Date: 22 September 2026

To: Mr. Amit Aggarwal, President, Regulatory Affairs, Vantara (Greens Zoological Rescue and Rehabilitation Centre and Radhe Krishna Temple Elephant Welfare Trust)

Re: Comments on Vantara's letter to the CITES Management Authority of India, dated 19/8/2026

Dear Mr. Aggarwal:

We, the undersigned organizations, have carefully considered Vantara's letter to the CITES Management Authority of India published on 19 August 2026,[1] and welcome the announced change in focus towards *in situ* conservation and the moratorium on further imports.

In response to Vantara's invitation to engage directly, we would like to share a number of observations and suggestions for strengthening your practices and improving outcomes.

You will be aware of the widespread and considerable concerns over the scale and scope of animal acquisitions by Vantara in recent years, and the impacts these have had for some of the world's most threatened species, the welfare of many thousands of animals, and the precedent that these acquisitions have set. In our decades of work on wildlife trade issues, we have never encountered anything comparable to the scale and diversity of live animal imports to Vantara: more than 60,000 specimens, representing an extraordinary range of species - including many that are endangered, threatened and internationally protected - acquired within an exceptionally short period of time by a single entity.

This has raised fundamental questions about Vantara's original purpose and actions, and it will be the task of governments and international bodies to follow up on these and consider any appropriate action. Major accredited zoos (some of which have been established for decades or longer) do not generally hold even half this number of animals, in part due to the challenges of providing high standards of species-specific animal care and housing in appropriate social groupings.

That is why your letter of 19th August is, potentially, so important. We sincerely hope that the voluntary commitments it sets out will be followed by robust, sustained, and transparent implementation.

Going forward, Vantara's efforts will be judged by whether international standards for the welfare of its resident animals are upheld or exceeded; whether Vantara's wildlife protection activities are consistent with international standards and guidelines for species management, including IUCN guidance documents and Action Plans; and how these activities support existing local, national, and international animal protection and conservation efforts.

In line with Vantara's declared voluntary one-year moratorium, while we note the permanent commitment in paragraph 41, we strongly advocate a clearer, stronger approach to future acquisitions (see below), a profound and long-term commitment to advancing global efforts to end the capture of animals from the wild for collections or public display, and meaningful support for the organisations and relevant authorities working to protect wild species *in situ*.

Furthermore, we urge Vantara to ensure that its activities contribute to significantly reducing demand for wild species, both within India and internationally, and do not directly or inadvertently create further demand for the acquisition of wild animals from any source for captive collections. In addition, we encourage Vantara to work with relevant authorities to directly address concerns regarding the provenance, export/import permitting, and acquisition of animals.

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[1] https://cms.vantara.in/uploads/Media_Statement_Letter_to_CITES_MA_India_and_Voluntary_Commitments_cfb4a786f5.pdf

To be specific, further consideration should be given to the following:

1. Replace the temporary moratorium with a permanent end to the import of wild animals, subject only to extremely limited and exceptional exemptions based on clearly defined criteria. Any exemption should be permitted only where there is an independently verified, demonstrable conservation need or benefit (as identified, for example, in an IUCN SSC Conservation Action Plan) or a demonstrable animal-welfare need, and where appropriate facilities or expertise are either not available or cannot be established in the relevant range State(s). The exemptions currently proposed in Paragraph 41 of the letter risk allowing the future import of animals originating from commercial facilities, of animals presented as captive-bred but likely sourced from the wild, and of animals for which the legality and provenance of the founder stock cannot be adequately verified.

If Vantara seeks to position itself as an exemplary institution that supports the protection of wild animals, it should adopt the most rigorous and precautionary criteria for wildlife transfers. It should set a standard that goes beyond the minimum threshold of what may be legally permissible, and, using strong governance procedures and outreach, engage credible independent stakeholders to ensure verification of genuine need, due diligence, and transparency. A moratorium limited to only 12 months (to June 2027) may signal to exporters that imports will resume thereafter. It risks creating further demand, leading to the stockpiling of animals by wildlife traders and traffickers in anticipation of its expiration.

We welcome the intention to not import “any great ape, big cat or any Appendix I listed specimen from a range State of the species, including from a captive breeding facility”, and “any animal taken from the wild in any range State”. However, we believe this policy must be expanded to include all species and applied to both source and exporting countries. This is in order to prevent import of animals of questionable origin that are misidentified as captive-bred, or of animals sourced from commercial facilities. Furthermore, Vantara should ensure that animals are not purchased – either by Vantara or any donor – or form part of any exchange for assistance as a *quid pro quo* (including with range States) (see below).

