



To: Clerk to Subcommittee on Issues Relating to the Development of Chinese Medicine,  
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11 February 2020

**Re: Hong Kong Legislative Council Panel on Health Services  
Subcommittee on Issues Relating to the Development of Chinese Medicine**

Dear Sir/Madam,

WildAid is a charity that is focused exclusively on reducing demand for endangered species. The illegal wildlife trade is a multi-billion dollar global industry largely driven by consumer demand in expanding economies. While most wildlife conservation groups focus on scientific studies and anti-poaching efforts, we work to reduce global consumption of wildlife products and to increase local support for conservation efforts. We also work with governments and partners to protect fragile marine reserves from illegal fishing and shark finning, to enhance public and political will for anti-poaching efforts, and to reduce climate change impacts. We believe that when the buying stops, the killing can too<sup>1</sup>.

Thank you for the opportunity to provide comments to Hong Kong Legislative Council's Panel on Health Services Subcommittee on Issues Relating to the Development of Chinese Medicine for consideration at its forthcoming debate scheduled for 24 February 2020.

WildAid supports the development of Traditional Chinese Medicine (TCM) and its philosophy embracing a harmonious relationship between man and nature, sometimes known as '*ecological civilization*', or 生态文明. This philosophy is reflected in the most recent edition of the Chinese Pharmacopoeia, wherein the concepts of protecting wildlife and environment and adhering to the sustainable development and promotion of green standards for TCM are stated.

However, we have not seen any such recognition or dialogue in relation to the use of endangered wildlife in TCM from the Hong Kong Government, despite the Government's endeavours to develop the TCM industry. We appreciate that the Government is a signatory to the Convention on International Trade in Endangered Species (CITES). However, as the Hong Kong government should be aware, CITES is an international body concerning trade and does not address policy issues concerning the use of endangered species in the TCM industry, as this is the responsibility of government.

It should also be noted that Hong Kong also has responsibilities under the United Nations Convention on Biological Diversity (CBD), whereby signatories must *ensure that activities within their jurisdiction or control do not cause damage to the environment of other States or of areas beyond the limits of national jurisdiction*<sup>2</sup>.

As such, we are concerned that there is no recognition in background paper CB(2)521/19-20(01)<sup>3</sup> of the need to account for the impacts that the demand for TCM products derived from plants and animals have on species conservation, global biodiversity and animal welfare. TCM is a leading driver in the very real threat of extinction facing many species and thus threatening our planet's biodiversity. It cannot be ignored that the endless pursuit of flora and fauna to satisfy the demand from the TCM industry has caused significant damage to the natural world. This fact is undisputed by the global scientific community. According to the Global Biodiversity Assessment published by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) in 2019<sup>4</sup>, the current decline in nature is unprecedented in human history, with an estimated – and staggering – **one million species at risk of extinction**. Direct exploitation, which includes overharvesting of wildlife for legal and illegal trade, is identified as the second most

1 <https://wildaid.org/about/>

2 <https://www.cbd.int/kb/record/article/6873?RecordType=article>

3 [https://www.legco.gov.hk/yr19-20/english/panels/hs/hs\\_dcm/papers/hs\\_dcm20200120cb2-521-1-e.pdf](https://www.legco.gov.hk/yr19-20/english/panels/hs/hs_dcm/papers/hs_dcm20200120cb2-521-1-e.pdf)

4 <https://ipbes.net/news/Media-Release-Global-Assessment>

important driver of biodiversity loss. The IPBES report described the current global response to this crisis as insufficient, urged that transformative changes are needed to restore and protect nature, and asserted that opposition from vested interests should be overcome for the public good.

TCM products that use threatened wildlife include: rhino horn, tiger penis and bone, bear bile, pangolin scale, dried seahorse, elephant ivory powder, leopard bone, lion bone, musk deer, manta and mobula ray gill rakers, saiga antelope horn, reptiles, amphibians and a whole range of other threatened fauna as well as flora. Closer to home our own native and critically endangered Golden Coin Turtle is threatened with extinction<sup>5</sup> in a large part due to the use of its plastron (lower shell) as the main ingredient for Gui Ling Gao herbal jelly.

Of great concern, some Traditional Chinese Medicines that include endangered wildlife as ingredients have only recently been developed and thus should not be regarded as TCM. A recent development cannot be described as traditional. An example is the recent use of the African and three Asian pangolin species not previously used in TCM. These species have all but replaced the Chinese Pangolin (the traditional ingredient) which is now functionally extinct across most of its range, primarily because of the unsustainable consumption of its scales in TCM.

According to the results of our own WildAid-commissioned survey of attitudes amongst Hong Kong people<sup>6</sup>, which was conducted by the Hong Kong Public Opinion Research Institute and released in August 2019<sup>7</sup>, two-thirds (67 per cent) of around 1,000 people interviewed considered the use of pangolins in TCM to be unacceptable. Some 96 per cent of those surveyed agreed that *“endangered animal species should be protected”*, whilst 85 per cent agreed that *“Chinese medicine should phase out the use of endangered wildlife species while promoting sustainable and herbal alternatives”*. A high proportion (85 per cent) of survey respondents also said that Hong Kong laws banning the use of endangered wildlife species in TCM need stricter enforcement.

