8. Following up on queries from several importing countries about export permits issued by the CITES Management Authority of Lao PDR and on the basis of information obtained from its 2011 and 2013 missions to the country, the Secretariat had identified a potential compliance matter relative to the sourcing of CITES specimens authorized for export. The most recent trade suspensions as a result of the Review of Significant Trade can be found in Notification No. 2016/018 of 15 March 2016. It informs Parties that the Standing Committee recommended the suspension of trade with Lao PDR in seven different species:

- *Macaca fascicularis* (long-tailed macaque/monkey)
- *Ptyas mucosus* (Common rat snake)
- *Python reticulatus* (Regal Python)
- *Naja* Spp. (Cobra snakes)
- *Cuora galbinifrons* (turtle species)
- *Heosemys annandalii* (turtle species)
- *Dendrobium nobile* (orchid)

Decisions taken at SC74

4. At its 74th meeting (SC74, Lyon, March 2022), the Standing Committee agreed to lift the current recommendation to suspend trade for *Macaca fascicularis* / Lao People's Democratic Republic (Lao PDR), and to remove the species/country combination from the Review of Significant Trade process, subject to the publication of zero export quotas for specimens of source codes W, F and R. These quotas were confirmed by Lao PDR and published on 30 March 2022. Should Lao PDR wish to resume trade under any of these source codes, it must communicate this to the Secretariat and the Chair of the Animals Committee along with a justification [including a non-detriment finding (NDF)], for their agreement (see SC74 Summary Record).

Investigative Report: Unveiling the Dark Side of the Research Monkey Trade: A comprehensive Expose on Corruption and Illegality in Mainland Asia

Prepared by: Sandy River Research
Date: February 18, 2025

I. Abstract

For decades, Asia has been the world's largest supplier of *Macaca fascicularis* (long-tailed macaques), a species of non-human primates (NHPs) used for research, with China leading the trade until 2020, when NHP exports were abruptly halted during COVID.[1] Cambodia quickly filled the void, almost doubling its NHP exports to the U.S. within a year from 11,351 in 2019 to 19,751 in 2020.[2] Moreover, Vietnam, which exported 480 NHPs to the United States in 2020, increased its exports of NHPs to 3,860 by 2023.[3]

Given the retrospective and current information now publicly available, this unprecedented surge in supply, met with dubious and opportunistic macaque collection programs in Mainland Asia, imposes serious due diligence requirements for importers and Clinical Research Organisations (CROs). In fact, recently available information establishes that most macaques imported into the United States from Cambodia and Vietnam, since at least 2021, which are exported as "captive-bred" or "purpose bred" NHPs, have likely been captured in the wild and are laundered by traders through a network of illegal farms and corrupt officials in Mainland Asia to conceal the macaques' illicit provenance.

Against this backdrop, and as will be addressed herein, CITES authorities, after having reviewed incontrovertible evidence of significant monkey laundering in Mainland Asia, including Cambodia and Vietnam, recently recommended that Cambodia's ability to export macaques be suspended and that Vietnam's macaque trade be allowed to continue, yet placed under "significant review. " Sadly, however, through both the ineptitude and largesse of these international enforcement mechanisms, the CITES Standing Committee, during its February 2025 conference, actually declined to enforce the proposed ban on Cambodian macaque trade, and instead "deferred" the decision on a Cambodian ban to a later date in 2025 after a site visit to Cambodia. Also, at the February 2025 CITES conference, the Standing Committee agreed to revisit Vietnam's macaque trade in November of 2025.

Meanwhile, the illegal macaque smuggling trade in Mainland Asia continues to flourish, unabated.

[1] https://www.cdc.gov/importation/bringing-an-animal-into-the-us/nonhuman-primate.html.
[2] https://apps.fas.usda.gov/gats/default.aspx.
[3] https://cites.org/sites/default/files/documents/E-SC78-Inf-14.pdf.

A Malignant Monkey Laundering Pipeline Exposed

In November of 2022, U.S. based criminal authorities in the Southern District of Florida, unsealed criminal charges against Cambodian wildlife officials and executives at a macaque farm in Cambodia.[4] The individuals were charged with violations of the Lacey Act involving a multi-year scheme to import into the United States from Cambodia wild caught macaques falsely labeled as "captive bred." While the March 2023 trial ended with the spectacular dismissal of most of the charges and the acquittal on the two remaining charges of the single Cambodian official on trial, the uncontroverted evidence shined a light on the seedy underbelly of a flourishing network of experienced and entrenched monkey launderers in Cambodia who, *via* corrupt officials and high profit margins, managed to deliver tens of thousands of wild caught macaques to a "purpose bred" farm in Cambodia for export.

As scrutiny of Cambodian NHP exporters and foreign officials increased following the November 2022 U.S. Department of Justice (DOJ) indictment, some U.S. importers, rather than cutting their ties with problematic farms in Cambodia and Vietnam, sought to maintain their supply of NHPs through strategies that conspicuously avoided even basic diligence via direct inquiry into the actual source and provenance of the exported NHPs. One such company, despite having acknowledged being under investigation relating to their NHP imports from Cambodia, by the DOJ and the U.S. Securities Exchange Commission, simply began rerouting shipments from the troubled Cambodian farms into Canada, avoiding U.S. regulatory and end user scrutiny as to the potential illicit provenance of the NHPs.

More recently, because Cambodian sourced macaques have been effectively embargoed from importation into the United States, the U.S. import supply, previously sourced from Cambodia, has shifted to Vietnam– a country historically fraught with corruption and wildlife laundering.[5] Alarming trends have emerged there to-– new, previously secret, Vietnamese "breeding" farms with inadequate NHP breeding stock pop up almost overnight, existing farms expand capacity wildly beyond practical or mathematically possible birth rates, and many of these operations have direct ties to farms in Laos—a country banned from wildlife trade by CITES due to rampant wildlife laundering and corruption.

This research report establishes that relevant Cambodian and Vietnamese farms have been, and continue to be, unlawfully exporting macaques, most of which are collected illegally from the wild in their respective countries or border states, and are falsely labeled as "captive bred." This report also will expose the systemic issues underlying the purposeful lack of accurate record keeping and corruption in the illegal trade in macaques that is presently rife and virtually uncontrolled in Mainland Asia. We also highlight that while corporate demand perpetuates these endemic and illegal practices, practical solutions that

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[4] *United States v. Kry, et al.*, Case No. 22-cr-20340-KW (SDFL).

[5] https://pdf.usaid.gov/pdf_docs/PA00WQTR.pdf ; https://www.worldwildlife.org/magazine/issues/summer-2024/articles/stemming-the-flow-of-illegal-wildlife-trafficking-in-viet-nam.

would expose the illicit *bona fides* of the exported NHPs are readily available – yet consciously avoided.

The Time to Act is Now

Initially, common sense dictates that since the November 2022 Florida indictment, NHP importers and Contract Research Organizations (CRO's) must conduct heightened due diligence as to the source, parentage and *bona fides* of NHPs from both Cambodia and Vietnam. Next, NHP importers should not be permitted by the U.S. Fish and Wildlife Service or Canadian authorities to turn a blind eye to the unimpeachable conclusion that NHPs exported from relevant farms in Cambodia and Vietnam are assuredly not from legitimately acquired parental stock and/or were laundered and exported directly from the wild. Based upon the supporting evidence in this report, no other conclusion is conceivably possible. In summary, evidentiary support for the findings set forth herein includes, *inter alia*, the absence of evidence of legitimate founder stock, the biologically impossible claimed breeding rates, the physical evidence of the mismatch of farm capacity to alleged output,[6] repeated false attestations to CITES my Mainland Asia countries, and the evidence of actual monkey laundering and the absence of evidence of accurate contemporaneous records by farms as are mandated to document claims of legitimate origin and birth. Without immediate enforcement action by authorities, Mainland Asia NHP farms engaged in this illicit activity will continue to corruptly prosper at the expense of the macaque population.

II. Introduction

A. Background

The CRO industry generally uses Cynomolgus or long-tailed macaques for preclinical testing due to their genetic similarity to humans and historical abundance, making them one of the most sought-after NHPs globally. As demand for macaques sourced outside of China surged during and post the COVID-19 pandemic, so did scrutiny over the legality and ethics of the supply chain. The 2022 charges filed in Florida against Cambodia-based Vanny Bio Research and the subsequent trial exposed a vast macaque smuggling network that should have forced NHP importers and CRO's to reevaluate and reinvigorate their due diligence programs into the sources and parentage of macaques imported from farms in Mainland Asia. Because the consequences of illegal wildlife trade in threatened species[7] extends beyond simply ethical considerations—it poses serious risks to unknowing clients, shareholders, biodiversity, public health, and the integrity of scientific research— effective and thorough due diligence programs are critical and mandatory.

1. How Trade in Cynomolgus Macaques is Regulated

Trade in primates is regulated through a variety of frameworks including national laws in the countries where farms are located, the CITES international treaty, and laws in the importing countries (*e.g.*, U.S. Lacey Act). CITES mandates that exported monkeys be properly labeled with an accurately coded designation indicating whether the NHPs were

[6] Output refers to actual births and sales.

[7] Long tailed macaques are listed as a threatened species in Appendix II of CITES.

captured in the wild or "purpose bred." A wild caught NHP is given the generational designation of F0, while purpose bred animals are categorized as F1, F2, or >F2 generation depending on the number of generations removed from F0. It is not *per se* illegal to export wild caught macaques as their legal status depends on whether the capture of those primates was done properly under the laws of the country of origin and whether the primates were properly declared on all associated paperwork as source code "W" for "wild caught." Source Code "C" designates that the parents of that NHP mated *while in captivity at a breeding facility*. *See* below tables.

Generation[8]	Technical Meaning	Plain Meaning
F0	Wild caught	Animals caught from the wild
F1	Specimens produced in a controlled environment from parents at least one of which was conceived in or taken from the wild	Animals born at a captive breeding facility where at least one parent was wild caught
F2	Specimens produced in a controlled environment from parents that were also produced in a controlled environment	Animals born at captive breeding facility where both parents were also born in a captive breeding operation
>F2	Subsequent generations produced from F2, etc.	Same as above, only subsequent generations.

Source Code[9]	Technical Meaning	Plain Meaning
W	Wild Caught	Animals captured from the wild
C	Bred in Captivity	Parents mated while in captivity at breeding facility
F	Born in Captivity	Parents mated in wild, but animal was born in a captivity
I	Confiscated or Seized Specimens	Animals were found to not have been acquired legally

Therefore, it is imperative that importers and CRO's adequately ensure *and document* whether the NHPs they seek to import (1) were born to parents legally acquired in the country of origin and used as breeding stock, or (2) were captured illegally and necessarily shipped with fraudulent paperwork asserting they were "captive bred."

[8] https://cites.org/sites/default/files/documents/COP/19/resolution/E-Res-10-16-R19.pdf.
[9] https://cites.org/sites/default/files/eng/prog/captive_breeding/E-Souce%20codes%20booklet%20-%20April%2017.pdf.

2. Wild Caught vs. Captive Bred NHP's

There is no shortage of wild caught primates available for lawful export to the U.S. In fact, legal imports of wild caught macaques in 2022 totaled 4,313 macaques. This is the largest level of wild caught imports since 1991 when 6,452 wild macaques were imported.[10]

While there are no prohibitions in the US on the *legal* importation or use of wild caught animals for research, many large importers and CRO's have publicly announced a corporate prohibition on the use of wild caught macaques. To bypass the issue of lack of adequate supply, as this report reveals, some of these entities evidently have deliberately ignored the Klieg light warnings of laundering activity surrounding foreign operations of NHP farms based in Mainland Asia.

B. Public Pronouncements Re: NHP Collection in Mainland Asia

In the face of mounting evidence of internal corruption, supposed "purpose-bred" breeding production numbers that defy common sense, science and, unrelenting demand, imports of macaques from Cambodia and Vietnam have continued, virtually unabated. Some public CRO 's, however, have acknowledged their awareness of the monkey laundering issues in Mainland Asia.

For example, on November 30, 2022, after the unsealing of the indictment in the Southern District of Florida, Charles River Laboratories (CRL) made the following statements in its Form 8-K filing[11]:

> [CRL] was not named or referenced in the DOJ proceedings, and the Company does not have any direct supply contracts with the indicted Cambodian supplier. [CRL] has global supply sources, *including other sources in Cambodia*, which is the primary country of origin of NHP imports into the United States and to [CRL]. However, in light of the indictment, and subsequent statements made by the Cambodian government, [CRL] is operating under the expectation that for some time period supply of Cambodia-sourced NHPs will be difficult to obtain in the United States. (emphasis added)

Later that day on an investor call, CRL's CEO, James C. Foster, acknowledged that "we're working really hard to mitigate any potential adverse impact *with other supply sources with our current supplier in Cambodia*." Foster continued that the "[f]acility we work with in Cambodia [KF Farms] *is an extremely high quality one*. *All the ones that we work with are high quality ones.*"

Similarly, on February 22, 2023, CRL announced that it had received a grand jury subpoena related to a criminal investigation into CRL's import of NHPs from Cambodia. In its Form 10-K, CRL affirmed that "we have voluntarily suspended future shipments of [NHPs] from

[10] trade.cites.org.

[11] https://ir.criver.com/static-files/2c25a578-306c-4d0b-aefe-929d3db88b0c.

Cambodia until such time that we and [the U.S. Fish and Wildlife Service] *can agree upon and additional procedures to reasonably ensure that [NHPs] imported to the United States from Cambodia are purpose-bred."*

In a conference call with investors and analysts on March 18, 2023, CRL's CEO Foster again weighed in on the breadth of the illegal macaque trade in Cambodia as follows:

> So there are no U.S. breeding sources. There are a couple of companies that[,] sort of brokers that[,] get animals from wherever. We have used those folks to some extent historically. I'm trying to be careful in picking my words here. We prefer not to use them. Reputationally, I just don't actually think they care where the animals come from or what the background is and they've been kind of inappropriate with pricing. . . . There are probably animals in country brought in from the outside, including it could be from Cambodia. It could be from the source that DOJ is looking at. I don't know that. *We're just not using them.* Number two, I dont think it's large numbers of the [NHPs]. Number three, I don't know how sustainable that is.

On May 11, 2023, CRL CEO Foster publicly affirmed, "we're quite confident from what we know that our [Cambodian] supplier–he has [been] purpose breeding these animals *according to all of our expectations*, *and we can demonstrate that . . .* ***we're confident that we can prove it and demonstrate it scientifically without a shadow of a doubt."*** (emphasis added).

In a June 8, 2023 conference call with Birgit Girshick, CRL's Executive Vice President and Chief Operating Officer, Girshick affirmed her understanding as to how breeding rates impacted the availability of NHP's for import, stating that "none of the [NHP] farms can scale really, really quickly" and that "the gestation doesn't allow that. The animals have to be a certain age." Moreover, on June 13, 2023, UBS published an analyst's report stating that "given the gestation periods and fecundity of primates, the rapid increase in supply originating in Cambodia simply was not possible without including (illegally-sourced) wild animals into the mix."

In March of 2024, CRL issued an "NHP Report" notifying investors as to the "measures [they had taken] to reinforce confidence that the non-human primates (NHPs) [CRL] imported are sourced in accordance with applicable laws."[12] Because "[r]ecent international developments have called certain aspects of the global NHP supply chain into question" CRL assured investors that they had "implemented new practices ***above and beyond what is required by applicable laws.***" As such, CRL further assured investors that they had in place a comprehensive "NHP Supplier Risk Management Process [and] Enhanced Monitoring and Auditing Processes" to include "increased [] focus on risk and compliance through the development and adoption of an enhanced, further comprehensive and cross-functional NHP Supplier Risk Management Processes, targeting all NHP suppliers and augmenting our standard supplier risk management process." In the chart below, CRL detailed the process

[12] https://ir.criver.com/static-files/36e9ef45-4e33-4db6-9e5d-ab51cdc794b1.

by which this enhanced due diligence would involve "three separate functions of the business":

As a part of these enhanced monitoring and audit processes, and consistent with our newly enhanced NHP Supplier Risk Management Process, all NHP Suppliers will be subject to enhanced due diligence, monitoring and auditing across three separate functions of the business – NHP Operations, Legal Compliance and Procurement. The table below illustrates potential areas of review that could be in-scope for NHP suppliers, depending on their risk profile:

NHP Operations	Legal Compliance	Procurement
• Business Overview • Permits & Licenses • Inventory (including requirements of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), production statistics, breeder inventory, stock / commercial stock count) • Infrastructure (including Environment, Health, Safety and Sustainability, site / personnel security, facilities, staff) • Animal Care (including animal care and recordkeeping) • Import, Export and Transportation (including import documentation, farm packing / loading, feed and water, offloading, vehicle inspection, duties)	• Compliance Screening (including adverse media, sanctions / watchlists and Public Exposed Persons (PEP) lists) • Compliance Questionnaire (including business information, financial information, government interaction, compliance with laws, trade compliance, conflicts of interest, compliance certification) • External Due Diligence Report (including legal / regulatory violations, operational risks, compliance, ethics, sustainability and governance risks, and reputational risks)	• Third Party Risk Management (including denied parties / debarment screening, adverse media and litigation monitoring) • ESG (including sustainability and human rights) • Insurance (including insurance collection and validation) • Financials (including financial stability scoring)

For each NHP Supplier, the Supplier Risk Management Process will be repeated in full at least every three (3) years or more frequently based on identified risks and other factors.

Finally, in a November 22, 2024 email to the Montreal Gazette, CRL's Chief Communications Officer, Amy Cianciaruso, publicly affirmed that "Charles River Laboratories complies with all Canadian *and international regulations pertaining to the importation,* care and treatment of animals used in our life-saving research."

C. The Choice to Avoid Common Sense Due Diligence

For lack of a better analogy, macaques are essentially a commodity. With only a finite number of purpose bred macaques available each year, any increase in demand can only be satisfied by "locating" more purpose bred macaques to import. As such, the greater the NHP demand (plainly there are not enough purpose bred NHPs to meet the demand), the more incentive there is for importers to avoid conducting "disqualifying" due diligence.

D. Pertinent Legal Provisions

1. CITES

Macaca fascicularis, or long-tail macaques, are listed as an Appendix II species in CITES indicating that they are "not currently threatened with extinction but that may become so without trade controls."[13] To export macaques, a CITES export permit is required to be issued. Per Article IV of the CITES convention, an export permit shall be granted only when "a Management Authority of the State of export is satisfied that the specimen was not obtained in contravention of the laws of that State for the protection of fauna and flora."[14]

[13] https://www.fws.gov/international-affairs/cites/cites-appendices#:~:text=Appendix%20II,Appendix%20II%20fact%20sheet.
[14] https://cites.org/eng/disc/text.php#IV.

This process is called a "legal acquisition finding," meaning if the acquisition of the animal violated any law in the country of export, a permit would not be issued. Examples of such instances would be the attempted export of a macaque unlawfully captured from the wild. Such a violation is further compounded when the same animal is then exported with fraudulent paperwork, such as a designation that such animal was "captive bred." Similarly, the *illegal* capture of animals from the wild to use as breeding stock would also cause any progeny to be exported illegally in violation of CITES.

2. Lacey Act

The Lacey Act[15] makes it illegal in the U.S. to import, export, transport, sell, receive, acquire any fish or wildlife taken, possessed, transported, or sold in violation of any law, treaty, or regulation of the United States or any foreign law. Thus, the knowing acquisition of macaques that were laundered, or are the progeny of animals caught in violation of foreign law, becomes a potential criminal violation of the Lacey Act.

3. *WAPPRIITA*

The Wild Animal and Plant Protection and Regulation of International and Interprovincial Trade Act (WAPPRIITA) is a Canadian law "to protect certain species of animals and plants, particularly by implementing the Convention and regulating international and interprovincial trade in animals and plants."[16] It largely parallels the US Lacey Act, in that it prohibits and criminalizes the importation, possession, and transportation of any animal or derivative that was possessed, distributed or transported in contravention of any law of any foreign state.

E. NHP Export Landscape in Mainland Asia

1. *Representations by the Government of Cambodia re: Founding Stock*

At the 30th meeting of the CITES Animal's Committee in July 2018, Cambodia submitted a document[17] explicitly confirming that "there have been no quotas granted for collecting live specimens of *Macaca fascicularis from the wild since 2010."* At the 33rd meeting of CITES Animal's Committee in July 2024, Cambodia updated its reporting to reflect a limited authorized capture of wild macaques since 2018: "[S]ince October 2010, in order to safeguard the wild population of *Macara fascicularis,* at the request of the FA, the MAFF has decided to suspend permits to collect and/or harvest *Macaca fascicularis* from the wild," with the exception being that "the collection of *Macaca fascicularis* from public areas and tourist site has been allowed." The report further confirmed that "[s]ince 2018 to present, 2057 heads (Vanny BioResearch 2,000 heads and Orient-Cam 57 heads) macaques were off-take from public places and tourist sites in accordance with Resolution Conf.10.16 (CoP 19)." Thus, with the exception of 2057 macaques removed from public places and tourist

[15] https://www.law.cornell.edu/uscode/text/16/3372.
[16] https://lois-laws.justice.gc.ca/eng/acts/W-8.5/page-1.html#h-468884.
[17] https://cites.org/sites/default/files/eng/com/ac/30/E-AC30-13-01-A2-R3.pdf.

sites, the wild capture of macaques has been prohibited by the Cambodian government since 2010.

On January 13, 2025, CITES recommended a trade suspension for Cambodia with respect to the trade of macaques.[18] At the CITES meeting in Geneva during the first week of February 2025, the issue of trade suspension with Cambodia was deferred until the next 20th Meeting of the Conference of the Parties (CoP20) in November of 2025. The legitimacy of Cambodia's representations to CITES which led to the deferral of the proposed trade suspension will be examined in the Cambodia section *infra*.

2. Representations by the Government of Vietnam re: Founding Stock

In 2014, the Vietnamese government confirmed to CITES that the capture of "live long-tailed macaques from the wild (outside Protected Area) for commercial purposes," *is prohibited absent "a Non-detriment finding."* The 2014 report further confirmed that "[s]ince 2006, Vietnam has ***not*** issued ***any*** permit to catch wild specimens for exportation or founder stock purposes." In 2023 the Vietnamese government confirmed to CITES that ***no*** macaques "from the wild have been found to be acquired to supplement the breeding stock since establishment [of the Vietnamese breeding farms]."

On January 13, 2025, CITES announced that it would keep under review the trade of macaques from Vietnam.[19] At the CITES meeting in Geneva during the first week of February of 2025, the Standing Committee determined that the issue of macaque trade with Vietnam would remain under review until the next CoP20 meeting in November 2025. The veracity of Vietnam's most recent representations to CITES which led to the decision to continue their review of their trade in macaques will be examined in the Vietnam section *infra.*

3. Laos Export Ban–No Exports of Macaques Allowed

In 2016, CITES issued a trade suspension for Laos for seven species, one of which was macaques.[20] This ban was later lifted briefly in 2022 when Laos claimed they would only issue permits for captive bred macaques.[21] CITES temporarily lifted the suspension, but quickly reinstated it in 2023 as evidence of illegal laundering mounted.[22] Laos has confirmed to CITES, however, that no exports of macaques occurred between 2020 and the end of 2023.[23] Confoundingly, Laos continues to permit multiple breeding farms to operate and produce NHPs with no export market– a recipe for participation in the illicit trade of NHPs.

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[18] https://cites.org/sites/default/files/documents/E-SC78-35-01_0.pdf.
[19] https://cites.org/sites/default/files/documents/E-SC78-35-01_0.pdf.
[20] https://cites.org/sites/default/files/notif/E-Notif-2016-018.pdf.
[21] https://cites.org/sites/default/files/notifications/E-Notif-2022-028.pdf.
[22] https://cites.org/sites/default/files/notifications/E-Notif-2023-127.pdf.
[23] https://cites.org/sites/default/files/documents/E-SC78-33-08.pdf.

At the CITES meeting in Geneva, during the first week of February of 2025, the Standing Committee determined to continue actively investigating the legal acquisition of macaques in Laos. The conditions in Laos supporting the monkey-laundering trade will be more fully discussed in the Laos section *infra*.

4. Thailand–No NHP Exports Permitted/No Commercial Breeding Farms

Thailand does not permit the export of macaques and has no commercial macaque breeding farms. Macaques are a protected species under Thai national law and specifically protected under the 2019 Wildlife Conservation and Protection Act which replaced the 1992 Wildlife Act. As discussed in the Thailand section *infra*, Thailand's plentiful supply of wild macaques and proximity to Cambodia, Vietnam and Laos, makes Thailand an obvious transnational smuggling and shipping point for the illegal trade.

F. A Shifting Supply Chain

With China's sudden halt of purpose bred macaque exports in early 2020, Cambodia stepped into the breach as the primary exporter of purpose bred macaques to the U.S. According to the USDA database, in 2020, Cambodia exported nearly 20,000 macaques to the U.S.—in retrospect, an extraordinary increase from prior years.[24] Moreover, Vietnamese exports to the U.S. increased eightfold over a four year period beginning in 2020. Recently available public information, provided below, establishes a pattern of fraudulent activity by Cambodia, Vietnam and Laos, where the Mainland Asia farms have persistently fudged facility capacities and breeding rates to conceal that NHP demand was being met by laundering tens of thousand of wild-caught macaques for export under the source code "C" for "captive-bred."

Following revelations in the November 2022 DOJ charges against individuals employed by Cambodian NHP supplier, Vanny Bioresearch Corp., and Cambodian wildlife officials, the United States, *via* the Fish and Wildlife Service, has effectively halted the importation into the United States of Cambodian macaques. Some importers, however, rather than requiring the farms to document and demonstrate the *legitimacy* of their Cambodian operations by quantifying and independently verifying farm capacities as well as NHP acquisition, and parentage and breeding rates, have instead responded by rerouting Cambodian NHP exports to Canada and pivoting to Vietnamese NHP suppliers.

Significantly, the legitimacy and viability of the purported Vietnamese supply chain, is also refuted by a significant mismatch in legally acquired breeders versus actual exports of NHPs, as well as additional inculpatory evidence as set forth below. Many Vietnamese farms are also directly connected, through ownerships and other undisclosed relationships, to illicit "farming" operations in Laos—presently under a CITES ban from primate trade due to widespread wildlife laundering and government corruption.

[24] According to the USDA database, 2019 exports to the USA from Cambodia totaled 11,351 macaques.

G. Baselines

1. Breeding Rates

The breeding rate of a farm is best described as the percentage of females that give birth each year. For example, if a farm has 1,000 breeding females and a 70% breeding rate, it would indicate 700 infants were born that year. Significantly, the breeding rate, of course, does not account for post-birth mortality rates or other morbidity factors affecting survival.

The below table is a summary of reported, but unsubstantiated, breeding rates by both Vietnamese and Cambodian farms in the various CITES reports over the years. For contrast, the breeding rates for Mauritius farms have been gleaned from scientific publications. *Noveprim*,[25] a Mauritius breeder, reports the breeding rate of their F0 breeders at 70.43%, while their reported breeding rate of F1 breeders (first generation captive bred) drops to 64.62%. *Bioculture*, another Mauritius breeder, reports a breeding rate of 71.44%, but does not explicitly indicate the generation of the breeders.[26] Thus, as noted below, the otherwise unverified breeding rates reported by most Vietnamese and Cambodian farms in 2023 far surpass both their prior reported breeding rates and rates that are biologically plausible. Of course, actual breeding rates could be confirmed directly by importers as Mainland Asia farms are required to maintain contemporaneous logs of actual live births.

Reported Breeding Rates				
Country	Breeding Farm	2014	2017	2023
Vietnam	Nafovanny	56%-69%	no reports	~55%
	Vina Mekong	no reports	no reports	85%
	Thanh Cong	no reports	no reports	75%
	Phuc Loc Phat	no reports	no reports	82.80%
Cambodia	Vanny Bioresearch	50% Blanket Rate Applied	60%	90%
	Rong De Group		60%	75%
	Orient Bio		60%	80%
	KF Cambodia		~60%	72%

[25] https://www.reuters.com/business/healthcare-pharmaceuticals/charles-river-forecasts-strong-full-year-profit-boost-noveprim-purchase-2024-02-14/.

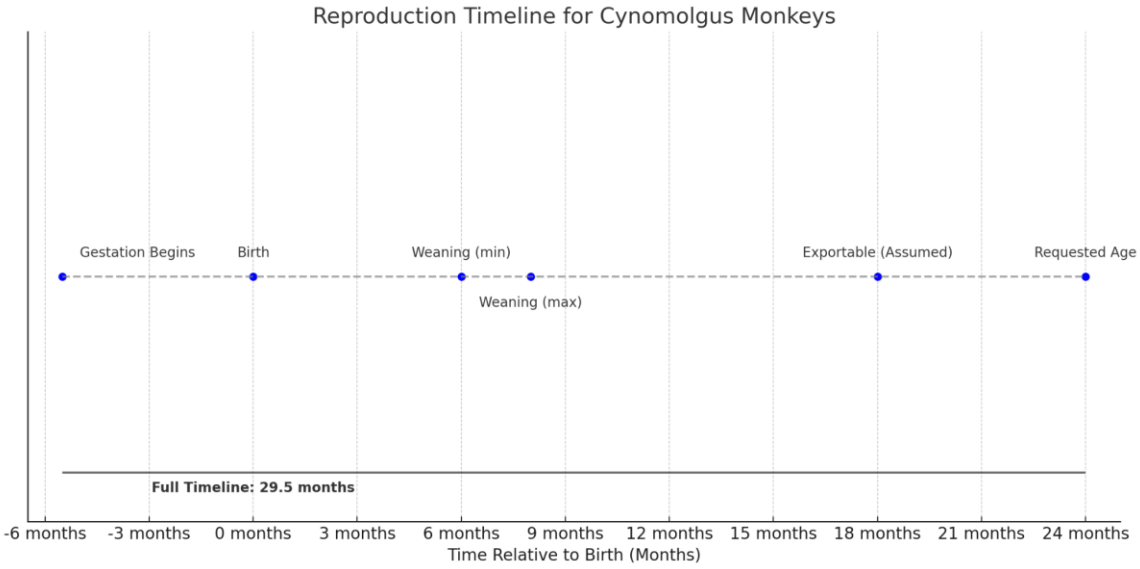
[26] https://cites.org/sites/default/files/documents/E-AC33-15-02_2.pdf.

Reported Breeding Rates				
	SNBL[27]		not reported	90% - 95%

2. Reproduction Time, Mortality and Morbidity

Cynomolgus monkeys used in research are typically required to be a minimum of 2 years of age for use during research studies and, therefore, are not imported when they are much younger.[28] The gestation period for females is approximately 5.5 months. Once born, the infants are typically weaned between 6 -8 months of age[29] depending on the particular farm.[30] In general terms, it takes approximately 3 years to produce a macaque which will be available for export.[31]

The below chart shows the typical reproduction timeline for macaques:



While this report employs the conservative assumption that NHPs will be available for export at 18 months of age, many factors (not included here) would serve to substantially reduce the number of NHP's actually available for export. For example, a breeder that dies or becomes too old or infirm to continue breeding must be replaced, necessarily causing a decline in the progeny available for export. Similarly, absent lawful wild capture, the only

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[27] In Cambodia's 2014 CITES report, SNBL farm is referred to as TIAN HU, which later changed its name to SNBL.