We also believe that the announcement to not import “save from a zoo registered with or recognised by the Government of the exporting State, or a CITES registered facility, or accredited by a recognised international or regional association of zoological institutions” is far too broad - as evidenced in CITES SC79.Doc.6.3.4 - and will not prevent commercial or fraudulent trade. Any potential relationship between Vantara and an accredited zoo should be independently evaluated and assessed on a case-by-case basis. All potential imports of animals from any source, including accredited zoos, should be subject to the same strict evaluation process and criteria established for exceptions to the permanent ban on imports.

We support the stated goal of limiting imports based on re-export certificates, but again we believe that clear and transparent criteria and procedures, as well as independent oversight, should be the basis of a permanent, regularly reviewed process rather than a response to an arbitrary deadline of seven years.

2. Work with relevant authorities in India, exporting and re-exporting countries, the CITES Secretariat and other stakeholders to address the concerns expressed regarding compliance with CITES and national regulations. For example with regard to concerns about the origin and legality of specimens, source and purpose codes used, and modes of acquisition, including those highlighted in CITES document SC79 Doc.6.3.4[2] and any other cases identified, and support appropriate measures in accordance with the CITES Convention and other applicable rules.

[2] https://cites.org/sites/default/files/documents/E-SC79-06-03-04_1.pdf

3. Define clear criteria for what constitutes a legitimate "rescue". Vantara should establish clear, publicly accessible standards detailing the limited and strictly defined circumstances under which specimens might be acquired. For example, imports characterised as "rescues" should be permitted only under clearly defined circumstances and subject to transparent criteria. We note that, prior to your letter of 19th August, Vantara imported hundreds of wild specimens of primates, birds, and reptiles from commercial entities in both range and non-range states.[3] These imports have cast doubt over the claim that Vantara is operating as a 'rescue facility'. Further, many of these individuals could not feasibly have been either rescued or bred in captivity.

4. Ensure that no payments are made for the acquisition or transfer of animals, whether directly by Vantara or indirectly through donors. We are particularly concerned that the letter characterizes the purchase of animals by "donors" for subsequent transfer to Vantara as "rescues" even though many could not have feasibly been rescued. Rather they involve the acquisition of wild-caught wildlife through commercial channels[4] that incentivize the removal of further animals from the wild. Such removals carry significant risks of cruel and inhumane treatment and associated morbidity and mortality throughout the acquisition process, from capture and transport to importation and subsequently. The purchase of animals, or the 'rescue' of surplus animals from commercial entities, creates financial incentives for commercial breeders to mislabel their exports to justify such transactions, thereby reinforcing existing illegal wildlife trade and trafficking networks and further imperilling wild populations. We propose that Vantara should not make any payments or donations that risk being construed as commercial trade, and maintain complete transparency regarding its payments and donations.

In addition, we note that the CITES Secretariat in SC79 Doc.6.3.4 called for clarification of all cases where invoices exist in relation to the transfer of animals to Greens Zoological Rescue and Rehabilitation Centre (GZRRC) and Radhe Krishna Temple Elephant Welfare Trust (RKTEWT), and where animals originally traded for commercial purposes have been re-exported for non-commercial purposes using code Z. Upholding the highest standards in this regard will prevent any risk of confusion, and set an important precedent for those same high standards to be maintained by others.

5. Provide a public inventory of the animals held at Vantara's facilities. As part of its transparency efforts, Vantara should regularly publish inventories of all animals in its possession. These inventories should detail where and when animals were sourced (including where they were born and the names of exporting or re-exporting facilities or, for those sourced nationally, facilities in India), where they are currently housed, records of transfers to other facilities, births and deaths (including neonatal deaths within 30 days), cause of death, and means of disposal of deceased animals. We strongly encourage Vantara to allow independent experts to undertake a reconciliation of reported wildlife imports against Vantara's current holdings, including species, numbers of individuals, and relevant identifying information.

6. Adopt stringent criteria and due diligence procedures for the transfer of any animals to other facilities, including exports. Criteria should include compliance with all international and national legal requirements; ensuring any transfers are wholly non-commercial in nature (including ensuring no subsequent sale of progeny); ensuring that animals are prepared and shipped to the highest of international standards, and verifying that the receiving facilities are suitably equipped to provide the animals with the highest standards of welfare and care.

