

# AN INVESTIGATION INTO THE ILLEGAL TRADE IN BEAR PRODUCTS IN SINGAPORE





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# **AN INVESTIGATION INTO THE ILLEGAL TRADE IN BEAR PRODUCTS IN SINGAPORE**

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by the  
**ANIMAL CONCERNS RESEARCH AND EDUCATION SOCIETY (ACRES)**

supported by  
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The Animal Concerns Research and Education Society (Acres) is a local charity, founded in 2001 by Singaporeans. Acres aims to:

- Foster respect and compassion for all animals.
- Improve the living conditions and welfare of animals in captivity.
- Educate people on lifestyle choices which do not involve the abuse of animals and which are environment-friendly.

Our approach is **Scientific, Creative, Practical and Positive.**



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## CONTENTS PAGE

<b>EXECUTIVE SUMMARY.....</b>	<b>1</b>
<b>INTRODUCTION.....</b>	<b>3</b>
<b>TRADITIONAL CHINESE MEDICINE (TCM) IN SINGAPORE.....</b>	<b>4</b>
<b>BEAR BILE AND TCM.....</b>	<b>5</b>
<b>BEAR FARMING AND ANIMAL WELFARE.....</b>	<b>7</b>
<b>BEAR FARMS AND CONSERVATION.....</b>	<b>9</b>
<b>CURRENT RESTRICTIONS ON INTERNATIONAL TRADE: CITES.....</b>	<b>11</b>
CITES Resolution Conf. 10.8 (Rev. COP12)*_ Conservation of and trade in bears.....	11
<b>THE REGULATORY FRAMEWORK IN SINGAPORE.....</b>	<b>14</b>
Endangered Species (Import And Export) Act 2006.....	14
No permits issued locally to date.....	15
<b>ACRES INVESTIGATION METHODOLOGY.....</b>	<b>16</b>
Design.....	16
Reliability.....	16
Sample.....	16
Definitions and parameters.....	17
<b>RESULTS OF INVESTIGATION.....</b>	<b>18</b>
Prevalence of bear products.....	18
Price range of bear products.....	18
Claimed origin of bear bile on sale.....	18
Claimed origin of bear gall bladder on sale.....	19

<b>DISCUSSION.....</b>	<b>20</b>
Overall.....	20
Source country.....	21
Recognition of illegality of trade by shopkeepers.....	21
Recognition of the cruelty involved in farming bears.....	23
Misleading the public: license to sell bear products.....	23
Demand for bear products in Singapore.....	24
Origin of bears.....	24
Ease of ordering and importing bear products.....	25
<b>SUBSTITUTES FOR BEAR BILE.....</b>	<b>26</b>
<b>CONCLUSION AND RECOMMENDATIONS.....</b>	<b>30</b>
<b>REFERENCE LIST.....</b>	<b>32</b>
<b>APPENDIX I: QUESTIONNAIRE.....</b>	<b>34</b>

## EXECUTIVE SUMMARY

1. East Asia, along with Singapore, has been considered as the centre of the world's demand for bear gall bladders as medicine.
2. The practice of bile farming is inhumane on the grounds that it severely and unavoidably compromises the physical and psychological health of bears on bear farms.
3. Due to significant illegal trade, CITES Resolution Conference 10.8 'Conservation of and trade in bear specimens' was passed in 1997, which noted "that the continued illegal trade in parts and derivatives of bear species undermines the effectiveness of the Convention and that if CITES Parties and States not-party do not take action to eliminate such trade, poaching may cause declines of wild bears that could lead to the extirpation of certain populations or even species."
4. Under Singapore's Endangered Species (Import And Export) Act 2006, any person who has in his possession or under his control, or who sells, offers or exposes or advertises for sale, or displays to the public any scheduled species which has been imported or introduced from the sea in contravention of subsection (1) shall be guilty of an offence and shall be liable on conviction to a fine not exceeding \$50,000 for each such scheduled species (but not to exceed in the aggregate \$500,000) or to imprisonment for a term not exceeding 2 years or to both.
5. **Anyone who advertises for sale any bear products contravenes the above Act, even if the products turn out to be not authentic. By making a claim that the product is from bears, the dealer is potentially driving up the demand for bear products which directly contravenes the spirit of CITES and the local legislation meant to enforce CITES.**
6. In 2001, Acres carried out an undercover investigation into the illegal bear products trade in Singapore. 50 out of the 68 shops surveyed were found offering bear products for sale.

