



TRAFFIC



LAW OF THE TIGER

A Comparative Study of the Laws
Governing Tiger Trafficking in
12 Tiger Range States

Executive Summary & Recommendation

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Wild tigers, India.
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1 EXECUTIVE SUMMARY

Despite national-level legal protections and being listed on Appendix I of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), tigers continue to be traded within and across international borders, driven by persistent demand for tiger parts and products, as well as enforcement gaps. Between January 2000 and June 2022, 85% of the estimated 3,377 tigers seized globally were confiscated within **tiger range countries (TRCs)**¹. This report relates to CITES Resolution Conf. 12.5 (Rev. CoP19)², which urges states to adopt or review legislation to ensure deterrent penalties and coverage of all forms of illegal trade involving Asian big cats. The results illustrate how the legal frameworks reviewed across 12 TRCs* still contain significant gaps and inconsistencies that hinder efforts to combat tiger trafficking. All findings and ongoing legal updates are available through the Legal Atlas digital platform.

Strong legal frameworks are essential for addressing tiger trafficking, but resilient and successful approaches also need to include effective enforcement of these frameworks, including respect for human rights, facilitating human-tiger coexistence approaches, meaningful engagement with communities – including Indigenous Peoples whenever appropriate – and inclusive conservation approaches. How gender, corruption, Indigenous Peoples and local communities are addressed in legislation in relation to tiger trafficking are not within the scope of this assessment, but are important areas to explore in future work. This assessment only examines what is written in the legal frameworks, and it does not consider whether or how the laws are implemented.

1.1 ENFORCEMENT

The transversal, organised and transnational nature of the trade in tiger parts and products demands effective enforcement and coordination.

While most TRCs assign a **lead authority**—usually forestry or wildlife departments—**coordination** between enforcement agencies is essential for success; yet, it is often fragmented by geography, legal mandates, and institutional silos. **Frontline officers sometimes lack critical powers**, such as the authority to arrest, conduct

searches, use appropriate and proportional force, or conduct investigations, which limits their ability to act effectively. Customs and police hold broader powers but are not always present where trafficking begins. Most TRCs also lack centralised data systems and either do not have or do not use generally applicable international cooperation mechanisms for wildlife crime, e.g., Association of Southeast Asian Nations (ASEAN) or Senior Officials Meeting on Transnational Crime (SOMTC) or Mutual Legal Assistance Agreements. Exacerbating matters, several TRCs focus narrowly on international trade, overlooking domestic markets and hybrid tigers, which often fall outside legal protection. These weaknesses hinder national enforcement and disrupt regional efforts to combat transnational wildlife crime.

1.2 CONFISCATION

Many TRCs lack comprehensive legal frameworks for the confiscation and management of stocks of tigers and tiger parts and products, thereby risking the leakage of these items back into illegal trade chains.

Confiscation requirements play an unheralded role in the effectiveness of enforcement. A mandatory confiscation model, where enforcement officials are legally required to seize illegal wildlife specimens, products, or tools used in the commission of a crime, offers clear advantages over a permissive or implied approach. It ensures consistency and reduces the risk of selective or discretionary enforcement, which can be further compromised by corruption, inadequate training, or external pressures. Removing discretion also helps close enforcement gaps and prevents traffickers from retaining contraband or continuing their operations.

Several TRCs have established mandatory confiscation provisions for illegal wildlife specimens, with countries like **China, Bhutan, India, Laos, Malaysia, and Thailand** requiring enforcement authorities to seize contraband in specified circumstances. **China's** legal framework is particularly robust, detailing a wide range of scenarios where confiscation is obligatory, including illegal trade, transport, consumption, and captive breeding of protected species, as well as the introduction of non-native wildlife without proper certification.

* There are 14 recognised TRCs. Russia and Kazakhstan were not reviewed in this assessment.

