



November 19, 2025

Ivonne Higuero
Secretary-General
CITES Secretariat

Sofie H. Flensburg
Chief
CITES Secretariat

Naimah Aziz
Chair, CITES Standing Committee
U.S. Fish and Wildlife Service

Rinah Razafindrabe
Vice-Chair, CITES Standing
Committee
Madagascar

Via e-mail: [REDACTED]

Dear Secretary-General Higuero, Chief Flensburg, Ms. Aziz, and Mr. Razafindrabe:

We are writing on behalf of People for the Ethical Treatment of Animals (PETA) and Abolición Vivisección to express serious concern regarding the leadership and recent decisions of the CITES Secretariat and specifically the Secretary-General. The Secretariat is entrusted with safeguarding the integrity of the Convention and ensuring that international wildlife trade remains legal, transparent, and non-detrimental to species survival. However, the recent decision to recommend that Cambodia, Vietnam, and the Philippines be removed from review—despite extensive and ongoing evidence of irregularities, falsified data, and the laundering of wild-caught macaques—represents a profound breach of that responsibility. Given the severity of these failures and their implications for an endangered species, we believe that the Secretary-General's continued leadership is inconsistent with CITES' purpose and obligations. We therefore urge her to step down.

That breach was underscored just days ago. On November 14, 2025, Thai wildlife-crime authorities intercepted two shipments totaling 143 long-tailed macaques being smuggled toward Cambodia in colored nylon mesh sacks identical to those documented entering Cambodian "captive-breeding" farms. Traffickers arrested at the scene admitted they were transporting the monkeys from Thailand into Cambodia¹—a real-time confirmation of the same laundering pipeline long identified by U.S. authorities as well as non-governmental organizations and repeatedly brought to CITES' attention.

These seizures were followed by a stunning public admission from a major U.S. importer. On November 18, at the Jefferies London Healthcare Conference, the

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¹ 81 monkeys and meth found in car driven by suspected wildlife smugglers, rangers in Thailand say. November 17, 2025. <https://www.cbsnews.com/news/monkeys-meth-car-suspected-wildlife-smugglers-thailand/> Accessed November 18, 2025

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- PETA Asia
- PETA India
- PETA France
- PETA Australia
- PETA Germany
- PETA Switzerland
- PETA Netherlands
- PETA Foundation (U.K.)

CEO of Inotiv publicly addressed upcoming monkey supply-chain activity and stated: “The U.S. has not been the bottleneck in the last year or two to imports from Cambodia. It’s been Cambodia issuing CITES [permits], and I think Cambodia is now ready to issue CITES.” He further noted that the upcoming CITES meeting “may have people feel more comfortable.”² This industry admission makes clear that trade is resuming not because any actor in the system has fixed the irregularities, but because the permitting machinery is moving again while the underlying illegality remains untouched.

For the Secretariat to recommend clearing Cambodia from review while this active trafficking route is being exposed is indefensible. It demonstrates not only a failure to act on existing evidence but an unwillingness to respond even when that evidence materializes in plain sight. This decision is particularly indefensible in light of the International Union for Conservation of Nature’s (IUCN) 2025 reassessment, which elevated the long-tailed macaque (*Macaca fascicularis*) from Endangered A3cd to Endangered A2cd+3cd+4cd,³ citing a “very high risk of extinction in the wild.” The IUCN identified *biological resource use*—including capture for the research and commercial trade industries—as one of the most severe and ongoing threats to the species. To move toward deregulating trade from these source countries at precisely this moment not only contradicts the best available science but fatally undermines the credibility of CITES itself.