7. The 2006 investigation was undertaken to determine the current prevalence of the illegal trade in bear products in Singapore. **Out of a total of 115 TCM shops investigated, 23 (20.0%) were found offering bear products for sale.**
8. China was reported by the shopkeepers to be the most common source of imported bear products.
9. 5 shopkeepers admitted that the trade in bear products is illegal. 2 shopkeepers recognised that farming bears was very cruel.
10. 8 shopkeepers mentioned that bears are protected species.
11. 4 shopkeepers stated that they have the required license to sell bear products. 1 of the shopkeepers pointed out that the license was obtained from the Ministry of Health.
12. 1 shopkeeper revealed that she had sold a lot of bear products and that she had been selling them for a long time. Another shopkeeper mentioned that there was demand for bear products in Singapore. 1 shopkeeper stated that he had regular buyers for the bear products.
13. 6 shopkeepers mentioned that the bear products were from wild bears.
14. 5 shopkeepers said they were able to order more bear products when asked by the investigator.
15. There is clearly no need for bear bile in TCM since there are over 50 different herbal alternatives to bear bile. The use of bear bile is also against the general principle of TCM which emphasizes the balance between human beings and nature.
16. It was encouraging that 1 shopkeeper recommended herbal alternatives instead of bear products. Acres urges the local TCM community to promote the use of herbal alternatives and to end the use of bears and other endangered animals in TCM.

## INTRODUCTION

This report is based on a study into the illegal bear products trade in Singapore conducted by undercover investigators from the Animal Concerns Research and Education Society (Acres) between May 2006 and October 2006.

Previously, in 2001, Acres carried out a similar undercover investigation into the illegal bear products trade in Singapore. The investigation found 50 out of the 68 Chinese medicine shops surveyed in Singapore selling bear gall bladders and bear bile.<sup>1</sup>



**A bear in a Vietnamese bear farm. © WSPA**

The 2001 investigation was initiated in response to findings of an investigation (1999 to 2000) by the World Society for the Protection of Animals (WSPA) into bear farms in China. WSPA investigators visited 11 farms which held approximately one-third (2,250 bears) of the total captive bear population in China (about 7,000 bears) at that time. During the investigation, some bear farms reported that they were illegally exporting their products to countries such as Singapore, Japan, Taiwan, Philippines and Korea.

East Asia, along with Singapore, has been considered as the centre of the world's demand for bear gall bladders as medicine.<sup>2</sup>

5 years have passed since the 2001 investigation by Acres, and this 2006 investigation was undertaken to determine the current prevalence of the illegal trade in bear products in Singapore.

## TRADITIONAL CHINESE MEDICINE IN SINGAPORE

Traditional Chinese Medicine (TCM) has more than 5,000 years of history. It is seen as part of Singapore's heritage and Chinese culture.<sup>3</sup> A report in 2001 stated that "about 45% of the population had consulted a TCM practitioner in the past and about 12% of daily outpatient attendance opt to see TCM practitioners here (in Singapore)."<sup>4</sup>

TCM, already making inroads into the health care system in Singapore, is set to gain an even stronger foothold.<sup>5</sup> In 2007, Singapore will host the fourth World TCM congress, the first time it is doing so.<sup>5</sup> As a sign of the growing legitimacy of TCM, hospitals, medical centres and organisations in Singapore have begun opening TCM wings to complement the practice of Western medicine.<sup>5</sup>

## BEAR BILE AND TCM

The use of bear parts in Chinese medicines dates back over 3,000 years.<sup>6</sup>

For the purpose of TCM, the bear is a walking drugstore.<sup>2</sup> While many parts of the bear have been used in TCM, the most prized part is the bile within the gall bladder. Gram for gram, some of the prices commanded for bear gall bladders in Asia have exceeded the cost of narcotics.<sup>2</sup>

Traditionally, bears were hunted and killed in order to obtain the gall bladder for medicinal use. However, since the 1980s, bile has been extracted from live bears kept on bear farms.<sup>6</sup> In China, one of the main producers of bear bile, originally there were many small farms. However, there has been a consolidation of the industry and the number of farms has been reduced, with fewer farms holding more bears. As of 2006, there are 68 farms with an estimated 7,000 bears compared to 247 farms holding 7,002 bears in 2005.<sup>7</sup>



A bear in a Vietnamese bear farm. © WSPA

China official figures indicate that the country's bear farms produce some 3,000 kg of surplus bile each year.<sup>7</sup> This indicates that there is significant stockpile of the product. Export of bear bile is, however, illegal under CITES, which China is party to.

