regulatory authorities should maintain these photos and DNA reference samples securely until a Tiger's death and confirmed disposal. This will deter misuse of microchips and laundering of parts.
  - Any Tigers found without proof of legality would be confiscated, with the owners facing criminal prosecution.
  - When a Tiger dies, the owner should be required to notify regulatory authorities, who would collect the chips upon receiving proof that the animal and its parts had been properly and permanently disposed of.
- States should also require that all facilities operating as Tiger "sanctuaries" or "refuges" adhere to strict criteria such as bans on breeding, sale, or trade in the animals. Every state at a minimum should adopt the USFWS 2007 definition of what constitutes an accredited sanctuary, as some of the most prominent U.S. cases of illegal Tiger trade in recent years originated from facilities calling themselves sanctuaries.

### Private and Non-profit Sectors:

- Private stakeholders such as zoos, circuses, sanctuaries – and their related associations – in possession of Tigers could establish a voluntary

system to inventory, regulate, and accredit holders of captive Tigers according to the principles outlined above. Legal or regulatory changes at the federal or state levels may take time; responsible private entities may be able to act more quickly.

- NGOs could assist this effort by funding and/or managing a U.S. Tiger database to track U.S. captive Tigers more broadly. Records in such a database could include each animal's license or permit number, and other identifying information.

### Detecting Trade:

- State and federal law enforcement should be provided with resources to conduct surveys and undercover investigations into trade in Tiger parts in the United States – including monitoring traditional Asian medicine stores and potential exports of Tiger parts.

- Resources for the USFWS wildlife inspection program and special operations should be enhanced to identify and eliminate potential markets for Tiger parts here and abroad.

**For an electronic copy of the full report, please visit [www.traffic.org/mammals/](http://www.traffic.org/mammals/).**

Suggested citation: Williamson, D.F. and L.A. Henry. 2008. *Paper Tigers?: The Role of the U.S. Captive Tiger Population in the Trade in Tiger Parts*. TRAFFIC North America, Washington D.C.: World Wildlife Fund.

### U.S. states that allow/ban possession of Tigers as pets

State	Tigers Allowed as "Pets"?	License, Permit, or Registration Required?
Alabama	Yes	No
Alaska	No	n/a
Arizona	No	n/a
Arkansas	No	n/a
California	No	n/a
Colorado	No	n/a
Connecticut	Yes	Yes
Delaware	Yes	Yes
Florida	No	n/a
Georgia	No	n/a
Hawaii	No	n/a
Idaho	Yes	No
Illinois	No	n/a
Indiana	Yes	Yes
Iowa	Yes	No
Kansas	No	n/a
Kentucky	No	n/a
Louisiana	Yes	Yes
Maine	Yes	Yes
Maryland	No	n/a
Massachusetts	No	n/a
Michigan	No	n/a
Minnesota	No	n/a
Mississippi	Yes	Yes
Missouri	Yes	Yes
Montana	Yes	Yes
Nebraska	No	n/a
Nevada	Yes	No
New Hampshire	No	n/a
New Jersey	No	n/a
New Mexico	No	n/a
New York	No	n/a
North Carolina	Yes	No
North Dakota	Yes	Yes
Ohio	Yes	No
Oklahoma	Yes	Yes
Oregon	Yes	Yes
Pennsylvania	Yes	Yes
Rhode Island	Yes	Yes
South Carolina	Yes	No
South Dakota	Yes	Yes
Tennessee	No	n/a
Texas	Yes	Yes
Utah	No	n/a
Vermont	No	n/a
Virginia	No	n/a
Washington	No	Yes
West Virginia	Yes	No
Wisconsin	Yes	No
Wyoming	No	n/a

Source: API 2007b; TRAFFIC Review of State Laws and Regulations 2007.

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For further information contact:

TRAFFIC North America  
 c/o World Wildlife Fund-US  
 1250 24th Street, N.W.  
 Washington, D.C. 20037 USA  
 Telephone: +1-202-293-4800  
 Fax: +1-202-775-8287  
 Email: [tna@wwfus.org](mailto:tna@wwfus.org)  
 Web Site: [www.traffic.org](http://www.traffic.org)

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