I. Longstanding Evidence of Widespread Laundering in Cambodia

For years, Cambodia has failed to reconcile the number of long-tailed macaques reported in its breeding facilities with the volume of animals it has exported under CITES. Discrepancies in production and trade data, highlighted by the U.S. Fish and Wildlife Service during *Operation Longtail Liberation* (2017–2022), revealed that tens of thousands of wild-caught macaques were laundered through Cambodian farms using falsified “captive-bred” documentation.⁴ These were not isolated violations but part of a coordinated system of commercial exploitation made possible by weak oversight of CITES breeding designations. The Secretariat has long been in possession of this evidence,^{5,6} much of it transmitted directly from the United States—whose CITES Management Authority was then headed by Naimah Aziz, now Chair of the CITES Standing Committee.

² Inotiv at Jefferies London: Strategic Growth Amid Challenges. November 18, 2025.

<https://www.investing.com/news/transcripts/inotiv-at-jefferies-london-strategic-growth-amid-challenges-93CH-4366090>. Accessed November 18, 2025.

³ Hansen, M.F, Ang A, Fuentes A, Nijman, V. *Macaca fascicularis*. The IUCN Red List of Threatened Species 2025. Published 2025. <https://dx.doi.org/10.2305/IUCN.UK.2025-2.RLTS.T12551A273015436.en>. Accessed November 12, 2025.

⁴ Transcript of Trial Proceedings. *United States of America v. Kry*, No. 1:22-cr-20340-KMW-8 (S.D. Fla. Mar. 14, 2024): 77:7-25, 78:1-10.

⁵ Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). Illegal Trade and Enforcement: SC78 Doc. 38.1. 78th meeting of the Standing Committee; February 2025; Geneva, Switzerland <https://cites.org/sites/default/files/documents/E-SC78-38-01.pdf>. Accessed November 12, 2025.

⁶ Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). Review of Trade in Specimens Reported as Produced in Captivity: SC78 Doc. 35.1. 78th meeting of the Standing Committee; January 2025; Geneva, Switzerland. <https://cites.org/sites/default/files/documents/E-SC78-35-01.pdf>. Accessed November 12, 2025.

II. The Secretariat's Reliance on Compromised Information

Despite that record, the Secretariat's June 2025 mission to Cambodia relied heavily on information supplied by the very facilities at the center of this trafficking network, including Vanny Bio Research, whose involvement in the illegal capture and export of wild macaques has been documented in U.S. court proceedings. The Secretariat then concluded that it had "established how the facilities operate and how they achieve their reproduction rates," while announcing that Cambodia had provided **detailed breeding and export data that would not be shared with the Standing Committee "for reasons of confidentiality."**⁷

III. Conflicts of Interest Undermining Standing Committee Oversight

That the current Chair of the Standing Committee, Naimah Aziz, is the Chief of the U.S. Fish and Wildlife Service's Division of Management Authority—the office responsible for ensuring that trade in CITES-listed species is conducted legally through the issuance and verification of international permits—makes the Secretariat's recent actions even more troubling. During her tenure, the United States documented extensive evidence of falsified CITES permits and the illegal export of wild-caught macaques from Cambodia through facilities such as Vanny Bio Research.⁸ Now, under Aziz's leadership, the Standing Committee is being asked to endorse the Secretariat's recommendation to clear Cambodia from review based on unverified, confidential facility reports—the very type of documentation that enabled the laundering scheme in the first place. This contradiction undermines the credibility of the Secretariat's mission and calls into question the impartiality of the Standing Committee's oversight.

IV. The Evidence Demanding Immediate Suspension of Trade

The evidence that follows—drawn from official records, investigations, and trade data—demonstrates why the trade in long-tailed macaques must be suspended and why the Secretary-General's continued dismissal of this information raises serious concerns about her leadership. It reflects only a fraction of the extensive evidence showing systemic irregularities in this trade.

- a. Between 2017 and 2022, Operation Longtail Liberation uncovered that roughly 30,000 wild-caught macaques from Cambodia had been illegally exported to the United States through Vanny Bio Research.^{9,10} Evidence presented in the 2024 U.S. trial of Masphal Kry, Deputy Director of Cambodia's Forestry Administration, confirmed this trafficking network, with

⁷ Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). Application of Article XIII in Cambodia: SC79 Doc. 6.3.2. 79th meeting of the Standing Committee; November 23, 2025; Samarkand, Uzbekistan. <https://cites.org/sites/default/files/documents/E-SC79-06-03-02.pdf>. Accessed November 12, 2025.