[28] https://journals.sagepub.com/doi/10.1177/01926233221103181.

[29] Some Vietnamese and Cambodian farms have now claimed, without evidentiary support, that weaning is occurring at 3-4 months of age.

[30] https://pmc.ncbi.nlm.nih.gov/articles/PMC10092073/ ; https://www.fda.gov/media/148478/download; https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0062141#s4.

[31] *See, e.g.*, https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0062141#s4.

way to maintain *or* increase the export supply is to remove previously born juveniles from the exportable population to introduce them into the breeding population. Furthermore, every breeding colony will have some level of mortality, both in the breeder base and in the progeny produced.

Morbidity also must be accounted for. There are diseases, viral positive animals and TB issues at most farms that could greatly reduce the animals available for export. Farms must maintain records of these deaths and substitutions. The implication on the exportable progeny is quite simple: many infants die, so even with a 70% breeding rate (70% of pregnant females actually give birth to a live offspring), a significant percentage of live born NHPs will never be available for export.

As such, to arrive at the actual "exportable" population of NHPs, a substantial number of NHPs must also be deducted from the breeding rate calculation, to include morbidity, mortality and replacement of aged breeders– breeding rates alone *never* produce an accurate count of the NHPs available for export. The conservative models used here, however, typically do not take these obvious reductions in NHPs available for export into consideration, and when they do, it is explicitly stated.

Interestingly, out of all the farms in Vietnam which submitted responses in the 2023 CITES request, only one farm, Nafovanny, reported a mortality rate, and that was a robust 2.3%. The remaining Vietnamese farms indicated, suspiciously and without explanation, that the mortality rates were not applicable or "N/A." This fact alone should be a definitive and obvious concern for any entity attempting to confirm the legitimacy of a farm's assertions regarding the *bona fides* of its export population.

As for Cambodian farms, they ***all*** failed to report ***any*** mortality rates to CITES in their 2023 and 2024 CITES reports. Again, a failure that, when taken either alone or in combination, further attests to the illegitimacy of the specific affirmations of the Cambodian farms.

NHP importers and CRO's have the right to demand demonstrable record proof of the actual number of lawfully acquired breeders, actual annual breeding rates, actual annual mortality and actual morbidity rates from exporting farms. Plainly, as shown below and for reasons that will become clear, most importers refrain from doing such basic diligence.

3. Facility Constraints vs. Alleged "Purpose Bred" Population

A breeding facility's infrastructure presents definitive limits on the total NHPs that can be housed at any given point in time. For a breeding colony, space needs to be available for (1) the breeder base and its progeny, (2) post-weaning space and (3) clinical and quarantine space.

The quantity of macaques that can be housed in an enclosure is necessarily limited by both the size of the enclosure and the composition of the group. For example, if the enclosure houses weaned juveniles, they can be housed in a higher density than a breeding group.

In our breeding farm analysis, oftentimes we observed that specific farms reported inventories that, because of the farm's size and infrastructure at the time, could not conceivably have housed the numbers of NHPs on site they reported to government agencies or CITES. Thus, the only explanation in these cases is that inventory had been post hoc "reengineered" and inflated to justify the number of NHPs actually exported.

H. A Definitive and Quantifiable Solution through Verified Audits

The damning evidence of monkey laundering presented in the Miami criminal case and the endemic regional corruption should mandate that importers and CRO's actually verify the *bona fides* of the "captive bred" attestations of Mainland Asia NHP farms. But because captive breeding farms in Cambodia and Vietnam must keep reliable contemporaneous records supporting the legitimacy of their founding and breeding stocks, breeding rates, morbidity and mortality, data driven due diligence models present obvious solutions.

Diligent quantifiable analysis which factors in biological limitations, such as confirmable founding stock, breeding rates, mortality and morbidity, and facility constraints as statistical reference points, would ensure a simple framework to test the veracity of a particular farm's claimed captive bred population. Common sense dictates that such basic pre-import due diligence would be incorporated into any meaningful NHP farm audits. That importers and CRO's now routinely fail to conduct basic statistical due diligence--which, as this report establishes, would disqualify as illegitimate the importation of NHP's from almost any, if not all, farms in Cambodia or Vietnam—is further evidence that some importers may be consciously avoiding discovering information of which they are keenly aware.

Given this scenario, and the current state of the available public information, no longer can CRO's and importers rely with blind faith on the preposterous and *unverified* representations of Mainland Asian breeders. As such, "robust" due diligence would mandate the inclusion of verifiable answers to the following nine (9) basic statistical audit questions which would definitively confirm the provenance of the NHPs sought to be imported:

- The date the farm was established;
- The amount of the lawfully acquired founding stock;
- The amount, date and source of lawful supplements to the founding stock;
- The annual number of female breeders since the farm's establishment;
- The annual birth rate since the farm's establishment;
- The annual mortality/morbidity rates of the juveniles and breeding females;
- The actual housing capacity of the farm during the relevant period;
- The actual staffing levels of the farm during the relevant period;
- The annual exports and lawful domestic transfers of NHPs.

The inability of an NHP farm to verifiably answer any of these questions should mandate termination of NHP imports from the non-compliant breeding farm.

As is set forth below, the application of these basic analytical audit steps *and math* to the *verified* answers to these questions (or lack thereof) would undoubtedly disqualify imports from virtually *all of the below identified* farms in either Cambodia or Vietnam as the founding and breeding stock, per government reports to CITES, cannot be legitimate. In addition, any reliable audits would consider other circumstantial evidence of corruption and/or laundering activity which might in-and-of-itself disqualify NHP importation into the U.S. from relevant Cambodian and Vietnamese breeding farms.

III. Purpose of This Research

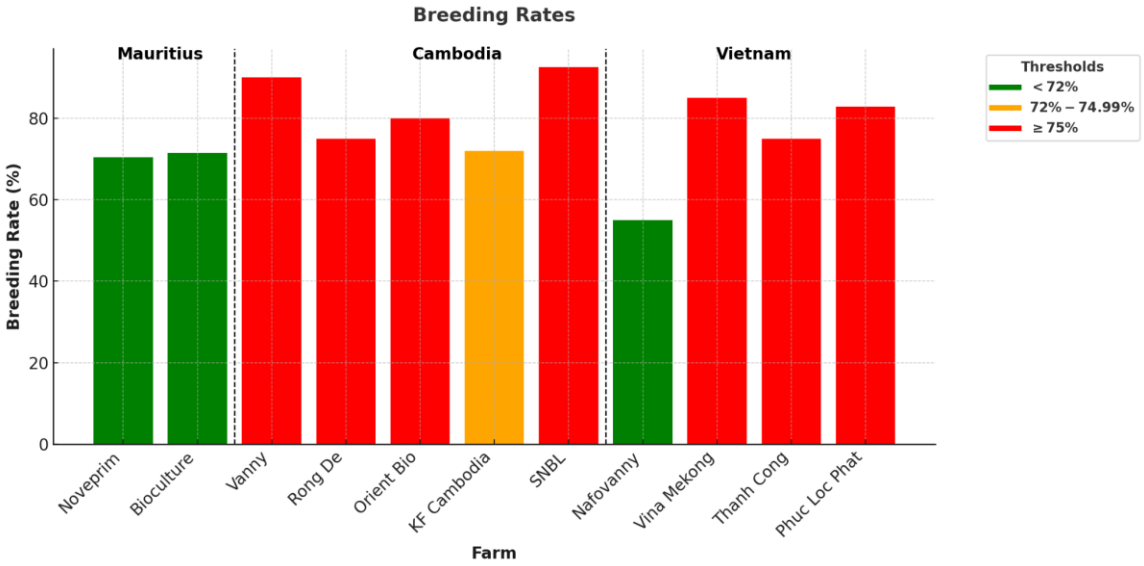
This report explores and exposes the shadowy practices that underpin the illegal and corrupt macaque trade in Mainland Asia, focusing on impossible exaggerations in breeding data, incriminating facility expansions and falsified shipment records. Our analysis connects these critical findings to the significant and purposeful failure of importers and CRO's to conduct verifiable due diligence which would assuredly and convincingly establish that the breeding farms' populations cannot be derived from lawfully acquired founding stock and the worthless designation of the imported NHPs as "captive bred." By exposing these willful omissions and clandestine machinations, the urgent need for both immediate trade suspensions with respect to Cambodia and Vietnam and more stringent domestic and international enforcement of statutory and treaty regulations, absolutely is required to staunch the practices that serve to perpetuate the laundering of macaques.

A. Executive Summary

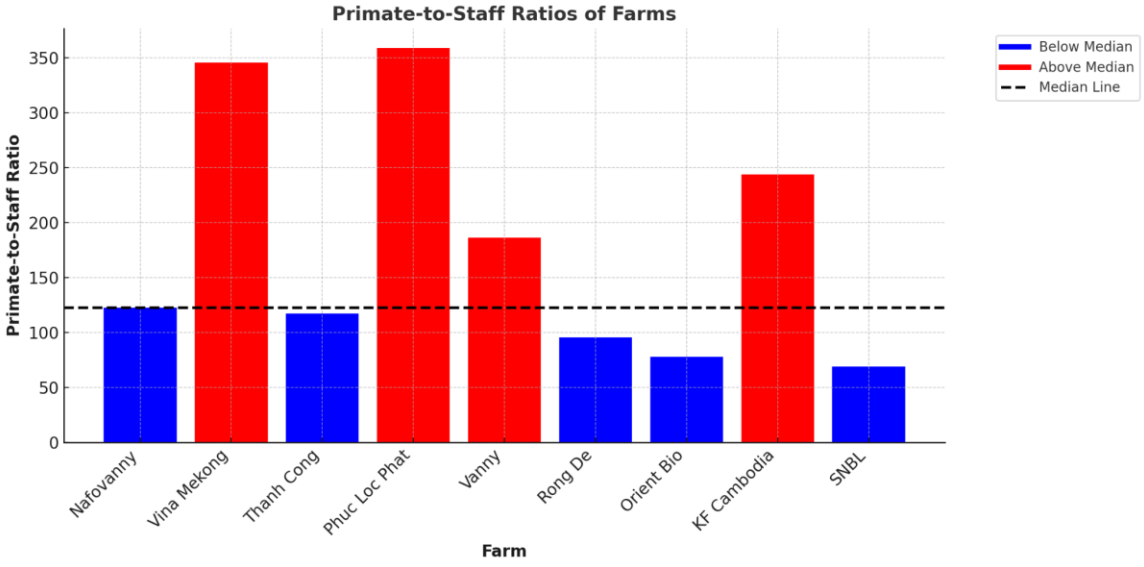
The illicit trade of macaques is not a new phenomenon—it has long been fueled by greed, corruption and the demand for primates in research. For years, illegal farms in Mainland Asia have laundered wild-caught animals as "captive-bred"--all with the complicity of local officials. Since 2022, data has become available which must be integrated into verifying whether these alleged "captive bred" macaque farms have participated in this illicit trade.

While the scale of the known laundering activity in Mainland Asia, as revealed here, may be shocking, it appears to be merely the tip of the illicit trade iceberg. This report reveals that few, if any, breeding farms in the region operate legally, as none have or had sufficient captive bred stock to justify the volume of shipments abroad. Indeed, the reported breeding numbers and shipment volumes simply cannot be explained through biological or mathematical realities, leading to only one logical conclusion–the laundering of NHP's in Mainland Asia remains out of control and virtually unregulated.

As the graph below plainly establishes, with Mauritian farms serving as a baseline, reported but unsubstantiated breeding rates of exporting Mainland Asia farms, as attested to CITES in 2023, are incongruous with biology and reality. With the exception of Nafovanny, Vietnamese and Cambodian farms are at the top of and beyond the upper limits of what is biologically possible or feasible and appear to have been reverse-engineered to artificially justify the otherwise implausible volume of NHPs shipped from each specific farm:



Cambodia's recent unsupported explanation to CITES that their farms have "optimized" their breeding rates by proactive and "timely observance" of pregnancies and weaning timelines and "timely implementation of lactation" is belied by the utter lack of adequate staff on hand to perform this intense and diligent primate attention.[32] Moreover, the grossly disproportionate staffing levels at certain NHP farms in Vietnam and Cambodia, as shown in the graph below,[33] also are indicative that the relevant breeding farms have in fact been overstating "purpose bred" macaque populations.



KF and Vanny in Cambodia, and Vina Mekong and Phuc Loc Phat in Vietnam, each have staff-to-primate ratios (greater than 175 to 1) that are entirely at odds with an efficient or

[32] https://cites.org/sites/default/files/documents/E-SC78-35-01-A5b.pdf.
[33] https://cites.org/sites/default/files/documents/E-AC33-15-02_2.pdf.

legitimate captive breeding farm as evidenced by the above comparison. As such, these staffing numbers present significant circumstantial evidence further suggestive of macaque farms that seek to disguise illegal monkey laundering.

B. Research Findings by Country and Relevant Farm

1. China–The Elephant in the Room and Catalyst of Illicit Trade in Macaques

Although China is not the physical starting point of the journey of macaques smuggled throughout Mainland Asia, it has long been a primary driver of market demand. In this regard, it is noteworthy that Cynomolgus macaques are not native to China. Before 1996, the Philippines, Indonesia, and to a lesser extent, Mauritius, were the main international exporters of long-tailed macaques. That changed in 1996, when China surpassed its regional competitors, eventually overtaking Mauritius by 2001.[34] Except for a brief dip in 2003, China remained the largest international exporter of macaques until 2019.[35]

Like many industries, China entered the market by offering lower-cost goods in seemingly endless quantities – in this case, macaques. Chinese dominance in this sector coincided with an uptick in macaque shipments to China from neighboring Laos, Vietnam, and later Cambodia, as supply chains responded to China's growing demand for large volumes of primates. Now, as macaque prices remain elevated from historical norms, China, demanding additional breeders for domestic consumption, and global importers unable to reliably source from China, farms in countries like Vietnam and Cambodia have stepped in to fill the gap. Consequently, the illegal trade continues to flourish—enabling a transnational network of wildlife laundering that persists to this day.

China's role in the macaque trade has evolved significantly over the years. Given that Cynomolgus macaques are not native to China, to even create its domestic industry China needed to import its macaques. In a 2008 CITES workshop for Non Detriment Findings, China submitted a case study on macaques (NDF Case Study), wherein China alleged that the macaque trade in China was sustainable while alleging that, between 2004 and 2007, China imported 36,620 macaques and *exported only 12,244 macaques.*[36] This data, however, is neither truthful nor accurate -- the CITES trade database shows that China actually exported ***over 65,000 macaques during this period.*** Further suspicions arise when, with the exception of 2006 and 2009, every year from 1992 - 2019, China exported exponentially more macaques than it imported.[37] Therefore, it is axiomatic that, in addition to using macaques for their own research purposes, China cannot credibly explain how they could have conceivably exported vastly more NHP's than they imported– all while establishing and supplying dozens of breeding farms. As such, absent heretofore undisclosed and

[34] trade.cites.org
[35] https://www.cdc.gov/importation/bringing-an-animal-into-the-us/nonhuman-primate.html
[36] https://cites.org/sites/default/files/ndf_material/WG5-CS5.pdf
[37] See Appendix A.

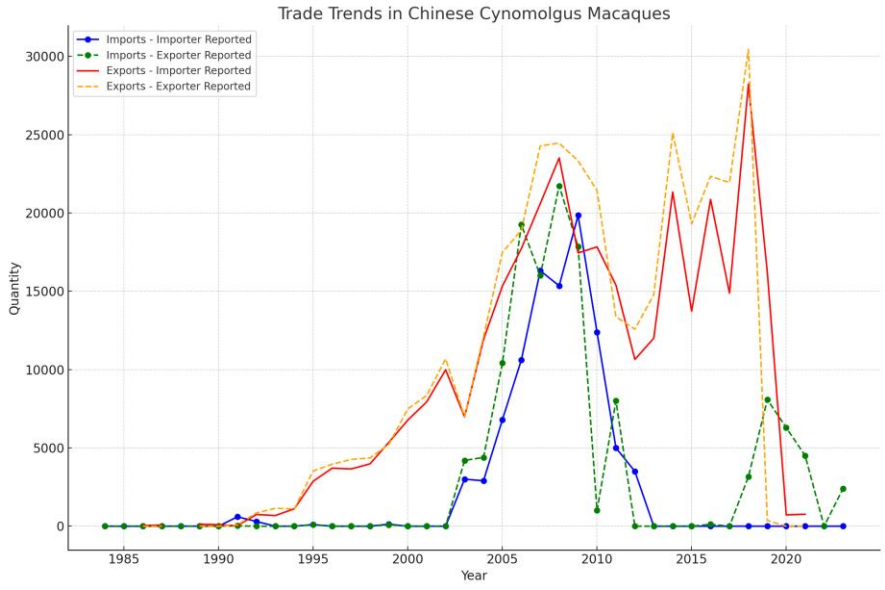
improbable evidence to the contrary, the only logical conclusion is that China is and has been engaged in the large-scale laundering of macaques for decades.

Prophylactic international legal frameworks and ineffectual statutory enforcement mechanisms have done little to stem the illegal smuggling of macaques from Mainland Asia. Chinese companies have rightfully been implicated in receiving smuggled macaques, often transporting them, with improper paperwork, from Cambodia or in the cover of darkness across Vietnam's northern border. When intercepted by Chinese authorities, the macaques are redirected to government-selected farms, raising concerns about legitimate enforcement and oversight. These primates are then used in research or breeding programs in China.

a. China CITES Data

CITES makes trade data available through its trade portal.[38] In that portal there are consistent discrepancies between the amount of NHPs an exporter reports it ships out and the number of NHPs an importer reports it receives. For example, between 1984 and 2005, *imports* of macaques into China were *13,840 or 19,218* depending on whether you rely on the importer or exporters data. China's documented *exports* during this period, however, were in fact ***81,372 or 87,594– more than 4 times the amount reported by China*****.** Given that macaques are not indigenous to China and there are no wild populations, there can be no scenario that such trade could be perceived as legitimate. This trend largely continued (with the exception of 2006 and 2009) until China halted exports in 2020.

The chart below reveals the implausibility of the delta between China's reported NHP imports versus NHP exports:



[38] trade.cites.org.

While traditionally a net exporter, China is now officially importing macaques to meet the demands of its expanding and competitive biotechnology sector. Since 2023, China has imported at least ***8,700*** macaques from a single farm in Cambodia— KF (Cambodia) Ltd..[39] Moreover, Chinese companies have established alleged primate "breeding" farms in, *inter alia,* Mauritius, Cambodia, Vietnam and Laos. Indeed, in August 2024, China and Vietnam agreed on a framework to facilitate the importation of macaques from Vietnam into China.[40] This agreement comes amid inexplicable record exports of Vietnamese macaques to the U.S., Europe and Cambodia.

Ominously, in April 2024, police discovered a shipment of 294 macaques awaiting pickup in a remote border village near Vietnam's northern border with China.[41] This incident underscores the ongoing challenges in curbing this illegal wildlife trade into China.

b. Relevant Chinese Farms[42]

(1) Hainan Newsource

Background

As of early September 2009, Hainan Newsource, did not yet exist as an operational breeding farm. According to corporate records, Hainan Newsource was founded by Zheng Xinguo, and several other partners in late 2009. By September 2010, the facility was partially built out, with expansion continuing to occur over the ensuing years. Hainan Newsource was a sister company to KF (Cambodia) Ltd. By December 2010 Hainan Newsource was supplying "purpose bred" animals to clients overseas. Nevertheless, the legality of acquisition of the source of macaques during the initial phase of Hainan Newsource operations in late 2010 and early 2011 is dubious at best.

Population Analysis

No data published.

Breeding Rates

No data published.

Mortality Data

Internal farm records[43] show that in January 2016 alone, fifty-seven breeding macaques either died or were euthanized. An additional sixty-six juvenile macaques also died or were

[39] http://stats.customs.gov.cn/.
[40] https://finance.sina.com.cn/money/forex/forexinfo/2024-08-13/doc-inciqnps4607142.shtml
[41] https://news.cctv.com/2024/05/01/VIDEL3CF6zMxnTbo1OEmFKwk240501.shtml ; https://baijiahao.baidu.com/s?id=1797744309378898512&wfr=spider&for=pc ; https://baijiahao.baidu.com/s?id=1797777344720368432&wfr=spider&for=pc
[42] Because CITES has never required China to be party to a Review of Significant Trade with respect to long tail macaques, China has not been required to publish and make available data similar to Cambodia, Vietnam, and Laos. Accordingly, this section on Chinese farms has been developed with limited data.
[43] See Appendix A, Hainan Newsource, Mortality Log.

euthanized. Further, five (5) monkeys died or were euthanized but not classified. Thus, in a single month in 2016, 128 macaques at Hainan Newsource died. Three of the 66 juvenile macaques were euthanized for being B Virus & SRV Virus positive. A further 17 juveniles were euthanized for being B Virus positive. The remaining euthanized macaques suffered from malnutrition, emaciation, enteritis, muscle atrophy or fractures.

Conservatively extrapolating these monthly mortality/morbidity numbers to annual mortality rates, Hainan Newsource was losing at least as many as 500 breeders and 500 juveniles a year from its NHP population. Such breeding operations would not be sustainable without the infusion of thousands of macaques. As shown in the Vietnam Section *infra,* this level of mortality is common with purpose-bred farms as Nafovanny and Thanh Cong also suffer from significant mortality and morbidity rates.[44] Such high mortality and morbidity demonstrates why, in 2019, Hainan Newsource would have been in need of an infusion of macaques from Cambodia.

Export Analysis

For the 2010 – 2011 year (through July 31), China authorized export quotas allegedly based on breeding capacities. As would be expected given the farm's infancy, China did not list Hainan Newsource as an exporter of macaques during that time. Yet, Hainan Newsource was able to secure CITES permits to export 560 macaques to the U.S. in 2011.[45] Hainan Newsource also exported 80 macaques to the U.S. in 2010. This is in addition to 16 macaques sold domestically as reported by the China Laboratory Primate Breeding & Development Association in a survey done at the request of forestry officials in China.[46]

For context, these primates exported to the U.S. would not have been able to be exported until they were at least 2 years old, and, as stated, the gestation period for long tail macaques is approximately 5.5 months. Accordingly, female breeders would need to have given birth to the primates exported in 2010-2011 by at least early 2009. This, of course, would not have been possible given the establishment of the facility in late 2009. Of particular note is that satellite imagery shows that the farm was not even constructed until 2010.[47]

[44] These two Vietnamese farms claim the acquired animals are purpose bred.
[45] See Appendix A, Hainan Newsource, Shipment Data.
[46] It is noteworthy that Hainan Newsource did not report these overseas exports (80+560) in this survey.
[47] See Appendix A.

Based on local reporting, in June of 2019, while Charles River Laboratories was negotiating to acquire a stake in Hainan Newsource,[48] 1,500 macaques were transported from KF Cambodia to Newsource for use as breeding stock.[49]

1,500 Cambodian crab-eating macaques arrive in Haikou for breeding

Haikou.com http://www.hkwb.net Time: 2019-06-24 20:48

Haikou.com June 24th news (correspondent Liu Zequn Li Jun reporter Li Wannei) On the afternoon of the 24th, as the flight landed smoothly, Haikou Meilan Airport welcomed a group of special "passengers" - 1,500 crab-eating macaques. This group of "special passengers" came from Phnom Penh, Cambodia, and arrived at Meilan Airport smoothly after a 2-hour and 40-minute flight.

Red Flags Abound

Because there is a relative dearth of CITES data on Chinese farms, we were unable to do an in depth analysis of Hainan Newsource as we have performed for KF (Cambodia) Ltd., the Cambodian breeding farm that was at the time commonly owned by a Chinese national. Nevertheless, the origin story of Hainan Newsource and its immediate export of large numbers of monkeys is extremely suggestive that the breeding stock was laundered to masquerade as "purpose bred."

The known mortality and viral positive data in China combined with absence of mortality data in Cambodia (as discussed below) is also compelling evidence of the lack of legitimacy of the numbers of exported monkeys from both countries. By factoring in normal mortality and viral positives, one can only conclude that these farms have been operating with little

[48] In August 2019, Charles River UK acquired an 80% stake of Hainan Newsource. Charles River UK is controlled by Charles River Laboratories International, Inc., which is registered in Delaware. The 80% stake was increased to 90% in May of 2022, followed by acquisition of 100% ownership in April of 2024, when Zheng Xinguo resigned as Chairman. Charles River UK, now owns 100% of Hainan Newsource.

[49] As set forth in the Section on Cambodian farms, *infra*, such a shipment would have occurred near a time when KF did not have enough capacity to house the number of NHPs that they reported to CITES in 2017.

regard for legal trade. The common ownership of Hainan Newsource & KF Cambodia may provide another clue as to the reason for this lack of regard.

(2) Guangxi Weimei Biotechnology

Background

Hainan Newsource was not the only Chinese farm exporting large numbers of macaques at or near the date of the farm's establishment. Guangxi Weimei, founded in August of 2005, exported 600 macaques to the U.S. in August of 2006, a single year after establishment. It, therefore, must be conceded that a shipment of "captive bred" two year old monkeys in 2006 would not have been born on a farm established in 2005.

In a 2007 South China Morning newspaper article, Xie Liping, the then owner of Guangxi Weimei, maintained that the farm had an initial population of "fewer than 100 crab-eating macaques."[50] Liping then claimed, astoundingly, that by July 2007 the farm's macaque population was in excess of ***12,000 macaques***–a physically and biologically absurd "purpose bred" population for a farm that was established less than two years prior, with a founding stock of less than 100 NHPs.

Throughout 2007, Guangxi Weimei exported another ***1,800*** macaques to the U. S. Again, due to proximity of the establishment of the farm in August 2005, these animals would not have been able to have been born on site. And by the end of 2012, Guangxi Weimei had exported a total of 8,400 macaques to a single U.S. importer.

Today, Guangxi Weimei is owned by JOINN, a Chinese CRO, and parent company to Biomere. a U.S. based corporation. Serious concerns continue to exist with respect to the legitimacy of Guangxi Weimei's founder stock, and thus the legality of the progeny currently being used by JOINN, especially for studies being sponsored by U.S. and European clients.

(3) Guangxi Guidong

Background

Guangxi Guidong, was established as a primate "breeding" company in 2004. Prior to 2018, it exported macaques to CITOX Lab in Montreal, Canada.[51] Guangxi Guidong also was a supplier of NHPs to JOINN,[52] the Chinese CRO and, as referenced, a parent company of Biomere. Yet, the issues of parental stock legitimacy and false labeling of macaques as "captive bred" at Guangxi Guidong remain unresolved since the criminal conviction of its owner.

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[50] https://www.scmp.com/print/article/599846/monkey-breeding-big-business.
[51] https://www.sciencedirect.com/science/article/pii/S1056871917300813.
[52] https://www.frontiersin.org/journals/endocrinology/articles/10.3389/fendo.2022.821588/full.

In January 2019, Guangxi Guidong's owner/founder, was *convicted*[53] of smuggling ***2,735*** macaques into China from Vietnam between July and December 2018.[54] Despite this monkey laundering conviction, Guangxi Guidong has been permitted to continue to receive contracts from Chinese authorities, including the Chinese FDA, for NHP supply.[55]

c. Need for Review of Chinese Trade by CITES

China's increasing demand for macaques is driven by its growing biotechnology industry and the increasing number of U.S. and European clients that outsource research. Chinese CRO's like JOINN, Pharmaron, and Frontage Labs, have acquired U.S. based firms, facilitating the transfer of research activities to China from their US satellite sites. Given China's extensive history of unexplained exponential growth of the NHP export trade, the smuggling of staggering numbers of macaques from Mainland Asia, CITES simply must add China to the Review of Significant Trade by CITES.

Traditionally the non-range state of an animal would not be considered in such a review. But the fact that it borders several range states and that the data only allows for one conclusion to be drawn regarding the propriety of China's legal acquisition of macaques, mandates China's inclusion in such a review. Furthermore, the 2008 Non Detriment Finding (NDF) Case Study submitted by China for cynomolgus macaques as referenced above should be rescinded for containing verifiably false export data.

Finally, companies outsourcing their work in primates to China ought to re-consider the efficacy and legality of such efforts. Certainly, the US FWS is now in possession of data that would enable the agency to reject imports of study samples from China. Just as significant, the receipt of any tainted study samples could also represent a Lacey Act violation.

2. Thailand–A Hunting Ground for Trafficked NHP's

Background

With its abundant population of wild macaques, Thailand often marks the starting point of the illegal supply chain in Mainland Asia. Small gangs—typically composed of family members or close-knit groups—often hunt macaques using improvised blow darts.[56] Once captured, these primates are crammed into crates or stuffed into mesh bags and then laundered through farms across Mainland Asia. As outlined below, over the past several years authorities have intercepted and seized numerous illegal shipments of laundered macaques. As such, despite the 2022 indictment of a Cambodian supplier and the increased scrutiny on the industry, the flow of wild-caught macaques being illegally introduced into breeding farms to disguise their provenance appears to have continued unabated.

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[53] http://lyj.gxzf.gov.cn/zfxxgkzl/fdzdgknr/zdjsxmpzhsslygk/t10706023.shtml.
[54] https://baijiahao.baidu.com/s?id=1647987914510803396&wfr=spider&for=pc.
[55] https://zycg.gov.cn/freecms/site/zygjjgzfcgzx/ggxx/info/2023/21330190-010c-444e-9f8a-d2f6be2755e6.html?id=395ad78d-a61c-11ee-b485-fa163e9acaa1.
[56] https://www.ch7.com/sports/777594.

Macaques from Thailand traverse several different laundering paths. For those that are taken into Vietnam, they are first moved through Laos. Upon arrival at farms in Vietnam they are laundered into the USA, Europe and oftentimes China. Most assuredly, they are also smuggled into Cambodia, where they are then commingled with “captive bred” populations and then also laundered into the USA, Japan, Korea, and China. As discussed above, this illicit activity causes any progeny to be prohibited for trade by CITES.