Also, we urge Vantara to prevent any animals held in its facilities - including captive-bred specimens belonging to species that are rare or not present in other facilities - from entering trade (commercial or non-commercial), including through exchanges with zoos or other facilities, unless these are part of

[3] CITES Trade Database and customs data

[4] CITES Trade Database and customs data

recognized conservation breeding programs established by independently accredited institutions in response to an established need identified by species conservation actions plans and/or IUCN SSC taxonomic specialist groups, and supported by scientific evidence.

7. Implement a 'no breeding' policy with very limited exceptions. Reputable animal sanctuaries do not breed animals, since it results in additional animals that require captive care, and take up sanctuary space from animals that may be in genuine need. Engagement in captive breeding for conservation purposes should only be considered for species for which there is a specific and identified conservation need for new or additional *ex situ* captive breeding (such as may be identified in a species conservation action plan or by the relevant IUCN SSC taxonomic specialist group). Any such program should be conducted in collaboration with the relevant range States, and in accordance with all relevant international and national regulations and protocols.

Vantara should prioritise support for legitimate *in situ* captive-breeding programs undertaken to address evidence-based conservation needs rather than establishing or supporting breeding programs in locations outside their natural range. Support for such programs should be carried out in collaboration with relevant authorities, partners and experts in the range States in which the captive-bred animals or their offspring are intended to be released. Any proposal to establish an *ex situ* conservation-breeding program, including any such programs already established by Vantara, should be subject to independent scrutiny, peer-review, and transparent justification.

8. Ensure that reputable conservation and animal rescue efforts in range States are strengthened and not undermined. Vantara should provide appropriate support for reputable rescue and rehabilitation facilities that are available within a range State (or facilities that, with support, have the potential to meet appropriate standards). This is because it is preferable to care for and rehabilitate rescued or confiscated animals within their range States. Wildlife is part of a country's natural heritage; retaining and caring for wildlife within its natural range not only supports conservation, but also preserves a sense of national ownership, pride, responsibility, and heritage. Support to range State facilities should preserve the facilities' independence and not be conditioned on or in exchange for a role in the facility operations, governance systems or advisory bodies.

However, a careful approach must be adopted when cooperating with facilities in range States to ensure they are not involved in the trade, sale, laundering or wild sourcing of animals for export. While we welcome the announcement of a future focus on in-country support, we are concerned that without strong safeguards in place, the prospect of funding for alleged rescue or conservation programmes might provide an incentive for the sourcing of animals from the wild, either from illegal sources or from commercial trade, in contravention of Vantara's stated objective to not directly or inadvertently create further demand for the acquisition of wild animals from any source for captive collections.

In addition, Vantara's activities must not undermine or seek to replace or determine the work of conservation organizations, reputable rescue and rehabilitation centers, or legitimate non-commercial conservation breeding and reintroduction programs. Vantara should also recognize the limits of its own experience and expertise in evaluating potential partners in other countries, exercise appropriate caution and due diligence when considering such partnerships and seek the involvement of reputable organisations and individuals in support of their stated objectives.

9. Partnerships should be made public. Vantara should make agreements with governments and other partners publicly available and detail the resources it is providing as part of its memoranda of understanding.

10. Give priority to repatriating animals to range States for rehabilitation and release, where possible and in accordance with IUCN and CITES guidelines, or to the provision of resources

to support their lifetime care in sanctuaries. The possibility of repatriation of animals currently held by Vantara for the purpose of rehabilitation and possible release into the wild, or for transfer to reputable sanctuaries within their natural range offering taxon-specific care, should be carefully considered. However, this should only be done when genuine rehabilitation/release programs are already established, or where sanctuaries have (or can attain, prior to transfer) the necessary capacities to ensure adequate welfare.

Rehabilitation and release projects should adhere to the IUCN guidelines for reintroductions and other conservation translocations, the IUCN Guidelines on Responsible Translocation of Displaced Organisms, and other relevant existing guidelines and protocols.

Reputable sanctuaries might include those accredited by or operating to the standards established by the Global Federation of Animal Sanctuaries (GFAS), Pan African Sanctuary Alliance (PASA), European Alliance of Rescue Centres and Sanctuaries (EARS), Orangutan Veterinary Advisory Group (OVAG) or Wild Animal Rescue Network (WARN Asia).

Repatriation should only be considered when it is in the best interest of the animal(s) concerned and should be limited to instances where high standards of welfare and rehabilitation *in situ* can be assured, and where there is both financial and technical capacity to provide suitable lifetime care, or, where feasible, to include the individual as part of a well-planned and monitored conservation translocation programme.