⁸ United States Department of Justice. Cambodian officials and six co-conspirators indicted for taking part in primate smuggling scheme. <https://www.justice.gov/usao-sdfl/pr/cambodian-officials-and-six-co-conspirators-indicted-taking-part-primate-smuggling-0>. Accessed November 12, 2025.

⁹ Superseding Indictment. *United States v. Keo*, No. 22-20340-CR-WILLIAMS(S) (S.D. Fla. filed Nov. 3, 2022). <https://www.peta.org/wp-content/uploads/2022/11/US-v-KEO-et-al.pdf>.

¹⁰ Transcript of Trial Proceedings. *United States v. Kry*, No. 1:22-cr-20340-KMW-8 (S.D. Fla. Mar. 12, 2024): 66:1–15, 67:25, 68:1–17.

Kry's own defense attorney conceding that Vanny Bio Research "did not operate lawfully" and was "conspiring to import wild-caught long-tailed macaques to the United States."¹¹

Despite receiving this evidence, the Secretariat's June 2025 mission to Cambodia relied on undisclosed, facility-supplied reports from the same operations implicated in the laundering network, including Vanny Bio Research. Its conclusion that it "did not see any evidence of such laundering"¹² directly contradicts U.S. investigative findings and court testimony and demonstrates a fundamental failure of verification and oversight.

- b. [Footage](#), provided to PETA, offers damning evidence of the large-scale capture and delivery of wild long-tailed macaques to a Cambodian breeding and export facility utilizing CITES permits. The footage documents hundreds of monkeys confined in sacks being unloaded from vehicles and taken into the facility, exposing regular deliveries of wild-caught animals and contradicting claims that the facility operates as a genuine captive-breeding facility. The accompanying images inside the facility (Figures 1 and 2) offer only fragments of what the full recordings show—a commercial pipeline built on the capture and laundering of wild-macaques.



Figure 1. Sacks containing long-tailed macaques delivered to a Cambodian licensed captive-breeding facility. Footage supplied to PETA.

Although this footage predates the Secretariat's June 2025 mission, it documents patterns of capture and laundering consistent with the irregularities identified by the USFWS and reported to CITES. Cambodian authorities have offered assurances that such practices no longer occur, but those assurances have never been independently verified. The Secretariat itself acknowledges that it does not conduct investigations and relies entirely on information supplied by national authorities and the facilities they oversee.¹² It therefore lacks both the technical

¹¹ Transcript of Trial Proceedings. *United States v. Kry*, No. 1:22-cr-20340-KMW-8 (S.D. Fla. Mar. 12, 2024).

¹² Convention on International Trade in Endangered Species of Wild Fauna and Flora. (CITES) Enforcement – Introduction. <https://cites.org/eng/prog/imp/enf/introduction>. Accessed November 15, 2025.

expertise and the enforcement mandate to assess breeding operations or detect laundering, yet its visit relied solely on data and site visits choreographed by the very operations under scrutiny—offering a performance of compliance rather than proof of it. Its conclusion that it did not see any evidence of wild-caught animals being laundered as captive-bred cannot be reconciled with the long record of irregularities and the visual documentation of monkeys arriving in sacks at a so-called “breeding” center.



Figure 2. Vehicle containing sacks of long-tailed macaques during delivery to a self-described licensed captive-breeding facility in Cambodia. Footage supplied to PETA.