Confirmation that Thailand is a key laundering transshipment point in Mainland Asia is easily seen through documented border seizures. Many of these illicit shipments are intercepted within miles of the borders of Cambodia and Laos but, like drug trafficking seizures, the high number of macaques seized likely represents only a fraction of the numbers of macaques actually being laundered. The chart below demonstrates this best through the disturbing regularity of recent seizures:

Recent Macaque Smuggling Seizures in Thailand					
UID	Date	QTY	Interception Point	Destination	Source
1	05/2021	102	Prachin Buri Province		MGROnline , TV3
2	10/2021	45	Aranyaprathet District, Sa Kaeo Province		Facebook, Weixin
3	07/2022	50	Mittraphap Road, Ban Khao San	Laos	YouTube
4	02/2023	9	Khao No		Facebook
5	03/2023	47	Ban Samrit Intersection, Tharaprasat Subdistrict		YouTube, Facebook, YouTube, YouTube, YouTube, Amarin TV
6	04/2023	44	Udon Thani		YouTube
7	04/2023	Not Reported	Lopburi		YouTube, Matichon, YouTube, CH3 News, Daily News, Facebook, Matichon, CH7 News
8	04/2023	Not Reported	Phetchaburi temple		YouTube
9	04/2023	45	Ban Khon Sai Road		MGR Online
10	06/2023	44	Chumphon Province		YouTube
11	06/2023	27	Nong Han District, Udon Thani Province	Neighboring Countries	YouTube
12	06/2023	30			Facebook
13	06/2023	35	Nong Khai Province	Neighboring Countries	DNP News
14	06/2023	33	Suphan Buri Province		CH7 News
15	06/2023	48	Khun Krathing Subdistrict		MGR Online
16	07/2023	62	Mekong River, Rattanwapi district		YouTube , Khaosod
17	08/2023	15	Nakhon Sawan Province		Thai PBS
18	01/2025	41	Pak Chong Subdistrict, Chom Bueng District, Ratchaburi Province.		CH7 News
19	01/2025	15	Thailand		Youtube

3. Cambodia

a. Background

Presently, there are six active macaque breeding farms operating in Cambodia: (1) Vanny Bio-Research Corporation (Est. 7/2002); (2) Shin Nippon Biomedical Laboratories (SNBL)(Est. 2/2005); (3) KF (Cambodia) Ltd (Est. 5/2005); (4) Orient Cam Co. Ltd (7/2011); (5) Rong de Group Co. Ltd. (Est. 11/2011); and (6) HT Biotech Co. Ltd (Est. 11/2021). This report will focus on the operations at KF (Cambodia) Ltd. and Orient Cam Co. Ltd.

Despite the 2022 U.S. Department of Justice (DOJ) indictment against individuals from Vanny Bio Research Corporation Ltd. (VBRC) for allegedly laundering wild-caught macaques and exporting them as captive-bred, the illegal trade of macaques from Thailand to Cambodia, as shown above, appears to have continued unabated. And regardless of the repetitive documented interceptions of illegal shipments in Mainland Asia, NHP farms in Cambodia continue to operate under a virtually unchallenged veneer of legitimacy.

In a November 2023 response to questions from CITES, Cambodia maintained that since 2010, with the exception of 2000 wild caught macques supplied to Vanny and 57 to Orient Cam beginning in 2018, "the breeding stock has *never* received additional specimens from the wild." Cambodia, however, did cite one additional exception– "[SNBL] imported 500 heads of breeding stock from Vietnam in August 2023."

In August of 2024, Cambodia responded to questions raised by the CITES Animal's Committee (discussed more fully below) where Cambodia offered fantastical and unsupported claims, such as, abbreviated weaning, close monitoring of pregnant females, and thousands of unreported NHPs, as alleged support for the legality of their operations.[57] There is a patent absurdity to Cambodia's new attempts to justify the alleged high breeding and production rates with claims that they wean infants at 100 - 120 days of age.

According to CITES, during an online meeting on November 26, 2024, the "United States of America shared with the Secretariat and the Chair of the Animals Committee extensive information on investigations conducted by authorities from the United States of America regarding *Macaca fascicularis* exported from Cambodia."[58]After that meeting, CITES seemed to finally grasp the fallacy and absurdity of Cambodia's prior representations to CITES. First as CITES recognized, "there is no evidence from literature that drastically reducing the weaning to only 100-120 days would actually decrease the interbirth intervals."[59] Second, Nafovanny in Vietnam, and Golden China (KF's predecessor) in Cambodia, in 2008, confirmed that when weaning was done at 2 months of age the resulting "reproduction rate for one adult female was ~1 offspring in every 13 months." Plainly, early weaning does not impact the breeding rate as Cambodia now claims.[60]

The Animals Committee specifically found that Cambodia's claimed breeding rates "suggest that some regular supply of wild specimens was necessary (at least in the past) to maintain a high reproductive output at least in some facilities."[61] This information confirmed for CITES "that over 50,000 animals have been laundered through one facility in just two years (2019-2021)."[62] Furthermore, the CITES Animals Committee found that "concerns remain that the high productivity rates cannot reflect a closed-cycle breeding operation in five out

[57] https://cites.org/sites/default/files/documents/E-SC78-35-01-A5b.pdf.
[58]https://cites.org/sites/default/files/documents/E-SC78-33-01.pdf.
[59] https://cites.org/sites/default/files/documents/E-SC78-35-01_0.pdf.
[60] https://www.traffic.org/site/assets/files/10083/captive-breeding-cambodia-vietnam.pdf.
[61] https://cites.org/sites/default/files/documents/E-SC78-35-01_0.pdf.
[62] *Id*.

of six facilities reported by Cambodia." More ominous was the Animals Committee finding that the U.S. FWS report showed "that the reported breeding output from five out of the six captive breeding facilities *exceeds the biological capacity of the species to produce that number of offspring in captivity."*[63]

Because of the evidentiary support for the proposition that systemic corruption also may be facilitating these alleged illegal activities, CITES concluded that such conduct necessitated a ban on the trade of NHPs from Cambodia. Nevertheless, at the Meeting of the Parties held in Geneva during the first week of February 2025, and despite Cambodia's refusal to directly address the U.S. FWS affirmations, CITES reversed course and rescinded the macaque trade ban on Cambodia, deferring decision until at least November 2025. Thus, the demonstrated illegal trade of NHPs exported from Cambodia was allowed (at least by CITES) to continue unabated.

Discrepancies in Reported Cambodian Macaque Population

Comparing the overall captive macaque population at various points in time with the population as reported collectively by the farms in Cambodia's 2017 CITES response, reveals further evidence of monkey laundering. Vanny Bio-Research Corp., reported to CITES NHP inventory numbers as of August 31, 2017, and Orient Cam and KF reported inventory as of September 2017. Collectively in the 2017 Cambodia CITES response, the five Cambodian farms[64] reported a total of 24,047 adults and 25,832 juveniles for a total population of 49,879 macaques in all macaque breeding farms of Cambodia at that time.[65]

Government Reports from Ministry of Agriculture, Forestry and Fisheries

Multiple reports by the Ministry of Agriculture, Forestry, and Fisheries of Cambodia (MAFF) also establish the Cambodian macaque population at various points in time. These reports were produced in seemingly random months throughout the year, as well as occasionally, quarterly. They addressed the overall agricultural and forestry sectors and are not specific to macaques, but there is a section in these reports discussing the populations at the macaque breeding farms, births, exports, and domestic transfers.

As set forth above, Cambodia reported a total NHP population of 49,879 as of fall 2017. But in July 2017 the farms only had a population of 39,922 according to MAFF's reporting – an impossible to reconcile difference of almost 10,000 macaques.[66] Further analysis confirms the size and scope of Cambodia's monkey laundering operations during this period.

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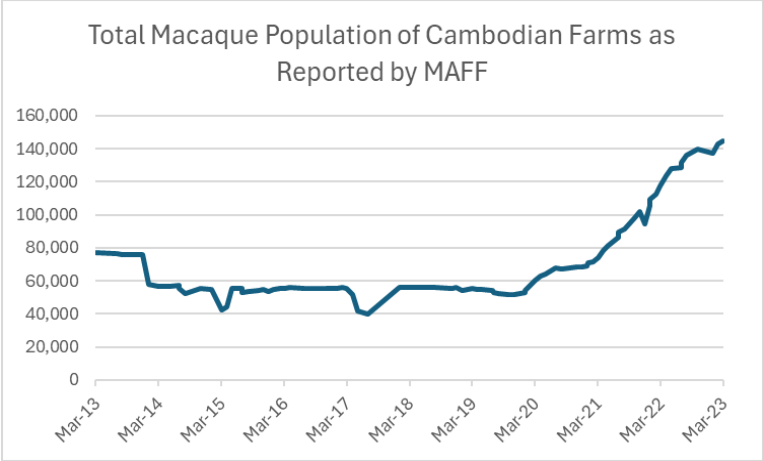
[63] *Id.*

[64] SNBL & Vanny were operating two sites, each for a total of 5 farms operating 7 sites.

[65] Despite the Cambodian Government's CITES reports reflecting the 2017 total verified population of 49,879, in 2024, KF claimed they mistakenly omitted 11,000 macaques from this count. The lack of credibility of this claim is discussed in the KF section, *infra*.

[66] As also discussed in the KF (Cambodia) Ltd., Section, *infra,* in 2024 KF reported to CITES that they had additional 11,000 macaques on site at this time in 2017 that they mistakenly failed to report to CITES. If that were true the discrepancy between MAFF's calculations and Cambodia's 2017 report to CITES would be an irreconcilable ***20,000*** "misplaced" macaques.



MAAF reported enormous jumps in total population at a time when there were record levels of exports from Cambodia– a scenario that definitively demonstrates either a vast smuggling enterprise or fudged population numbers, or both. As explained below, in 2020, 2021, and 2022, the number of infants the Cambodian government also reported that had been born in each year exceeded what was possible from the maximum female breeder population by approximately ***110,000 macaques***– NHPs that could not have been born on the farms and would have had to have been laundered onto the farms, just as the CITES Animals Committee had determined.

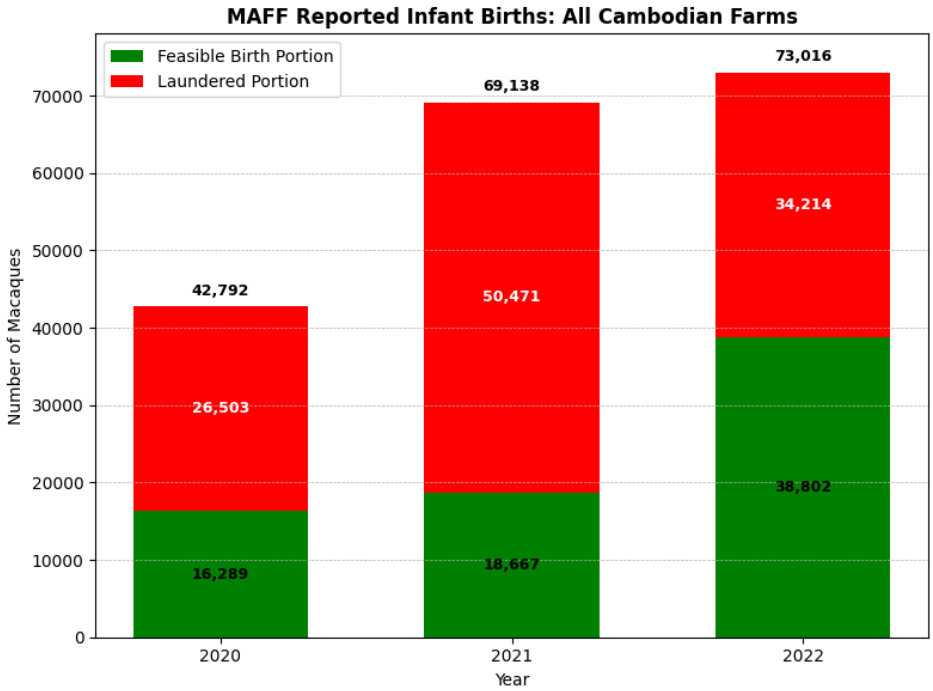
While we could create a model to demonstrate the biological impossibilities of this growth, the simpler model comparing the maximum infants that could be produced versus what was being reported is the clearest method to demonstrate that monkey laundering surely has been happening on a scale previously unimagined. This model, using MAFF data, would demonstrate whether the births claimed by the Cambodian relevant farms were even possible. The model uses the following 5 steps:

1. Ending inventory from the prior period as reported by the Cambodian government is used to establish starting inventory for the current period;
2. That starting inventory then deducts the exports and births of the current period as reported by the Cambodian government, as well as 40% of the births from the previous year as those infants would not be old enough to ship in the current year, and certainly would not be breeders. This will give the maximum possible breeder stock, conservatively assuming, every animal remaining is a breeder;
3. The breeder females are then derived by assuming 1M:12F as Cambodia set forth in their 2024 CITES response;
4. Once the maximum possible female breeder number is derived, it is multiplied by the estimated breeding rate to yield the maximum possible infants. For our purposes, we used a biologically elevated 72.5% rate of birth;
5. We then apply the maximum possible births and subtract the births as reported by the Cambodian government to obtain the difference. We did not take mortality into account.

This model is the most conservative of models, utilizing extremely high birth rates and without applying reductions to the population for mortality, morbidity or breeder replacement.

	A	B	C	D	E	F	G
1	**All Cambodian Macaque Farms**	12/31/2017	12/31/2018	12/31/2019	12/31/2020	12/31/2021	9/31/2022
2	Starting Inventory from Previous Year Ending		55,734	53,924	53,213	69,215	105,636
3	Total Population at End of Time Period	55,734	53,924	53,213	69,215	105,636	137,359
4	Infants	10,130	11,813	15,697	42,792	69,138	73,016
5	Max Parental Stock		40,920	36,120	24,340	27,893	57,980
6	Likely Female Breeders		37,772	33,341	22,468	25,748	53,520
7	Likely Male Breeders		3,148	2,778	1,872	2,146	4,460
8	Computed Breeding Rate		31.27%	47.08%	190.46%	268.52%	136.43%
9	Exports from MAFF Reports*	4,310	10,762	13,079	22,594	24,205	20,001
10							
11	Application of 72.5% Breeding Rate				16,289	18,667	38,802
12	Infants That Could Not Have Been Born in Farms				-26,503	-50,471	-34,214
13							
14	*2019 export data missing from report, obtained from CITES						

Application of this model demonstrates that, from 2020-2022, the Cambodian farms' claims of nearly 185,000 live births between 2020 and the third quarter of 2022 is not mathematically possible. As shown below, using the Cambodian government's forestry department reports, under this conservative analysis, the Cambodian "purpose bred" farms would have had to have procured an additional ***110,000 NHP's*** from a source other than their breeding farms. Illicit monkey smuggling and corruption are the only logical explanations for remedying this enormous deficit of alleged "purpose bred" NHPs.



The operations of the relevant Cambodian farms are examined in more detail below.

b. Relevant Cambodian Farms

(1) K.F. (Cambodia) LTD

Background

K.F. (Cambodia) LTD ("KF"), is a Cambodian corporation purportedly captive breeding macaques for export. KF was founded in May 2005 by Zheng Xinguo, a Chinese national. The Cambodian government, in 2014, reported to CITES the following corporate history of KF[67]:

> **5- K-F (Cambodia) LTD.**
>
> K-F (Cambodia) LTD. has been authorized to manage the farm for breeding Long-tailed Macaques (*Macaca fascicularis*), which now has 36 buildings to breed and export young animals from Golden China Group Co., Ltd, through Prakas No. 403, dated 11 August 2005, which was issued by the Ministry of Agriculture, Forestry and Fisheries. The farm covers 16 hectares of the area in Prey Pril village, Trapang Ruesey commune, Kampong Svay district, Kampong Thom province. Prior to 2005, the farm had been managed by Golden China Group Co., Ltd, with a permission letter provided through Prakas No. 061, dated 05 February 2003, which was issued by the Ministry of Agriculture, Forestry and Fisheries. From 2010 to 2013, the company did not request a quota for export.
>
> The company has established the Standard Operating Procedures at its farm.

Population Analysis

Utilizing CITES reports prepared by the Cambodian government in 2014, 2017, 2023, and 2024,[68] the following anomalous data has been compiled purportedly showing the number of breeders and breeding rates at KF over that time period. It is important to note that during this date range, 2014 through 2023, the Cambodian government ***did not*** authorize the wild capture of ***any*** NHP's to supplement KF's breeding population.

Compiled Population Statistics of KF in CITES Reports										
	2014 CITES			2017 CITES			2023 CITES			2024 CITES
	Total Stock	Female Breeders	Juveniles Present	Total Stock	Female Breeders	Juveniles Present	Total Stock	Female Breeders	Juveniles Present	Female Breeders
2014	Not Discussed	4,858	Not Discussed							
2017				10,992	5,494	4,915				
2021										11,293

[67] https://cites.org/sites/default/files/eng/com/ac/28/AC28-09-03-A2.pdf.

[68] 2014: https://cites.org/sites/default/files/eng/com/ac/28/AC28-09-03-A2.pdf.
2017: https://cites.org/sites/default/files/eng/com/ac/30/E-AC30-13-01-A2-R3.pdf.
2017: https://cites.org/sites/default/files/eng/com/ac/30/E-AC30-13-01-A2-R3-Add.pdf.
2023: https://cites.org/sites/default/files/documents/E-AC33-15-02_2.pdf.

2022										17,745
2023							42,686	17,704	23,172	15,371

Breeding Rate Analysis

As the below-table indicates, with each CITES filing KF claimed to have aberrationally increased its breeding rates from 50% in 2014, to a biologically suspect rate of 72% in 2023. Moreover, in Cambodia's 2023 CITES response, KF claimed that 11,950 progeny were allegedly born in 2022 with the 17,704 female breeders allegedly on hand.[69]

Compiled Breeding Data of KF in CITES Reports							
	2014 CITES	2017 CITES	2023 CITES		2024 CITES		Production Difference
	Breeding Rate	Breeding Rate	Production	Breeding Rate	Production	Breeding Rate	
2014	50%						
2017		60%					
2021					6,283	56%	
2022			11,950		13,632	77%	1,682
2023				72%	9,160	60%	

These 2022 numbers (11,950 births/17,704 female breeders), however, equate to a breeding rate of only 67.5%-- a breeding rate more in line with published breeding rate data and biological norms. Interestingly, with a 72% breeding rate and a claimed stock of 17,704 female breeders, the number of offspring produced would have been ***12,747***, not the reported 11,950. These mathematical anomalies, of course, must be questioned and examined thoroughly given the data analysis set forth above and below and the attestations in Cambodia's 2024 supplemental report to CITES.

More important, CITES also found this 72% breeding rate to be suspiciously high, and "requested Cambodia to provide clarifications about the high reproduction rates in writing to the Secretariat for review."[70] Cambodia's obviously "reverse engineered" August 30, 2024 response to the CITES request is discussed further below.

Shipment Analysis

According to Cambodia's August 30, 2014 CITES response, between 2010 to 2013, KF exported ***no*** NHPs from Cambodia. As such, in this report we will focus on shipments from

[69] https://cites.org/sites/default/files/documents/E-AC33-15-02_2.pdf.
[70] https://cites.org/sites/default/files/documents/E-SC78-38-01.pdf.

2017 and thereafter. The below table summarizes the actual international exports from KF compiled through a variety of data sources.[71]

KF Exports to USA, Canada and China				
	KF to USA	KF to CA	KF to CN	Total KF Exports
2018	1,440			1,440
2019	2,880		1,500	4,380
2020	4,843	1,416		6,259
2021	4,262	720		4,982
2022	4,176			4,176
2023		4,789	2,400	7,189
2024		3,280	6,300	9,580

Facility Capacity Analysis

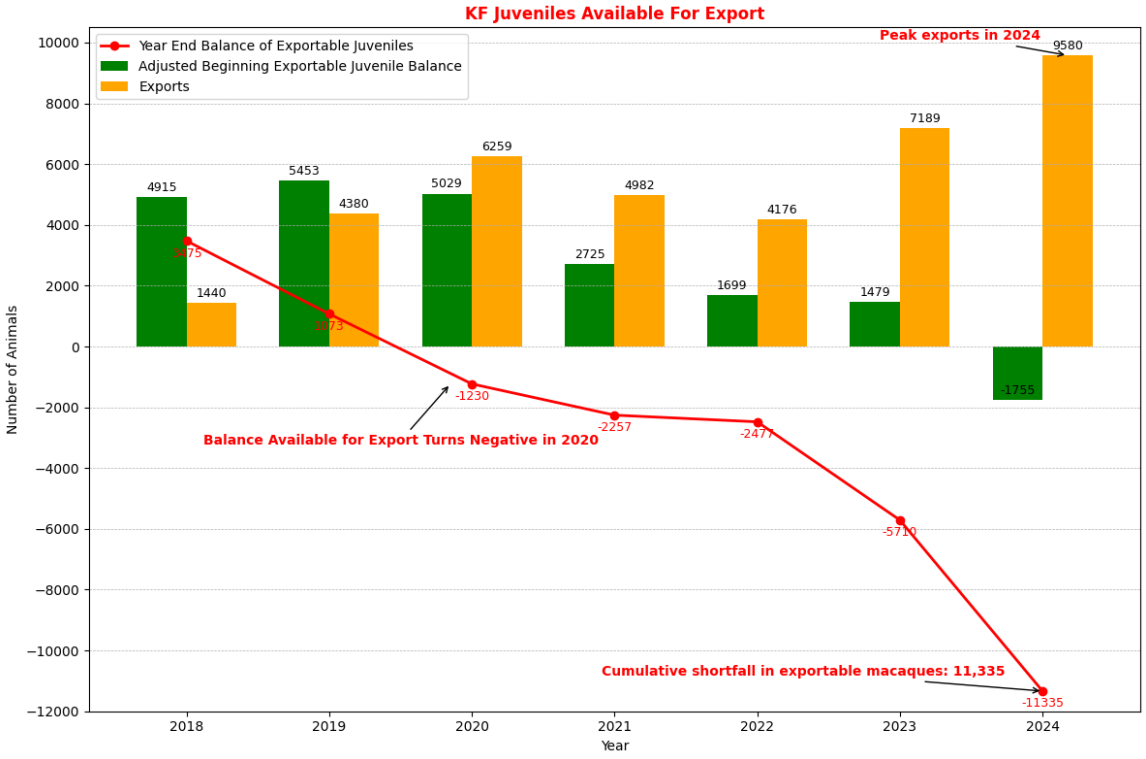
In 2017, KF reported to CITES that their entire stock of macaques on site was 10,992 animals, inclusive of 5,494 breeders. Yet, as satellite imagery shows, at the beginning of 2017, KF had constructed only 8 group housing buildings (40 large cages each) on the right tract of land, while the left hand tract had only 4 group housing buildings (3 X 20, and 1 X 36). As the 2024 Cambodian CITES response affirms, there are 12 females to 1 male in a breeding group pen. As such, to accommodate the claimed 5,494 female breeders, KF would have needed 594 cages--a deficit of almost ***180 cages from the visible footprint.*** Also, there would have been no space to house most of the claimed 4,195 juveniles, at least 3,000 of which would have been weaned and needing separate cages.

Plainly, using KF's reported calculations, KF could not have housed the 10,992 animals alleged to have been present on site in 2017. Thus, at least by 2017, KF was most certainly *overstating* their NHP population by at least 3,500 NHPs–a 40% overstatement of housed NHP inventory. Such a dynamic misrepresentation alone must cast doubt on the veracity of and subsequent attestations made to CITES by Cambodia with respect to KF's operations.

[71] https://x.com/TinaDITH/status/1594356959020343298?lang=en&mx=2 ; https://x.com/TinaDITH/status/1594360661445730304 ; https://x.com/TinaDITH/status/1594359374180679680 ; https://www150.statcan.gc.ca/n1/pub/71-607-x/2021004/imp-eng.htm ; http://stats.customs.gov.cn/indexEn; https://weibo.com/ttarticle/p/show?id=2309404386795247764034.

During this period of rapid expansion of the facility, it is stipulated that the Cambodian government issued no wild capture permits to KF and that KF had reported no legal intakes of animals from a source other than its initial or founding stock since 2003.[72] The question of whether KF could simultaneously expand the breeding site while shipping substantially more juveniles than the farm could possibly generate, provides at least one obvious answer–KF initially needed more space to house the thousands of laundered NHPs necessary to fill export orders.

As is demonstrated by the chart below, if KF was exporting "purpose bred" NHPs that had been born at their facility at the rate claimed, they would have exhausted their exportable supply (18 month old juveniles) by 2020, with the *deficit* of exportable juvenile NHP's increasing rapidly thereafter through 2024. Thus, there can be no dispute that the deficit has been filled by macaques obtained illegally and likely laundered into and out of the KF site for export for many years. These unimpeachable numbers further render Cambodia's 2024 CITES response a farce.



From 2017 through 2023 KF underwent massive facility expansion, all while exporting thousands of alleged "captive bred" macaques, well beyond its physical capacity to produce offspring. As such, and as logic would dictate, facility expansion would have been necessary only if KF were acquiring macaques from a source independent of the captive breeding

[72] https://cites.org/sites/default/files/documents/E-AC33-15-02_2.pdf.

production. Therefore, as shown through the satellite imagery below, the visible expansion is actually direct evidence of a substantial laundering operation.

Satellite Images of KF Facility Construction Progress		
		
December 31, 2016	July 7, 2019	December 22, 2023

Based on the above analysis, the only logical conclusion is that, since at least 2017, KF has obtained tens of thousands of macaques for export that were not produced as part of their legitimate breeding operations. This finding is further certified by Cambodia's September 30, 2024 "amended" response to CITES.

The 11,000 "Missing" Breeding Females and Offspring from 2017

In 2024, with their historical export tabulations under the microscope of CITES and other international enforcement agencies, KF was required to respond to the pointed questions of CITES. Cambodia responded to CITES on September 30, 2024. In that response, KF, designated as"Facility 1," recognizing that the number of exports post-2017 could not have been born from the previously reported (2017) numbers of female breeders (5,494) and total stock (10,992), now provided the following fantastical "explanation" without any supporting documentation:

> In the 2017 documents submitted to CITES, Facility #1 [KF], in the table below, had 22 open corrals with upwards of 500 breeders and offspring per corral. The quantities of LTMs [long tail macaques] in these corrals ***were not included*** in the submitted 2017 numbers, ***as no expotting [sic] was taking place from these corrals*** [whatever that is supposed to mean]. By 2020, these breeders and offspring were being moved to new housing and being added to the population numbers. The corrals were demolished and removed.

So rather than having 5,494 female breeders on site at KF as reported to CITES in 2017 (which number the KF could not have supported as set forth above), *without any contemporaneous supporting documentation* and seven years hence, Cambodia now was baldly attesting that actually there had been more than ***11,000 female breeders and***

offspring at the KF site in 2017 that had not been reported to CITES–*or over half of KF's supposed population*. Assuming that it was true (it cannot be) that in 2017 KF had failed to account for "22 open corrals holding upwards of 500 breeders *and offspring* per corral," the offered basis for not reporting them– "no expotting [sic] was taking place from those corrals"-- is silly and nonsensical– these are breeding farms: female breeders are never exported and their offspring are not exported until they reach at least 18 months of age.

The Cambodian September 2024 CITES response, in addition to being demonstrably false and providing no verifiable information, appears to be an exercise of reengineering data to reconcile the now-questioned exponential growth at the facility with the previously reported numbers of exports–claiming that substantially more unreported breeders and infants existed on site at an earlier point in time. In effect, they needed to find at least 11,000 more breeding females and their offspring to justify their prior reported numbers.

Every part of this claim is both preposterous and demonstrably false. In truth and in fact, those "open corrals" were in fact not functional NHP corrals at all, but were the rubble of former cage pads, overgrown with vegetation. The structures on the pads had been destroyed sometime between 2010 and 2016 and simply did not, and could not, have contained 11,000 NHPs in 2017. Contemporaneous satellite photos (below) confirm that what KF now claims are open corrals, are nothing more than abandoned and overgrown ruins of past housing likely dating back to circa 2010 period. It is quite clear that KF's September 2024 claims to CITES regarding the existence in 2017 of 22 "open corrals" containing almost 11,000 live macaques are entirely fabricated and reverse-engineered in an attempt to explain NHP exports which had been exposed to far exceed farm capacity.

Satellite Images Confirming Non-existence of 22 Functional Corrals in 2017		
 *02/28/2010 Image*	 *12/31/2016 Image*	 *09/26/2017 Image*

From the 2017 satellite photos and capacity analysis set forth above, however, we know that in 2017 KF Cambodia could not even house the 5,494 claimed female breeders, let alone the claimed juveniles on site. It is also very obvious from examination of these satellite photos alone that the new claims made by KF of 11,000 macaques stuffed in 22 operational "open corrals," is merely an attempt at revisionist history to justify the prior illicit NHP exports to the U.S., Canada, and China.

(2) Orient Cam Co., LTD

Background

Orient Cam Co., LTD. was registered in Cambodia on July 18, 2011, after acquiring the operations of a previously approved farm, Vathanak Praser Corporation Import Export Co. Orient Cam is owned by a publicly traded Korean company, Orient Bio.

Orient Bio previously owned a facility in the U.S. known as Orient Bioresource Center, which Orient Bio sold in 2022.[73] A likely contributing factor to the sale was the conviction of an OBRC executive for "knowingly and willfully making a materially false, fictitious, and fraudulent statement and representation to Special Agents of the United States Fish & Wildlife Service during a criminal investigation into international trafficking of primates

[73] https://www.inotiv.com/news/inotiv-inc.-announces-expansion-of-non-human-primate-facilities-and-services-with-acquisition-of-orient-bioresource-center-inc

into the United States."[74] Furthermore, it was revealed in the South Florida trial of Masphal Kry that Orient's US subsidiary, was the "subject" of the earlier referenced federal investigation, with contacts listed as Geraldine Fleurie[75] and JaeJin Chang,[76] the Chairman and CEO of the Orient Group of companies.[77]

In August 2022, *Veng Sakhon*, the Cambodian Agricultural Minister at the time, flew to South Korea and met with Orient Group executives to sign an MOU to cooperate on agricultural endeavors.[78]As reported in *Radio Free Asia* on December 22, 2022:

> Veng appears to be referenced twice in the indictment [surrounding Vanny]. First, the prosecutor alleges that FA Director Keo Omaliss was described in a May 4, 2018, email as trying to "persuade his superior to allow collection of the needed monkeys." As the FA is a department of the Agriculture Ministry, Veng would have been Keo's immediate superior at that time. An email purportedly from the following month is subsequently alleged to have relayed a claim by Keo that "the minister had approved and issued the collection quota" for long-tailed macaques. More broadly, the indictment repeatedly alleges unnamed Agriculture Ministry employees participated in the collection and laundering of wild monkeys.[79]

Population Analysis

Orient Cam reported the below data in 2017 and 2023 to CITES. Between 2017 and 2023, Orient Cam's breeding rate jumped an unusual 20%, while its overall population more than doubled from 3,048 macaques to 6,606 macaques. Of note, Orient Cam reported that their female breeders had more than tripled in number.[80]

A 2016 scientific publication by Orient Cam researchers, however, analyzed the inventory of NHPs at Orient Cam by age.[81] This examination of breeders revealed that in 2016 , 894 females and 164 males were at least 8 years of age, and, thus, would have required replacement before 2023 due to their advanced age. As shown below, during this time frame, Orient Cam exported 1700 NHPs which would have further reduced its population.

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[74] https://www.justice.gov/usao-sdfl/pr/man-convicted-lying-federal-agents-during-international-wildlife-trafficking

[75] https://www.linkedin.com/in/geraldine-fleurie-b3aa3335. Flurie is listed as, "Senior Director, Global Supply Management at Charles River Laboratories."