Bear gall bladders and bile products are used to treat a range of complaints such as fever, haemorrhoids, conjunctivitis and liver diseases.<sup>8</sup> It has been proven that ursodeoxycholic acid (UDCA), the active ingredient in bear bile, can be successfully used to treat certain liver problems and the dissolution of gallstones.<sup>8</sup>

Powdered gall bladder and bile are also used as ingredients in teas, wines and tonics and in items such as shampoos and throat lozenges.<sup>8</sup>

It should be noted that the use of bear bile is against the general principle of TCM that emphasizes the balance between human beings and nature.<sup>9</sup>

## BEAR FARMING AND ANIMAL WELFARE (ANIMALS ASIA FOUNDATION)<sup>7</sup>

The practice of bile farming is inhumane on the grounds that it severely and unavoidably compromises the physical and psychological health of wild-caught and captive-bred bears on bear farms.

Bears on bile farms are deprived of food, water and movement; suffer chronic pain, illness, and abuse; and live with a catheter or hole in their abdomen or have their gall bladders repeatedly punctured.



**Pitiful living conditions for farmed bears. © AAF**

Chinese regulations state that bears are to be given space to move about at all times, except for brief periods every day when they are in cages for bile extraction. Inspection of the outdoor enclosures on farms reveals, however, that they are rarely, if ever, utilised, and that many bears spend their entire lives in the ‘extraction cages’ and are never let out.

The only method for bile extraction that currently meets regulation is the so-called ‘free-dripping’ method. This method was first detailed by China CITES representative, Dr. Fan Zhiyong, at TRAFFIC’s symposium in October 1999. Dr. Fan maintained: “A new technique to make fistula for bears was developed by technicians in 1989, under which bears many not suffer from the use of rubber tubes any more because the fistula is made of materials taken from their own bodies. The opening of the gall bladder fistula is similar to the anus and can be blocked by muscle contraction.”

This statement epitomises the ongoing deceit of the farmers who invent new methods of bile extraction in an attempt to convince

the government that bear farming is humane. It also demonstrates a lack of medical understanding and the violation of ethical principles necessary to maintain the bear farming industry. More importantly, it goes against what bear farmers experience, namely that fistulas constantly develop infections and become plugged by tissue trying to heal the wound.



**A bear farm in China. © WSPA**

One of the many problems with the free-dripping fistula technique is that the opening continually tries to heal over, which makes it difficult for the farmer to extract bile. To prevent this problem, while circumventing the regulations, farmers insert a short Perspex catheter into the free-drip hole and gall bladder and cut the tube flush with the surface of the abdomen just beneath the skin. Unless the bears with this method of fistulation are closely inspected, the clear plastic catheter is all but invisible and the hole in the bear's abdomen looks like a regulation free-dripping fistula.

The manufacture of no other products consumed by humankind requires an animal to undergo major surgery, and then to live with permanent open wounds from that surgery, let alone under conditions of such cruelty as are found in bear bile farms.

Animal Asia Foundation's research establishes that modern methods of bile extraction clearly cause pain and suffering, and that husbandry practices on bear farms continue to violate every principle of humane care of animals.

## BEAR FARMS AND CONSERVATION

China has argued that bear farming is able to reduce the poaching of China's Appendix I bears. Officials of China's Management Authority and the State Administration for Traditional Chinese Medicine have termed bear farming as a conservation success (Qing Jian Hua, Deputy Director, The People's Republic of China Endangered Species of Wild Fauna and Flora Import and Export Office, pers. Comm. to TRAFFIC East Asia, 1996; Chen Heng, Director, Department of Circulation and Production, State Administration for Traditional Chinese Medicine, pers. Comm. to TRAFFIC East Asia, 1996).

However, there is a lack of high-quality scientific data about wild bear populations in Asia.<sup>7</sup> The Chinese Government first adopted the Korean practice of bear bile farming in the 1980s with the argument that it would protect wild Asiatic black bears by satisfying the market



**Bears are still taken from the wild to stock the bear farms.**

© WSPA

for bile with farmed products.<sup>7</sup> However, the lack of reliable data on the population or distribution of Asiatic black bears in China make it difficult to evaluate whether bear farming meets the goal of preserving wild populations.<sup>7</sup>

Population estimates reported in the past have suffered from inadequate methodology and great variations in results, and have therefore been unreliable.<sup>7</sup> As Dr. David Garshelis, Co-chair of the IUCN Bear Specialist Group, noted in a letter to the China Daily: "The truth is that we do not know whether bear farming saves any wild bears. We know that huge surpluses of farmed bile are produced; yet we also know that poaching of wild bears continues

because wild bile is more valuable than farmed bile. The truth is that nobody knows how many wild bears live in China, nor how many are being poached every year.”<sup>7</sup>

The reality is that, despite the presence of farmed bear bile, the gall from a wild bear is seen as more potent in TCM, and is worth considerably more.