11. Provide transparent clarification as to what kind of "international accreditation and benchmarking" Vantara is aiming to pursue. It is unclear from which entities accreditation is being sought, or against which criteria benchmarking is being pursued. If Vantara genuinely wishes to operate its facilities in India as sanctuaries, it should aspire to meet established international wildlife sanctuary standards (for example, those established by the Global Federation of Animal Sanctuaries). Should Vantara wish to participate in established conservation breeding programmes, simply self-identifying as a sanctuary is insufficient and inappropriate.

12. Guarantee high-quality lifetime care for individual animals held by Vantara. Provide information on the institutional mechanisms in place to ensure that Vantara's commitments to the animals it currently holds are long-term, enduring, and will survive changes in organizational priorities, leadership, ownership, or funding. These mechanisms should take into account taxon-specific requirements for housing, social structure, and social integration needs over both the short and long term. Given the scale of Vantara's acquisitions to date, any disruption or diminution in the commitment or capacity to provide appropriate care could have catastrophic consequences for the welfare of tens of thousands of animals.

13. Ensure independent oversight. Regarding Vantara's proposed internal due diligence procedures (encompassing a Due Diligence Committee, an Advisory Board, and a Governing Council), Vantara states that its goal is to build confidence by subjecting its operations to review by independent experts. However, it is our understanding that panel members may be compensated by Vantara and are appointed and subject to dismissal by Vantara, while also advising on and developing its internal procedures. Without full disclosure, this raises questions as to their independence and the potential for conflicts of interest. Governing council members, advisers, consultants, and senior personnel should disclose financial, familial, professional, and political relationships that could create actual or perceived conflicts of interest.

In addition, the mandate and terms of reference for the Governing Council, Due Diligence Committee and Advisory Board should be published. Given that Vantara may possess substantially greater financial, legal, professional, and political resources than the organizations, researchers, or

institutions that are scrutinising its activities, it is vitally important that its institutional arrangements are demonstrably and transparently robust and independent.

In addition, Vantara should ensure that, going forwards, none of its staff or leadership employ (or have employed) inappropriate or unethical means to acquire animals, or seek to intimidate, suppress, or undermine legitimate civil-society scrutiny.

14. Ensure protections for civil society. We appreciate Vantara's stated commitment to address any additional concerns or complaints. To support this commitment, Vantara should establish mechanisms to encourage and embrace assessment by, and constructive dialogue with, civil society. NGOs, researchers, journalists, whistleblowers, and concerned citizens should be able to raise issues and provide recommendations in good faith, without facing legal or institutional pressure.

At a time when wildlife trade interests are often well-financed and well-connected, and when legal and regulatory measures are underfunded and can be too slow to adequately enforce measures to protect species from the impact of escalating trade pressure, institutions with substantial resources and influence should support efforts to protect wildlife in its natural habitats, rather than incentivise further exploitation.

There is now a choice to be made between, on the one hand, the continued exploitation and commodification of wildlife, or, on the other, a substantial and concerted effort to reduce pressure on wild populations, safeguard and protect individual animal welfare, and support conservation *in situ*.

Based on the letter of 19th August, we hope that Vantara will take that responsibility seriously and demonstrate through its actions - not simply its stated intentions - that it is prepared to work with the long-established conservation and animal protection movement to make a meaningful contribution to the future of wildlife in the wild.

Sincerely,

Animal Welfare Institute

Asociación Rescate y Conservación de Vida Silvestre (ARCAS)

Born Free Foundation

David Shepherd Wildlife Foundation

Eagle Network

Ecoflix Foundation

EMS Foundation

Eurogroup for Animals

Four Paws International

Fondation 30 Millions d'Amis

Fondation Brigitte Bardot

Fondation Franz Weber

Freeland-Brasil

Jane Goodall institute Global (JGIG)

Last Great Ape Organisation (LAGA)

Liberia Chimpanzee Rescue & Protection

Orangutan Information Centre

Pan African Sanctuary Alliance (PASA)

Pro Wildlife

Rede Nacional de Combate ao Tráfico de Animais Silvestres (RENCTAS)

SAFE Worldwide

Species Survival Network (SSN)

Ulinzi Africa Foundation

Wildlife Impact

Wildlife Animal Protection Forum South Africa (WAPFSA)

Working for the Wild

World Parrot Trust

cc. Mr. Vivaan Karani, CEO of Vantara; Mr. John E. Scanlon AO, Vantara Governing Council Chair; Ms. Ivonne Higuero, CITES Secretary-General; Ms. Sofie H. Flensborg, CITES Legal Unit Chief; Mr. Ben Janse van Rensburg, CITES Enforcement Unit Chief