[76] https://www.orientbio.co.kr/eng/s1/s1_1.php

[77] Case 1:22-cr-20340-KMW Document 291-5 Entered on FLSD Docket 03/06/2024

[78] https://www.cpp.org.kh/en/details/321920

[79] https://www.rfa.org/english/news/cambodia/wildlife-smuggling-12222022104540.html

[80] 2017: https://cites.org/sites/default/files/eng/com/ac/30/E-AC30-13-01-A2-R3-Add.pdf
2023: https://cites.org/sites/default/files/documents/E-AC33-15-02_2.pdf

[81] https://synapse.koreamed.org/articles/1053868

Orient Cam Population Data Comparison from CITES Reports		
Year of CITES Report	2017	2023
Adults Present	1,002	3,309
Adult Males	108	308
Adult Females	894	3,001
Breeding Rate	60%	80%
Number of Juveniles	2,046	3,297

Taking these reported populations into account, Orient Cam would have needed to produce over 6,300 macaques between 2018 and 2023 for the reported inventory to be accurate. This does not include any allowance for morbidity and mortality of infants, juveniles, and breeders we did not include in analysis of replacements. Given the 2017 CITES report stated a female breeder population of 894, and the export of 1700 NHPs, there is no mathematical analysis that would support this type of production.

Breeding Rate Anomalies and Analysis

In their 2023 CITES response, Cambodia stated that in 2022, 2,827 infants were born. At an 80% breeding rate, however, that would have required 3,534 breeder females. Yet in 2023, 3,001 female breeders are reported.

Further anomalies appear in the 2024 CITES response in which Orient Cam reports in 2021 and 2022 more infants born than breeder females on site – an impossible scenario. Suddenly in 2023 the breeding rate dips to 64%, a remarkable drop from the reported 80% just a year earlier.

This leads us to question the veracity of the data provided. If in 2023, Orient Cam reported an 80% breeding rate to CITES, and in 2024, they now state the 2023 breeding rate was actually 64%, what are the actual breeding rates of the farm? Obviously, the 2021 and 2022 data of infant births on site has to be doctored as there is no scenario where more infants can be born than there are available breeders. It is because of these biologically impossible reported breeding rates, that CITES has requested more information from Cambodia.

Further evidence of fraudulent data can be seen when looking at the juvenile population reported by Orient in Cambodia's 2023 CITES response. The total juvenile population is reported as *3,297* macaques. The previous year births were reported as 2,827, and none of those macaques would have been old enough to export in the first half of 2023 when the only export to Korea occurred. This would indicate that approximately 470 of the reported juveniles were born in the first 8 months of 2023, when the data was reported. In 2024,

however, Orient reported that the 2023 births totaled 1,991 infants, indicating an average of approximately 59 births per month for the first 8 months. Thus 380 births per month would have been required for the final 4 months of the year–a nearly 6.5 fold increase, and a biological impossibility.

NHP Export Analysis

As previously discussed, Orient Cam is the only Korean owned macaque farm in Cambodia, and thus we expect with high confidence that all 1700 NHP exports to Korea are from Orient.

Year	Quantity Exported
2018	220
2019	190
2020	540
2021	480
2022	0
2023	250

Orient Cam was also approved by the Japanese Ministry of Agriculture, Forestry, and Fisheries for shipment of macaques to Japan in 2014.[82] There was, however, a period of time where such approval was suspended. On the December 9, 2023 version of Japan's MAFF website, accessed via archive.org, the Japanese government's approved list of facilities permitted to export macaques to Japan, shows the list was last updated in January 2023 with a "suspended" status for Orient.[83] On April 5, 2024 the next available Archive shows that Orient Cam is no longer suspended from exporting to Japan as of March 2024.[84] This is again confirmed in a May 2024 update.[85]

Zoonotic Issues

A 2016 publication confirms several cases of macaques supplied by Orient to a company in Korea as confirmed to have had TB.[86] While not much more relevant information is

[82] https://jvpa.jp/jvpa/wp-content/uploads/2014/05/2014033.pdf

[83] https://web.archive.org/web/20231209051132/https://www.maff.go.jp/aqs/animal/pdf/list_designated-facility_non-human-primates.pdf

[84] https://web.archive.org/web/20240405023852/https://www.maff.go.jp/aqs/animal/pdf/list_designated-facility_non-human-primates.pdf

[85] https://www.maff.go.jp/aqs/animal/pdf/list_designated-facility_non-human-primates_240502.pdf

[86] https://pmc.ncbi.nlm.nih.gov/articles/PMC5168865/.

discussed in this publication, it does mean that TB was likely present at the Orient Cambodia facility and would mean the probable culling of NHPs to prevent spread of TB, requiring further supplementation of NHP stock.

4. Vietnam

a. Background

With Cambodian supplies restricted as previously noted, U.S. based importers and CROs have turned to Vietnamese NHP suppliers, who also claim to provide lawful captive-bred macaques. As this report reveals, however, these Vietnamese suppliers also are demonstrably engaging in wildlife laundering by misrepresenting wild-caught primates as purpose-bred to fulfill the high-volume of exports to the U.S.

Only Four "Exporting" Captive Breeding Facilities

In a 2014 response to CITES, Vietnam reported the existence of only four (4) licensed captive breeding (hereafter "Four Exporting Farms"). Vietnam also provided a response to CITES in 2023 and again confirmed that there were only four (4) captive breeding operations that they curiously defined as breeding facilities "*recorded* ***with export activity*** *during the last years.*" No other captive breeding facilities were identified. This relatively recent hint, that Vietnam may actually have other "non-exporting" captive breeding facilities, as we now see, is an important divergence from their 2014 CITES response which claimed to list *all* licensed breeding farms regardless of export activity.

There was yet another revelation in Vietnam's 2023 CITES response–several farms disclosed, for the first time, that, though Vietnam had not authorized the capture of wild monkeys since 2006, the exporting farms had been "supplementing" their breeding stock since 2019 with over *3,727* macaques allegedly acquired from previously undisclosed "legal domestic breeding facilities." Initially, Vietnam's 2023 CITES response also omitted critical data regarding the newly revealed "satellite" breeding farms. In fact, two of the eleven "satellite farms" have apparently become operational in just the past few years– Hoang Gia and Life Biosciences.[87]

In October 2024, Vietnam responded to the CITES Animal's Committee request for more information about the newly revealed "satellite" breeding farms, and the legal source of the founding stock of these farms. In Vietnam's response they now reported that the Four Exporting Farms had received, not the *3,727* NHPs from the "satellite farms" as reported in their 2023 CITES response, but instead they had received ***13,426*** NHP's from these "satellite" farms from 2019 to 2023– almost 10,000 more than originally reported.

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[87]If two new farms is not enough to raise suspicion over regulatory oversight, then perhaps a fourth new facility that "will be a primate farm with the largest scale and quality in the world"should cause an appropriate level of concern. This project is to be called Khanh Binh High-Tech Park Project. https://kinhtexaydung.petrotimes.vn/xay-dung-trai-nuoi-linh-truong-hang-dau-the-gioi-tai-khanh-hoa-699285.html. This planned new facility is said to be a collaboration between Eco & Tech Company of Korea and Nha Trang Pasteur Institute, an entity operating directly under the authority of the Vietnamese Ministry of Health.

Vietnam's October 2024 response, however, now included Nafovanny's relevant alleged intake of 6,520 from these "satellite" farms.

Apparently surprised by some of Vietnam's revelations, uniquely divergent from Vietnam's 2023 CITES response, in late 2024 CITES demanded more specific information from Vietnam about these newly revealed "satellite farms," including (1) the number of these "satellite farms," (2) the date these "satellite farms" were established and whether the founding stock was sourced from the wild pre-2006, (3) the number of offspring they produce annually, (4) whether these "satellite farms" only supplied the four "exporting" farms; and (5) whether these "satellite farms" were registered, inspected in the same manner as the four "exporting" farms.[88]

In January 2025, Vietnam submitted a response to CITES.[89] In their 2025 response, Vietnam failed to, as requested, specifically identify *any* of these "satellite farms," but instead, generally identified the provinces of the 11 "facilities" of the "major farms for domestic commercial purposes." Rather than identifying the specifics of their name, location, date of establishment, source of founding stock, annual production since establishment, and which of the four "exporting" farms they had supplied or whether they registered and inspected similar to the four "exporting" farms, as demanded by CITES, Vietnam only identified the "Total Stock" of each unidentified "satellite farm" including the male and female populations– but for only a single year, 2024.

Nevertheless, Vietnam yet again increased the amount of NHP's received by the Four Exporting Farms from the undisclosed "satellite" farms to **14,876** during the relevant time period–an *unexplained* addition of *1450* from their 2024 response and an addition of more than *11,000 NHPs* from their 2023 response. Plainly, Vietnam's multiple unsupported CITES responses have been creatively crafted; they each appear to be an attempt to artificially backfill misleading gaps in problematic prior CITES responses, further obfuscating the actual laundering and farming activity. As usually happens, however, when these responses are grounded neither in accuracy nor truth, further probing has exposed deeper misleading gaps and outright false "statistics."

What was not identified in Vietnam's 2025 response, and as more thoroughly discussed below, is the lack of a demonstrably legitimate source for the founding stock and inventory in any of these newly discovered "satellite farms." Given that wild capture is and has been unlawful in Vietnam, this failure to specifically identify known "satellite" breeding farms seems purposeful.

One new "satellite" farm, Hoang Gia, where numerous smugglers crates have been recently observed,[90] obtained a CITES permit for the export of NHPs less than 9 months after commencing operations and shipped 500 NHPs to HT Biotech in Cambodia. Curiously,

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[88] https://cites.org/sites/default/files/documents/E-SC78-35-01_0.pdf.
[89] https://cites.org/sites/default/files/documents/E-SC78-Inf-14.pdf.
[90] Appendix D, Hoang Gia, Smugglers Crates. Photo from 2024.

Vietnamese officials did not address these glaring irregularities in their 2023 CITES report or include this important information in their response. The most logical conclusion is that the source of the 500 macaques was illicit or not "lawfully acquired" and that corruption is present.

Finally, the Vietnamese and Chinese governments have recently negotiated the health and quarantine requirements to allow for Vietnamese macaques to be exported directly to China, a move which will most certainly further an opening of the floodgates to further monkey laundering.[91]

Vietnam's 2024 CITES Revelation: Commercial Satellite Farms as NHP Source

On October 20, 2024, the Vietnamese government submitted an updated response to CITES' questions regarding the legitimacy of operations. Much of what is contained in this document are references to various laws in place that allegedly seek to act as mechanisms to ensure legal trade in macaques. As this report has demonstrated, these mechanisms continue to be ineffectual, particularly in the face of corruption and rampant monkey laundering.

As previously discussed, Vietnam's 2014 CITES submission emphatically confirmed that there were *only* "*four legal captive breeding facilities* of sub-species *M. fascicularis* in Viet Nam."[92] Now, in their 2024 response, Vietnam incredulously reveals that there actually existed previously undisclosed and presently unidentified 11 additional "breeding facilities" within Vietnam that, since 2011, allegedly have served as the exclusive "sources" to "maintain breeding and reproduction for export."[93] The Vietnamese government does not name any of these "satellite" breeding farms, or explain with any specificity the provenance of the "source" of the macaques at these"satellite facilities." This preposterous reverse-engineered rebuttal, further demonstrates and supports the conclusions of this report– that Vietnam's purpose bred macaque farms have been sourcing their NHPs from unverified illegal operations involved in the illegal monkey trade.

Vietnam's 2024 response also makes other compelling revelations and inculpatory omissions. Prior to the date of Vietnam's responsive submission, export activity had occurred from a new "farm," Hoang Gia, which had shipped 500 macaques to a new farm in Cambodia – HT Biotech. Yet, there is no information about a legal Hoang Gia farm in Vietnam in the 2024 CITES response, nor is there information in the data provided by the Cambodian government reflecting the current operational status of HT Biotech.

Vietnam's 2025 CITES Response: New Presentation on Satellite Farms

The PowerPoint response submitted by the Vietnamese CITES Management Authority to CITES in January 2025, rather than provide verifiable and truthful information, further

[91] https://english.vov.vn/en/economy/vietnamese-businesses-to-export-monkeys-to-china-post1111405.vov

[92] https://cites.org/sites/default/files/eng/com/ac/28/E-AC28-09-03-A3.pdf.

[93] https://cites.org/sites/default/files/documents/E-SC78-35-01-A5d.pdf.

masks the illegal laundering of macaques into and out of Vietnam.[94] It is apparent that Vietnam is attempting to deflect from addressing the critical gaps CITES had exposed in Vietnam's previous responses, by using the 2025 presentation to create a kind of three-card-monte game by keeping CITES officials in a perpetual state of confusion over the amount and movement of NHPs in and out of Vietnam at any given time.

The January 2025 CITES presentation now attests that there are actually ***twenty-three*** (23) commercial captive breeding facilities in Vietnam. Excluding the four exporting breeding farms Vietnam had previously disclosed, this would leave 19 previously concealed breeding facilities. Vietnam's January 2025 CITES presentation lists some data on the 11 "major farms" for domestic commercial purposes. Given that two of the farms listed have fewer than 60 total macaques, it would indicate the eight remaining farms are so small, they would not impact our analysis here.

Conspicuously, Vietnam's 2025 CITES presentation effectively anonymizes the names and addresses of these "satellite farms." There are no names, specific locations, formation date, source of macaques, or detailed information on breeding rates, mortality, and domestic transfers, as was presented for the four exporting facilities. In effect, this lack of specific information assures that no diligence can be performed on these feeder farms to confirm legal operations or legal acquisition of founding stock.

This, of course, appears purposeful. For example, the largest facility in terms of female breeding stock and listed as a domestic supplier, is located in Ninh Binh and is labeled as "Facility 11." As noted previously, Hoang Gia, established in 2023, is the only "satellite farm" located in Ninh Binh, and thus it is likely "Facility 11."

Hoang Gia could not have been a source of macaques for any of the Four Exporting Farms. In fact, Hoang Gia claims to have sourced their macaques from yet another farm in Vietnam – a common pattern when trying to conceal the true origin of macaques. Yet, Hoang Gia actually should have been included amongst the Four Exporting Farms, as they had already, before Vietnam's 2025 Response was filed, exported 500 macaques with no clear provenance to Cambodia.

Similarly, "Facility 5," located in Tay Ninh, is likely Duong Thi Minnh Thao, also located in Tay Ninh, and is owned, or is in partnership with the Chinese CRO, Life Biosciences. Once again based on satellite imagery, this farm was established in 2022, and claims to have sourced its macaques from unspecified "other farms" in Vietnam. Thus, Duong Thi Minnh Thao could not have been a legitimate supply source for the Four Exporting Farms. This farm also is likely involved in the laundering of macaques.

[94] https://cites.org/sites/default/files/documents/E-SC78-Inf-14.pdf.

Evidence Further Disproving Legitimacy of Satellite Farms

Two of the eleven major domestic suppliers have been shown not to be suppliers to the Four Exporting Farms, but actual newly established farms. Therefore, because they would have had to acquire their parental stock from these legal domestic "satellite" farms, their acquired stock must be added to the number of NHPs allegedly generated from these farms (14,876 + 1530 + 630). Doing so would increase the total NHPs transferred by the remaining nine "satellite" farms to ***17,036*** macaques.

The below chart sets forth what Vietnam represented to CITES in 2025 as the total stock added to the Four Exporting Farms by the previously undisclosed "satellite" farms from 2019 through 2023. Because two of the new "satellite" farms could not have supplied NHPs to the Four Exporting Farms, these new farm populations, which would have to have been acquired from these very same "satellite" farms, have been added to the total purchased NHP supply.

Alleged NHP Purchases from "Satellite" Farms to add to Stock[95]				
	Nafovanny	Phuc Loc Phat	Vina Mekong	Thanh Cong
2019	1,510	450	1,985	4
2020	1,550	170	0	692
2021	400	0	250	0
2022	660	900	600	410
2023	2,400	0	2,135	760
2025 reported				14,876
New Farm Stock				2,160
Total Needed				17,036

The 2024 and 2025 CITES responses by Vietnam were very clear that all purchases of macaques from these domestic facilities was to add breeding stock. Therefore we must assume that at least 80% of the acquired macaques would have been females for breeding purposes. Because female macaques give birth at approximately an even gender split, the

[95] Data from 2025 CITES response. The 2024 CITES presentation lists 13,426 macaques purchased.

true number of macaques these "satellite" farms would need to have produced to supply 80% female breeders, however, is *over 25,000 NHPs.*

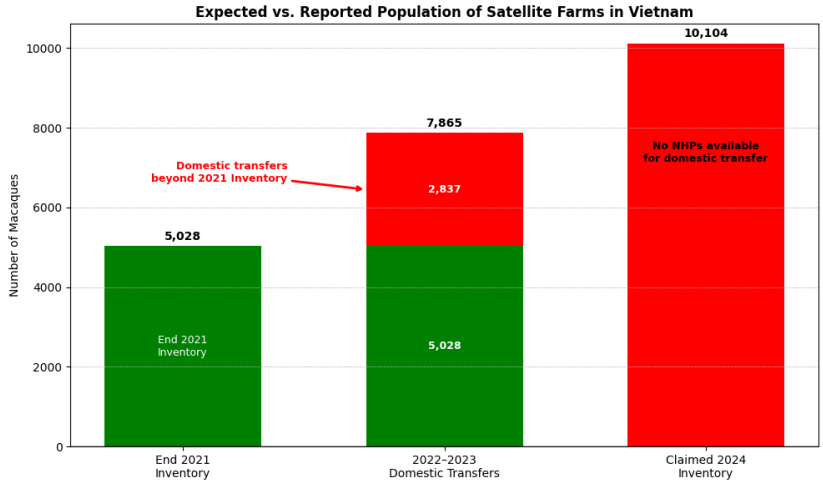
This is derived by estimating 80% of the 17,036 NHP's are females, *i.e.,* 13,628 females. Recognizing that macaques give birth at approximately an even gender split, to be able to supply 13,628 females, the breeders would also have produced approximately 13,628 males. Adding the males and females that would need to have been produced yields 27,257. Therefore, the "satellite" farms would have had to have generated over 27,000 macaques to supply the Four Exporting Farms with 17,036 breeders.

According to Vietnam's 2025 CITES response, the "CITES Management Authority of Vietnam (CITES MA), under the VNForest, and in collaboration with FAO[96] Vietnam office, conducted surveys and developed software to create a captive wildlife facilities management (CWFM) system that would provide up-to-date information on the distribution of Vietnam's Captive Wildlife Facility's (CWF), herd structure, reproduction abilities, the number of wildlife species and individual animals in the CWFs".[97] "With the support from CITES-MA and FAO, the data of each year from 2017, 2020 and 2021 was collected up to 31 December and entered into the CWFM database."[98] According to the survey, "[p]rimates were kept in a limited number of CWFs (52), but some species were kept in large commercial farms for research purposes. These included the Long-tailed macaque (*M. fascicularis*) in 24 CWFs with 44,123 individuals."[99] This "all farm" total number can then be compared to the January 2025 CITES response by Vietnam stating the total 2021 year end inventory for the Four Exporting Farms was 39,095 macaques.

When the 2021 year end inventory of the Four Exporting Farms (39,095) is subtracted from the inventory of set forth in the FAO research paper (44,123) it would show that a total of ***5,028*** macaques remained in Vietnam's non-exporting commercial facilities by the end of 2021.

In 2022, Vietnam's Four Exporting Farms claimed to have purchased 2,570 macaques from these "satellite farms" and in 2023 they claimed to have purchased 5,295 macaques, for a total acquisition of 7,865 macaques in two years. Yet, in Vietnam's 2025 report to CITES, Vietnam claimed that the other "satellite farms" had in excess of ***10,000 macaques*** on hand by the end of 2024. Of course, that would not have been conceivably possible given that the ***total inventory*** **of all of the satellite farms** (male and female breeders, infants and weaned juveniles), according to Vietnam's own analysis, had been depleted to about 5000 NHP's by the end of 2021. The chart below demonstrates the absurdity of Vietnam's 2025 claims to CITES.

[96] Food and Agriculture Organization of the United Nations.
[97] https://pmc.ncbi.nlm.nih.gov/articles/PMC10288083/.
[98] https://pmc.ncbi.nlm.nih.gov/articles/PMC10288083/.
[99] https://pmc.ncbi.nlm.nih.gov/articles/PMC10288083/.



The spread between what the Vietnamese government is claiming the "satellite" farms have in population, versus what they should have is close to ***13,000*** macaques. Furthermore, if these were legitimate "satellite" farms, one has to wonder what would have happened to all the surplus males that these satellite farms would have generated and not been of any interest to the breeding farms. Over 10,000 males remain unaccounted for.

Finally, when analyzing the "satellite" farm inventory data as reported by Vietnam in 2025, many unsustainable and unexplainable anomalies remain: farms that produce so few progeny they would not be operating in a sustainable manner; farms that oddly have years worth of stockpiled progeny; and male parental stock rates that are extraordinarily out of line with what Vietnam reports as the typically breeding group structure of males to females.

The information in columns A through G in the table below was taken from Vietnam's 2025 CITES response. We derive the implied juveniles by subtracting the parental stock from the total stock. We calculate the Male Parental Stock Percentage by dividing Male Parental Stock with Female Parental Stock. Finally, we use 75% as a breeding rate to calculate the infants born per year to the Female Parental Stock, and take the number of juveniles and divide it by this number to estimate how many years it would take to generate the progeny on hand.

	A	B	C	D	E	F	G	H	I	J
1	TT	Province	Owner of farm	Total stock	Parental stock (Total)	Parental stock (Male)	Parental stock (Female)	Implied Juveniles	Male Parental Stock %	Years worth of Progeny
2	1	Tây Ninh	Facility 1	3721	1039	139	900	2682	15.44%	3.97
3	2	Tây Ninh	Facility 2	36	19	4	15	17	26.67%	1.51
4	3	Tây Ninh	Facility 3	976	821	165	656	155	25.15%	0.32
5	4	Tây Ninh	Facility 4	430	350	50	300	80	16.67%	0.36
6	5	Tây Ninh	Facility 5	630	202	70	132	428	53.03%	4.32
7	6	Đồng Nai	Facility 6	952	197	20	177	755	11.30%	5.69
8	7	Khánh Hòa	Facility 7	358	358	125	233	0	53.65%	0.00
9	8	Bình Dương	Facility 8	578	482	196	286	96	68.53%	0.45
10	9	Bình Phước	Facility 9	834	599	216	383	235	56.40%	0.82
11	10	Bình Thuận	Facility 10	59	19	8	11	40	72.73%	4.85
12	11	Ninh Bình	Facility 11	1530	1495	454	1041	35	43.61%	0.04

Common sense dictates that breeding farms cannot survive if they do not hold back progeny for breeder replacement. Moreover, six of the 11 "satellite" farms have less than a year's progeny on site and four of the 11 "satellite" farms have juvenile populations several times greater than female breeding stock. Finally, the percentage of male parental stock at most of these sites is utterly inconsistent with a legitimate breeding operation. All of these factors point to "satellite" farms that must take in laundered or unprovenanced monkeys to remain operational.

b. Relevant Vietnamese Farms

(1) Vina Mekong

Background

Vina Mekong, originally known as Binh Long, was founded in October 2001. Per Vietnamese corporate registration records, in December 2015, Binh Long changed its name to Vina Mekong. This is further corroborated in the 2023 CITES response in which Vina Mekong notates the source of its breeding stock as the original entity, Binh Long. Its founder is listed as Huynh Huu Dung. Vina Mekong presently maintains one farm location in Vietnam, in Tay Ninh Province, and one location in Laos, referred to as Binh Long.[100]

In its 2023 response to CITES Vietnam was unwilling to certify the legal acquisition of breeding stock for Vina Mekong. In Vietnam's 2024 response to CITES, however, Vina Mekong reported its initial stock of 2,000 macaques in 2001 as obtained *from "Binh Long."* Vietnam, however, has offered no explanation as to the initial potential legitimate source of those 2,000 macaques and has offered conflicting source data between its 2014, 2023 and 2024 CITES responses. Between 2003 and 2007, Vina Mekong further acquired 859 NHP's from an unidentified "legal domestic source." Finally, the Vietnamese government closes the discussion on Vina Mekong by noting that the farms had acquired 4,170 macaques between 2019 – 2023 – with no provenance data offered.

Population Analysis

Vina Mekong's Tay Ninh facility had only 210 houses on site as of 2019. These houses would have been capable, per Vina Mekong's own affirmations, of housing no more than ***2,100*** macaques, and potentially an additional ~750 infants that would not yet have been weaned from their nursing mother, *i.e.*, too young to export.[101]

Yet, per customs records, in 2019, Vina Mekong, with only one farm legally operating in Vietnam, exported a total of ***4,700*** macaques to China from the Tay Ninh facility. Remarkably, the Vietnamese government certified that in 2019 the Tay Ninh facility held a total of approximately 4,500 macaques–***after*** 3,200 macaques had already been exported to China.[102] As such, according to Custom's data and Vietnam's population census, Vina

[100] As set forth in the Laos section, *infra*, the Laos location continues to be referred to as Binh Long.
[101] 2019 stated births in 2023 CITES report was 1,389 individuals. Assuming weaning at 6 months, we would estimate that ~750 unweaned infants could have been present.
[102] Appendix D, Vina Mekong, Customs Records.

Mekong's Tay Ninh farm would have needed a population of approximately ***8,000 macaques*** in 2019– a mathematical and practical impossibility based on its own stated housing capacities. The only logical conclusion is that government corruption allowed wild caught macaques to be laundered for export as "purpose bred" through Vina Mekong's Tay Ninh facility.

Facility Capacity Analysis

As of March 2013, Vina Mekong's Tay Ninh farm was capable of housing "up to" 3,000 macaques with a staff of 30 employees (100/1 ratio) according to Vina Mekong's website.[103] As can be seen by aerial imagery below, as of late 2018, Vina Mekong's farm, since at least 2013, contained only 6 rows of housing with a capacity of 2100 macaques (210 cages X 10 macaques per cage), not including un-weaned infants.

In mid to late 2019, the Tay Ninh facility began undergoing an aggressive expansion, with no identified legitimate source of breeding monkeys to fill the new cages. As set forth above, Vina Mekongs old website[104] stated macaques were housed in a density of 10 macaques per 16 sqm cage/house.

As evidenced by the satellite imagery from late 2023, Vina Mekong's Tay Ninh farm now contained 26 rows on the left side of the property (each row containing 38 houses) for a total of 836 monkey houses on the left side, and 22 rows on the right side of the property (each row containing differing numbers of houses) for a total of 770 monkey houses on the right. As such, with a total of 1606 houses in late 2023, Vina Mekong now had the capacity to house more that 16,000 macaques— almost an eight-fold capacity increase in less than 5 years. Such a dramatic increase in farm population with the claimed breeding stock would establish as logically absurd Vina Mekong's claims of "purpose bred" exports.

Satellite Images of Vina Mekong Facility Construction Progress

[103] **https://web.archive.org/web/20120504114645/http://monkeyvn.com:80/introduction.aspx**.

[104] In the original website, Vina Mekong was called "Binh Long."

Satellite Images of Vina Mekong Facility Construction Progress		
12/13/2013[105]	11/2/2018[106]	12/24/2023[107]

Source of Breeding Stock

In their 2014 response to CITES, Vietnam asserted that Vina Mekong's predecessor, Binh Long, had obtained their founding of breeding stock in 2009 from the Huynh Huu Dung farm, who, in turn, had obtained their founding stock of NHPs from Cambodia in 2001.[108]As such, in 2014 Vina Mekong had a total population of 1410 NHPs ,with only 210 female and 157 male breeders (having the remaining 1000 NHPs on hand allegedly as produced progeny).

Curiously, Vietnam's 2023 CITES response also stated that, at some undefined time, its breeding stock was supplemented with "500 females heads as parents [sic] stock," from an unidentified farm ***in Laos,*** which *was* the subject of a ban on trade at that time. As such, because Vina Mekong could not confirm, with supporting documentation, the legal acquisition of its breeding stock, the Vietnamese CITES authority, "due to lack of information," specifically excluded certifying the legitimate origin of Vina Mekong's breeding stock as properly established pursuant to the requirements of CITES and relevant national laws– a necessary requirement to issue valid CITES permits. This report was published to the CITES website on June 6, 2024. A mere two weeks later, Vina Mekong exported 649 macaques to the U. S., followed by another shipment of 705 macaques in early November 2024. *Vina Mekong continued and continues to export thousands of NHPs to U.S. importers and CROs under CITES permits.*

As to the 500 females allegedly sourced from an unidentified farm in Laos at an undefined time, it is understood that CITES placed a trade ban on Laos in 2016. It was briefly lifted in 2022, but quickly reinstated in November of 2023. Despite the brief window, Laos has not reported any legally exported macaques *since 2011*, and none to Vietnam *since 2009.* Likewise, Vietnam has no record of *legal imports* from Laos during this time period. Accordingly, these alleged "500 female" breeders were likely smuggled from Vina Mekong's Laos Farm, Binh Long. Binh Long (Laos) is a sister company to Vina Mekong, with common ownership. As discussed in the Laos section, the Laotian government was unable to provide

[105] 6 Rows, 3L+3R, (38*3)+(32*3), 210 Houses. Outdoor housing capacity of 2,100 macaques.
[106] 6 Rows, 3L+3R, (38*3)+(32*3), 210 Houses. Outdoor housing capacity of 2,100 macaques.
[107] 48 rows total, 26 rows, Left Side, 28 Houses per structure on Right, 24-62 Houses per structure on Left varying row to row. 62, 56, 50, 42, 38, 34, 28, 28, 24, 24, 26, 28, 32 (top to bottom). 22 Rows, Right Side, 32 Houses per structure on Right, 38 Houses per structure on Left. 1,606 Houses. Outdoor housing capacity of 16,060 macaques.
[108] This claim by the Huynh Huu Dung farm is decidedly suspect as the CITES Trade database confirms that there were no legal imports into Vietnam from Cambodia between 2001 and 2005.

the CITES Secretariat with any documentation regarding legal acquisition of the stock at the Binh Long, Laos site, resulting in ongoing concerns by CITES.

Interestingly, Vina Mekong also claimed in Vietnam's troubling 2023 CITES response that they had acquired one-year-old macaques as "rearing" stock. As reflected in the below chart. Vina Mekong identified no legitimate source for this stock. For reference, no other farm in Cambodia or Vietnam has reported intakes of "rearing" animals, a term which is more synonymous with ranching. CITES defines ranching as "[r]earing in a controlled environment of animals taken as eggs or juveniles from the wild, where they would otherwise have had a very low probability of surviving to adulthood."[109] As such, any importer of animals from Vina Mekong would be on notice that the animals are presumptively illegally captured from the wild, and thus, illegally exported as captive bred.

In 2024, Vietnam seemed to backtrack on its 2014 and 2023 statements and now claimed Vina Mekong sourced its initial stock of 2,000 long tailed macaques when they were granted a certificate of wild animal farm by the Bin Phuoc Forest Protection Department. This is at odds with Vietnam's past CITES responses and should be given no credence.

Doctored Breeding Rates

As seen in the chart below, large unexplained swings in the annual breeding rates reported to CITES in both 2019 and 2023 also suggest that Vena Mekong's reported breeding rates have been fabricated.

