

# Tigers Among US

## The Impact of Poorly Regulated Captive Tigers in the United States on Tigers in the Wild

**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 be over 5,000) and far exceeds the approximately 3,200 individuals believed to exist in the wild today. Tigers are being poached in the wild for their bones, skins, and other body parts to feed an escalating demand in Asia, which uses them for fashionable tonics, traditional medicine, meat and ornamental purposes.

Around 95 percent of the U.S. captive tiger population is in private hands, some regulated by the U.S. Department of Agriculture (USDA) and others under state regulation but the majority is under virtually no regulation at all. A small number are found in zoos and other facilities accredited by the Association of Zoos and Aquariums (AZA).

The status and management of the U.S. captive tiger population and its implications for conservation of remaining wild tiger populations were investigated in *Paper Tigers?: The Role of the U.S. Captive Tiger Population in the Trade in Tiger Parts*, a 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 analyzed the laws and regulations governing captive tigers in the United States, assessed the status of

**Tigers are listed in Appendix I of CITES (Convention on International Trade in Endangered Species), which means they are banned from international commercial trade under this treaty. Additionally, CITES has agreed to a series of decisions and resolutions for its 175 member governments to implement to help protect tigers from illegal trade. Since 2000, CITES 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.**

this population, evaluated the role of the U.S. in domestic and international tiger trade, and, finally, discussed the overall implications for conservation of tigers in the wild.

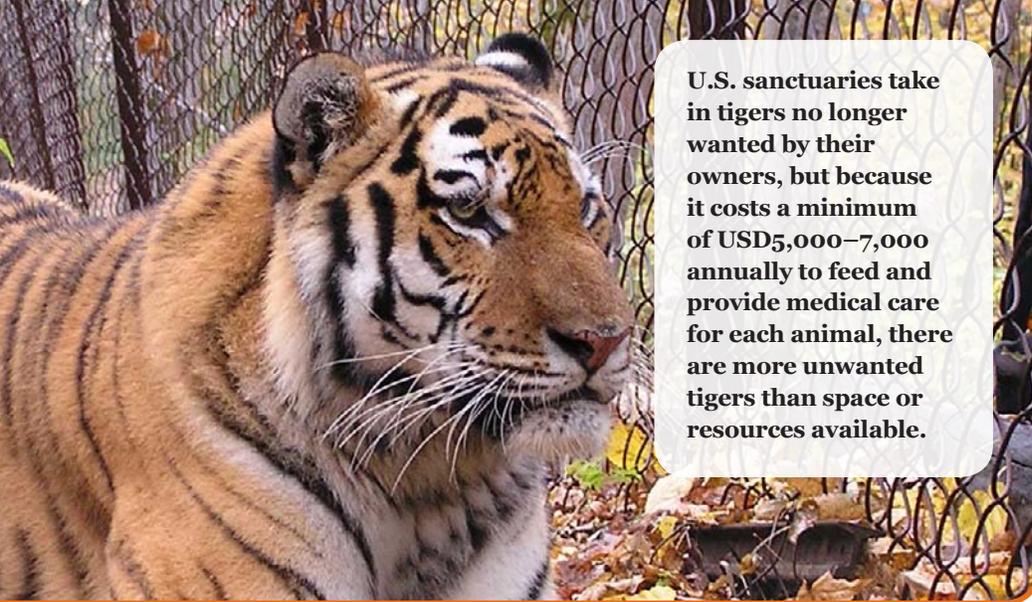
The report found critical flaws in the United States' management of its captive tiger population. Left unaddressed, continuing lax management of the United States captive tiger population could have global trade implications. Without tighter regulation, captive tigers in the U.S. could be killed and traded to

provide parts for international demand in Asia and even in the U.S.

This would only perpetuate a market that is devastating wild tiger populations, as repeated surveys have found a marked consumer preference for wild-sourced parts for medicine, meat and tonics. Any leakage of U.S. tiger parts into the illegal market could help derail decades of efforts to suppress this market—efforts supported by many governments, traditional medicine practitioners, conservation organizations

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**U.S. 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.**

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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. Nations that have significant captive tiger populations, such as the United States, need to ensure that they are part of the global tiger conservation solution and do all they can to minimize any risk to wild tigers.

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

## Conclusions

➤ Markets continue to exist in Asia and elsewhere for a variety of tiger parts and products. There is widespread concern about the potential for countries with commercial tiger breeding operations to reopen a legal domestic market for tiger products. With many thousands of tigers in commercial breeding operations in several countries in Asia, there is now an extensive 'stock' of tigers that could be used to supply trade. There is already some illegal leakage of tiger parts and products from these commercial breeding operations. Reopening of any legal trade in tiger parts, and illegal leakage from captive operations, carries

implications not only for wild tigers but also for captive tigers held in other countries. A large legal market in Asian countries like 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 large scale, commercial captive breeding operations, all of the tigers in the U.S. 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 only to 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:

- **28 states** have laws **banning** the possession of tigers in private collections;
- **17 states** allow for the keeping of tigers by individuals but **require a state permit or registration** (Iowa, Oregon, and Washington have recently instituted bans on private possession of tigers, but also have systems in place to regulate the tigers that were grandfathered in prior to enactment of those bans.); and
- **8 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

**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 in parts and derivatives used for traditional medicine, meat, clothing, and ornamentation.**

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 die.

➤ 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. Nearly 7,000 tiger products from 15 different countries were seized at U.S. borders between 2003-2007.

➤ 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 bones for medicinal purposes.

➤ TRAFFIC's findings indicate that there are potentially hundreds of mature unwanted tigers in private possession or in 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 by the U.S. government, including the following steps.

## Key Recommendations

WWF and TRAFFIC recommend 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.

➤ **A central reporting system and database for all captive tigers held within U.S. borders should be created under new or existing law.** Currently, there is no comprehensive mechanism to determine at any given time where captive tigers are held in the U.S. and who owns them. A federal reporting system and database for all U.S. tigers — without exception — would increase tracking capabilities and enhance enforcement efforts and human safety.

➤ **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 from different subspecies, 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**

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**There is ample evidence, based on USFWS's investigation Operation Snow Plow, that illegal interstate trade has occurred. Operation Snow Plow resulted in the conviction of 17 defendants across 6 states for the illegal killing of tigers, as well as leopards and snow leopards, and the commercialization of their meat, hides and other body parts.**

**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.

➤ Agencies tasked with regulating tigers should consider requirements to assist in identification and tracking of U.S. captive tigers, including photographs and DNA hair samples, as well as implantation of microchips.

➤ 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.

### 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, as was done so successfully in Operation Snow Plow.

The U.S. has been a strong and consistent leader in global tiger conservation and its leadership is needed now more than ever, with wild tigers numbering as few as 3,200. The United States must take steps to close existing regulatory loopholes and comprehensively track its own domestic tiger population. By acting on the recommendations above and cleaning up its own backyard, the U.S. is not only taking direct action to help save wild tigers, but is also maintaining credibility and leverage in pushing tiger range states and consumer states to take steps necessary to saving wild tigers as well.

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

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	No	Yes
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	No	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

**For further information contact:**

**TRAFFIC North America  
World Wildlife Fund  
1250 24th Street, N.W.  
Washington, D.C. 20037 USA  
Telephone: +1-202-293-4800**

**Web Site:  
[www.worldwildlife.org/tigers](http://www.worldwildlife.org/tigers)**

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