Mills et al., (1995) reports that some Asian consumers believe bile from wild bears is superior to that from farmed bears.<sup>2</sup> Furthermore, bear farms have a high mortality rate. Thus, the poaching of bears in countries such as China, Vietnam, Myanmar, Laos, India and Thailand continues. All the farms surveyed in WSPA’s investigation (2000) admitted to supplementing captive populations in China’s bear farms with wild-caught bears.<sup>10</sup>

## **CURRENT RESTRICTIONS ON INTERNATIONAL TRADE: CITES**

The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) is an international agreement to ensure that trade does not threaten wildlife species with extinction.

The international trade in bear species is regulated by CITES, which Singapore is party to.

All 8 bear species are listed on the Appendices of CITES. The majority of species are listed on Appendix I of CITES, meaning no commercial trade is allowed: Asiatic black bear; Malayan sun bear; Sloth bear; Spectacled bear; and Brown bear (populations in China, Butan, Mongolia and Mexico).

None of China's bear farms are registered with the CITES Secretariat. This is required if Appendix I bears, bear parts or bear derivatives originating from such captive breeding facilities are to be traded internationally for commercial purposes. This trade would also require relevant permits.

Chinese bear parts or derivatives have been found outside of China.<sup>10</sup> This means they would have been illegally exported from China and illegally imported into the consuming country. This is in violation of CITES, as well as the national legislation of CITES Parties.

### **CITES Resolution Conf. 10.8 (Rev. CoP12) Conservation of and trade in bears<sup>11</sup>**

Due to significant illegal trade, Resolution Conference 10.8 'Conservation of and trade in bear specimens' was passed which noted "that the continued illegal trade in parts and derivatives of bear species undermines the effectiveness of the Convention and that if CITES Parties and States not-party do not take action to eliminate such trade, poaching may cause declines of wild bears

that could lead to the extirpation of certain populations or even species”

#### The Conference of the Parties to the Convention

URGES all Parties, particularly bear range and consuming countries, to take immediate action in order to demonstrably reduce the illegal trade in bear parts and derivatives by:

- a) confirming, adopting or improving their national legislation to control the import and export of bear parts and derivatives, ensuring that the penalties for violations are sufficient to deter illegal trade.
- b) increasing CITES enforcement by providing additional resources, nationally and internationally, for wildlife trade controls;
- c) strengthening measures to control illegal export as well as import of bear parts and derivatives;
- d) initiating or encouraging new national efforts in key producer and consumer countries to identify, target and eliminate illegal markets;
- e) developing international training programmes on enforcement of wildlife laws for field personnel, with a specific focus on bear parts and derivatives, and exchanging field techniques and intelligence;
- f) developing bilateral and regional agreements for conservation and law enforcement efforts; and
- g) sharing forensic technology to assist Parties lacking sufficient capabilities for the identification of bear parts and derivatives, and for examination of products labelled as containing parts and derivatives of bears;

RECOMMENDS further that Parties and States not-party, as a matter of urgency, address the issue of illegal trade in bear parts and derivatives by:

- a) strengthening dialogue between government agencies, industry, consumer groups and conservation organizations to ensure that legal trade does not provide a conduit for illegal

- trade in parts and derivatives of Appendix-I bears and to increase public awareness of CITES trade controls;
- b) encouraging bear range and consumer countries that are not party to CITES to accede to the Convention as a matter of urgency;
  - c) providing funds for research on the status of endangered bears, especially Asian species;
  - d) working with traditional-medicine communities to reduce demand for bear parts and derivatives, including the active promotion of research on and use of alternatives and substitutes that do not endanger other wild species; and
  - e) developing programmes in cooperation with traditional-medicine communities and conservation organizations to increase public awareness and industry knowledge about the conservation concerns associated with the trade in bear specimens and the need for stronger domestic trade controls and conservation measures.

## THE REGULATORY FRAMEWORK IN SINGAPORE

### Endangered Species (Import and Export) Act 2006

The Endangered Species (Import and Export) Act 2006 of Singapore is the national legislation that gives effect to CITES controls on import and export of wildlife and wildlife products.