Year	Reported to CITES- 2023	Reported to CITES -2024	Difference
2019	85% blanket rate	62.15%	(22.85%)
2020		86.65%	1.65%
2021		80.32%	(4.68%)
2022		83.56%	(1.44%)
2023		59.47%	(25.53%)

Discrepancies in Exports

With respect to exports, Vina Mekong understated their actual export volume in 2019 by 2,500 NHP's, and again in 2022 by 275. This report previously established that Vina Mekong shipped more macaques in 2019 than their facility could even accommodate. Finally, we were initially perplexed at the 720 NHP overstatement of exports in Vietnam's 2024 CITES response, in comparison with Customs data.[110] This discrepancy points to only one logical conclusion – the unrevealed export of 720 macaques did indeed occur, but it was an illegitimate shipment across the border to China, and hence, was not recorded in customs data.

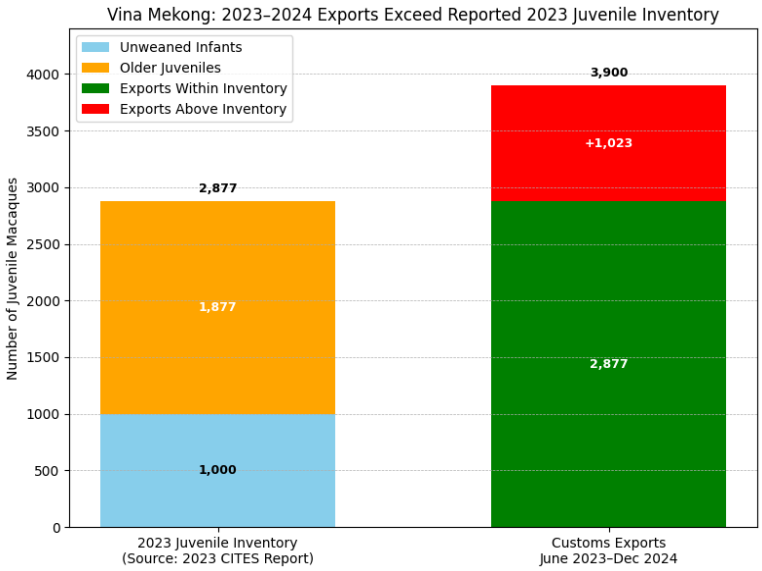
[109] https://cites.org/eng/resources/terms/glossary.php

[110] https://cites.org/sites/default/files/documents/E-SC78-35-01-A5d.pdf , Customs data in Appendix D, Vina Mekong, Customs Records. Customs data shows a shipment of 500 macaques to SNBL, and a shipment of 480 macaques to Hartelust for a total of 980 macaques. The 2024 CITES response states 1,700 macaques were exported leaving 720 unaccounted for.

Comparing Vietnam's 2023, 2024 and 2025 CITES Responses

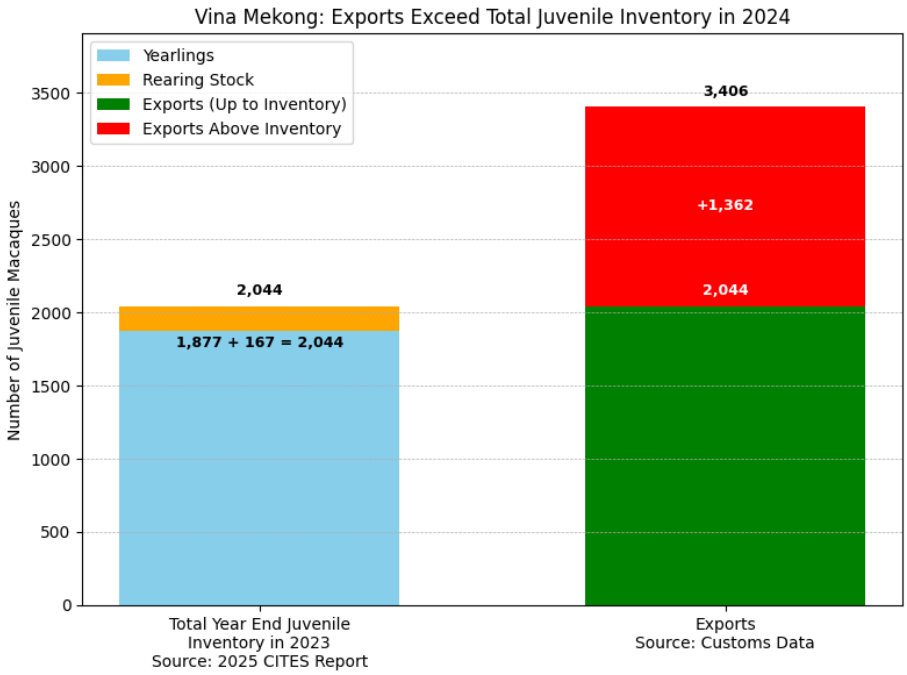
In Vietnam's 2023 CITES response Vina Mekong, confirmed a total juvenile inventory of "2,877." 1,000 of those births were un-weaned infants indicating they were born between January and June 2023. Vietnam's 2024 CITES submission, however, states that Vina Mekong had 1,877 births in 2023 indicating an additional 877 births occurred between July and December 2023 which were not captured in the 2023 CITES report. Of course these NHPs would not be old enough to export until 2025, so are not considered here.

Customs data shows that between June 2023 and December 2024, Vina Mekong exported over 3,900 macaques– 1,000 more macaques than would be mathematically possible to export. Moreover, this calculation does not take morbidity, mortality and macaques into consideration. The below chart demonstrates graphically illegitimacy of Vina Mekong's attestations to CITES.



Discrepancies Utilizing 2025 CITES Response

The lack of veracity of Vina Mekongs claims to CITES is further corroborated using the 2025 CITES report which affirms that by the end of 2023, Vina Mekong had a juvenile inventory of 1,877 yearlings and 167 rearing stock for a total inventory of 2,044 juveniles. Yet in 2024 Vina Mekong actually exported 3,406 macaques–over 1,300 more macaques than they even had in inventory at the farm.



Mortality

Vina Mekong reports no mortalities between 2019 and 2022, alongside 47 mortalities in 2023. The assumption that there were no NHP deaths between 2019 and 2022 is not credible.

Zoonotic Issues

In January 2023, Hartelust, a European importer received a shipment of 480 macaques from Vina Mekong.[111] As the macaques were further distributed to customers of Hartelust, it became apparent many of the macaques were infected with Tuberculosis (TB)

First, TB was detected in a shipment of macaques to France. Then, Anapath, a CRO in Spain, received 114 of the macaques. All animals were necropsied, and 10 of 114 NHP's showed signs of TB, or approximately 8.75% of the shipment this client received. This percentage far exceeds the median TB rates per CDC.[112] Hartelust then culled the entire remaining group of NHPs it had received from Vina Mekong.

Additional data reveals that Vina Mekong has recent batches of animals with at least a 20% viral positive rate – animals which importers and CRO's could not utilize as that would be against industry standard.[113] Taking into account the presence of TB and a high viral positive rate indicates Vina Mekong would need an even greater population of NHPs to

[111] https://www.abolicion-viviseccion.org/en/brote-de-tuberculosis-en-macacos-enviados-a-laboratorios-de-toda-europa/
[112] https://www.cdc.gov/Mmwr/preview/mmwrhtml/00021299.htm.
[113] https://pubmed.ncbi.nlm.nih.gov/18323576/.

provide disease free NHPs to clients. Finally, while a high viral rate could be indicative of poor management, given the above reporting, the likely culprit is that these macaques are wild caught macaques which would naturally have higher viral rates that circulate in the wild population.[114]

More Red Flags– Impractical Ratios of Macaques to Staff

Vina Mekong lists its employed staff at 24 people and claims a population of ***8,299*** macaques in its 2023 CITES response. Yet on their prior website, for a facility that could house up to only 3,000 macaques, they listed a personnel of 30. The chart below compares the current claimed staff-to-macaques ratios at Vina Mekong, its prior ratios and the claimed ratios of other Vietnamese farms.

Vietnam: Farm Staffing Ratio	
Facility	Macaques Per Staff Member
Vina Mekong (CITES)	346
Vina Mekong (Old Website)	100
Nafovanny	120
Thanh Cong	117

Thus, the claimed 2023 staffing ratio at Vina Mekong plainly would not support a "captive bred" inventory of 8,299 NHPs. Moreover, if the farm indeed maintained those staffing levels, the NHPs could not have been receiving the required level of care, resulting in higher rates of morbidity and mortality, and driving down even further the numbers of NHPs available for export.

Furthermore, the numbers provided in Vietnam's 2023 CITES response simply do not add up. Specifically, in one section of their 2023 response, Vina Mekong states the total inventory of the farm is 8,299 macaques, composed of 1,364 males, 4,384 females, and an additional *2,551* unidentified animals. In the next section it breaks down the stock as 3,156 breeder females, 724 breeder males, 1,877 weaned juveniles, and 1,000 unweaned juveniles, for a total of 6,757 macaques. That calculation would leave 1,542 of the NHPs purportedly on site, unaccounted for. One must also ask why are there 2,551 "unidentified animals" if there are only 1,000 unweaned juveniles. These cannot simply be mistakes, but given the evidence set forth herein, Vina Mekong's representations are not worthy of credit and appear to be falsified to cover a robust monkey laundering operation.

[114] https://pubmed.ncbi.nlm.nih.gov/18323576/.

Despite this record conclusively confirming that Vina Mekong is obtaining NHPs from sources other than its captain breeding program, and that the Vietnamese government cannot verify the legitimacy of Vina Mekong's founding and export stock, over 3,200 macaques have been exported from Vina Mekong to the United States in 2024 alone.[115] CITES regulations, particularly Conference 11.3, Compliance and Enforcement, place an obligation on the U.S. to disallow the import of specimens it believes were traded in contravention of CITES. There can be no doubt that specimens imported from Vina Mekong were traded in contravention of CITES.

(2) Thanh Cong Jingang

Background

Thanh Cong Jingang is a farm in Lang Son, a city in Northern Vietnam located approximately 10 miles from the border of China. The farm was founded in 2007, and recently has engaged in a partnership with Hainan Jingang Biotech, a Chinese CRO and breeder of macaques. It is unclear as to the current status and parameters of this relationship, though we believe Hainan Jingang to be the owner of Thanh Cong Jingang. Exports by the farm are being made under Thanh Cong Jingang legal entity, and not under the predecessor Thanh Cong entity.

It should also be noted that there has been a newly formed company in Laos as well: Laos Jingang Biotechnology, which was formed in July 2023 and is 100% owned by Hainan Jingang Biotechnology. Laos Jingang Biotechnology's operational status is unclear as Laos did not disclose any information on this farm in their communications with Laos discussed *infra*. This sister site to Thanh Cong Jingang would serve no business purpose other than to be used for laundering macaques to Thang Cong Jingang from Laos, and ultimately facilitate laundering NHPs to Hainan Jingang in China, as well.

Inability to Accurately Identify Founding Stock

In Vietnam's 2023 CITES response, Thanh Cong Jingang confirmed (1) that there were 120 macaques in their 2006 founding stock, and (2) that there were four additional intakes through mid 2007, accounting for an additional 398 macaques–for a total breeding stock of 509 macaques. In Vietnam's 2024 CITES response, however, the breeding stock at the farm is now listed as an initial number of 557 macaques– an unexplained discrepancy of 48 NHPs. There is plainly a consistent pattern in Vietnam of farms continuously misstating what otherwise should be easily documented stock NHP numbers.

Doctored Breeding Rates

Large unexplained swings in the annual breeding rates reported to CITES in both 2019 and 2021 suggest that Thanh Cong Jingang's reported numbers were fabricated.

Thanh Cong Jingang: Reported Breeding Rates			
Year	Reported to CITES- 2023	Reported to CITES -2024	Difference

[115]Customs data in Appendix D, Vina Mekong, Customs Records.

Thanh Cong Jingang: Reported Breeding Rates			
2018	75%		
2019	76%	62.53%	(13.47%)
2020	74%	77.44%	3.44%
2021	75%	49.47%	(25.53%)
2022	74%	80.66%	6.66%
2023		66.36%	

Fabricated Supplements to the Numbers of Breeding Females

Similarly, in 2019 and 2023, Thanh Cong Jingang inexplicably adjusted upward by 804 and 500 the number of breeding females reported to CITES. These increases of more than 100% and 25% respectively, provided to CITES without explanation, further clouds the viability and legitimacy of the farm's operations.

Thanh Cong Jingang: Reported Breeding Females			
Year	2023 CITES[116]	2024 CITES	Difference
2018	948		
2019	784	1,588	804
2020	1,396	1,396	0
2021	1,696	1,696	0
2022	1,838	1,856	18
2023	2,006	2,506	500

Discrepancies in Year Ending Inventory

Thanh Cong Jingang inflated their Year Ending Inventory in 2022 and 2023 by ~20%. This is shown via the 2025 CITES report by using the ending inventory in the prior year as the starting inventory for the current year, and adding the yearlings from the current year, any purchases made in the current year, then subtracting sales and mortalities in the current year. This basic analysis demonstrates that Thanh Cong overstated their ending inventory in 2022 by nearly 1,000 macaques, and in 2023 by nearly 900 NHPs.

Sources of Breeding Stock

Per Vietnam's 2023 CITES response, Thanh Cong Jingang was not established until May 2007. Therefore, it is unlikely that breeding had commenced in August 2006 when it allegedly acquired an initial batch of 120 macaques of which 102 were to be females capable of breeding.[117] Furthermore, with respect to the 692 NHPs it claims to have

[116] Breeders derived by using data on births and reported breeding rates.
[117] https://cites.org/sites/default/files/documents/E-AC33-15-02_2.pdf

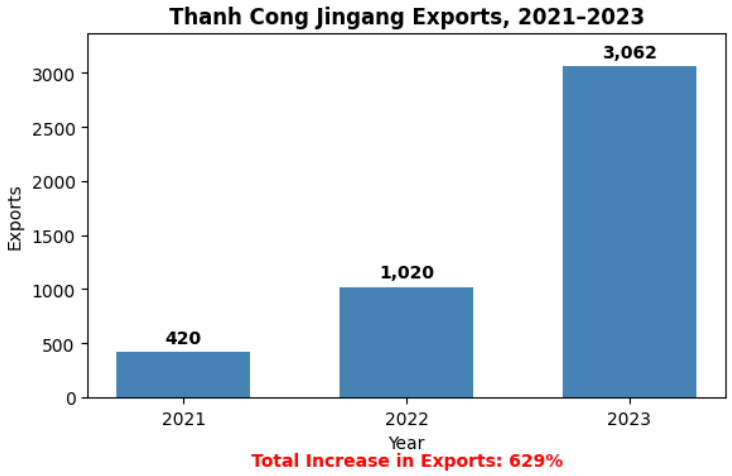
"procured" in 2020, Thanh Cong Jingang has failed to identify their source–presumptively establishing unlawful acquisition.

With such obvious gaps in justification of the *bona fides* of their breeding stock, importers of NHPs sourced from Thanh Cong Jingang farm would have had to consciously avoid any concrete due diligence with respect to the lawful acquisition of the parents of the 540 NHP's that were exported from Thanh Cong in 2022. The same is true with respect to the almost 2,000 macaques exported from this location in 2023.

Export/Population Analysis

According to Vietnam's 2025 CITES response, Thanh Cong Jingang had a total population of 4,864 macaques by the end of 2022. In 2023, however, Thanh Cong Jingang exported 3,062 macaques, and had 646 mortalities, yet somehow ended the year with 4,449 macaques on site.

Furthermore, as is shown in the graph below, the rapid increase of exports from Thanh Cong Jingang is a red flag in itself.



Zoonotic Issues

Mortalities

As reflected in the chart below, Vietnam's 2025 CITES response disclosed an incredibly high number of mortalities at Thanh Cong Jingang (likely linked to outbreaks of TB)[118] that previously had not been reported. These high mortalities, combined with the relatively

[118] https://www.cdc.gov/mmwr/volumes/73/wr/mm7307a2.htm?s_cid=mm7307a2_w
In late 2022, a shipment of 540 macaques was imported by CRL from Thanh Cong Jingang. Per a CDC report, this group of animals was infected with Tuberculosis, and at least 34 of the macaques were euthanized in the USA.

small NHP population at the farm, gives further credence to the incredulous nature of the legitimacy of Thanh Cong Jingang's reported exports.

Thanh Cong Jingang: Reported Mortalities		
Year	Mortality Reported	Mortality as % of Total Reported Stock[119]
2019	643	
2020	1,353	34.86%
2021	0	0%
2022	1,477	33%
2023	646	13.28%

More concerning is the presence of TB in the imported animals indicates that TB must be present in Thanh Cong Jingang, and therefore many of the monkeys on site would not be available for shipment as they would need to be culled. A TB outbreak such as this could mean hundreds of animals being culled at Thanh Cong Jingang, making the notion of availability of enough animals to make the reported shipments with captive bred NHPs even more unlikely. In its 2025 response to CITES, Vietnam finally disclosed total annual mortalities, but provided no explanation or documentation as to the basis for these high mortality rates.

More Red Flags—Evidence of Wild Caught being Unlawfully Shipped

As the Thanh Cong Jingang farm is alleged to be founded in 2007, it is at least notable that the farm was not included in Vietnam's 2014 CITES response as a CITES approved captive breeding facility. As such, prior to 2014, it may be reasonably concluded that Thanh Cong Jingang farm was not operating in accordance with CITES protocols.

Concerns over the legitimacy of breeding stock at the Thanh Cong Jingang farm have also been expressed publicly by other governments. For example, in 2022, when Hartelust, a small European supplier of primates, sought approval to import macaques from Thanh Cong Jingang into the Netherlands, Dutch authorities initially denied approval of the importation. In doing so, Dutch authorities confirmed that the reason for their initial denial was that "based on the available data and consultation with the relevant authorities, the [Wildlife Authority]cannot determine that these are bred specimens and is therefore of the opinion

[119] Calculated by using mortality of the current year divided by ending stock in the year prior.

that the import may have adverse effects on wild populations."[120] *Two days later Dutch authorities inexplicably reversed their stance and gave permission for the shipment.*

Facility Density Analysis

In its 2023 CITES response, Vietnam maintained that the Thanh Cong Jingang farm has 156 rooms, at 18m2/each. Assuming every room housed 12 breeding females, that would only allow for 1,872 breeding females to be on site. In June 2023, however, Thanh Cong Jingang claimed there were 2,006 adult females and 2,852 juveniles on site.[121] Obviously there would have been no space for the 2,882 juveniles that Thanh Cong Jingang claimed were on site. Thus, *there is no plausible scenario where more than 5000 macaques could have been housed at the Thanh Cong Jingang facility in 2023.*[122]

Comparing the Thanh Cong Jingang population from CITES records with the farm's exports from Vietnamese Customs records, there are no mathematically possible scenarios where the farm could generate the number of macaques that were exported. The rate and volume of increase in the exports also points inexorably to an illegitimate supply chain.

Finally, recent photographic evidence confirming the open presence of stored plastic red and blue smugglers' crates gathered along with other common smuggling crates at the Thanh Cong Jingang farm confirms both endemic corruption and the illicit provenance of the macaques. These smuggler's crates can be further seen in the various photos of intercepted smuggled shipments available in Appendix A and Appendix B, in the respective "Intercepted Shipments" sections.

[120] https://www.animalrights.nl/hoe-apenhandelaar-hartelust-overschakelde-op-vietnamese-import-aapjes (Quote translated from Dutch)
[121] https://cites.org/sites/default/files/documents/E-AC33-15-02_2.pdf
[122] Satellite Images of the site are available in Appendix D.

5. Laos

Laos, an impoverished country, is vulnerable to all forms of exploitation due to high levels of corruption. It is known as a hub for drugs and human trafficking, as well as wildlife trafficking where it's ranked in the top 10 countries globally for wildlife trafficking.[123] The last legal export of macaques from Laos occurred in ***2011***, and the word legal is used in the loosest of sense, only discerning that it was done with a CITES permit. The below composite table shows the dates of formation of the "purpose bred" farms in Laos.

Name (English)	Formation Date	Ownership[124]
Yuan Ma Biology Co.,Ltd	12/7/2023	China
Sookvannaseng Integrated Co., Ltd	9/9/2021	51% Lao, 49% China
Kang An Bear Research Sole Co., Ltd	9/20/2023	China
SNBL Sokxay Co., Ltd	5/16/2023	Japan

[123] https://ocindex.net/country/laos#

[124] In most cases these are approximately 50% owned by nationals or corporations listed in the ownership column. Data from corporate records.

STD FARM Company Limited	12/12/2022	51% Lao, 49% China
Laos Jingang Biotechnology Sole Co., Ltd[125]	7/10/2023	China
Vientiane Xinling Development Science and Technology Co., Ltd	4/21/2009	10% Lao, 90% China
Laos Acer Biotechnology Sole Co., Ltd	5/21/2024	China
Vannaseng Trading Sole Co.	03/06/2009	Lao
Binh Long II	12/06/2006	Vietnam

Because this multitude of breeding farms cannot legally export NHPs, Laos has long been a waystation for those engaged in the monkey laundering trade. Macaques are routinely smuggled in from Thailand, a bordering nation. As set forth, *supra*, recently, many illicit shipments of macaques have been intercepted on their way to Laos – some within miles of a Laotian wildlife farm, **Vannaseng Trading Co., Ltd., ("Vannaseng")**, which has been long implicated in widespread wildlife laundering of all species including tigers, and elephants.[126]

Vannaseng is not the only farm that continues to operate in Laos. While **Vina Mekong**, is headquartered in Vietnam, they have long maintained a sister farm in Laos under the Binh Long name. Significantly, as annotated in table above and despite the export ban, four new farms were established in the past two years[127] – two with connections to China, and one with connections to the largest CRO in Japan, SNBL. Thanh Cong Jingang also has a facility in Laos known as Laos Jingang Biotechnology.[128]

With no research occurring in Laos, and no official exports of NHPs having been authorized since 2011, no legitimate purpose can be served to open breeding farms in Laos. The most logical basis for such breeding farms is that companies are opening up sister farms in Laos to serve as a way station to access smuggled Thai macaques and exported to Mainland Asia countries where they can be falsely labeled as captive bred and, thus, "legally" acquired.

[125] Not discussed in any filings with CITES. Its ownership by a Chinese primate company makes it clear it's a primate company.
[126] https://reports.eia-international.org/niap/niap-country-laos/.
[127] https://cites.org/sites/default/files/documents/E-SC78-33-08_0.pdf.
[128] http://www.ned.moic.gov.la/index.php/en/explore-data-en/search.

Investigation by CITES

Currently, CITES is investigating issues of legal acquisition of founder stock for alleged captive breeding facilities in Laos – the same claims we have already made for China, Cambodia, and Vietnam.

In December 2023, Laos reported to CITES that no import or export of macaques had occurred since 2020 even though export quotas had been issued. It further stated in the same report that Vannaseng and Soukvannaseng were the only two captive breeding facilities in Laos.[129] Astonishingly, in the same report, Laos also indicated that five new macaque facilities had been established, with two already breeding macaques, two not possessing any macaques, and one in the process of acquiring macaques from the wild.

In an earlier CITES response from 2022, the Lao government had stated there was only one farm left operating in Laos–Soukvannaseng.

Farm	Population	Birth Rate	Mortality Rate	Initially Stocked
Soukvannaseng	20,950	14%	4%	2003 from forests and bought from local communities

This raises the question of where all the other farms now being reported as operational have sourced their macaques. The sheer numbers tell the story.

It should be noted what was omitted by Laos in their responses to CITES was that the Laotian government conducted an inspection of Vannaseng in March 2016, and "the inspectors said they suspected the farm had been involved in the illegal purchase of monkeys captured in the wild."[130] A further Laotian government report states "Vannaseng – illegally imported 2,000 macaque monkeys captured and sold by villagers in Cambodia."[131]

[129] https://cites.org/sites/default/files/documents/E-SC78-33-08_0.pdf.
[130] https://www.theguardian.com/environment/2016/sep/27/revealed-how-senior-laos-officials-cut-deals-with-animal-traffickers.
[131] https://www.theguardian.com/environment/2016/sep/26/bach-brothers-elephant-ivory-asias-animal-trafficking-network.

Given the undeniable facts as outlined above , CITES requested more information from Laos and Laos submitted its report in September 2024. A summary of data provided has been compiled into the below table.[132]

Name (English)	Date Established	Population	Origin of Macaques	Other Notes
Yuan Ma Biology Co.,Ltd	2022	500	No source information given	
Sookvannaseng Integarted Co., Ltd	2009	9,280	Original stock from Vannaseng	Only trades with China
Kang An Bear Research Sole Co., Ltd	2023	0	No Data	Not yet operational
SNBL Sokxay Co., Ltd	2023	No Data	Wild	Collecting from wild
STD FARM Company Limited	2021	0		Not yet operational
Laos Acer Biotechnology Sole Co., Ltd	2022	7,612	Binglong II source of Breeding stock	
Vannaseng Farm Individual Enterprise	2002	6,187		Partnerships with Korea, US, and Cina
Binh Long II	Not included in the report, likely as inventory was transferred, but the facility still exists and could be restocked.			

[132] https://cites.org/sites/default/files/documents/E-SC78-33-08_0.pdf.

It should be noted that several of the population quantities differ in the report submitted to CITES from an internal presentation prepared by the Lao Department of Forestry in May 2024. A table compiling the differing statistics is below:

Farm	September 2022 CITES Report[133]	May 2024 Presentation	September 2024 Report to CITES[134]
Vannaseng		6,187	6,187
Sookvannaseng	20,950	11,760	9,280
Yuan Ma		648	500
Laos Acer Biotechnology		7,612	7,612

The disappearance of almost 12,000 macaques from Sookvannaseng in a two year period during an export ban should not be a mystery given what is established here–they were most certainly laundered into the international export market. And there is further confirmation of the illicit source of these macaques.

In their 2022 report to CITES, Laos acknowledged that the Sookvannaseng farm's breeding stock was "brought from the forests and bought from local communities."[135] The 2024 Laotian CITES response, however, changed course, and now states the breeding stock for Sookvannaseng was "sourced from Vannaseng."[136]

The Lao government further submitted documents about the origin of breeders for the various farms, but submitted them in Lao, and the documents were unable to be reviewed by CITES. The Lao government, however, neglected to submit any documentation verifying the legal acquisition of breeder stock for Binh Long, which is currently at Laos Acer Biotechnology, causing CITES to have concerns.

Moreover, despite having received authorization to export 500 macaques, Laos has advised that with respect to the farm, Lao Universal Development, the source of these exported macaques is unknown. Lao Universal Development is now under investigation by Lao and Myanmar authorities as the permit showing these macaques originated from Myanmar has been determined to be fraudulent.[137] The actual source of these macaques remains

[133] https://cites.org/sites/default/files/eng/com/sc/74/E-SC74-30-01.pdf.
[134] https://cites.org/sites/default/files/documents/E-SC78-33-08_0.pdf.
[135] https://cites.org/sites/default/files/eng/com/sc/74/E-SC74-30-01.pdf.
[136] https://cites.org/sites/default/files/documents/E-SC78-33-08.pdf.
[137] https://cites.org/sites/default/files/documents/E-SC78-33-08_0.pdf.

unknown. It is also of note that this farm's existence is not disclosed in reports to CITES by the Laos government.

With regard to Non-Detriment Findings (NDF), the Laos government asserts that facilities established prior to Laos joining CITES (2004) would not be subject to having an NDF for the stock they had at the time. According to the Laos government this would apply to Vannaseng and Soukvannaseng.[138]

Regarding the wild capture of animals cited in the 2022 CITES response, which would have been submitted in 2021, Laos asserts the wild population of macaques mostly lives in protected areas, and that the population in those protected areas was only 300 to 500 monkeys. In an NDF submitted to CITES in April 2024, Laos now claims the wild population of macaques is 30,586, with the highest concentration in Attapeu province and Champasak province.[139] Lao further submitted a report in September of 2024 that confirmed the government has not yet issued any permits for the capture of wild animals. Also the Laos government has further assured that only individuals from F2 generation and beyond would be permitted for export. It should be noted that SNBL Sokxay was formed and hired staff in 2023 –before an NDF was even submitted Similarly, the CITES report from Laos also confirms that SNBL is already collecting animals from the wild.[140]

Trade

Trade Activity

The table in Appendix E, obtained from the public CITES trade database where all regulated trade between countries is recorded, reveals the last legal export from Laos involved a shipment to China in 2011 and the last trade to Vietnam occurred in 2009. Thus, the claimed movement of 500 macaques from Binh Long Laos to Vina Mekong in Vietnam was not reported to CITES, as it involved an illegal shipment of macaques.

Trade Suspensions

In 2016, CITES placed a trade ban on Laos for the trade of long-tailed macaques as well as several other species. This was lifted in 2022, but quickly put back into place in 2023. The relevant notifications are in the appendix.

Issued Quotas

Despite the lack of legal trade with Laos since 2011, Laos has been issuing quotas to two farms from 2022 to present even though exports cannot occur.

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[138] The formation date of Sookvannaseng is in 2009 and it would therefore be subject to an NDF.
[139] https://cites.org/sites/default/files/documents/E-SC78-33-08_0.pdf
[140] https://cites.org/sites/default/files/documents/E-SC78-33-08_0.pdf

Binh Long II

Background

Binh Long, is a sister site to Vietnam's Vina Mekong, as both farms are owned by *Huynh Huu Dung*. This farm was originally registered in 2006, and was last registered in 2018. Binh Long II is listed in the Laos corporate records as currently active. This farm plainly receives macaques laundered from Thailand and stages them for further shipment to Vietnam and China.

Population Analysis

Based on satellite images, it is estimated that approximately 156 outdoor houses would hold between 1,560 to 2,340 breeders depending on density – if it were a breeding operation. The old Binh Long website stated a capacity of 5,000 monkeys which we think is highly suspect. Ultimately, we don't believe this site to be a breeding site as there exists no reason to breed in Laos when one can't legally export from Laos.

> PROJECT BINHLONG 3 IN LAOS
>
> - **Binh Long branch 3** in Laos has a total size of 80000m2 and can raise up to 5000 monkeys.

Facility Analysis

The Binh Long facility appears to have 6 outdoor group housing structures, and some other structures which we attribute to single housing of animals, administrative functions, and storage. The facility has not experienced any construction changes since at least 2011. Since that time no legal exports from Vietnam have occurred. If breeding was occurring at this site, with no outlet for exports, or domestic use of these animals, the farm would have needed to do a massive expansion to support progeny were they being born each year.

Breeding Rate Discrepancies

While we have no data to performa breeding analysis for Binh Long, logic dictates, however, that it would not be legally possible for active breeding to be taking place at Binh Long as there would be no lawful method to export its progeny. And continued growth with no depletion through sales would require continuous expansion of the facility, which, of course, would not be feasible.