In contrast, a few TRCs, such as **Bangladesh, Nepal**, and **Indonesia**, grant authorities the power to confiscate but do not require it, while others, like **Cambodia, Myanmar**, and **Viet Nam** provide no explicit guidance, leaving confiscation to be inferred from broader wildlife laws or other legislative instruments. To enhance enforcement impact, mandatory confiscation should ideally include narrowly tailored exceptions for controlled deliveries, enabling authorities to trace supply chains, gather intelligence, and dismantle organized trafficking networks rather than limiting action to intercepting low-level offenders.

As tiger seizures increase, TRCs face growing challenges in managing confiscated live animals and stockpiles of parts and derivatives. CITES Resolution Conf. 17.8 outlines disposal options for live specimens, including tigers: captivity, reintroduction to the wild, or euthanasia. For dead specimens, disposal is limited to scientific, educational, enforcement, or identification use—auctions are prohibited for Appendix I species to prevent re-entry into illegal trade. CITES Resolution Conf. 12.5 urges countries to consolidate and destroy stockpiles of tiger parts, where possible, with limited exceptions.

Only a few countries (**Cambodia, China, Indonesia**, and **Nepal**) have express legal requirements to manage confiscated specimens. **Cambodia** provides detailed procedures, including disposal, species reintroduction, and repatriation to countries of origin. **Nepal** requires the mandatory destruction of non-living specimens of endangered species. **Indonesia** offers multiple options, such as auction (limited to unprotected or non-Appendix I species), museum transfer, or destruction. Even though auction is limited, **any sale of seized specimens, even of lower-risk species, is discouraged under CITES best practices** unless done with strong safeguards, clear legal origin, and oversight to prevent abuse.

Those with partial stockpile management mandates include **China** and **Bangladesh**. **China** mandates that confiscated items be managed by local wildlife authorities; however, it lacks detailed procedural guidance. **Bangladesh** has the authority to regulate the management of seized wildlife, but has not yet issued implementing rules. **India's** wildlife protection law does not mandate stockpile management, however, there is a new rule on disposal which includes tigers.³

1.3 THE TRADE CHAIN

This section analyses how TRCs regulate the whole wildlife trade chain. A key finding in this report is that while tigers are protected in all TRCs and subject to CITES controls, national legal frameworks often fail to comprehensively regulate the entire wildlife trade chain, especially beyond the import/export stage governed by CITES.

Explicitly criminalising all acts related to tiger trafficking, such as offering for sale, advertising, solicitation, possession, and facilitation, is critical not only for enforcement but even more so for prosecution. Enforcement agents may identify suspicious activity, but without explicit legal provisions covering the full range of trafficking behaviours, prosecutors can struggle to press charges that match the available evidence. More importantly, by criminalising a broader spectrum of acts and actors, the law enables prosecutors to pursue more individuals involved at different stages of the supply chain. This not only increases the likelihood of securing convictions, but also gives prosecutors greater leverage, using the threat of liability or sentencing to encourage cooperation or plea deals, ultimately helping them reach higher-level organisers behind the illegal trade.

The definition of *wildlife trade* is a foundational question because it shapes the entire legal framework used to detect, investigate, prosecute, and adjudicate wildlife crime. While a definition may seem like a technical matter, its impact is far-reaching and often invisible in the outcome of a case. For instance, if the definition is too narrow, prosecutors may be compelled to drop or downgrade charges due to a lack of legal basis, even when wrongdoing is evident. If it excludes preparatory acts or emerging forms of trade (such as online solicitation), entire segments of criminal conduct may remain unaddressed by the law. In other words, the breadth and clarity of how *wildlife trade* is defined not only influences who is prosecuted but also shapes the strength of enforcement efforts, the ability to secure convictions, and the deterrent message sent to potential offenders.

Only two countries—**Thailand** and **Viet Nam**—provide comprehensive definitions of ‘wildlife trade’ or an equivalent term. Most others either limit the formal definition to international trade (e.g., **Cambodia** and **Myanmar**) or do not define it, although they all identify specific acts that fall within the scope of trade, such as import, export, possession and dealing. Although a definition is not the only method for achieving policy coherence, the lack of one can lead to a patchwork approach, causing inconsistencies and legal gaps, particularly for non-commercial or intermediary trade acts such as storage, advertising, and possession. These omissions make enforcement and prosecution of tiger trafficking more difficult and allow traffickers to exploit loopholes.