The relevant section for the purpose of this study is:

#### **Section 4 - Restriction on import, export, etc., of scheduled species**

- (1) Any person who imports, exports, re-exports or introduces from the sea any scheduled species without a permit shall be guilty of an offence and shall be liable on conviction to a fine not exceeding \$50,000 for each such scheduled species (but not to exceed in the aggregate \$500,000) or to imprisonment for a term not exceeding 2 years or to both.
- (2) Any person who has in his possession or under his control, or who sells, offers or exposes or advertises for sale, or displays to the public any scheduled species which has been imported or introduced from the sea in contravention of subsection (1) shall be guilty of an offence and shall be liable on conviction to a fine not exceeding \$50,000 for each such scheduled species (but not to exceed in the aggregate \$500,000) or to imprisonment for a term not exceeding 2 years or to both.
- (3) Any person who sells, offers or exposes or advertises for sale, or displays to the public such scheduled species as the Minister may, by notification in the *Gazette*, specify shall be guilty of an offence and shall be liable on conviction to a fine not exceeding \$10,000 for each such scheduled species (but not to exceed in the aggregate \$100,000) or to imprisonment for a term not exceeding 12 months or to both.

“Ursidae” (or large bears) is listed in the Schedule.

The provisions of this Act can apply to products and derivatives as well.

It should be noted that anyone who advertises for sale any bear products contravenes this Act, even if the products turn out to be not authentic. By making a claim that the product is from bears, the dealer is potentially driving up the demand for bear products which directly contravenes the spirit of CITES and the local legislation meant to enforce CITES.

**Section 2 (Interpretation) of the Endangered Species (Import and export) Act 2006 defines “advertise” as follows:**

“Advertise”, in relation to a scheduled species, means to describe, make reference to or allude in any way, by any means or in any form, to that scheduled species –

- (a) whether directly or indirectly;
- (b) whether orally, in writing in any language, diagrammatically, pictorially, by the use of symbols or photographs, or in any combination thereof; and
- (c) whether by the common name or the scientific name of that scheduled species or otherwise;

### **No permits issued locally to date**

The CITES Section of the Agri-Food and Veterinary Authority of Singapore has not issued permits for the import of bear gall bladders or bear products for primarily commercial purposes.

## ACRES INVESTIGATION METHODOLOGY

### Design

5 undercover investigators, who worked in pairs, asked TCM shopkeepers whether they sold bear products. If asked what the products were for, the investigators stated that it was for the treatment of liver disease.

### Reliability

The study aimed to be scientifically reliable through the use of one standardised set of questions to guide the researchers in their interviews (Appendix I). However, as is the case with certain sample groups, it was not always possible to ask all questions and sometimes it was possible to obtain more information, depending on how forthcoming with information the respondents were.

### Sample

115 TCM shops with significant geographical spread were randomly selected from the Yellow Pages directory. The shops were located in the following areas:

- Ang Mo Kio
- Bedok
- Bukit Merah
- Chinatown
- Hougang
- Jurong East
- Little India
- Pasir Ris
- Tampines
- Yishun

## Definitions and parameters

1. When the terms “bear products”, “bear bile pills”, “bear bile sachets”, “bear bile powder” and “bear gall bladders” are referred to in this report, they are based on the claims of the shopkeepers and taken to be authentic. It was not within the scope of the study to verify the authenticity of the products.
2. When a shop is categorised as selling bear products it refers to a shop whose shopkeeper(s) had products or said they stocked products which they purported as being from bears.
3. The term “shopkeeper” is used to mean any person who served the investigators at the shop.

## RESULTS OF INVESTIGATION

### Prevalence of bear products

Of the 115 shops investigated, 23 shops (20.0%) were found offering bear products for sale (all recorded on video). 11 shops offered bear bile pills (or capsules) only, 8 shops offered both bear bile pills and bear gall bladders, 1 shop offered gall bladders and bear bile sachets, 2 shops offered bear bile sachets only and 1 shop offered bear bile powder only.

### Price range of bear products

Price range per bear bile pill (or capsule): S\$1 - S\$10.

Price range per gall bladder: S\$10 - S\$4,000.

Price range per box of bear bile sachets: S\$100 - S\$380.

Price of bear bile powder: S\$20.

### Claimed origin of bear bile pills (or capsules) on sale

Country	No. of shops	%
China	13	68.4
Indonesia	1	5.3
Malaysia	1	5.3
Russia	1	5.3
Thailand	1	5.3
Unknown	2	10.5

**Claimed origin of bear gall bladder on sale**

Country	No. of shops	%
China	3	33.3
Indonesia	1	11.1
Russia	1	11.1
Thailand	1	11.1
Neighbouring countries	1	11.1
India/China	1	11.1
Unknown	1	11.1

**Claimed origin of bear bile sachets on sale**

Country	No. of shops	%
China	1	33.3
North Korea	2	66.7

**Claimed origin of bear bile powder on sale**

Country	No. of shops	%
China	1	100.0

## DISCUSSION

### Overall

It is positive to note that the percentage of shops found offering bear products for sale in Singapore has dropped significantly from 73.5% of shops surveyed in 2001 to 20.0% of shops surveyed in 2006.