Shipment Analysis

The facility was first registered in 2006. CITES has no registered exports out of any Laotian farms since 2011, and trade has been banned since 2016, despite a brief lifting where according to the CITES trade database no legal activity occurred. While there is no shipment specific data that exists, there is confirmation that Binh Long was transferring macaques to Vietnam *without* CITES permits which is further discussed in our Red Flags section. There would also be no reason to maintain a facility for 13 years if unregistered illegal shipments weren't occurring.

Red Flags

Shipments of animals between Laos and Binh Long/Vina Mekong without CITES permits have been confirmed by Vina Mekong themselves when they stated in the 2023 CITES response the addition of macaques from Laos, which would have been from their sister site Binh Long. The facility also appears to have been maintained until early 2024 when the grounds stopped being maintained. We suspect just before this time a large shipment of macaques was moved between sites given the massive construction that occurred at Vina Mekong's Tay Ninh site.

We have seen conflicting data as to the site. On the one hand we have documentation that they transferred the inventory to Vietnam and shut down the site circa 2016, which would have been done without permits. On the other hand, the Laotian government claims that in 2022, Binh Long supplied around 5,000 macaques to a newly formed Chinese owned farm in Laos called Laos Acer Biotechnology. However, the government was unable to provide CITES with any supporting evidence showing the Binh Long stock was legally acquired. It should be noted that according to our models the Binh Long facility is not capable of housing 5,000 macaques.

In either scenario, it is clear that Binh Long, owned by the same individual who owns Vina Mekong, necessarily is involved in significant wildlife laundering.

Laos Acer Biotechnology

Background

Laos Acer Biotechnology was formed 3/01/2022.[141] In June 2021, the site was barren land, and by April 2022, the ground was being prepared for construction, and by October the site was completed.

Population Analysis

In a document produced by the Laotian Department of Forestry in May 2024, the Laotian government states that the founding stock of the farm was about 5,000 Macaques which are alleged to have been received from Binh Long, and further states that the current population was 7,612 individuals.

SNBL Sokxay

Background

SNBL Sokxay is a joint venture between Shin Nippon Biomedical Laboratories and Sokxay Group in Laos on 5/16/2023.

Red Flags

SNBL Sokxay was formed in Laos in May of 2023, a country prohibited in trading CITES regulated species. The source of animals for any farm operating in Laos should be viewed as

[141] Laos corporate records list a formation date in 2024, but the tax date is listed as 2022. This is confirmed in another document from the Laotian government as the correct formation date.

highly suspect, especially as the macaque population in Laos is limited. Given the inability to legally trade in macaques, it appears that SNBL is planning to ship animals from this site to their site in Kampong Cham, Cambodia, where they could then be either used for breeding or simply exported to Japan. It is further noteworthy that the SNBL site in Cambodia received a shipment of 500 macaques in 2023 from Vina Mekong in Vietnam.

IV. Synthesis of Findings

Our findings show that few if any of the farms in Mainland Asia are operating legitimately. Across all facilities studied, we observed implausible breeding rates, impossible shipment volumes, facilities too small to house alleged numbers of purpose bred NHPs and unprovenanced sources for founding and newly introduced stock. The varying analysis methods performed include:

- Review of CITES and Forestry Serview farm and trade data
- Review of CITES treaty and relevant country regulations
- Analysis the farms size and expansion growth of the physical facility
- Review of responses to CITES, including analyzing stated farm populations, breeding rates, and staffing rates
- Analyzing export data and against farm population
- Reviewing scientific and research journals
- Reviewing geographical monkey smuggling arrest, seizure and conviction data

Key Findings:

- Excessive population growth far exceeding biological norms
- Biologically impossible breeding rates
- Inability to trace legitimate founder or breeding stock
- Links to operations in Laos–a country banned from trade in macaques
- Facility capacities and claimed populations inconsistent with physical constraints
- Hundreds of illegal cross-border shipments
- Regulatory authorities failing to prevent or detect laundering (suggesting complicity or negligence)
- Statistical analysis establishing that, during the relevant period, Cambodia exported more that 100,000 NHP's that were demonstrably not captive bred at Cambodian breeding farms
- Repeated materially false statements to CITES by Mainland Asia countries regarding captive bred NHP populations, breeding rates and source of founding/breeding stock
- A significant failure by Mainland Asia breeding farms to produce any contemporaneous documentation supporting affirmations made to CITES
- Regulatory authorities issuing CITES certifications regarding NHP populations unsupported by facts on the ground

- Obvious entrenched corruption necessary to facilitate a vast monkey laundering enterprise
- Complete lack of basic analytical due diligence by importers and CRO's
- Failure of International bodies and U.S. law enforcement to take appropriate and warranted action sufficient to prevent the export of demonstrably laundered NHPs from Mainland Asia

While as demonstrated here all relevant farms have obtained NHPs beyond the capacity of the farms to legitimately produce from their breeding facilities, necessitating participation in monkey laundering activity. As shown above, active and rampant monkey laundering is the only logical explanation for the volume of NHP export is the only explanation for the vast chasm at KF between the progeny they could legitimately produce and the amount they have exported. We have shown that the delta is in the tens of thousands of laundered monkeys. And KF has repeatedly lied, retreated and re-engineered numbers in its submissions to CITES.

The analysis of Vietnam's NHP farms is striking in that the farms universally could not or would not credibly verify a legitimate source of alleged founding and breeding stock. The case of the Vina Mekong farm is most striking as, in 2019, exports vastly exceeded the housing capacity of the Vina Mekong site.

While the discrepancies aren't as large as KF, we believe that's simply because not enough time has elapsed and we have caught these farms early on in their operation so to say. Vina Mekong has greatly expanded its facility at a similar scale to that of KF, and Thanh Cong is working on the same.

Because breeding farms in Cambodia and Vietnam are required to keep contemporaneous records, it should be a relatively simple exercise to support, with documents, the basics: legitimate acquisition of parental and breeding stock, number of breeders, progeny, breeding rates and mortality. Yet no farm has chosen to do so.

The only explanation for this abject failure is the one most obvious– for years these farms have been engaged in the corrupt enterprise of monkey laundering to satisfy the demands of importers and CRO. Yet importers and CRO's continue to turn a blind eye to this illicit activity which could be easily uncovered with basic analytical due diligence. It is simply a numbers game, where contemporaneous records and simple math would provide all of the necessary answers to an inquisitive importer. Exports from Cambodia and Vietnam, however, continue to be authorized by apparently toothless regulating and enforcement bodies.

V. Recommendations

1) Mandating that all farms in Mainland Asia document with verifiably contemporaneous records (a) the source of the founding stock; (b) the source of any supplements to the

founding stock; (c) the *bona fides* of the relevant breeding stock; (d) the relevant breeding rate; and (d) the relevant mortality and morbidity.

2) Mandating that Importers and CRO's importing NHPs from Mainland Asia breeding farms establish diligence protocols which require verifiable documentation establishing , *inter alia*, (a) the legitimacy of the farm's founding stock and any supplements thereto; (b) the legitimacy of the breeding stock from which the to be exported progeny was born; and (c) verifiable contemporaneous documentation at to the farm's relevant breeding, mortality and morbidity rates. We are aware of efforts to utilize genetic screening, however, do not believe it to be a viable route for reasons we will discuss in a subsequent report.[142]

3) Immediate enforcement action by CITES and relevant enforcement and regulatory agencies to prevent the export of NHPs from any breeding farms in Cambodia and Vietnam until such time as these farms can reliably document the provenance of the farm's founding and supplemental breeding stock, and breeding and mortality rates as set forth above.

[142] Some have suggested that genetic testing will solve the problem of monkey laundering. The use of genetic testing, however, is ineffective when whole troops of macaques including parents can be illegally captured. It also does not aid in verifying the legal acquisition of breeding stock, a key requirement for permits to be granted. Finally, if the farming operation has limited breeding and supplements with wild caught animals, unless all animals are DNA tested, farms would conceivably ship laundered animals to countries such as Japan or China where no DNA testing is required., Essentially, laundering would could continue undetected.
https://pubmed.ncbi.nlm.nih.gov/1297631/.

VI. Appendices

Appendix A: China

Intercepted Shipments

Trade Data

	Occurrences of Chinese macaque Imports Exceeding Exports			
	Imports		Exports	
Year	**Importer reported quantity**	**Exporter reported quantity**	**Importer reported quantity**	**Exporter reported quantity**
1986	1	1	45	0
1989	2	1	130	0
1990	2	2	93	0
1991	600	22	35	86
2006	10610	19252	17725	18887
2009	19845	17850	17447	23329

2010 Export Quotas

Hainan	Hainan Jingang Experimental Animal Technology Co., Ltd.		2376
Hainan	Hainan Longfuyi Industrial Co., Ltd.		201
Hainan	Hainan Primate Experimental Animal Development Co., Ltd.		371

2011 Sales by Chinese Farms

Appendix 1: Statistics on the export sales of experimental monkeys by breeding enterprises in 2011

Unit Name	Number of macaques exported	Number of macaques sold in China	Number of exported cynomolgus monkeys	Number of cynomolgus macaques sold in China
Guangdong Blue Island Biotechnology Co., Ltd.	214		435	248
Zhaoqing Chuangyao Biotechnology Co., Ltd.			214	179
Conghua Huazhen Animal Farm			3780	
Guangzhou Chunsheng Biotechnology Development Co., Ltd.			2900	
Gaoyao Kangda Experimental Animal Technology Co., Ltd.			545	42
Gaoyao Kangyuan Experimental Animal Technology Co., Ltd.	33			
Yueyuan Animal Farm, Qigan Town, Conghua City				
Hainan Longfuyi Industrial Co., Ltd.			200	
Hainan Jingang Biological Co., Ltd.			260	611
Hainan Xinzhengyuan Biotechnology Co., Ltd.				16

Hainan Newsource

Business Card

Corporate Profile

Company Introduction

Hainan Xinzhengyuan Biotechnology Co., Ltd. (hereinafter referred to as Xinzhengyuan Technology) was established on December 7, 2009. It is a domestic private enterprise with a registered capital of RMB 10 million and a total investment of RMB 120 million. Xinzhengyuan is located in Julong Village, Xianmin Village Committee, Jiazi Town, Qiongshan District, Haikou City, Hainan Province (E110° 24'0.31 "N19° 38'16.62"), covering an area of 180 acres, 45 kilometers away from the main urban area of Haikou City, 36 kilometers away from Haikou Meilan International Airport, and has convenient transportation. The company is located on the northern edge of the low-latitude tropics and belongs to the monsoon tropical climate zone. The annual average temperature is 23.8℃, the highest average temperature is 28.0, the lowest average temperature is 18.8, the annual frost-free period is 346 days, and there is no ice and snow all year round. The annual average sunshine hours are 2225.2 hours, the seasonal differences are not obvious, the air is fresh and pollution-free, and it is the best climate environment zone for breeding and breeding of experimental cynomolgus monkeys, experimental animals of the genus Macaca, in China.

Ownership & Directors

Charles River Laboratories International, Inc. acquired 80% stake in Hainan New Source Biotech Co., Ltd.

December 09, 2019

Share

Charles River Laboratories International, Inc. (NYSE:CRL) agreed to acquire 80% stake in Hainan New Source Biotech Co., Ltd. on August 1, 2019. Qiang Li and Stewart Wang of DLA Piper acted as legal advisors to Charles River Laboratories International, Inc. Charles River Laboratories International, Inc. (NYSE:CRL) completed the acquisition of 80% stake in Hainan New Source Biotech Co., Ltd. on August 28, 2019.

Share

实际控制人	总股权比例
Charles River U.K. Limited	100%

序号	姓名	职位	持股比例	最终受益股份
1	CANDACE LYNNE HEINING	董事长	/	/
2	VARUN BHAT	董事	/	/
3	陈丕仁	董事兼总经理	/	/
4	Shannon Mauri Parisotto	董事	/	/
5	Kevin McNelly	董事	/	/
6	Birgit Girshick	监事	/	/
7	滕佳妍	财务负责人	/	/

CHARLES RIVER U.K. LIMITED

Company number **00950184**

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Officers | Persons with significant control

1 active person with significant control / 0 active statements

Charles River Laboratories International Inc. ACTIVE

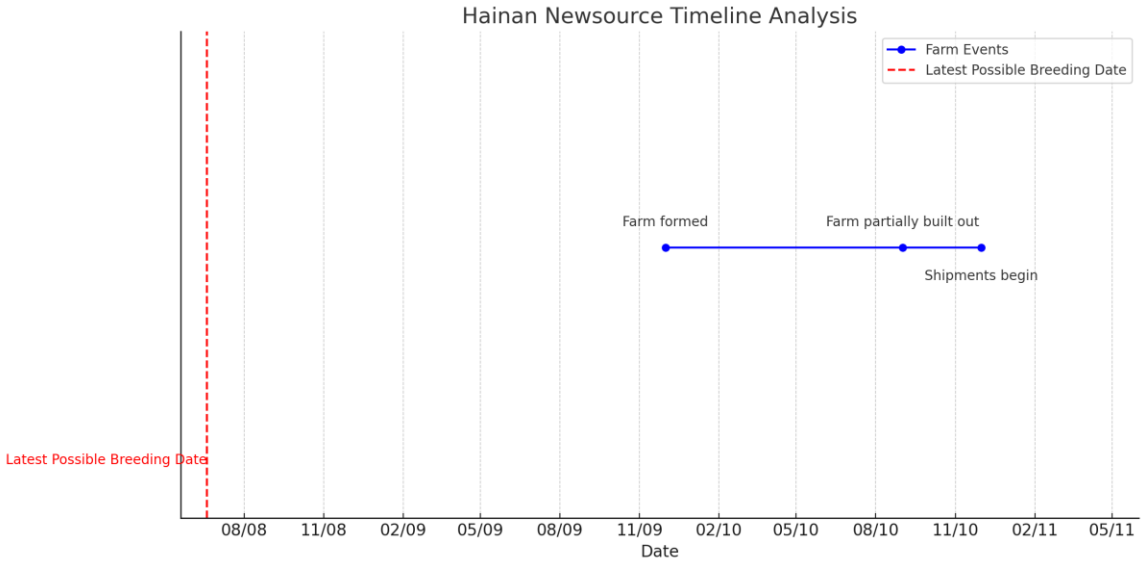
Correspondence address
251 Ballardvale Street, Wilmington, Massachusetts, United States, 01887

Notified on
1 April 2019

Mortality Log

A	B	C	D	E	F	G	H	I
2016年1月猴只死亡明细表								
序号	区域	猴号	性别	死亡日期	类别	死亡原因	记录兽医	备注
118	A01-01	C1111090	♀	2016.01.27	商品猴	低温、消瘦	林明江	
101	A01-16	C1406158	♀	2016.01.25	商品猴	消瘦、低温	林明江	
100	A02-21	C1010149	♂	2016.01.25	商品猴	消瘦、低温	林明江	
68	A02-25	C0803063	♂	2016.01.20	商品猴	胃肠炎	林明江	
125	A02-27	C0804049	♂	2016.01.29	商品猴	严重外伤	林明江	
102	A03-24	C1212203	♂	2016.01.25	商品猴	消瘦、低温	林明江	
69	A05-12	C1312054	♀	2016.01.22	商品猴	安乐死	林明江	极度消瘦
67	B02-08	C0908128	♀	2016.01.19	繁殖猴	极度消瘦、营养不良	陈祖创	
66	B02-20	C1006012	♀	2016.01.19	繁殖猴	极度消瘦、营养不良	陈祖创	
109	B02-24	C0905006	♀	2016.01.27	繁殖猴	营养不良	陈祖创	
7	B03-02	C1007108	♀	2016.01.04	繁殖猴	营养不良	陈祖创	
10	B03-04	C1005060	♀	2016.01.06	繁殖猴	营养不良	陈祖创	
13	B03-04	C0908150	♀	2016.01.07	商品猴	营养不良	陈祖创	
17	B03-04	C1007100	♀	2016.01.08	繁殖猴	营养不良	陈祖创	
93	B03-11	C0709048	♀	2016.01.25	繁殖猴	营养不良、低温	陈祖创	
94	B03-13	C0811178	♀	2016.01.25	繁殖猴	营养不良、低温	陈祖创	
19	B03-16	C0909206	♀	2016.01.09	繁殖猴	营养不良	陈祖创	
95	B03-16	C0711080	♀	2016.01.25	繁殖猴	营养不良、低温	陈祖创	

Timeline Analysis



Aerial Imagery

Date: October 2009 Aerial

Date: September 2010 Aerial

Date: December 2010 Aerial

Date: August 2014 Aerial

Shipment Data

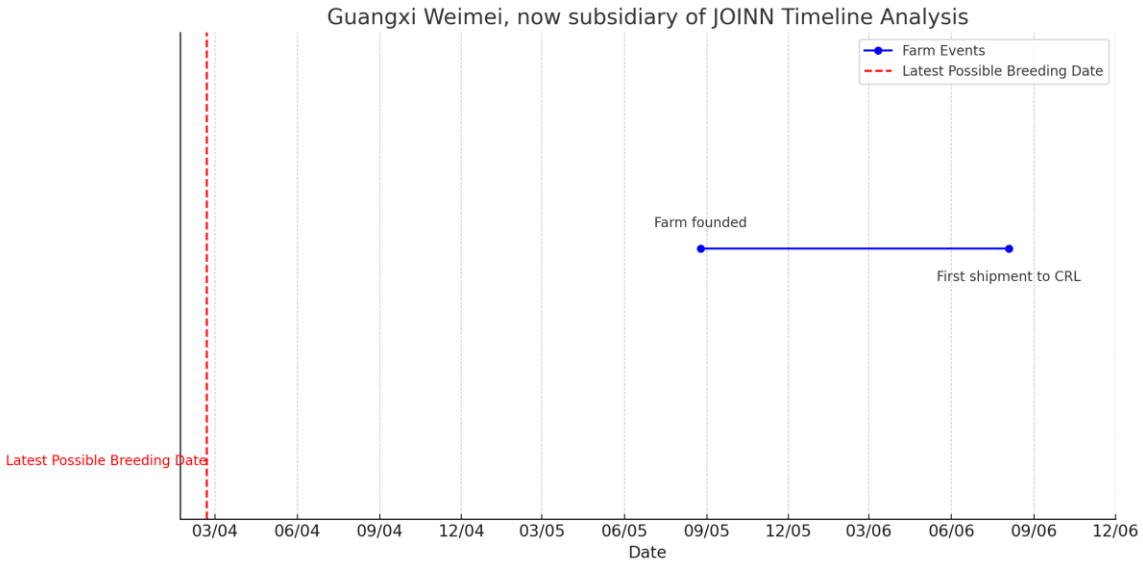
Species	Subspecies	Generic Name	Specific Name	Wildlife Desc	Qty	Unit	Ctry Orig	Ctry Imp	Purp	Src	Act	Dn	Disp Date	Ship Date	I	Pt	U.S.Importer/ Exporter	Foreign Importer/ Foreign Exporter
FASCICULARIS		MACAQUE	CRAB-EATING	LIV	80	NO	CN	CN	T	C	C	C	1/5/2011	12/29/2010	I	NY	BUCKSHIRE CORPORATION	HAINAN NEWSOURCE BIOTECH CO LTD
FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	T	C	C	C	1/25/2011	1/5/2011	I	LA	PRIMATE PRODUCTS, INC.	HAINAN NEW SOURCE BIOTECH CO. LTD
FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	T	C	C	C	2/1/2011	2/1/2011	I	LA	PRIMATE PRODUCTS, INC.	HAINAN NEW SOURCE BIOTECH CO., LTD.
FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	T	C	C	C	3/1/2011	3/1/2011	I	LA	PRIMATE PRODUCTS, INC.	HAINAN NEW SOURCE BIOTECH CO., LTD
FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	T	C	C	C	3/9/2011	3/9/2011	I	LA	PRIMATE PRODUCTS, INC.	HAINAN NEW SOURCE BIOTECH CO., LTD
FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	T	C	C	C	12/8/2011	12/8/2011	I	NY	ALPHA GENESIS INC	HAINAN NEWSOURCE BIOTECH CO LTD
FASCICULARIS		MACAQUE	CRAB-EATING	LIV	110	NO	CN	CN	T	C	C	C	5/29/2012	5/24/2012	I	NY	ALPHA GENESIS INC	HAINAN NEWSOURCE BIOTECH CO LTD

Guangxi Weimei

Shipment Data

	Species	Subspecies	Generic Name	Specific Name	Wildlife Desc	Qty	Unit	Ctry Orig	Ctry Imp	Purp	Src	Act	Dn	Disp Date	Ship Date	I	Pt	U.S.Importer/ Exporter	Foreign Importer/ Foreign Exporter
4	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	T	C	C	C	8/4/2006	8/4/2006	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
9	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	T	C	C	C	9/16/2006	9/16/2006	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
2	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	T	C	C	C	11/1/2006	11/1/2006	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
9	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	T	C	C	C	12/1/2006	12/1/2006	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
7	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	T	C	C	C	12/15/2006	12/15/2006	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
3	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	T	C	C	C	2/14/2007	2/14/2007	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
3	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	T	C	C	C	3/7/2007	3/7/2007	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
5	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	T	C	C	C	3/21/2007	3/21/2007	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
3	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	T	F	C	C	4/17/2007	4/17/2007	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
1	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	T	C	C	C	5/18/2007	5/18/2007	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
5	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	T	C	C	C	6/1/2007	6/1/2007	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
3	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	T	C	C	C	6/19/2007	6/19/2007	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
5	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	40	NO	CN	CN	T	C	C	C	7/27/2007	7/27/2007	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
7	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	80	NO	CN	CN	T	C	C	C	7/27/2007	7/27/2007	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
4	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	T	C	C	C	8/26/2007	8/26/2007	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
2	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	T	C	C	C	9/4/2007	9/4/2007	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
3	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	T	C	C	C	9/21/2007	9/21/2007	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
0	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	40	NO	CN	CN	T	C	C	C	10/10/2007	10/10/2007	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
1	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	80	NO	CN	CN	T	C	C	C	10/10/2007	10/10/2007	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
2	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	T	C	C	C	11/6/2007	11/6/2007	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
7	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	T	C	C	C	11/24/2007	11/24/2007	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
7	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	T	C	C	C	12/21/2007	12/21/2007	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
3	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	T	C	C	C	1/20/2008	1/20/2008	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
3	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	T	C	C	C	3/11/2008	3/9/2008	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
1	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	T	C	C	C	3/14/2008	3/14/2008	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
0	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	T	C	C	C	4/4/2008	4/5/2008	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
3	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	T	C	C	C	4/15/2008	4/15/2008	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
7	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	T	C	C	C	5/4/2008	5/4/2008	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
0	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	S	C	C	C	5/11/2008	5/11/2008	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
7	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	S	C	C	C	6/11/2008	6/11/2008	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
5	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	S	C	C	C	6/20/2008	6/20/2008	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
2	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	S	C	C	C	6/25/2008	6/25/2008	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
5	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	S	C	C	C	8/1/2008	8/1/2008	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
7	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	S	C	C	C	8/12/2008	8/12/2008	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
3	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	S	C	C	C	9/12/2008	9/12/2008	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
7	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	S	C	C	C	9/23/2008	9/23/2008	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD
2	FASCICULARIS		MACAQUE	CRAB-EATING	LIV	120	NO	CN	CN	S	C	C	C	10/17/2008	10/17/2008	I	LA	CHARLES RIVER LAB	GUANGXI WEIMEI BIO-TECH CO., LTD

Timeline Analysis

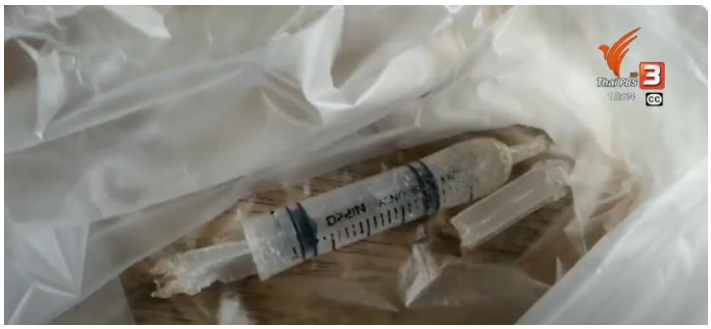


Appendix B: Thailand

Intercepted Shipments


ตร.ทางหลวงสกัดจับ
ขบวนการลักลอบค้าลิงแสม


ช่วย 15 ชีวิต ลิงแสม
แอบซุกบ้านร้างเตรียมส่งขาย



Appendix C: Cambodia

Table of Farms

Name (English)	Name (Foreign)	Registration Number	Establishment Date
K. F (CAMBODIA) LTD.	ខេ. អេហ្វ (ខេមបូឌា)	Co.2379E/2005	5/9/2005
SHIN NIPPON BIOMEDICAL LABORATORIES (CAMBODIA) LIMITED.	ស៊ីន នីជុន ប៊ីអូមេឌីខល ឡាបូរ៉ែតចូរី (ខេមបូឌា) លីមីធីត	Co. 2252E/2005	2/2/2005
VANNY BIO RESEARCH (CAMBODIA) CORPORATION LTD.	វ៉ាន់នី ជាយអូ រីសើុច (ខេមបូឌា) ខបភើរេសិន អិលធីឌី	Inv. 773 E/2002	7/29/2002
RONG DE GROUP CO.,LTD	រ៉ុង ដឺ គ្រុប ខូ អិលធីឌី	Co. 3141 KH/2006	11/23/2011
ORIENT CAM CO., LTD.	អូរៀន ខេម	Co.1698KH/2011	7/18/2011
HT BIOTECH CO., LTD.	អេចធី ជាយអូថេក ឯ.ក	1000103247	11/8/2021

MAFF Population Data

MAFF NHP Inventory at ALL Cambodian Macaque Farms[143]	
Date	Total Population Reported by MAFF
May 2017[144]	41,842
July 2017[145]	39,922
December 2017[146]	55,734
December 2018[147]	53,924

[143] https://www.maff.gov.kh/documentcategories

[144] https://server.maff.gov.kh/parse/files/myAppId5hD7ypUYw61sTqML/47a24d4f136c1b7596cc4068a9eef0ca_1503018311.pdf

[145] https://server.maff.gov.kh/parse/files/myAppId5hD7ypUYw61sTqML/29f61e16dec066430da4cd721c7f22c7_1503032179.pdf

[146] https://elibrary.maff.gov.kh/book/6063e270a4383

[147] https://server.maff.gov.kh/parse/files/myAppId5hD7ypUYw61sTqML/c54acdb991487ceacf55963299700b4c_1551341138.pdf

December 2019[148]	53,213
December 2020[149]	69,215
December 2021[150]	105,636
September 2022[151]	137,359

KF Cambodia

Business Card

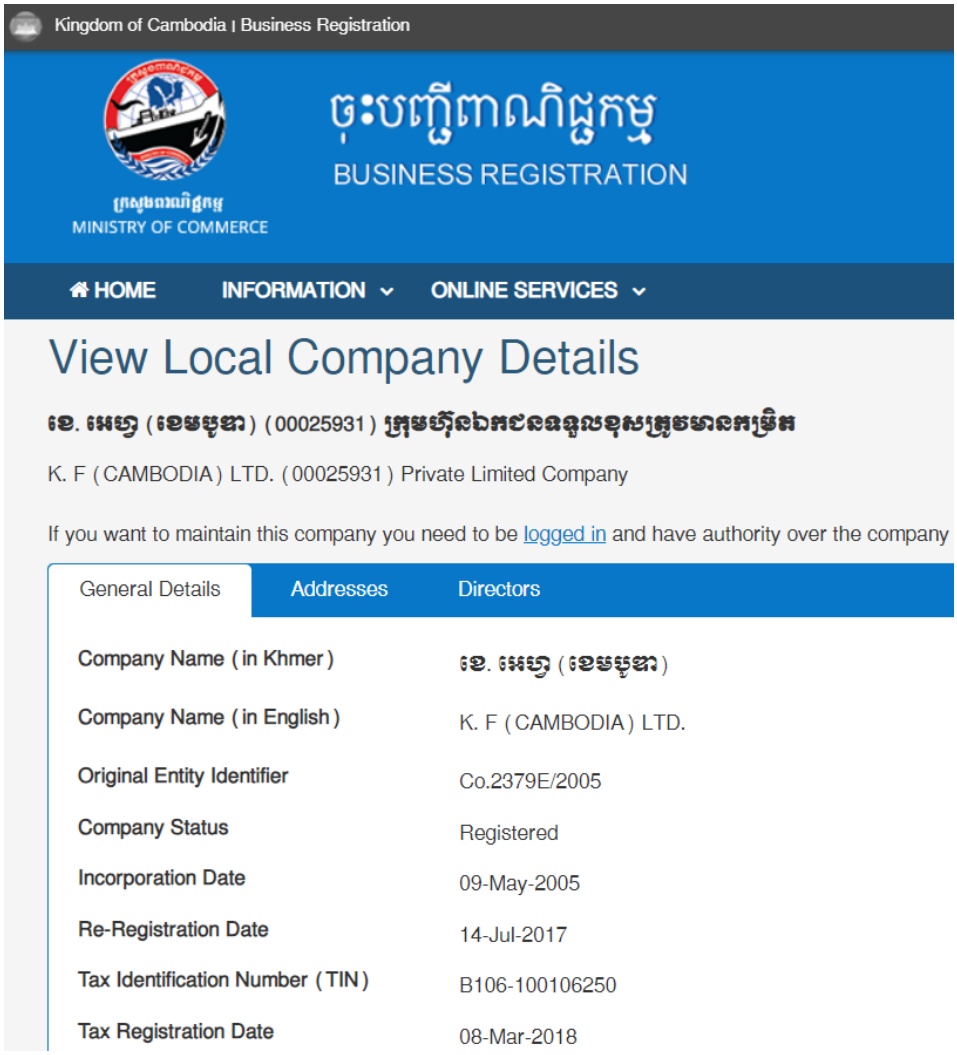
[148] https://server.maff.gov.kh/parse/files/myAppId5hD7ypUYw61sTqML/ddc4d5bf424539da9d0519327a816f90_1580457202.pdf

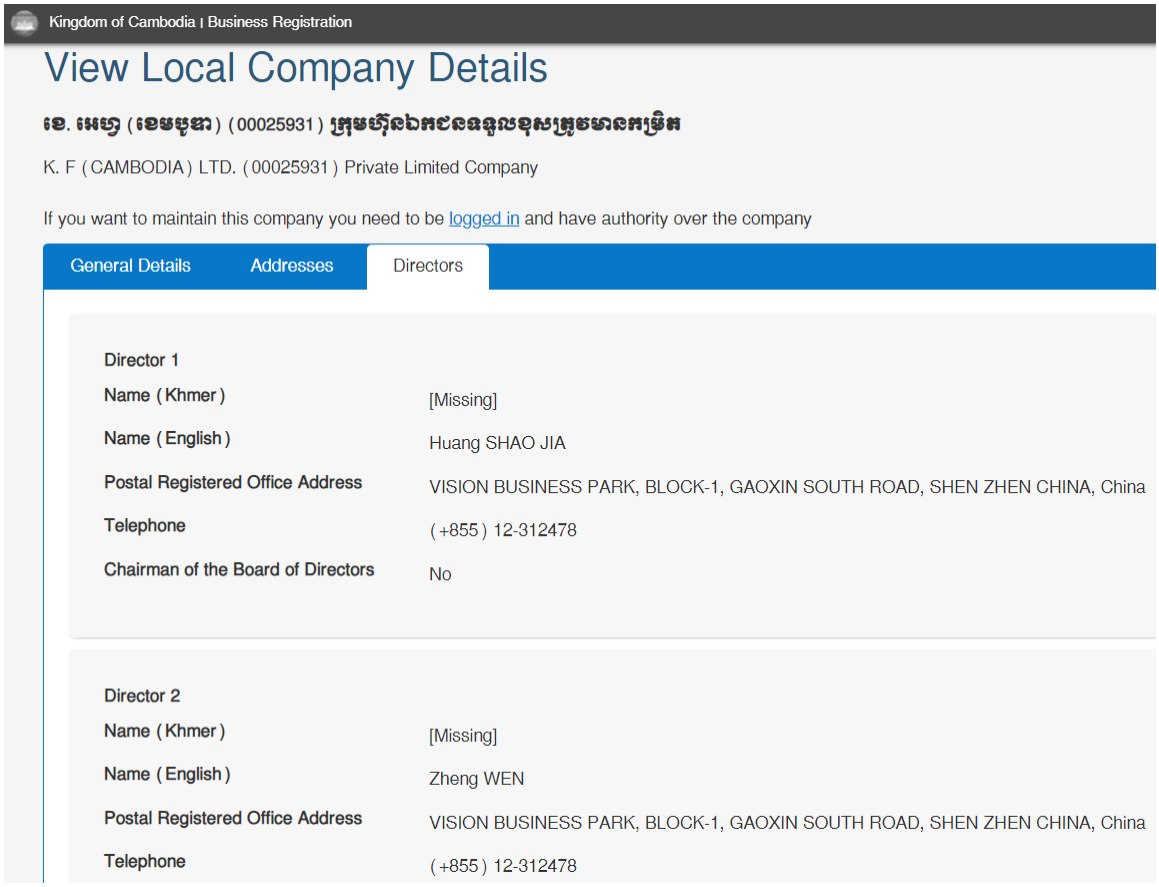
[149] https://server.maff.gov.kh/parse/files/myAppId5hD7ypUYw61sTqML/0b97422c2b09d2ce9d04b73dbf8e31b4_1610425796.pdf

[150] https://server.maff.gov.kh/parse/files/myAppId5hD7ypUYw61sTqML/1c50142c660dfece1032eebbc285bc5a_1642044187.pdf

[151] https://server.maff.gov.kh/parse/files/myAppId5hD7ypUYw61sTqML/558126e439e427732955947901fbab51_1666856595.pdf. Suspect First 9 months and not year end.