Across all TRCs, laws tend to focus on **primary trade acts** (e.g., hunting, sale, purchase), while largely neglecting **facilitative acts** (e.g., advertising, online trade, transport, processing). Only five countries regulate advertising, and just two address online trade, despite its growing importance in illegal wildlife markets. **Viet Nam**, for instance, prohibits illegal advertising of tiger products but fails to criminalise online trade, likely leaving a gap in

³ Ministry of Environment, Forest and Climate Notification, G.S.R. 501(E), 12th July, 2023.

enforcement. Note that Viet Nam has already recognised this issue and its first Law on E-Commerce will be promulgated by the end of 2025.

The uneven treatment of trade acts is especially problematic in the context of **transnational organised crime**. Inconsistent legal coverage undermines the principle of dual criminality,* making cross-border cooperation (e.g., extradition or mutual legal assistance) more difficult. Traffickers can exploit these weaknesses by operating in jurisdictions with the least restrictive or unclear laws.

1.4 LABELLING REQUIREMENTS

Between January 2020 and June 2022, analysis of tiger seizures showed that tiger skins, bones, and whole animals were the most frequently confiscated items. These parts are often used in the production of traditional medicines, tonics, and status products. However, the illegal market is increasingly comprised of mislabelled or falsely advertised parts from other big cats, which are sold as tigers, creating serious enforcement challenges. Identifying tiger derivatives—especially in processed or degraded products—requires advanced forensic tools and expertise, which are often unavailable to enforcement authorities.

To address this, **China** and **Malaysia** remain the only TRCs that explicitly ban the sale and marketing of any product claiming to contain tiger parts, regardless of its actual content. This approach shifts the enforcement burden from proving the physical presence of tiger material to acting solely on commercial representation, thereby easing prosecution. Despite CITES Res. Conf. 9.6 (Rev. CoP19) being clear on this need, other TRCs lack this type of legal tool, allowing traffickers to exploit a regulatory gap where false claims cannot be penalised unless tiger content is scientifically confirmed.

Labelling laws across TRCs vary widely. Both **China** and **Malaysia** have affirmative labelling requirements that apply to both domestic and international trade. Three others (**Cambodia**, **India** and **Viet Nam**) restrict labelling laws to international trade. **India** adds to this a shift in the burden of proof to the accused, who must prove the legality of their trade, further ensuring that businesses are in compliance with regulatory requirements. A further three (**Indonesia**, **Myanmar** and **Thailand**) use a ‘definitional’ approach, allowing enforcement based on label content without requiring labels. Four TRCs, namely **Bangladesh**, **Bhutan**, **Laos**, and **Nepal**, have no labelling requirements, limiting enforcement capabilities in curbing the illegal trade in tiger products.

1.5 KEEPING & BREEDING TIGERS

An estimated 8,900 tigers are held in over 300 facilities across East and Southeast Asia, many of which are implicated in the commercial trade of tigers and their

parts and products. This trade from captive sources can undermine global tiger conservation efforts by fuelling demand, normalising the consumption of tiger products, and contributing to the poaching of wild populations. Despite clear guidance from CITES, which **prohibits breeding for commercial trade purposes and emphasises the importance of breeding solely for conservation purposes**, most countries in the region lack specific, enforceable regulations to align with these goals. Only two countries expressly recognise captive breeding for conservation in their legal frameworks (**Bhutan** and **India**), while others focus primarily on commercial operations.

National legal frameworks vary significantly in their regulation of captive tiger facilities. While most TRCs require licenses or permits for breeding and possession, oversight mechanisms are inconsistent and often generalised, lacking the provisions needed to ensure tiger facilities are not involved in trade. Traceability systems are weak, with few countries maintaining central registries or requiring detailed individual identification. Disposal of dead tigers is another regulatory gap; although some countries mandate post-mortems and controlled destruction, many lack procedures altogether, particularly for hybrids. Without **robust, standardised regulation, enforcement, and transparent facility management**, captive tigers remain at risk of entering illegal trade networks, posing an ongoing threat to the conservation of wild tigers.