However, the fact that 1 in 5 shops surveyed offered bear products continues to raise serious concerns.



**A shopkeeper offering bear bile capsules for sale.**

© Acres

This continued illegal trade in bear parts clearly goes against the spirit of CITES and also tarnishes Singapore reputation as being a premier TCM centre in the region.

This continued trade creates a demand for bear products and fuels the continued exploitation of bears held in deplorable conditions on bear farms. It is also detrimental to wild populations of bears, especially in Asia. CITES Resolution Conf. 10.8 has stated that if CITES Parties and States not-party do not take action to eliminate such trade, poaching may cause declines of wild bears that could lead to the extirpation of certain populations or even species.

There is undoubtedly an urgent need to tighten our border controls to prevent the continued smuggling of these products into Singapore. There is also a need to prosecute traders and shopkeepers who continue to sell these products. A deterrent sentence should be meted out to send a strong message that Singapore does not tolerate the illegal trading of bear products.

It should be noted that anyone who advertises for sale any bear product(s) contravenes the Endangered Species (Import and Export) Act 2006, even if the product(s) turns out to be not authentic. By making a claim that the product is from bears, the dealer is potentially driving up the demand for bear products which directly contravenes the spirit of CITES and the local legislation meant to enforce CITES.

### Source country

Singapore has no wild bears to be poached or bear farms. Thus, bear product(s) offered locally must have been illegally imported.

The investigation revealed that China was reported by the shopkeepers to be the most common source of imported bear products.

This is similar to findings of the investigation conducted in 2001.

### Recognition of illegality of trade by shopkeepers

At least 19 shops (82.6%) did not openly display the bear products. They were usually kept behind counters or within other parts of the shop not in view of the public. Thus, customers usually had no direct access to these products unless assistance from the shopkeepers was requested.



**A shopkeeper offering a bear gall bladder for sale.**

© Acres

The fact that these bear products were hidden from public view may indicate that shopkeepers know that it is illegal to sell them.

5 shopkeepers admitted to the investigators that the trade in bear products is indeed illegal.

1 shopkeeper said: “This (bear bile) cannot be sold like this, selling it like this now is wrong.”

Another shopkeeper said: “Bear bile is completely not allowed for sale... I cannot sell this...it is completely not allowed to sell this (bear bile) in Singapore. I only sell to regular customers...we brought this in (into Singapore). The Singapore Government does not approve selling...just for a gall bladder, you kill a bear. This is to protect animals, not allowed to kill bears... We cannot give you a receipt and you cannot say you bought it from here.”

The following was recorded in another conversation with a different shopkeeper selling bear products:

Shopkeeper: “Cannot import from China, bear bile is illegal.”

Investigator: “When did this happen?”

Shopkeeper: “For very long time. China does not permit, 1 bear bile can be sentenced 3 years jail and canning.... If we are not familiar with you, not possible to sell (bear bile from China) to you... it is illegal... if we sell to you and you report it to government, my boss has to go to jail for 5 years.”

8 shopkeepers mentioned that bears are protected species.

One shopkeeper said: “Bears are protected animals. It is very hard to find them (in the wild) nowadays.”

One conversation with another shopkeeper selling bear products revealed the following:

Shopkeeper: “Bears are protected animals, very hard to find.”

Investigator: “How long has it been?”

Shopkeeper: “It has been a long time ago...These (bear bile capsule) are real ones, are leftover stock. Now it is actually illegal to sell. We can’t possibly throw away the leftovers, so we just sell to finish the stock.”

## **Recognition of the cruelty involved in farming bears**

2 shopkeepers recognised that farming bears is very cruel.

1 shopkeeper obviously acknowledged the cruelty and stated: “Can find in China in Ha Er Bin, they keep the bears in cages, insert needles in their liver to extract (bile)..., not supposed to do this to protected animals...It is very cruel, their lifespan is not so good, bears may have health problems.”

Another shopkeeper said: “It is very cruel in China how they extract (the bile).”

## **Misleading the public: license to sell bear products**

4 shopkeepers stated that they have the required license to sell bear products. 1 of the shopkeepers pointed out that the license was obtained from the Ministry of Health. Another shopkeeper mentioned that shops needed to obtain a license from the Ministry of Health before the shop can sell bear products.

When asked by an investigator if the bear products on sale were approved by the government, 1 shopkeeper replied:

“Got Ministry of Health license, because this kind of bear bile belongs to protected animals.”

