



Use of endangered animals in traditional Chinese medicine

“As extinction spreads, some of the lost forms prove to be keystone species, whose disappearance brings down other species and triggers a ripple effect. The loss of a keystone species is like a drill accidentally striking a power line. It causes lights to go out all over.”

E.O. Wilson, *The Diversity of Life* (1992).

According to the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES), loss of biodiversity is as much a threat to the world as climate change, while biodiversity itself is one of the most important tools to slow it down. In its 2019 report, IPBES estimated that 1 million out of 8 million species are endangered, and that many are at risk of extinction in the coming decades. The International Union for Conservation of Nature (IUCN) states that 28 per cent of all the species it has assessed are endangered and that the risk of extinction is accelerating.

With this as the backdrop, the Council started work on a new topic in 2020 – the use of globally endangered animal species in the production of traditional Chinese medicines (TCM). These are species that the IUCN has assessed as being critically endangered, endangered or vulnerable,⁷ or that are included on the CITES list of species subject to an international trade ban.⁸ All these species are threatened with global extinction.

TCM covers many types of treatment, such as acupuncture, massage, the use of herbal medicines and medicines containing ingredients made from the body parts of wild animals. Examples include pangolin scales, saiga antelope horns or the bones of tigers and leopards. Even though animal parts constitute a small proportion of the ingredients used in TCM, the growing demand for TCM could contribute to species loss. TCM is the greatest threat to the pangolin, often described as the world's most trafficked mammal. Despite the ban on international trade in animal parts and live, endangered animals, it is growing substantially, in part because the market for TCM products is growing, according to the UN Office on Drugs and Crime (UNODC).

The use of animal parts from endangered animals in the production of medicines is not prohibited in China if the ingredients come from legal stockpiles. Many years ago, the Chinese authorities established stockpiles of body parts from certain endangered species, but there is no updated information about the size of these publicly owned stockpiles, how they are replenished, where the animals come from or how much of them has been used to date. According to UNODC, there are indications that the demand is increasingly being met through illegal trading.

The GPFG has invested in many Chinese pharmaceutical companies, but not all of these produce TCM. With the help of consultants, the Council first found out which endangered species are used in the production of TCM. It then identified products containing such ingredients. The identification of species used in TCM formulations is based on various editions of the *Pharmacopoeia of the People's Republic of China*,⁹ a compendium of officially approved TCM ingredients, as well as an overview compiled by the State Forestry Administration in 2004, describing which species are considered medicinal and which are protected in China.

The companies were identified by means of information they themselves publish. Companies producing such products market them on their websites, where a list of ingredients is given. All these companies were contacted and asked to provide information about their use of endangered animals in their production of medicines. Most of the companies replied, but they provided few details about their use of endangered animals and emphasised that their practice was legal. Only one company disclosed that it would cease using such ingredients. Work with this company was discontinued after it took down the pages on its website relating to TCM products.

So far, five pharmaceutical companies have been excluded from the GPFG. A lack of information prevents any quantification of the individual company's contribution to the environmental damage caused. When nothing is known of the extent to which a company uses threatened species, where the animal parts originate from, which stockpiles of animal parts exist or how they are replenished, the Council considers that the issue of companies' contribution to serious environmental damage boils down to whether or not they include endangered animal species in their production. As long as the companies cannot point to a firm goal of ceasing to use body parts from endangered species in their production and a timebound plan for when use of such species will cease, the Council presumes that there is an unacceptable risk of the companies contributing to serious environmental damage in the meaning of the ethical guidelines.

7 IUCN 2020. The IUCN Red List of Threatened Species. Version 2020-2. <https://www.iucnredlist.org>.

8 Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), particularly Appendix 1.

9 The term "formulation" means TCM treatments combined with standardised amounts of specific ingredients as defined in standards by the authorities. One part of the *Pharmacopoeia of the People's Republic of China* covers such standards for a large number of TCM formulations, some of which contain body parts from endangered animal species.