1.6 HYBRIDS

Tiger hybrid—such as ligers (male lion × female tiger) and tigons (male tiger × female lion)—are bred exclusively in captivity and have no natural counterpart in the wild due to the geographic and ecological separation of lions and tigers. These hybrids are increasingly found in captive tiger facilities, often driven by demand for visually striking or rare animals, and have entered commercial trade. Under CITES, hybrids with recent lineage from Appendix I-listed species, such as tigers, are to be treated as Appendix I specimens.⁴ However, where **national legislation fails to explicitly recognise hybrids** as “wildlife” or to regulate them within frameworks governing captive breeding, enforcement gaps emerge. These loopholes can allow for the continued trade in tiger parts under the guise of hybrids, undermining conservation efforts and complicating monitoring and enforcement.

Among the 12 TRCs reviewed, only **Malaysia** and **Viet Nam** expressly regulate hybrids, with **Viet Nam** adopting a particularly comprehensive approach by incorporating hybrids into its CITES Implementing Decree. Some TRCs, such as **Bangladesh** and **China**, offer potentially broad legal definitions that may implicitly cover hybrids; however, their laws lack specific provisions addressing hybrids within captive breeding or species protection

* **Dual criminality** refers to the principle that, for one country to provide legal assistance (such as extradition, evidence sharing, or prosecution supporting a criminal case), the act in question must be considered a crime **in both countries** involved. In the context of **mutual legal assistance (MLA)** and **illegal wildlife trade**, dual criminality can pose a significant barrier. If one country criminalizes the trade of a specific species or activity (e.g., failure to label properly, or possession), but the other does not, legal cooperation may be denied.

regimes, leaving interpretation uncertain. The majority of TRCs (7 out of 12 reviewed), however, appear to exclude hybrids from legal protection due to narrow definitions of “wildlife” that limit coverage to species naturally occurring in the wild. This includes countries like **India**, **Indonesia**, and **Nepal**, whose legal frameworks either omit hybrids or implicitly exclude them as non-wild or domesticated.

The inconsistent treatment of hybrids across legal systems is a critical vulnerability in efforts to control the trade in big cats. Clear legal recognition and regulation of hybrids are necessary to prevent their exploitation as a legal loophole in illegal wildlife trade and to address related concerns around animal welfare, breeding practices, and the laundering of tiger parts.

1.7 THE CRIMINAL JUSTICE RESPONSE

The criminal justice response to tiger trafficking in TRCs reveals **a persistent gap between the scale of the crime and the strength of legal and institutional frameworks intended to address it**. While most countries assign lead responsibility to forestry or wildlife departments, such as **Cambodia’s** Forestry Administration or **Nepal’s** Department of National Parks and Wildlife Conservation, coordination across agencies, while essential for an effective response, remains fragmented. Only a few TRCs, including **India**, **Malaysia**, and **Thailand**, have established permanent inter-agency bodies at the national level. **India’s** Wildlife Crime Control Bureau, **Malaysia’s** Joint Enforcement Task Force and Wildlife Crime Bureau, and **Thailand’s** Wildlife Enforcement Network are legally mandated to facilitate cooperation. In contrast, others, such as **Indonesia** and **Nepal**, permit coordination on a discretionary basis,

often limited to specific cases or temporary task forces. At the same time, countries like **Bhutan** have no specific legal requirement for inter-agency cooperation.

Enforcement powers also vary widely. In **India**, **China**, and **Malaysia**, frontline officers and customs officials are granted broad authority, including the power to search, arrest, and, in some cases, conduct controlled deliveries. Yet in many TRCs—such as **Bangladesh**, **Myanmar**, and **Laos**—rangers and forest officers may lack one or more essential powers, among them the ability to detain suspects or conduct investigations without police support. In **Laos**, for example, offences related to environmental crimes, particularly those involving timber and wildlife, are the responsibility of forest officers. Police are only involved in complex cases, and even then, only upon request through the LAO-WEN framework. This legal fragmentation hinders real-time enforcement in remote areas where poaching and initial trafficking often occur. Meanwhile, advanced investigative tools—such as undercover operations and data-driven intelligence—are only explicitly authorised in a small number of jurisdictions, limiting the ability to trace criminal networks.