Another shopkeeper said: “Can’t get bear bile in Singapore, can only sell under the table, can’t sell like that, must have permit from the Singapore Government, then can sell. This one (bear product) is approved.”

He further elaborated that: “What you bought previously (bear products) was sold under the table and not approved by the Ministry of Health. Nowadays the medicines must be approved by the Ministry of Health before you can sell, this is the way to do it.”

A different shopkeeper said: “This (the bear product he was selling) is from Korea, it is approved but export from China is not allowed....

This whole gall bladder is from Russia. For this, we have the certificate from Singapore.”

Another shopkeeper mentioned: “This one (bear gall bladder) is real. To open a shop, we need a license. All people selling this have license. No license you cannot sell because bears are now protected...we can openly display because we have a license. If you have no license, they close your shop.”

These statements are entirely false. Currently, the commercial trade and sale of bear products in Singapore is illegal.

Another shopkeeper told investigators that one could export bear products from Singapore, but could not import them into Singapore. This is potentially misleading customers who may unknowingly commit a crime based on advice from this particular TCM shop.

### **Demand for bear products in Singapore**

1 shopkeeper revealed that she had sold a lot of bear products and that she had been selling them for a long time. Another shopkeeper mentioned that there was demand for bear products in Singapore.

1 shopkeeper stated that he had regular buyers for the bear products. 3 shopkeepers told investigators that they still had stocks of bear products.

### **Origin of bears**

During this investigation, 6 shopkeepers mentioned that the bear products were from wild bears. One shopkeeper said: “Most of them are wild... they have a license to kill a number of bears each year.”

## **Ease of ordering and importing bear products**

The apparent ease with which these products are being illegally imported into Singapore raises serious concerns. 1 shopkeeper mentioned that they import the bear products themselves and 5 shopkeepers claimed that it was local wholesalers who imported the bear products. 1 shopkeeper revealed that the local wholesaler directly imported the bear products from China.

5 shopkeepers said they were able to order more bear products when asked by the investigator. One shopkeeper mentioned that he could order and get more bear products within a week.

Another shopkeeper said: “If you want a lot, you must order, you can get the stock immediately or within 2 to 5 days from China.”

## SUBSTITUTES FOR BEAR BILE

Many Traditional Medicine Practitioners have stated that the use of bear bile is unnecessary and that many alternative remedies exist. Alternative therapies, including herbal medicine and acupuncture, have been found to be equally or more effective depending on the condition being treated.<sup>9</sup> Synthetic UDCA is also now commercially available to replace natural bear bile.<sup>9</sup>

Below are a number of statements, gathered by Animals Asia Foundation, from people who believe that bear bile has no place in modern Traditional Medicine.

“Herbal alternatives have the same effect - so why kill the animals?”

- Dr. Ho Ka Cheong  
President Hong Kong Chinese Herbalist Association Ltd.

“There are many hundreds of ingredients in our Pharmacopoeia, and whatever beneficial effect may be achieved by using endangered species, there are equally beneficial effects by using other alternatives. Please understand that we are in the business of healing people, not in the business of causing danger to wild animal species.”

- Word-Fei Cheung  
Assistant Manager to the Institute of Chinese Medicine, China.

“One of the main reasons why I have, all along, participated in the work of protecting endangered animals is to make the public understand that the majority of Chinese medicine made from endangered animals is not indispensable. We can easily replace them with herbal medicines, which are cheaper and easier to find. If Chinese medicine community ceases to use endangered animals as medicine, it can not only join in helping save endangered species from extinction, but can also raise the international reputation of Chinese medicine to that of a sophisticated branch of medicine.”

- Dr. Lo Yan Wo  
Chinese Association of Medicine and Philosophy, Hong Kong.

“On behalf of the Association of Traditional Chinese Medicine (UK), the largest Traditional Chinese Medicine organization in Britain, I would like to take this opportunity to publicly state that ATCM strictly condemn and prohibit the use of bear bile by TCM practitioners in treatment regardless of illness. This is based on grounds that we believe the process of extracting bear bile to be inhumane and therefore unethical, especially it is against the general principle and Law of Traditional Chinese Medicine i.e. emphasis on keeping the balance between mankind and nature. There is no need for stretching to such an extreme measure to obtain a purely exotic sounding substance from an already endangered species, when there are countless other available alternatives.”

- Dr. Jidong Wu  
President of the Association of Traditional Chinese Medicine (UK) Middlesex University.