Corporate Records





Kingdom of Cambodia | Business Registration

View Local Company Details

ខ. អេហ្វ (ខេមបូឌា) (00025931) ក្រុមហ៊ុនឯកជនទទួលខុសត្រូវមានកម្រិត

K. F (CAMBODIA) LTD. (00025931) Private Limited Company

If you want to maintain this company you need to be logged in and have authority over the company

General Details | Addresses | Directors

Director 1

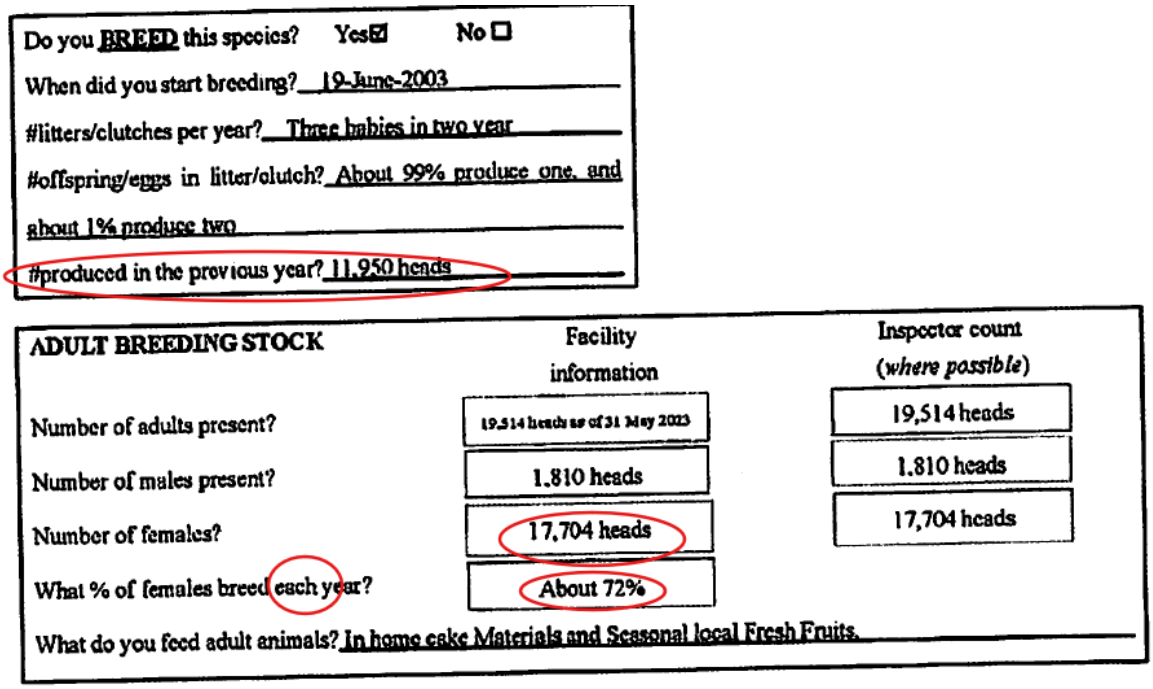
Name (Khmer)	[Missing]
Name (English)	Huang SHAO JIA
Postal Registered Office Address	VISION BUSINESS PARK, BLOCK-1, GAOXIN SOUTH ROAD, SHEN ZHEN CHINA, China
Telephone	(+855) 12-312478
Chairman of the Board of Directors	No

Director 2

Name (Khmer)	[Missing]
Name (English)	Zheng WEN
Postal Registered Office Address	VISION BUSINESS PARK, BLOCK-1, GAOXIN SOUTH ROAD, SHEN ZHEN CHINA, China
Telephone	(+855) 12-312478

Figure 17: https://www.businessregistration.moc.gov.kh/

Breeding Data



Do you BREED this species? Yes☑ No☐

When did you start breeding? 19-June-2003

#litters/clutches per year? Three babies in two year

#offspring/eggs in litter/clutch? About 99% produce one, and about 1% produce two

#produced in the previous year? 11,950 heads

ADULT BREEDING STOCK	Facility information	Inspector count (*where possible*)
Number of adults present?	19,514 heads as of 31 May 2023	19,514 heads
Number of males present?	1,810 heads	1,810 heads
Number of females?	17,704 heads	17,704 heads
What % of females breed each year?	About 72%	

What do you feed adult animals? In home cake Materials and Seasonal local Fresh Fruits.

Intake Data

DATA COLLECTION FORM

SPECIES INFORMATION (*to be completed separately for each species held at the facility*)

Date of inspection: 14-15 June 2023 Name of senior inspecting officer: Chheav Sopheaktra

Facility name: Facility 1 Species: *Macaca fascicularis*

*Date species first acquired? 19-June-2003 Source and life-stage of initial stock? Cambodia

Numbers of initial stock, and sexes, if know 4,000 heads Males? 267 heads Females? 3,733 heads

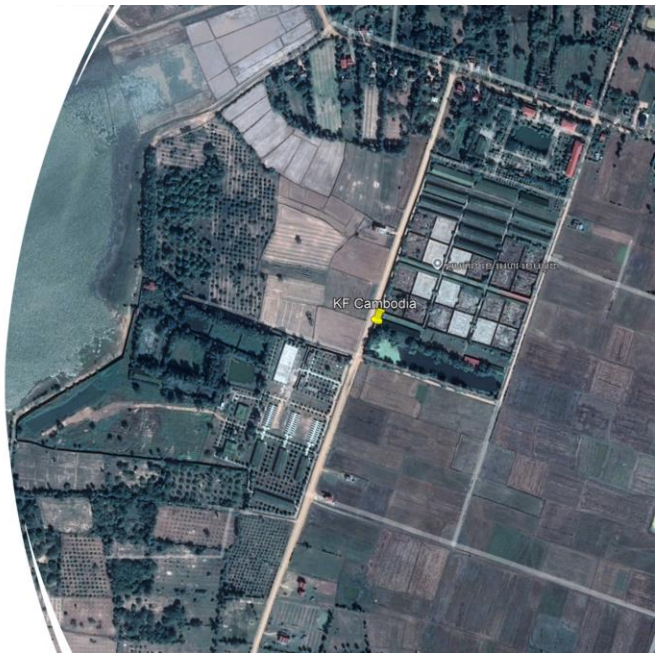
*Have additional animals been obtained since you acquired the initial stock? If so, from where?

No

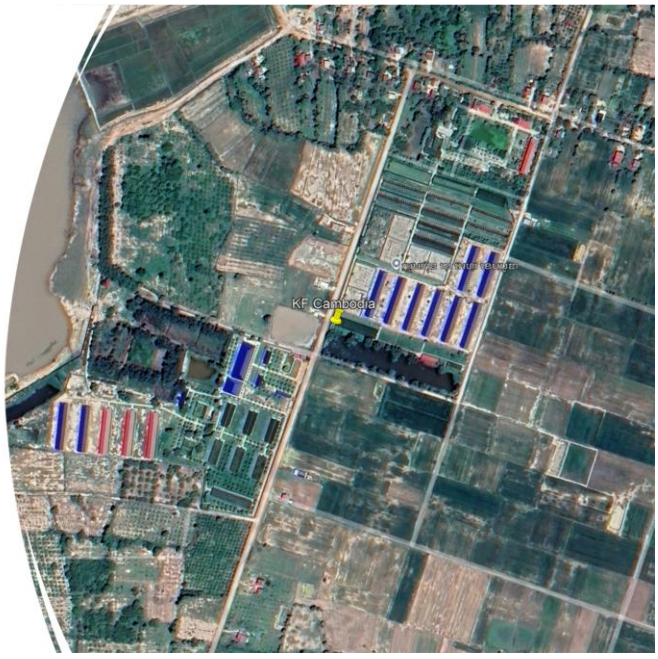
Aerial Imagery

Facility Photos – 12/31/2016

Facility Photos – 12/11/2017



Facility Photos – 07/07/2019

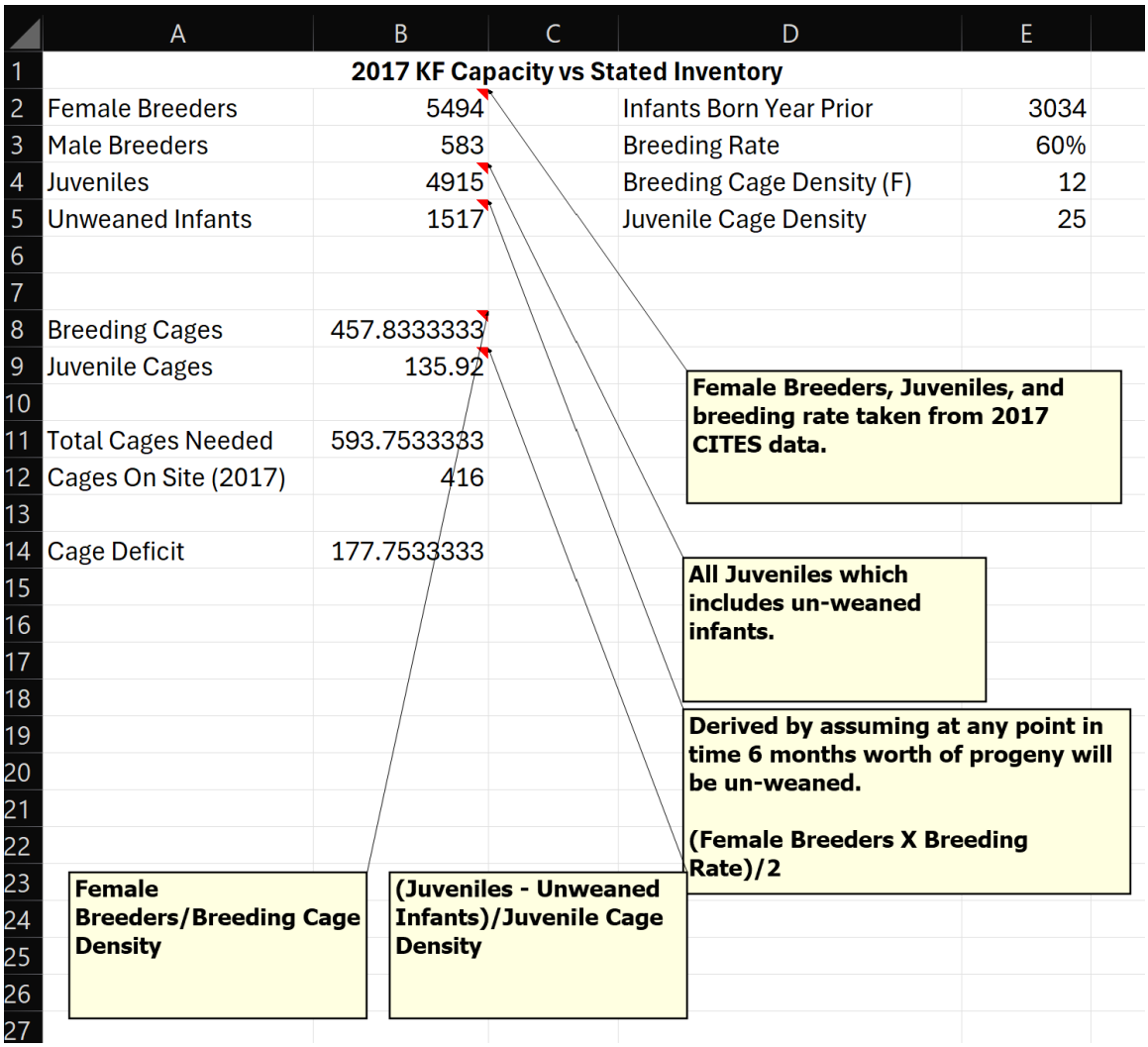


Facility Photos – 07/25/2020

Facility Photos – 12/22/2023

Capacity vs Stated Inventory

The impossibility of KF's representation to CITES is also evident when comparing their stated inventory against the farm's capacity in 2017 as demonstrated by the graph below:



Appendix D: Vietnam

Table of Farms

Name (English)	Name (Vietnamese)	Enterprise Code	Establishment Date	Note
Nafovanny	Công Ty Liên Doanh Nuôi Và Phát Triển Khỉ Việt Nam	3600223684	05/29/1993	
Vina Mekong	Công Ty Tnhh	3800232291	10/31/2001	Changed name

	Một Thành Viên Vina Mekong			from Binh Long on 12/3/2015
Thanh Cong - Jingang Biological Technology Joint Stock Company	Công Ty Cổ Phần Sinh Vật Kỹ Thuật Thành Công - Jingang	4900255858	5/10/2007	Changed name from THÀNH CÔNG
Phuc Loc Phat Mtv Tm Dv Company Limited	Công Ty Tnhh Mtv Tm Dv Phúc Lộc Phát	0315320652	10/10/2018	
Hoang Gia Agriculture Joint Stock Company	Công Ty Cổ Phần Nông Nghiệp Hoàng Gia	0107386229	04/05/2016	
Yile Experimental Monkeys Farm Company Limited - Nha Trang	Công Ty Tnhh Trang Trại Nuôi Khỉ Thực Nghiệm Yile - Nha Trang	4202006795	08/20/2024	Company status “Suspended”
Life Biosciences	Hộ Kinh Doanh Dương Thị Minh Thảo	Unable to Locate	Unable to Locate	Facility completed in 2022

Hoang Gia

Smugglers Crates

Vina Mekong

Corporate Records

BASIC INFORMATION | ELECTRONIC REPORT | PRODUCT CATALOG

ORDER PRODUCTS

Business name :
VINA MEKONG ONE MEMBER COMPANY LIMITED

Business name written in foreign language :
VINA MEKONG COMPANY LIMITED

Abbreviated business name :
VINA MEKONG GROUP

Note business name :
Converted on December 3, 2015 from Binh Long Monkey Farm Private Enterprise, MSDN: 3800232291 issued by the Department of Planning and Investment of Binh Phuoc province on October 31, 2001.

Operating status :
Active

Business registration number :
3800232291

Legal type :
One member limited liability company

Date of establishment :
October 31, 2001

Name of legal representative :
HUYNH HUU DUNG

Head office address :
Thanh Hiep Hamlet, Thanh Bac Commune, Tan Bien District, Tay Ninh Province, Vietnam

Ownership

OWNER AND CEO
HUU DUNG HUYNH

- **Direct: (+84)908.00.77.99**
- **Email: huudung@binhlongmonkeyfarm.com.vn**
- **Has been running the company in 20 years**

Source of Breeding Stock

MINISTRY OF AGRICULTURE AND RURAL DEVELOPMENT
VIET NAM CITES MANAGEMENT AUTHORITY

	Facility 1	Facility 2	Facility 3	Facility 4
	population. Triennial inspection on sanitary standards.			
Records of acquisition, breeding, certificates, etc./ *Các loại giấy tờ, sổ theo dõi, biên bản kiểm tra*	Census data, animal identity number, and any movement that affects the total number of animals.	All origin documents are kept in filing cabinet.	- Logbooks, inspection documents, certificates, and others - Captive breeding logbooks monitored by District Department of Forest Protection upon changes, endorsed by direct management level authority of the District Department of Forest Protection.	Operation logbooks, breeding logbooks, forest product input/output logbooks, others related to animal quantity variation, business registration, captive breeding facility ID. Responsible authority: Provincial Department of Forest Protection and other authorities
Question C5. Initital breeding stock was established in accordance with provisions?				
Source of the breeding stock at establishment	4,007 heads, acquired in 1993 from a Vietnam stated-own enterprise.	120 heads, acquired in 2006 from sale of state asset liquidation, Ha Tinh province	1,266 heads, from Binh Long farm, Binh Phuoc province.	Acquired in 2007 through auction of consifscated assets under public treasury, Ha Tinh province.

Table 1. Total and founder stock of four facilities registered in Vietnam

Breeding facilities	Nafovanny	Huynh Huu Dung	Tan Hoi Dong	Binh Long
Year of establishment	1993	2001	2005	2009
Registered with the PFPD of	Dong Nai	Binh Phuoc	Tay Ninh	Tay Ninh
Total stock (heads) Of which, parental stock: - Male - Female	35438 12039 1621 10418	1536 1010 100 910	2339 742 84 658	1410 367 157 210
Source of founder stock: Captive-bred animals	Bought from 18 Thang Tu Company	Imported from Cambodia	Imported from Laos	Sourced from Huynh Huu Dung

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Question C5. *How was it determined that the breeding stock was established in accordance with the provisions of CITES and relevant national laws and in a manner not detrimental to the survival of the species in the wild?*

Among the response, there are two (Facility 4 and Facility 2 ..) seen with the source of initial breeding stock from sale/auction of state asset or public treasury. This is often found as confiscated specimens to be put into public treasury, and later placed under different sale manners in line with domestic regulations. In the meantime, Facility 1 . acquired its first found stock through the transfer of a state-owned company in 1993. Facility 3 reports its initial source as procured from a domestic farm of the species, however, does not clearly indicate its origin.

Thourgh our assessment, the declared source of initial stocks are considered legitimate origin at the time of acquirement. Certain domestic regulations on harvest from wild and its impact to survival of species in the wild should had been achieved given the legitimate origin (1993 – 2007). This statement does not include Facility 3 due to the lack of information.

152 **Source: 2014 CITES Report**

Newspaper Articles

rfa Radio Free Asia

普通话 粵语 မြန်မာ 한국어 ລາວ ខ្មែរ བོད་སྐད ئۇيغۇر Tiếng Việt English

Laos Slapped for Supplying Macaques to Illegal Wildlife Traders in China

2016.04.06

153

Scientific Publications

Case Reports > J Toxicol Pathol. 2024 Oct;37(4):197-206. doi: 10.1293/tox.2024-0048. Epub 2024 Jul 1.

Natural outbreak of *Mycobacterium caprae* infection in imported laboratory cynomolgus macaques (*Macaca fascicularis*): diagnostic pitfalls and management of safety precautions

Klaus Weber [1], Francisco José Mayoral [2], Carla Vallejo [2], Raúl Sánchez [2], Roberto Hartelust [3], Paula Mendoza [2], Bernat Pérez de Val [4 5], Jordi Savé [2], Yoshimasa Okazaki [1], Paula Ortega [1], Laura Rocamora [2], Albert Sandoval [2], Raquel Vallejo [1], Ricardo de Miguel [1], Kristel Kegler [1]

154

Shipment Data

153 https://www.rfa.org/english/news/laos/laos-macaque-attack-04062016160812.html

154 https://pubmed.ncbi.nlm.nih.gov/39359895/

Shipments from Vina Mekong to Russia, USA, China, Cambodia, and Netherlands

	VM to RU	VM to USA (CRL, Inotiv, Prelabs)	VM to CN	VM to KH (SNBL)	VM to NL (Hartelust)	Total VM Shipments
2019	0	0	4,700 (1,500 after 08/2019)	0	0	4,700
2020	0	0	0	0	0	0
2021	0	1,240	0	0	0	1,240
2022	275	1,440	0	0	0	1,715
2023	0	0	0	500	480	980
2024	140	1,841	0	0	0	1,981

Customs Records

2019

B/Ls details

Time and others			
Date	2019-04-24	Bill of Lading Number	--
Export serial number	--		

Description of the goods	
HS code	01061100
Product Description	khỉ đuôi dài (Macaca fascicularis)#&VN @

Buyer			
Buyer	yunnan jinjiekang bioscience co.ltd.	Buyer's address	--

Supplier			
Supplier Address	ấp 2, Xã Đồng No, Huyện Hớn Quản, Tỉnh Bình Phước, Việt Nam	Supplier	công ty tnhh một thành viên vina mekong
Company tax number	3800232291	Supplier's phone number	908007799

Business data + Details

Packing information			
Unit price (currency)	300	Qty	600
quantity unit	UNC	Total amount (currency)	180000
exchange rate	23150	currency	USD
Total amount(USD)	183770.673		

Shipping			
payment method	KC	Name of Vietnam Port Customs Warehouse	DIEM LUU HH XK 61PA
Destination country	China	Flight/voyage number	XE TAI
Trade mode	CPT	Custom	CUA KHAU LAO CAI (LAO CAI)
importing country	--	Transportation mode	--
Import port	--	Port of departure	CUA KHAU LAO CAI (LAO CAI)

B/Ls details

Time and others

Date	2019-05-13	Bill of Lading Number	--
Export serial number	--		

Description of the goods

HS code	01061100
Product Description	khỉ đuôi dài (Macaca fascicularis)#&VN @

Buyer

Buyer	yunnan jinjiekang bioscience co.ltd.	Buyer's address	--

Supplier

Supplier Address	ấp 2, Xã Đồng Nơ, Huyện Hớn Quản, Tỉnh Bình Phước, Việt Nam	Supplier	công ty tnhh một thành viên vina mekong
Company tax number	3800232291	Supplier's phone number	908007799

Business data

+ Details

Packing information

Unit price (currency)	300	Qty	600
quantity unit	UNC	Total amount (currency)	180000
exchange rate	23330	currency	USD
Total amount(USD)	185199.559		

Shipping

payment method	KC	Name of Vietnam Port Customs Warehouse	DIEM LUU HH XK 61PA
Destination country	China	Flight/voyage number	XE TAI
Trade mode	CPT	Custom	CUA KHAU LAO CAI (LAO CAI)
importing country	--	Transportation mode	--
Import port	--	Port of departure	CUA KHAU LAO CAI (LAO CAI)

B/Ls details

Time and others

Date	2019-05-22	Bill of Lading Number	121900003321648
Export serial number	--		

Description of the goods

HS code	01061100
Product Description	khỉ đuôi dài (Macaca fascicularis)#&VN @

Buyer

Buyer	luongding shanshengyuan	Buyer's address	--

Supplier

Supplier Address	ấp 2, Xã Đồng Nơ, Huyện Hớn Quản, Tỉnh Bình Phước, Việt Nam	Supplier	công ty tnhh một thành viên vina mekong
Company tax number	3800232291	Supplier's phone number	908007799

Business data

+ Details

Packing information

Unit price (currency)	300	Qty	2000
quantity unit	UNC	Total amount (currency)	600000
exchange rate	23245	currency	USD
Total amount(USD)	615082.69		

Shipping

payment method	KC	Name of Vietnam Port Customs Warehouse	DIEM LUU HH XK 61PA
Destination country	China	Flight/voyage number	Y87456/27MAY
Trade mode	CPT	Custom	Ho Chi Minh City
importing country	--	Transportation mode	--
Import port	--	Port of departure	HO CHI MINH

B/Ls details

Time and others

Date	2019-11-20	Bill of Lading Number	121900007439181
Export serial number	302880493221		

Description of the goods

HS code	01061100
Product Description	CON KHỈ ĐUÔI DÀI SỐNG(Macara fascicularis)#&VN @

Buyer

Buyer	hubei topgene biotechnology co.ltd.	Buyer's address	--

Supplier

Supplier Address	Ấp 2, Xã Đồng Nơ, Huyện Hớn Quản, Tỉnh Bình Phước, Việt Nam.	Supplier	công ty tnhh một thành viên vina mekong
Company tax number	3800232291	Supplier's phone number	908007799

Business data

+ Details

Packing information

Unit price (currency)	300	Qty	1500
quantity unit	UNC	Total amount (currency)	449961.11
exchange rate	23140	currency	USD
Total amount(USD)	449961.11		

Shipping

payment method	KC	Name of Vietnam Port Customs Warehouse	DIEM LUU HH XK 61PA
Destination country	China	Flight/voyage number	YG9092/25NOV
Trade mode	CPT	Custom	Ho Chi Minh City
importing country	--	Transportation mode	AIR
Import port	--	Port of departure	HO CHI MINH

2023

B/Ls details

Time and others			
Date	2023-01-31	Bill of Lading Number	--
Export serial number	305303497130		

Description of the goods	
HS code	01061100
Product Description	#&CON KHỈ ĐUÔI DÀI SỐNG. (320 CON ĐỰC, 160 CON CÁI) (tên khoa học: Macaca fascicularis)#&VN @

Buyer			
Buyer	n.c.hartelust b.v.	Buyer's address	--

Supplier			
Supplier Address	Ấp Thanh Hiệp, Xã Thanh Bắc, Huyện Tân Biên, Tỉnh Tây Ninh, Việt Nam	Supplier	vina mekong co.ltd.
Company tax number	--	Supplier's phone number	--

Packing information			
Unit price (currency)	400	Qty	480
quantity unit	--	Total amount (currency)	--
exchange rate	23280	currency	USD
Total amount(USD)	192000		

Shipping			
payment method	KC	Name of Vietnam Port Customs Warehouse	--
Destination country	Netherlands	Flight/voyage number	--
Trade mode	FOB	Custom	--
importing country	Netherlands	Transportation mode	AIR
Import port	--	Port of departure	--

B/Ls details

Time and others

Date	2023-08-21	Bill of Lading Number	--
Export serial number	305753674240		

Description of the goods

HS code	01061100
Product Description	#&LIVING LONG-TAILED MONKEY. (300 Males, 200 Females) (scientific name: Macaca fascicularis) #&EN

Buyer

Buyer	snbl (cambodia)., ltd	Buyer's address	--

Supplier

Supplier Address	Ấp Thạnh Hiệp, Xã Thạnh Bắc, Huyện Tân Biên, Tỉnh Tây Ninh, Việt Nam	Supplier	vina mekong co.ltd.
Company tax number	3800232291	Supplier's phone number	--

Business data

+ Details

Packing information

Unit price (currency)	400	Qty	500
quantity unit	--	Total amount (currency)	200000
exchange rate	23700	currency	USD
Total amount(USD)	200000		

Shipping

payment method	KC	Name of Vietnam Port Customs Warehouse	--
Destination country	Cambodia	Flight/voyage number	--
Trade mode	DAF	Custom	--
importing country	KH	Transportation mode	LAND (truck)
Import port	--	Port of departure	--

2024

B/Ls details

Time and others

Date	2024-01-03	Bill of Lading Number	--
Export serial number	306113977430		

Description of the goods

HS code	01061100
Product Description	LIVE LONG-TAILED MONKEY. (141 MALE, 179 FEMALE) (scientific name: Macaca fascicularis)#&VN

Buyer

Buyer	charles river laboratorieas inc.	Buyer's address	CHARLES RIVER, LABORATORIES, FREDERICK,8501 PROGRESS, DRIVE FREDERICK, MD21701, MARYLAND, US

Supplier

Supplier Address	Ấp Thanh Hiệp, Xã Thanh Bắc, Huyện Tân Biên, Tỉnh Tây Ninh, Việt Nam	Supplier	vina mekong co.ltd.
Company tax number	3800232291	Supplier's phone number	0908 007799

Business data

+ Details

Packing information

Unit price (currency)	750	Qty	320
quantity unit	--	Total amount (currency)	240000
exchange rate	24060	currency	USD
Total amount(USD)	240000		

Shipping

payment method	KC	Name of Vietnam Port Customs Warehouse	--
Destination country	United States	Flight/voyage number	--
Trade mode	FOB	Custom	--
importing country	US	Transportation mode	AIR
Import port	--	Port of departure	--

B/Ls details

Time and others			
Date	2024-01-03	Bill of Lading Number	--
Export serial number	306113974740		

Description of the goods	
HS code	01061100
Product Description	LIVE LONG-TAILED MONKEY. (180 MALE, 180 FEMALE) (scientific name: Macaca fascicularis)#&VN

Buyer			
Buyer	charles river laboratorieas inc.	Buyer's address	CHARLES RIVER, LABORATORIES, FREDERICK,8501 PROGRESS, DRIVE FREDERICK, MD21701, MARYLAND, US

Supplier			
Supplier Address	Ấp Thạnh Hiệp, Xã Thạnh Bắc, Huyện Tân Biên, Tỉnh Tây Ninh, Việt Nam	Supplier	vina mekong co.ltd.
Company tax number	3800232291	Supplier's phone number	0908 007799

Business data + Details

Packing information			
Unit price (currency)	750	Qty	360
quantity unit	--	Total amount (currency)	270000
exchange rate	24060	currency	USD
Total amount(USD)	270000		

Shipping			
payment method	KC	Name of Vietnam Port Customs Warehouse	--
Destination country	United States	Flight/voyage number	--
Trade mode	FOB	Custom	--
importing country	US	Transportation mode	AIR
Import port	--	Port of departure	--

B/Ls details

Time and others			
Date	2024-03-06	Bill of Lading Number	--
Export serial number	306248084830		

Description of the goods	
HS code	01061100
Product Description	LIVE LONG-TAILED MONKEY. (250 MALE, 262 FEMALE) (scientific name: Macaca fascicularis)#&VN