Legal coverage of core wildlife crimes is similarly uneven. While countries like **India**, **Viet Nam** and **Thailand** criminalise a broad range of trade acts, including possession, transport, and advertising, others—such as **Myanmar** and **Indonesia**—focus narrowly on sale and export, leaving facilitative or intermediary activities under-regulated. **India**, notably, also shifts the burden of proof to the defendant to demonstrate the legality of possession, an underutilised but effective tool reducing prosecutorial burden. Online trade, despite being a known trafficking channel, is only explicitly addressed in **China** and **Thailand**. **Malaysia** has included language in its 2021 Bill that is theoretically applicable to online trade cases (“business dealing” and “promotion of wildlife”), but falls short of explicitly regulating this practice. **Laos** has issued two regulatory instruments that begin its efforts to stem online trade, but which have not yet been embedded in national law. Moreover, although all TRCs have anti-money laundering frameworks, only four—**India**, **China**, **Malaysia**, and **Thailand**—adequately identify wildlife crime as a predicate offence, restricting the application of financial crime tools elsewhere.

These gaps have far-reaching implications. When offences such as possession or online trade are not uniformly criminalised, prosecutions may stall, and international cooperation may be hindered by the principle of dual criminality. The overall picture is one of fragmentation between agencies, legal provisions, and enforcement powers, allowing traffickers to exploit regulatory weak points. A stronger criminal justice response will require not only legislative reform but also more explicit mandates, empowerment of all frontline officers, and institutionalised coordination to confront the spatially spread, often transnational, and organised nature of the tiger trade.



Two wild tigers in Bandhavgarh National Park, India. © Suyash Keshari / WWF-Australia

2 RECOMMENDATIONS



This report's comparative analysis of laws across 12 tiger range countries (TRCs) reveals that tiger trafficking persists in part because of legal fragmentation and gaps in regulating the entire trade chain, including captive breeding, hybrid species, and digital markets. While some TRCs have made progress in targeted areas, few possess a comprehensive legal framework that anticipates the organised and transnational nature of the trade.

The following recommendations offer targeted reforms across key areas of national regulation related to tiger trade, from captive facilities to criminal justice responses. They are aimed at helping governments close legal loopholes, improve coordination, and align with best

practices. These can be prioritised based on the national context, for example, whether they are a source, transit and/or consuming country.

2.1 OVERARCHING

The following recommendations apply generally to the legal frameworks reviewed.

- **Clarity over ambiguity** – Laws should favour precise definitions and unambiguous terms, avoiding vague wording that leaves room for broad or conflicting interpretation, e.g., expressly define and regulate 'hybrids' as opposed to relying on an interpretation that hybrids fall under a recognised species.

- **Internal consistency** – Ensure that terms, definitions, and procedures are used consistently across the legislation and harmonised with existing statutes to avoid contradictions.
- **Anticipating application** – Draft provisions with attention to how courts, regulators, and the public will apply them in practice, not just how they read on paper.
- **Explicit procedures for exceptions** – Where exceptions or special cases are needed, define them explicitly rather than leaving them to discretionary judgment.
- **Future-proofing** – Avoid unnecessary technological or situational specificity that may quickly become outdated; instead, provide adaptable frameworks supplemented by regulations or standards.



2.2 ENFORCEMENT

Effective enforcement relies on clear institutional roles, coordinated mandates, and legally defined powers across all agencies involved in regulating wildlife crime.

- **Mandate permanent inter-agency, national task forces** with operational authority and shared data access, to tackle illegal wildlife trade, for example, India's Wildlife Crime Control Bureau (WCCB).
- **Clarify enforcement mandates** to ensure that all frontline enforcement officials, protected area rangers, forest officers, customs officials, and police have the necessary arrest, search, seizure, and investigation powers relevant to wildlife crime within their area of jurisdiction.
- **Legalise controlled deliveries and covert operations**, empowering enforcement agencies to investigate and dismantle transnational trafficking

networks.