- c. In July 2024, PETA released an [analysis](#) of data reported by Cambodia to CITES, which raised serious questions about the reliability and validity of Cambodia’s claims regarding the success of its captive-breeding operations. The analysis found that growth rates reported by Cambodian facilities—Vanny Bio Research and K-F Cambodia—between 2017 and 2023 were biologically impossible. Following the Secretariat’s most recent mission to Cambodia, the Animals

Committee concluded that the reported reproduction rates were “plausible.”¹³ However, this conclusion is based on limited facility data and does not adequately explain or justify the biologically impossible growth rates previously reported by Cambodian breeding operations.

- d. On January 27, 2025, PETA, joined by 39 individuals and organizations, submitted a new [petition](#) to the U.S. Fish and Wildlife (USFWS), urging the USFWS to list *Macaca fascicularis* under the Endangered Species Act. This petition expands upon the 2023 filing with new, peer-reviewed evidence showing that population declines are even more severe than previously documented.¹⁴ Among the materials is a 2024 [population viability analysis](#) conducted by the IUCN Species Survival Commission Conservation Planning Specialist Group, which modeled the demographic effects of capture and trade across the species’ range. The analysis found that the removal of adult females—highly valued as breeders for “captive-breeding” export facilities—precipitates rapid, often irreversible population collapse. These findings directly implicate Article IV(2)(a) of the Convention, which requires that “a Scientific Authority of the State of export has advised that such export will not be detrimental to the survival of that species” before any export permit is granted.¹⁵

In light of the IUCN analysis, no exporting Party can credibly make a non-detriment finding (NDF). It is therefore concerning that the Secretariat has suggested wild collection might resume following a new NDF. Current data show that any further wild capture would be detrimental to the species. Under Resolution Conf. 12.8 (Rev. CoP18),¹⁶ the Secretariat and Standing Committee are obliged to act when such deficiencies are evident, and Resolution Conf. 9.24 (Rev. CoP17)¹⁷ reinforces the need for a precautionary approach when the sustainability of trade is uncertain. Together, these provisions make clear that allowing any continuation or resumption of wild capture is incompatible with CITES’ core obligations under Article IV.

- e. On February 28, 2025, Sandy River Research produced an in-depth investigation [report](#) titled *Unveiling the Dark Side of the Monkey (Macaque) Trade: A Comprehensive Exposé on Corruption and Illegality in Mainland Asia*.¹⁸ The report revealed how, in Cambodia, Vietnam, Laos, and China, the “legal” trade in non-human primates (NHPs) is systematically manipulated and described how “NHP breeding farms have disguised their inability to purpose

¹³ Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). Implementation of Resolution Conf. 17.7 (Rev. CoP19) on Review of Trade in Specimens Reported as Produced in Captivity: SC79 Doc. 8. 79th meeting of the Standing Committee; November 23, 2025; Samarkand, Uzbekistan. <https://cites.org/sites/default/files/documents/E-SC79-08.pdf>. Accessed November 15, 2025.

¹⁴ Liston ALK, Schülke O, Ostner J, et al. A model for the noninvasive, habitat-inclusive estimation of upper limit abundance for synanthropes, exemplified by *M. fascicularis*. *Sci Adv.* 2024;10(4).

¹⁵ Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). Text of the Convention. <https://cites.org/eng/disc/text.php#IV>. Accessed November 15, 2025.

¹⁶ Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). Resolution Conf. 12.8 (Rev. CoP18): Review of Significant Trade in Specimens of Appendix-II Species. <https://cites.org/sites/default/files/documents/COP/19/resolution/E-Res-12-08-R18.pdf>. Accessed November 15, 2025.

¹⁷ Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). Resolution Conf. 9.24 (Rev. CoP17): Criteria for amendment of Appendices I and II. <https://cites.org/sites/default/files/documents/COP/19/resolution/E-Res-09-24-R17.pdf>. Accessed November 15, 2025.