Buyer			
Buyer	--	Buyer's address	--

Supplier			
Supplier Address	Ấp Thạnh Hiệp, Xã Thạnh Bắc, Huyện Tân Biên, Tỉnh Tây Ninh, Việt Nam	Supplier	vina mekong co.ltd.
Company tax number	3800232291	Supplier's phone number	0908 007799

Business data	+ Details

Packing information			
Unit price (currency)	750	Qty	512
quantity unit	--	Total amount (currency)	384000
exchange rate	24480	currency	USD
Total amount(USD)	384000		

Shipping			
payment method	KC	Name of Vietnam Port Customs Warehouse	--
Destination country	Vietnam	Flight/voyage number	--
Trade mode	FOB	Custom	--
importing country	VN	Transportation mode	AIR
Import port	--	Port of departure	--

B/Ls details

Time and others

Date	2024-04-12	Bill of Lading Number	--
Export serial number	306343026202		

Description of the goods

HS code	01061100
Product Description	LIVE LONG-TAILED MONKEY. (86 MALE, 54 FEMALE) (scientific name: Macaca fascicularis)#&VN

Buyer

Buyer	home of pharmacy research and manufacturing company (jsc rmc)	Buyer's address	--

Supplier

Supplier Address	Ấp Thạnh Hiệp, Xã Thạnh Bắc, Huyện Tân Biên, Tỉnh Tây Ninh, Việt Nam	Supplier	vina mekong co.ltd.
Company tax number	3800232291	Supplier's phone number	0908 007799

Business data

+ Details

Packing information

Unit price (currency)	750	Qty	140
quantity unit	--	Total amount (currency)	105000
exchange rate	24770	currency	USD
Total amount(USD)	105000		

Shipping

payment method	KC	Name of Vietnam Port Customs Warehouse	--
Destination country	Russia	Flight/voyage number	--
Trade mode	FOB	Custom	--
importing country	RU	Transportation mode	AIR
Import port	--	Port of departure	--

B/Ls details

Time and others

Date	2024-06-25	Bill of Lading Number	--
Export serial number	306527209460		

Description of the goods

HS code	01061100
Product Description	LIVE LONG-TAILED MONKEY. (116 MALE, 173 FEMALE) (scientific name: Macaca fascicularis)#&VN

Buyer

Buyer	--	Buyer's address	CHARLES RIVER, LABORATORIES, FREDERICK,8501 PROGRESS, DRIVE FREDERICK, MD21701, MARYLAND, US

Supplier

Supplier Address	Ấp Thạnh Hiệp, Xã Thạnh Bắc, Huyện Tân Biên, Tỉnh Tây Ninh, Việt Nam	Supplier	vina mekong co.ltd.
Company tax number	3800232291	Supplier's phone number	0908 007799

Business data

+ Details

Packing information

Unit price (currency)	750	Qty	289
quantity unit	--	Total amount (currency)	216750
exchange rate	25247	currency	USD
Total amount(USD)	216750		

Shipping

payment method	KC	Name of Vietnam Port Customs Warehouse	--
Destination country	Vietnam	Flight/voyage number	--
Trade mode	FOB	Custom	--
importing country	VN	Transportation mode	AIR
Import port	--	Port of departure	--

B/Ls details

Time and others			
Date	2024-06-25	Bill of Lading Number	--
Export serial number	306527166650		

Description of the goods	
HS code	01061100
Product Description	LIVE LONG-TAILED MONKEY. (180 MALE, 180 FEMALE) (scientific name: Macaca fascicularis)#&VN

Buyer			
Buyer	--	Buyer's address	CHARLES RIVER, LABORATORIES, FREDERICK,8501 PROGRESS, DRIVE FREDERICK, MD21701, MARYLAND, US

Supplier			
Supplier Address	Ấp Thạnh Hiệp, Xã Thạnh Bắc, Huyện Tân Biên, Tỉnh Tây Ninh, Việt Nam	Supplier	vina mekong co.ltd.
Company tax number	3800232291	Supplier's phone number	0908 007799

Business data + Details

Packing information			
Unit price (currency)	750	Qty	360
quantity unit	--	Total amount (currency)	270000
exchange rate	25247	currency	USD
Total amount(USD)	270000		

Shipping			
payment method	KC	Name of Vietnam Port Customs Warehouse	--
Destination country	Vietnam	Flight/voyage number	--
Trade mode	FOB	Custom	--
importing country	VN	Transportation mode	AIR
Import port	--	Port of departure	--

B/Ls details

Time and others

Transaction Date	2024-09-28	Bill of Lading Number	306779791201
Type of Export Code	B11	Type of Export Name	Ordinary export (investment enterprises)

Description of the goods

HS Code	01061100
Product Description	CON KHỈ ĐUÔI DÀI SỐNG. (360 CON ĐỰC, 360 CON CÁI) (tên khoa học: Macaca fascicularis)#&VN
Product Desc(EN)	LIVE LONG-TAILED MONKEYS. (360 MALE, 360 FEMALE) (scientific name: Macaca fascicularis)#&VN

Buyer

Buyer	envigo global services inc	Buyer Address 1	
Buyer Address 2	--	Buyer Address 3	--
Buyer Address 4	--	Buyer Address 5	--
Buyer Address 6	--	Buyer Address 7	--
Buyer Address 8	--		

Supplier

Supplier	công ty tnhh một thành viên vina mekong	Supplier ID	3800232291
Supplier(EN)	VINA MEKONG COMPANY LIMITED	Supplier Address(VN)	Ấp Thạnh Hiệp, Xã Thạnh Bắc, Huyện Tân Biên, Tỉnh Tây Ninh, Việt Nam
Supplier Tel	0908 007799		

Packing information

quantity	720	Quantity unit	UNC (animals)
Unit Price(USD)	1000	Amount(USD)	720000
Unit	UNC (animals)	Unit Price(Currency)	1000
Total Price(Currency)	720000	Exchange Rate	24410
Currency	USD		

View	Date	HS Code	Product Description	Destination Country	Quantity	Net Weight [Kg]	Total Value USD	Exporter Name
	30-10-2024	01061100	Live Long-tailed Monkeys. (180 Male, 180 Female) (scientific Name: Macaca Fascic...	Vietnam			360000.00	Vina Mekong One Member Company Limited
	30-10-2024	01061100	Live Long-tailed Monkeys. (180 Male, 165 Female) (scientific Name: Macaca Fascic...	Vietnam	345			

Vietnam Detailed Export

Exporter Details

Exporter	Vina Mekong One Member Company Limited
Exporter Address	Thanh Hiep Hamlet, Thanh Bac Commune, Tan Bien District, Tay Ninh Province, Vietnam

Buyer Details

Buyer	Charles River Laboratories, Inc.
Buyer Address	Charles River Laboratories Frederick 8501 Progress Drive Frederick Md21701 Maryland Us

"Rearing Stock" Intakes

Vina Meking: Rearing Stock Intakes	
Year	Quantity
2019	1,185
2021	480
2022	600

Discrepancies In Infants Produced

Discrepancies in Infants Produced at Vina Mekong			
Year	Reported in 2023	Reported in 2024	Difference
2018	1,080		
2019	1,389	931	(458)
2020	1,428	1,428	0
2021	1,890	1,685	(205)
2022	1,976	1,809	(167)
2023		1,877	

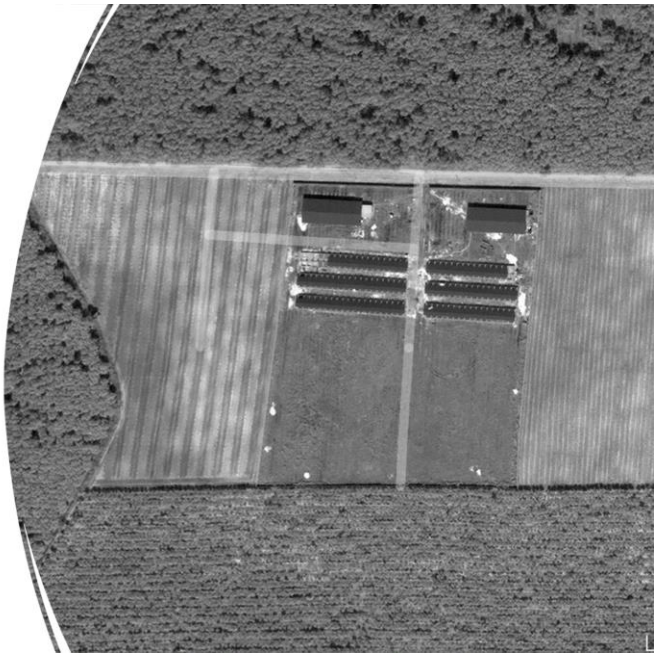
If the 2024 data is indeed accurate then between 2019 – 2022 overstated offspring by 830, with no explanation given as to these discrepancies. The 2024 data matches the reported numbers in the 2025 data.

Tay Ninh Facility

Aerial Imagery

Facility Photos 11/13/2009

- 6 Rows



Facility Photos 12/13/2013

- 6 Rows

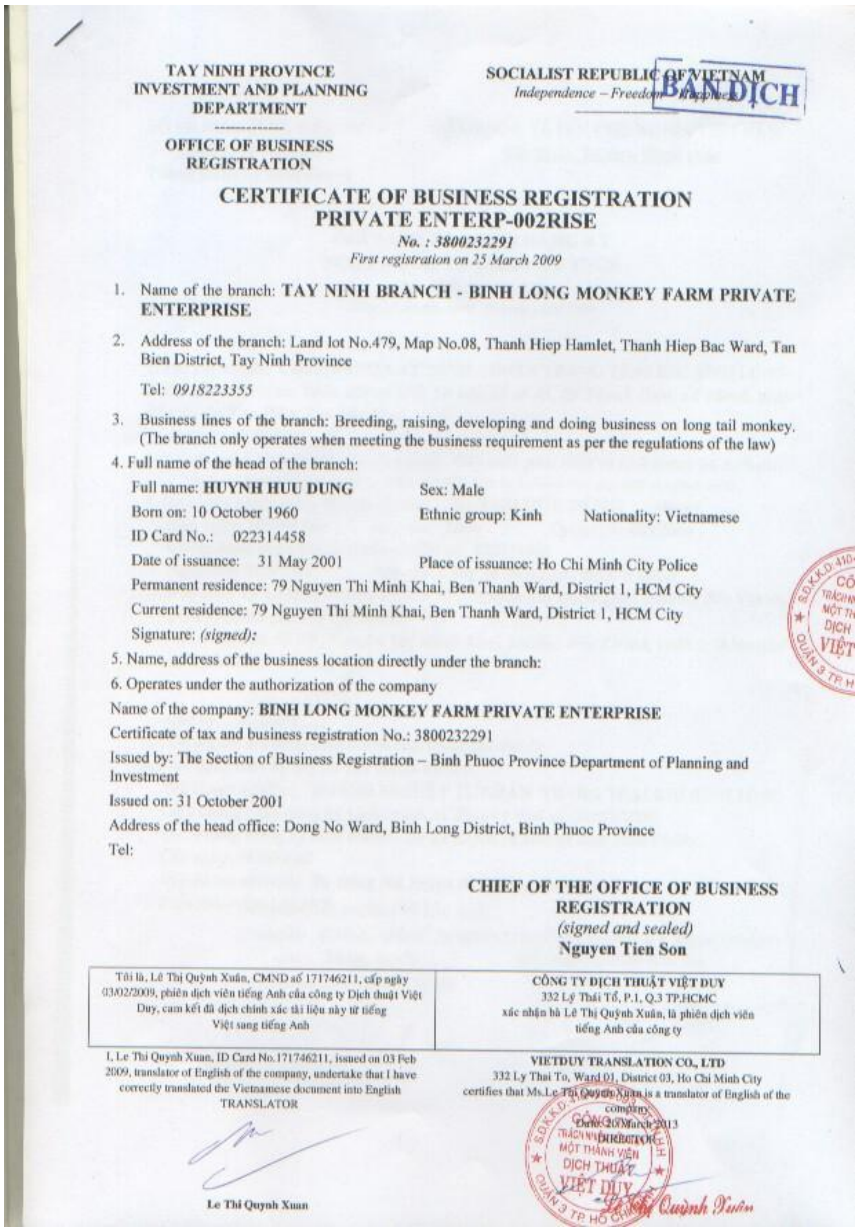
Facility Photos 11/02/2018

- 6 Rows

Facility Photos 11/18/2019

- 9 Rows, Complete
  - 4L+5R
    - (38X4)+(32*5)
    - 312 Houses
- 1 Row, Under Construction

Licenses



TAY NINH PROVINCE
INVESTMENT AND PLANNING DEPARTMENT

OFFICE OF BUSINESS REGISTRATION

SOCIALIST REPUBLIC OF VIETNAM
Independence – Freedom – Happiness

BẢN DỊCH

CERTIFICATE OF BUSINESS REGISTRATION
PRIVATE ENTERP-002RISE
No. : 3800232291
First registration on 25 March 2009

1. Name of the branch: **TAY NINH BRANCH - BINH LONG MONKEY FARM PRIVATE ENTERPRISE**
2. Address of the branch: Land lot No.479, Map No.08, Thanh Hiep Hamlet, Thanh Hiep Bac Ward, Tan Bien District, Tay Ninh Province

   Tel: *0918223355*
3. Business lines of the branch: Breeding, raising, developing and doing business on long tail monkey. (The branch only operates when meeting the business requirement as per the regulations of the law)
4. Full name of the head of the branch:

   Full name: **HUYNH HUU DUNG** Sex: Male

   Born on: 10 October 1960 Ethnic group: Kinh Nationality: Vietnamese

   ID Card No.: 022314458

   Date of issuance: 31 May 2001 Place of issuance: Ho Chi Minh City Police

   Permanent residence: 79 Nguyen Thi Minh Khai, Ben Thanh Ward, District 1, HCM City

   Current residence: 79 Nguyen Thi Minh Khai, Ben Thanh Ward, District 1, HCM City

   Signature: *(signed)*:
5. Name, address of the business location directly under the branch:
6. Operates under the authorization of the company

Name of the company: **BINH LONG MONKEY FARM PRIVATE ENTERPRISE**

Certificate of tax and business registration No.: 3800232291

Issued by: The Section of Business Registration – Binh Phuoc Province Department of Planning and Investment

Issued on: 31 October 2001

Address of the head office: Dong No Ward, Binh Long District, Binh Phuoc Province

Tel:

CHIEF OF THE OFFICE OF BUSINESS REGISTRATION
(signed and sealed)
Nguyen Tien Son

Tôi là, Lê Thị Quỳnh Xuân, CMND số 171746211, cấp ngày 03/02/2009, phiên dịch viên tiếng Anh của công ty Dịch thuật Việt Duy, cam kết đã dịch chính xác tài liệu này từ tiếng Việt sang tiếng Anh

CÔNG TY DỊCH THUẬT VIỆT DUY
332 Lý Thái Tổ, P.1, Q.3 TP.HCMC
xác nhận bà Lê Thị Quỳnh Xuân, là phiên dịch viên tiếng Anh của công ty

I, Le Thi Quynh Xuan, ID Card No.171746211, issued on 03 Feb 2009, translator of English of the company, undertake that I have correctly translated the Vietnamese document into English
TRANSLATOR

Le Thi Quynh Xuan

VIETDUY TRANSLATION CO., LTD
332 Ly Thai To, Ward 01, District 03, Ho Chi Minh City
certifies that Ms.Le Thi Quynh Xuan is a translator of English of the company.
Date: 20 March 2013
DIRECTOR

Le Thi Quynh Xuan

Facility Images

Thanh Cong

Scientific Publications

Outbreak of *Mycobacterium orygis* in a Shipment of Cynomolgus Macaques Imported from Southeast Asia — United States, February–May 2023

Weekly / February 22, 2024 / 73(7);145–148

Print

Samantha D. Swisher, DVM[1,2]; Sara J. Taetzsch, DVM[1]; Mark E. Laughlin, DVM[1]; William L. Walker, DVM, PhD[3]; Adam J. Langer, DVM[3]; Tyler C. Thacker, PhD[4]; Jessica L. Rinsky, PhD[5]; Kimberly A. Lehman, DVM[4]; Anne Taffe, MPH[1]; Nancy Burton, PhD[5]; Doris M. Bravo[4]; Emily McDonald, MD[5]; Clive M. Brown, MBBS[1]; Emily G. Pieracci, DVM[1] (VIEW AUTHOR AFFILIATIONS)

Sources of Breeding Stock

In its 2023 CITES response, Thanh Cong Jingang claims it received the below infusions into its breeding stock from the following claimed sources:

Thanh Cong Jingang: Sources of Breeding Stock Intakes			
Date	Males	Females	Source
10/10/2006	20	78	Asset liquidation from Department of Forest Protection, Ha Tinh province
10/30/2006	20	39	Asset liquidation from Department of Forest Protection, Ha Tinh province
5/22/2007	0	32	Asset liquidation from Department of Forest Protection, Ha Tinh province
12/4/2007	0	200	Tan Sinh Thai jsc
2020	170	522	No Information Provided

Unexplainable Discrepancies in Annual Reported Births

The data reported in 2024 and 2025 has no discrepancies, but there are significant discrepancies between the 2023 and 2024 reports.

Thanh Cong Jingang: Discrepancies in Reported Births		
Year	Reported to CITES in 2023	Reported to CITES in 2024
2018	711	
2019	596	993
2020	1,033	1,081
2021	1,272	839
2022	1,360	1,497
2023		1,663

Discrepancies in Domestic Purchases

Thanh Cong Jingang omitted from their 2023 response the procurement of 410 macaques in 2022. The 760 macaques from 2023 were also missing. As usual, no NHP provenance is ascribed to any of these procurements.

Thanh Cong Jingang: Discrepancies in Domestic Purchases			
Year	Reported in 2023	Reported in 2024	Difference
2019	0	4	4
2020	692[155]	692	0
2021	0	0	0
2022	0	410	410
2023		760	

Facility Images

[155] 170 males and 522 females

Appendix E: Laos

Trade Data

Comparative Tabulation Report

Year	App.	Taxon	Class	Order	Family	Genus	Importer	Exporter	Origin	Importer reported quantity	Exporter reported quantity	Term	Unit	Purpose	Source
2004	II	Macaca fascicularis	Mammalia	Primates	Cercopithecidae	Macaca	VN	LA		5000		live		B	W
2004	II	Macaca fascicularis	Mammalia	Primates	Cercopithecidae	Macaca	VN	LA		985		live		T	W
2005	II	Macaca fascicularis	Mammalia	Primates	Cercopithecidae	Macaca	VN	LA		2000		live		T	W
2006	II	Macaca fascicularis	Mammalia	Primates	Cercopithecidae	Macaca	CN	LA			2000	live		T	C
2006	II	Macaca fascicularis	Mammalia	Primates	Cercopithecidae	Macaca	CN	LA		1000		live		T	R
2007	II	Macaca fascicularis	Mammalia	Primates	Cercopithecidae	Macaca	CN	LA		6700	4850	live		T	C
2007	II	Macaca fascicularis	Mammalia	Primates	Cercopithecidae	Macaca	CN	LA		1000		live		T	R
2007	II	Macaca fascicularis	Mammalia	Primates	Cercopithecidae	Macaca	VN	LA		800		live		T	C
2008	II	Macaca fascicularis	Mammalia	Primates	Cercopithecidae	Macaca	CN	LA		2050		live		T	C
2008	II	Macaca fascicularis	Mammalia	Primates	Cercopithecidae	Macaca	CN	LA		720	6580	live		T	R
2009	II	Macaca fascicularis	Mammalia	Primates	Cercopithecidae	Macaca	CA	LA			120	live		T	
2009	II	Macaca fascicularis	Mammalia	Primates	Cercopithecidae	Macaca	CN	LA		2000		live		S	R
2009	II	Macaca fascicularis	Mammalia	Primates	Cercopithecidae	Macaca	CN	LA		900		live		T	F
2009	II	Macaca fascicularis	Mammalia	Primates	Cercopithecidae	Macaca	CN	LA		4500	4900	live		T	R
2009	II	Macaca fascicularis	Mammalia	Primates	Cercopithecidae	Macaca	VN	LA		2000		live		T	C
2009	II	Macaca fascicularis	Mammalia	Primates	Cercopithecidae	Macaca	VN	LA			2000	live		T	R
2010	II	Macaca fascicularis	Mammalia	Primates	Cercopithecidae	Macaca	CN	LA		4600	2	live		T	C
2011	II	Macaca fascicularis	Mammalia	Primates	Cercopithecidae	Macaca	CN	LA			2000	live		T	C

Trade Suspensions

2016 Trade Ban

8. Following up on queries from several importing countries about export permits issued by the CITES Management Authority of Lao PDR and on the basis of information obtained from its 2011 and 2013 missions to the country, the Secretariat had identified a potential compliance matter relative to the sourcing of CITES specimens authorized for export. The most recent trade suspensions as a result of the Review of Significant Trade can be found in Notification No. 2016/018 of 15 March 2016. It informs Parties that the Standing Committee recommended the suspension of trade with Lao PDR in seven different species:

- *Macaca fascicularis* (long-tailed macaque/monkey)
- *Ptyas mucosus* (Common rat snake)
- *Python reticulatus* (Regal Python)
- *Naja* Spp. (Cobra snakes)
- *Cuora galbinifrons* (turtle species)
- *Heosemys annandalii* (turtle species)
- *Dendrobium nobile* (orchid)

2022 Lifting of Trade Suspension

Decisions taken at SC74

4. At its 74th meeting (SC74, Lyon, March 2022), the Standing Committee agreed to lift the current recommendation to suspend trade for *Macaca fascicularis* / Lao People's Democratic Republic (Lao PDR), and to remove the species/country combination from the Review of Significant Trade process, subject to the publication of zero export quotas for specimens of source codes W, F and R. These quotas were confirmed by Lao PDR and published on 30 March 2022. Should Lao PDR wish to resume trade under any of these source codes, it must communicate this to the Secretariat and the Chair of the Animals Committee along with a justification [including a non-detriment finding (NDF)], for their agreement (see SC74 Summary Record).

2023 Trade Ban

SC77 RECOMMENDATIONS
[SEE EXECUTIVE SUMMARY SC77 SUM. 6 (REV. 1)]

The Committee recommended that Parties suspend trade with the Lao People's Democratic Republic in specimens of all CITES-listed species for commercial purposes until the Lao People's Democratic Republic has substantially achieved the following recommendations:

Source: https://cites.org/sites/default/files/notifications/E-Notif-2023-127.pdf

Export Quota

Country: Lao People's Democratic Republic

Cercopithecidae

Year	Species	App.	Quotas	Unit	Source code	Specimen type	Publication date
2024	Macaca fascicularis±	II	0	-	W	All	27 Feb 2024
2024	Macaca fascicularis±	II	0	-	W, R, F	All	27 Feb 2024
2023	Macaca fascicularis±	II	0	-	F, R, W	All	13 Mar 2023
2023	Macaca fascicularis	II	6000	hds	C	Live, captive bred specimens (Suok Vanaseng Trading Co, Ltd.)	14 Apr 2023
2023	Macaca fascicularis	II	1800	hds	C	Live, captive bred specimens (Vanaseng Trading Co, Ltd.)	14 Apr 2023
2022	Macaca fascicularis	II	0	-		All specimens of source code W (wild)	30 Mar 2022
2022	Macaca fascicularis	II	0	-		All specimens of source code R (ranched)	30 Mar 2022
2022	Macaca fascicularis	II	0	-		All specimens of source code F (born in captivity)	30 Mar 2022
2022	Macaca fascicularis	II	6000	-		live captive-bred specimens	26 May 2022
2021	Macaca fascicularis	II	3,000	-		Live, captive bred specimens (Souk Vannaseng Trading Company Ltd.)	03 Feb 2021
2020	Macaca fascicularis	II	3000	-		Live, captive bred specimens (Souk Vannaseng Trading Company Ltd.)	09 Oct 2020

Binh Long II

Corporate Records

Enterprise Registration Details

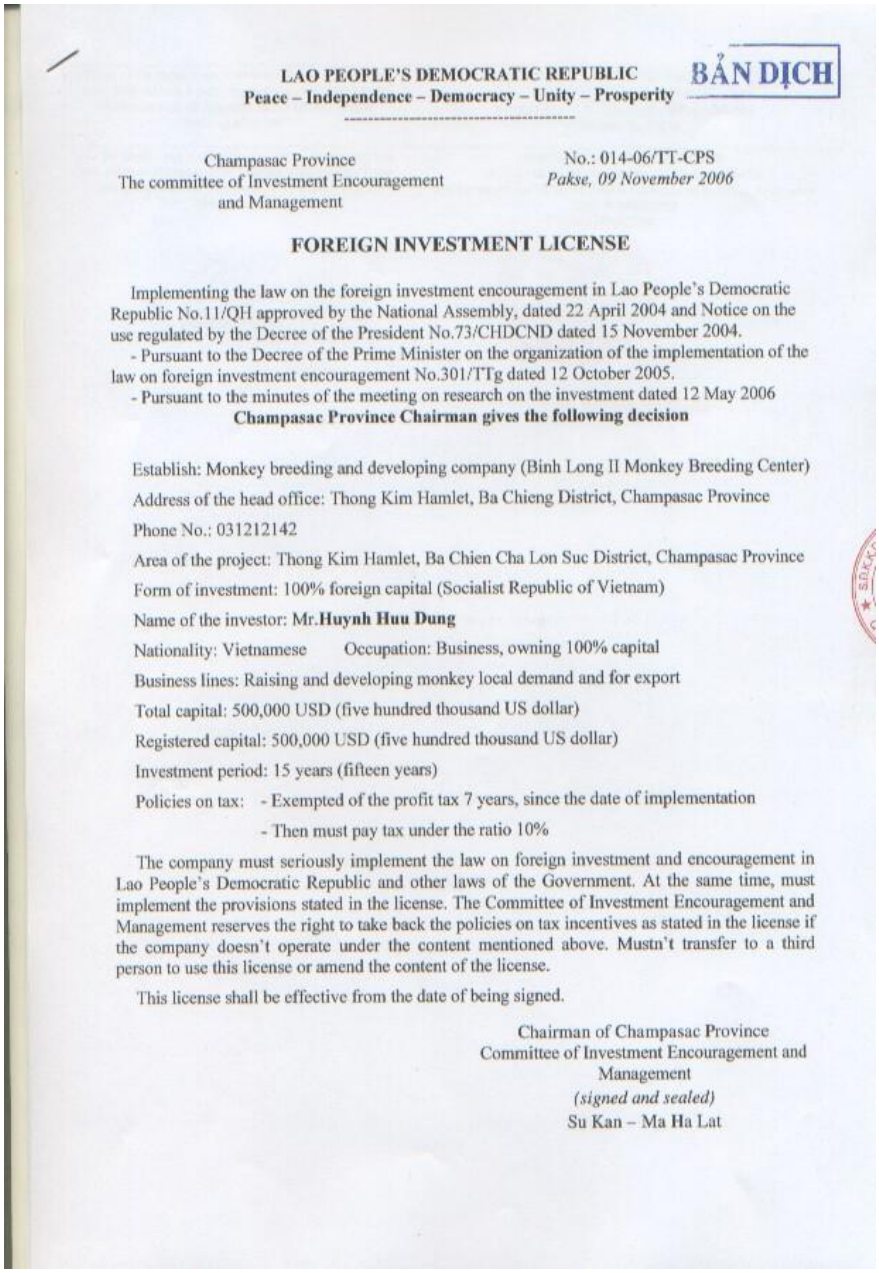
Enterprise Number	1600004803
Lao Enterprise and Name	ບໍລິສັດ ລ້ຽງລີ້ງ ແລະ ຂະຫຍາຍພັນລີ້ງ (ສູນລ້ຽງ ລີ້ງບ້ຶງລອງ II) ຈຳກັດຜູ້ດຽວ
English Enterprise Name	
Registered By	Mr ຮຸ້ນ ຫວີ ຢຸ້ງ
Registration Date	22-05-2018
Status	Active
Province	Champasack
District	Phathoomphone
Village	Lak 40

Aerial Imagery

Date: October 14, 2024

Facility Images

Licenses



LAO PEOPLE'S DEMOCRATIC REPUBLIC
Peace – Independence – Democracy – Unity – Prosperity

BẢN DỊCH

Champasac Province
The committee of Investment Encouragement and Management

No.: 014-06/TT-CPS
Pakse, 09 November 2006

FOREIGN INVESTMENT LICENSE

Implementing the law on the foreign investment encouragement in Lao People's Democratic Republic No.11/QH approved by the National Assembly, dated 22 April 2004 and Notice on the use regulated by the Decree of the President No.73/CHDCND dated 15 November 2004.

- Pursuant to the Decree of the Prime Minister on the organization of the implementation of the law on foreign investment encouragement No.301/TTg dated 12 October 2005.
- Pursuant to the minutes of the meeting on research on the investment dated 12 May 2006

Champasac Province Chairman gives the following decision

Establish: Monkey breeding and developing company (Binh Long II Monkey Breeding Center)

Address of the head office: Thong Kim Hamlet, Ba Chieng District, Champasac Province

Phone No.: 031212142

Area of the project: Thong Kim Hamlet, Ba Chien Cha Lon Suc District, Champasac Province

Form of investment: 100% foreign capital (Socialist Republic of Vietnam)

Name of the investor: Mr.**Huynh Huu Dung**

Nationality: Vietnamese Occupation: Business, owning 100% capital

Business lines: Raising and developing monkey local demand and for export

Total capital: 500,000 USD (five hundred thousand US dollar)

Registered capital: 500,000 USD (five hundred thousand US dollar)

Investment period: 15 years (fifteen years)

Policies on tax: - Exempted of the profit tax 7 years, since the date of implementation

- Then must pay tax under the ratio 10%

The company must seriously implement the law on foreign investment and encouragement in Lao People's Democratic Republic and other laws of the Government. At the same time, must implement the provisions stated in the license. The Committee of Investment Encouragement and Management reserves the right to take back the policies on tax incentives as stated in the license if the company doesn't operate under the content mentioned above. Mustn't transfer to a third person to use this license or amend the content of the license.

This license shall be effective from the date of being signed.

Chairman of Champasac Province
Committee of Investment Encouragement and Management
(signed and sealed)
Su Kan – Ma Ha Lat

SNBL Sokxay

Corporate Records

Enterprise Registration Details

Enterprise Number	0100029373
Lao Enterprise and Name	ບໍລິສັດ ເອັສເອັນບີແອລ ໂຊກໄຊ ຈຳກັດ
English Enterprise Name	SNBL Sokxay Co.,Ltd
Registered By	Mr TAKEHIKO ONO
Registration Date	16-05-2023
Status	Active
Province	Vientiane Capital
District	Xaysetha
Village	Thatlouang-kang
Tax Information Number	727621028000
Tax Registration Date	16/05/2023
Tax Status	Active
VAT Status	Registered

Appendix F: Mauritius

Breeding Rates

		F0	F1	Not Stated
Mauritius	Noveprim	70.43%	64.62%	
	Bioculture			71.44%