- **Require the integration of wildlife crime into national crime data systems**, and invest in evidence documentation protocols to support prosecution.
- **Provide legislative support for the development of other investigatory techniques** to further the identification of the species in products, including but not limited to forensic infrastructure, chain of custody, and other evidentiary requirements.

While not directly related to legal content, the development of wildlife trade-related legislation should be **accompanied by comprehensive training for law enforcement (including prosecutors and the judiciary) in the laws and cases surrounding wildlife trafficking**, thereby fostering a deeper understanding of all potential crime types, the elements of proof, and the required evidence.

Further, **enforcement officers should be trained to respect and protect human rights, and safeguards against human rights violations during law enforcement operations should be in place.**

Concerning rangers, resources from the Universal Rangers Support Alliance (URSA) should be used to ensure that welfare, working conditions, competence and code of conduct are included in the training provided.⁵

2.3 CONFISCATION

Confiscation regimes must prevent re-entry into the illegal market and establish clear rules for the handling of seized tigers and derivatives.

- **Establish standardised, centralised stockpile protocols**, including digital inventory systems and secure facilities for long-term storage consistent with CITES guidance.⁶
- **Require destruction of confiscated specimens not used for scientific or educational purposes**, with third-party monitoring and public disclosure to ensure transparency.
- **Prohibit commercial redistribution or auctioning of confiscated specimens.**
- **Mandate confiscation of any illegally held tigers or their parts or products**, including from captive facilities not in compliance with licensing or trade laws.

In addition to the preceding legislative changes, **consider developing forensic handling guidelines for seizures** of tigers, and their parts and products, and treat the enclosures of confiscated captive tigers or seizure locations as crime scenes. Proper evidence collection—including chain of custody, DNA sampling, and photographic documentation—is essential for successful prosecutions, as it enables the linking of individual cases to broader trafficking networks.

2.4 THE TRADE CHAIN

Legal gaps across the trade chain enable traffickers to exploit weak points in regulation, especially where laws fail to cover intermediary activities or digital platforms.

- **Define 'wildlife trade' (or trade) to include all associated acts**, not just physical sale, import, export and re-export, including but not limited to offers for sale, solicitation, advertising, display, online transactions, brokerage, possession, barter and exchange, processing, transport, and storage.
- Prohibit trade in tigers and their parts and products, **whether from wild and captive sources**.
- **Criminalise online and social media trade of tiger parts and products**, and empower authorities to demand takedown or access to platform data where violations occur.
- **Impose liability on intermediaries**, such as couriers, online platforms, and advertising services that knowingly facilitate illegal tiger trade.
- **Extend legal controls to payment systems and marketplaces** used to transact illegal wildlife sales.

2.5 LABELLING

Fraudulent labelling obscures the presence of tiger parts and fosters continued demand. Laws must be adapted to address marketing, packaging, and consumer deception.

- **Prohibit the sale, promotion, or advertisement of any product claiming to contain, or marketed in any way as containing, tiger (or other protected species), parts, or derivatives**, irrespective of actual content.
- **Ban any product claiming to contain, or marketed as containing, tiger parts or products**, whether or not scientifically confirmed, to remove legal ambiguity from the marketplace.
- **Define 'specimen' in law to include labelling, trademarks, or symbols implying tiger content**, enabling seizure and confiscation even without lab testing.
- **Create penalties for false or misleading wildlife-related product claims on labels**, targeting both manufacturers and distributors.
- **Introduce national labelling standards** for wildlife-based products that enable enforcement and support consumer awareness.
- **Extend liability to both sellers and advertisers of tiger parts and products**, including online platforms and influencers who promote such goods and services.

Such measures would significantly enhance enforcement capacity, reduce market signalling, and help dismantle the foundations that sustain the illegal tiger trade.