¹⁸ Sandy River Research. *Unveiling the Dark Side of the Research Monkey Trade: A Comprehensive Exposé on Corruption and Illegality in Mainland Asia*. Scribd. Published February 18, 2025.

breed sufficient NHPs to meet global demand by, with the assistance of corrupt officials, . . . illegally supplementing their farms with monkeys routinely laundered from the wild.”¹⁸

The investigation found biologically impossible birth rates, inflated facility data, and tens of thousands of “missing” animals that could not have originated from legitimate captive-breeding operations. Satellite imagery and trade records exposed large-scale laundering and corruption throughout the supply chain, while prominent importers and contract research organizations continued purchasing from farms that failed to meet CITES standards. Together, these findings reveal an entrenched, region-wide system of falsification and regulatory complicity that renders claims of sustainable, captive breeding indefensible.

- f. In March 2025, the Cambodian MAFF published photographs showing former U.S. Interior Secretary David Bernhardt visiting Cambodian macaque-breeding facilities, including Vanny Bio Research—the company at the center of the U.S. Department of Justice’s Operation Longtail Liberation trafficking case. Also present were Vanny’s indicted general manager, Hing Ip Chung, and a representative of Charles River Laboratories, a major importer of Cambodian macaques into the United States. This episode raises serious questions for the [US CITES Management Authority](#) as well as CITES in general, as it suggests that key industry and political figures continue to engage with a facility whose breeding and export operations were implicated in falsified CITES permits and the laundering of wild-caught macaques as “captive-bred.” Such continued engagement signals a breakdown of the compliance framework that CITES relies upon to maintain the credibility of its permitting system.
- g. In June 2025, Sandy River Research published *Deeper Into Darkness: The Monkey Trade Exposé*, uncovering widespread falsification, smuggling, and government complicity sustaining the long-tailed macaque trade across Vietnam, Cambodia, Laos, and China.¹⁹ The [investigative report](#) documented biologically impossible breeding claims, unregistered facilities, and confirmed trafficking routes linking Vietnamese farms to convicted smugglers in China. Even as Vietnam assured CITES that wild capture is banned, its own authorities reported rampant snaring and “inadequate, fragmented” enforcement—evidence of a regional laundering network operating far beyond CITES control.
- h. In [June 2025](#), PETA obtained records from the U.S. Department of Agriculture’s National Veterinary Services Laboratories (NVSL) revealing that more than 70 long-tailed macaques imported into the United States between 2021 and 2023 tested positive for tuberculosis (TB), including *Mycobacterium orygis*—a strain never before detected in U.S. animals. The infected monkeys originated primarily from Cambodia and Vietnam and were imported by major suppliers under CITES export permits. In [August 2025](#), the U.S. Centers for Disease Control and Prevention (CDC) publicly acknowledged an increase in TB cases among imported monkeys since 2021, confirming the ongoing introduction of infected animals into international trade despite assurances of captive breeding and health certification.

The NVSL and CDC findings expose a grave compliance issue for CITES: the documented importation of TB-infected long-tailed macaques demonstrates that animals labeled as “captive-bred” and “disease-free” were in fact sourced and traded in violation of both health and origin

¹⁹ Sandy River Research. *Deeper Into Darkness: The Monkey Trade Exposé*. Scribd. Published June 2025.

certifications. These infections, including the novel *Mycobacterium orygis* strain, show that the required verification of breeding and veterinary conditions under Article IV(2)(a) and Resolution Conf. 12.8 (Rev. CoP18)¹⁶ is not functioning. The circulation of diseased animals across borders under CITES documentation underscores a breakdown in oversight and provides further evidence that current trade cannot meet the standards for lawful, non-detrimental export.