As to recent news developments in Hong Kong and mainland China, it should be noted that Chinese state media have recently reported that strong scientific evidence has emerged from the South China Agricultural University in Guangzhou which suggests that the pangolin is suspected as the probable source of the novel coronavirus (nCoV-2019) infectious disease<sup>8</sup>. We therefore commend China for permanently shutting down its wildlife markets across the country as a quick and decisive response to the novel coronavirus outbreak, and likewise we also encourage the Chinese government to take a small step further by permanently removing pangolin products from the Chinese pharmacopoeia – along with all other endangered flora and fauna.

As the TCM industry expands and takes economic advantage of opportunities presented by China's significant Belt and Road Initiative (BRI), it is alarming that the Hong Kong government is discussing its development without concern for the biodiversity and natural ecosystems of Belt and Road countries. We urge the Hong Kong government to develop more sustainable and regulated practices as regards TCM along the Belt and Road countries of Africa, Asia and South America, in particular for the many species now at risk of extinction, including the eight species of pangolin.

Further, where the sustainability of ingredients is of concern, there is now an important opportunity to demonstrate informed science-based use of alternatives in the industry. With regards to animal use, the 3Rs principle 'Replacement, Reduction and Refinement'<sup>9</sup> has been developed to address animal welfare issues and is a widely accepted ethical principle now embedded in the conduct of animal-based science worldwide. These principles should also be adopted for the use of animals in TCM, with the focus on replacement, i.e. alternatives to the use of any animal based products.

The Hong Kong government's current approach notably overlooks the key principles of considering the planet's health and therefore people's health. Such an approach is contrary to TCM philosophy. Healthy ecosystems are essential to the continuation of sustainable TCM practices as well as sustainable livelihoods from wildlife tourism, healthy communities and populations across the globe. Presently, discussions focus on trade, not the underlying principals, biodiversity and the broader health of humanity itself.

We also note that the Hong Kong government has been enhancing the understanding of the history and curative effects of Chinese medicine among the general public with promotional campaigns. However we urge the Government to also educate TCM practitioners and its users about the sustainable use of ingredients and consumption. Research has identified many alternatives, and Hong Kong should expend resources in this field, refer to international best practice and aspire to be a leader. Failure to educate on sustainability would leave the HKSAR Government open to accusations that it is complicit in the extinction of endangered species.

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5 <https://www.iucnredlist.org/species/5962/97360008>

6 [http://wildaid.org.hk/sites/default/files\\_tmp/WildAid\\_TCM\\_report.pdf](http://wildaid.org.hk/sites/default/files_tmp/WildAid_TCM_report.pdf)

7 [http://wildaid.org.hk/sites/default/files\\_tmp/PRESS\\_RELEASE\\_TCM\\_Survey\\_2019\\_08\\_08\\_ENG.pdf](http://wildaid.org.hk/sites/default/files_tmp/PRESS_RELEASE_TCM_Survey_2019_08_08_ENG.pdf)

8 [http://www.xinhuanet.com/english/2020-02/07/c\\_138763566.htm](http://www.xinhuanet.com/english/2020-02/07/c_138763566.htm)

9 <https://www.nc3rs.org.uk/the-3rs>

In 2018 we were encouraged by China's announcement that it will "*postpone after study*" the overturning of its 1993 ban on the trade of rhino horns and tiger parts for medicinal use<sup>10</sup>. Any opening up of legal trade in rhino horn and tiger parts will undoubtedly encourage poaching, trafficking and illegal trade of the world's last remaining wild populations of rhinos and tigers, and we are grateful that the State Council of China has recognised this<sup>11</sup>.

Indeed, the pangolin trade clearly illustrates that despite a ban on international trade following CITES Appendix I listings in 2016, the continuation of China's domestic trade has provided a front for laundering a steady flow of scales being smuggled into the country. The volume of scales currently being trafficked into mainland China through Hong Kong is staggering and represents hundreds of thousands of threatened pangolins<sup>12</sup>. Scientists believe that if this trend continues, all eight pangolin species will become extinct within our lifetime. As a consequence huge pressure is being brought to bear on pangolin range states in Africa aiming to protect their wildlife from transnational organised crime syndicates trafficking endangered species to supply mainland China and Hong Kong's growing demand for TCM.

In conclusion, as the TCM industry expands, we urge the Government to; *act responsibly by strictly adopting the principles of sustainability, adhere to Hong Kong's responsibilities under CBD and support the philosophy that endangered species (from both captive bred facilities and the wild) should not be allowed in TCM and this point should be articulated clearly at all opportunities.*

Yours sincerely,



Alex Hofford  
Director  
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10 <https://apnews.com/812a4ce139e24835abe2a618e22f9f3e>

11 <https://wildaid.org/endangered-pangolin-may-have-spread-coronavirus-to-humans/>

12 <https://eia-international.org/news/huge-9-5-tonne-bust-of-pangolin-scales-must-sharpen-nigerias-appetite-to-tackle-wildlife-crime/>