Traditional medicine made from wildlife parts and herbs, sold at a morning market in Mong La special administrative zone, Myanmar. © WWF-Myanmar



2.6 KEEPING & BREEDING TIGERS

Captive tiger populations remain poorly regulated in many TRCs, creating a legal and enforcement vacuum where keeping and breeding may be uncontrolled, unreported, or exploited for illegal trade.

- **Require facility-level licensing for all establishments housing tigers**, including zoos, safari parks, rescue centres, and private owners, with clear penalties for unlicensed operations.
- **Require verification of legal sourcing of tigers** to prevent the acquisition from unknown or dubious sources.
- **Mandate individual animal registration**, including microchipping, photographic identification of stripe patterns, and DNA sampling, to enable traceability and prevent laundering of wild-caught or illegally bred animals.
- **Introduce legal limits on breeding**, such as permits that require conservation justification, genetic viability, and alignment with species management plans.
- **Require reporting of all births, deaths, transfers, and escapes** of captive tigers to a centralised national database accessible to enforcement agencies.

2.7 HYBRIDS

Hybrid tigers (crosses between a tiger with another big cat species) often fall outside legal definitions, enabling unregulated breeding and trade. Their ambiguous status undermines species protection efforts and facilitates illicit activities laundering.

- **Include hybrids of tigers in the definition of ‘tiger’ or ‘wildlife’** under national laws to ensure they are subject to the same controls as purebred tigers.
- **Prohibit unlicensed breeding of hybrids**, and require all existing hybrid specimens to be registered and tracked.
- **Ensure CITES implementation laws cover hybrids** with the same trade restrictions as other Appendix I species.
- **Prevent hybrids from being used to evade trade restrictions**, especially in commercial breeding or entertainment contexts.



Captive tigers in a small enclosure, Thailand.
© Supplied



Royal Belum State Park, Malaysia. © Emmanuel Rondeau / WWF-US



Traditional medicine made with tiger parts, sold at a morning market, Myanmar. © WWF-Myanmar

2.8 THE CRIMINAL JUSTICE RESPONSE

The ability to prosecute wildlife crime depends on well-defined offences, adequate penalties, and tools that match the sophistication of organised trafficking.

- **Criminalise all acts in the trafficking chain**, including but not limited to possession, advertising, storage, transport, and online transactions.
- **Treat wildlife trafficking crimes as a serious crime**, aligning penalties with those for narcotics and arms trafficking where appropriate.
- **Designate tiger trafficking crimes as a predicate offence** under national anti-money laundering laws to enable financial investigations and asset forfeiture, aiding the apprehension of high-level actors.
- **Harmonise offences across borders** to facilitate mutual legal assistance and extradition under the principle of dual criminality.

As with section 2.2, while not directly related to legal content, the development of wildlife trade-related legislation should be **accompanied by comprehensive training for law enforcement, including prosecutors and the judiciary, in the laws and cases surrounding wildlife trafficking and the impact of such trade on wild populations and people**, thereby fostering a deeper understanding of the nature of these crimes and their consequences.

REFERENCES

¹ Wong, R. and Krishnasamy, K (2022) *Skin and Bones: Tiger Trafficking Analysis from January 2000 – June 2022*. TRAFFIC <https://www.traffic.org/publications/reports/skin-and-bones-report-2022/>

² CITES Resolution Conf. 12.5 (Rev. CoP19) *Conservation of and trade in tigers and other Appendix-I Asian big cat species* <https://cites.org/sites/default/files/documents/COP/19/resolution/E-Res-12-05-R19.pdf>

³ Ministry of Environment, Forest and Climate Notification, G.S.R. 501(E), 12th July, 2023.

⁴ CITES Resolution Conf. 10.17 (Rev. CoP14) *Animal hybrids* <https://cites.org/sites/default/files/documents/COP/19/resolution/E-Res-10-17-R14.pdf>

⁵ URSA Resources https://www.ursa4rangers.org/ursa4rangers-resources/?_language=english

⁶ CITES, *Disposal of illegally traded and confiscated specimens* https://cites.org/eng/imp/Disposal_of_confiscated_specimen



Wild tiger, India.
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