- i. In October 2025, a credible whistleblower reported that hundreds of long-tailed macaques died en route to K-F (Cambodia) when transport trucks broke down. The CITES Secretariat's June 2025 report had cited this facility as one of eight "operational" breeding centers said to demonstrate reproduction "under captive-breeding conditions" and asserted that it "did not see any evidence of wild animals being laundered as captive-bred."⁷ Yet only months later, K-F was receiving a large, undocumented shipment of monkeys from unidentified sources—an occurrence fundamentally incompatible with the definition of a *captive-bred, self-sustaining* colony under Resolution Conf. 10.16 (Rev.). They also underscore what the Secretariat itself acknowledged: Cambodia's veterinary authorities are not mandated to verify the origin of animals. This incident reveals how the Secretariat's verification mission—dependent on facility-supplied information and lacking investigative authority—failed to identify, or even account for, the ongoing irregularities in Cambodia's macaque trade.
- j. On November 14, 2025, Thai wildlife-crime authorities conducted two major raids near the Cambodian border, intercepting 143 long-tailed macaques packed into blue nylon mesh sacks identical to those documented in PETA's footage of monkeys being delivered to Cambodian "captive-breeding" farms. The match is unmistakable: same construction, same coloration, same practice of cramming multiple animals into a single bag, a method used by traffickers, not captive-breeding operations.

News outlets reported that the macaques were freshly caught from the wild, destined for traditional Chinese medicine and use in laboratory testing abroad.²⁰ In the second raid, authorities arrested traffickers who admitted transporting the monkeys from Thailand into Cambodia.²¹ This is the precise smuggling pipeline exposed in U.S. investigations—caught in real time—using the same equipment and methods seen in footage of wild-caught monkeys arriving at Cambodian farms whose exports later move out under "captive-bred" CITES permits.

This is not merely corroborating evidence; it is a direct, contemporary demonstration of the mechanism by which wild macaques continue to be funneled into Cambodian farms. Yet the Secretary-General still proposes clearing Cambodia from review and continues to insist that captive-breeding operations there are self-sustaining.

²⁰ 143 macaques rescued from smugglers in Sa Kaeo. Bangkok Post. November 12, 2025.

<https://www.bangkokpost.com/thailand/general/3137881/143-macaques-rescued-from-smugglers-in-sa-kaeo>. Accessed November 16, 2025.

²¹ 81 monkeys and meth found in car driven by suspected wildlife smugglers, rangers in Thailand say. November 17, 2025. <https://www.cbsnews.com/news/monkeys-meth-car-suspected-wildlife-smugglers-thailand/> Accessed November 18, 2025



Figure 4. Authorities in Thailand stopped this vehicle and found macaques stuffed into blue net bags. [Photo](#) published November 2025 on the CBS News website.



Figure 5. Thai Authorities inspecting crates containing macaques that had been packed into blue net bags. [Photo](#) published November 2025 on the Khaosod website.

Beyond these documented irregularities, CITES has also failed to acknowledge the repeated violations of the IATA Live Animals Regulations involving shipments of long-tailed macaques. CITES explicitly requires that all transports of live specimens comply with these standards under Resolution conf. 10.21, yet [well-documented failures](#) in food and water provision, temperature

control, and transport documentation have been routinely overlooked.²² These violations further illustrate the broader pattern of non-compliance that the Secretariat has chosen not to address.

V. Restoring the Integrity of the Treaty

The evidence now shows that the long-tailed macaque trade has been taken over by wildlife traffickers and organized criminal networks, moving wild-caught and often infected animals into international laboratories.

The Secretariat has set aside clear evidence of illegal capture, falsified documentation, and disease risks while defending a trade built on secrecy and sustained by documented illegality. The Secretary-General's continued leadership is incompatible with CITES' mandate to ensure legal, non-detrimental trade in endangered species. We therefore reiterate our call for her resignation. The Standing Committee—under the chairship of Naimah Aziz, whose own agency documented many of these violations—must also demonstrate independence.

CITES can restore its authority only by confronting the evidence, suspending macaque exports, initiating an independent investigation into the Southeast Asian trade, and replacing leadership that has failed to act. Anything less will confirm that the Treaty is no longer protecting wildlife, but those who profit from exploiting it.

Thank you for your urgent attention to this matter. We look forward to your response.

Sincerely,



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²² <https://www.peta.org/wp-content/uploads/2024/08/Reply-from-CITES-2024-August-12.pdf>