With the help of Traditional Medicine Practitioners in the United Kingdom, WSPA has identified 4 main actions and indications of bear bile. Though not exhaustive, they are:

- Clearing heat and detoxifying.
- Clearing liver fire.
- Brightening eyesight through the liver.
- Brightening eyesight and clearing away liver fire.

Using the information above, WSPA has identified herbs that have one or more of the same actions or indications as bear bile:<sup>12</sup>

#### Clearing heat and detoxifying

Chinese pin yin	Pharmaceutical name
Ban Bian Lian	Herba Lobeliae Chinensis
Bai Hua She She Cao	Herba Hedyotidis Diffusae
Bai Jiang Cao	Herba Patriniae
Bai Tou Weng	Radix Pulsatillae
Bai Xian Pi	Cortex Dictammi
Chuan Xin Lian	Herba Andrographitis

Chui Pen Cao	Herba Sedi
Da Qing Ye	Folium Isatidis
Hong Teng	Caulis Sargentodoxae
Jin Yin Hua	Flos Lonicerae
Lain Qiao	Fructus Forsythiae
Ma Bo	Lasiosphaera seu Calvatia
Ma Chi Xian	Herba Portulacae
Pu Gong Ying	Herba Taraxaci
Qing Dai	Indigo Naturalis
Qin Pi	Cortex Fraxini
Shan Dou Gen	Radix Sophorae Subprostratae
She Gan	Rhizoma Belamcandae
Yu Xing Cao	Herba Houttuyniae
Zao Xiu or Chonglou	Rhizoma Paridis
Zi Hua Di Ding	Herba Violae

#### Clearing liver fire

Chinese pin yin	Pharmaceutical name
Long Dan Cao	Radix Gentianae
Lu Hui	Aloe
Zao Xiu or Chonglou	Rhizoma Paridis
Zi Hua Di Ding	Herba Violae

#### Brightening eyesight through the liver

Chinese pin yin	Pharmaceutical name
Sha Yuan Zi	Semen Astragali
Gou Qi Zi	Fructus Lycii
Nu Zhen Zi	Fructus Ligustri Lucidi
Shi Hu	Herba Denbrobii

### Brightening eyesight and clearing away liver fire

Chinese pin yin	Pharmaceutical name
Che Qian Zi	Semen Plantaginis
Gou Qi Zi	Fructus Lycii
Gu Jing Cao	Flos Eriocauli
Jue Ming Zi	Semen Cassiae
Ju Hua	Flos Chrysanthemi
Man Jing Zo	Fructus viticis
Mi Meng Hua	Flos Beddlejae
Mu Zei	Herba Equiseti Hiemalis
Nu Zhen Zi	Fructus Ligustri Lucidi
Qin Pi	Cortex Fraxini
Qing Xiang Zi	Semen Selsosiae
Sang Ye	Folium Mori
Xia Ku Cao	Spica Prunellae
She Jue Ming	Concha Haliotidis
Zhen Zhu Mu	Concha Margaritifera Usta

Further details on the substitutes of bear bile can be found in the WSPA report “Finding Herbal Alternatives to bear bile”.<sup>12</sup>

## CONCLUSION AND RECOMMENDATIONS

Acres acknowledges the important role that TCM plays in providing complementary health care to Singaporeans. TCM is part of a great historical tradition and the culture of many Chinese Singaporeans and must be preserved.

However, the continued illegal trading of bear products for TCM tarnishes Singapore's reputation as a premier centre for TCM in the region, and serious efforts must be made to curb this illegal trade and maintain our good reputation.



There is clearly no need for bear bile in TCM since there are over 50 different herbal alternatives to bear bile. The use of bear bile is also against the general principle of TCM which emphasizes the balance between human beings and nature.

It is a positive sign that the percentage of shops selling bear products has decreased since 2001. It is encouraging to note that, during this investigation, 3 shopkeepers mentioned that they will not sell bear products anymore after they finish selling their current stock.

Acres will continue our efforts in monitoring the illegal trade in bear products in Singapore and also in creating awareness about the cruelty and illegality of this trade.

We urge the Singapore authorities to hand out severe sentences to anyone found selling or advertising bear products for sale and to tighten border controls to prevent the further illegal import of these products into Singapore.

Lastly, during this investigation it was encouraging that 1 shopkeeper recommended herbal alternatives instead of bear products. Acres urges the local TCM community to promote the use of herbal alternatives and to end the use of bears and other endangered animals in TCM.

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## APPENDIX I: QUESTIONNAIRE

1. Do you have any bear bile products?
2. How much is it?
3. Which country is it from?
4. Do you still have stock?
5. Will you be able to order more if we need more?
6. Are these products from wild bears or from a farm?

