



legalatlas

# To and Through the Gulf

IWT Routes & Legal Environment

**Rapid Review**

February 2022

## Authors

Aubrey Collins, JD  
Dr. Alice Pasqualato  
James Wingard, JD  
Samantha Gordine, PhD

## Editing and Design

Maria Pascual, MSc

Bahrain  
Jordan  
Kuwait  
Qatar  
Saudi Arabia  
UAE

# IWT Routes: Key Takeaways

The Gulf Region is a **key destination country** for IWT for at least the following six species:

1. **Cheetah** (*Acinonyx jubatus*)
2. **Saker Falcon** (*Falco cherrug*)
3. **Peregrine Falco** (*Falco peregrinus*)
4. **African Grey Parrot** (*Psittacus erithacus*)
5. **Nile Crocodile** (*Crocodylus niloticus*)
6. **Chimpanzee** (*Pan troglodytes*)

**Three (3) countries** in the Gulf Region (UAE, Kuwait and Saudi Arabia) are **key transit countries** for **rhino horn, ivory and pangolins** supplying markets in Asia.

**Four (4) Gulf Region airports** report some of the **highest numbers of wildlife trafficking** instances in the world (Abu Dhabi and Sharjah in UAE, Riyadh in Saudi Arabia, and Muscat in Oman).

**Illegal pet trade** in the Gulf Region is considered one of the main threats to **cheetahs** but is only partially regulated.

Figure 1: Gulf Region IWT markets are supplied with species from **28 known and suspected source countries**



# IWT Legal Environment: Key Takeaways

Figure 2: The Gulf Region uses several types of laws to regulate wildlife trade.

|                               | Bahrain | Jordan | Kuwait | Qatar | Saudi Arabia | UAE |
|-------------------------------|---------|--------|--------|-------|--------------|-----|
| Environmental Protection Law  | .       | ■      | ■      | ■     | ■            | ■   |
| Wildlife Law                  | ■       | ■      | .      | ■     | ■            | .   |
| Hunting Law                   | .       | ■      | .      | ■     | ■            | .   |
| CITES Implementing Law        | ■       | .      | ■      | ■     | ■            | ■   |
| Animal Protection/Welfare Law | ■       | ■      | ■      | ■     | ■            | ■   |
| Dangerous Animal Law          | .       | .      | .      | ■     | .            | ■   |
| Anti-Money Laundering Law     | ■       | ■      | ■      | ■     | ■            | ■   |

Figure 3: No GCC country explicitly criminalizes all activities along the entire trade chain for illegally sourced wildlife. Specific acts of ‘processing,’ ‘possessing,’ and ‘consuming’ illegally sourced wildlife, for example, are not expressly criminalized in any. Table shows acts not mentioned.

|              | Take | Transport | Processing | Storage | Advertise | Trade | IMP/EXP | Possession | Consumption | Welfare | Exhibition |
|--------------|------|-----------|------------|---------|-----------|-------|---------|------------|-------------|---------|------------|
| BAHRAIN      |      | ●         | ●          |         | ●         |       |         | ●          | ●           |         | ●          |
| JORDAN       | ●    |           | ●          |         |           |       |         |            | ●           |         |            |
| KUWAIT       |      |           | ●          |         | ●         |       |         | ●          | ●           |         |            |
| QATAR        |      |           | ●          |         | ●         |       |         |            | ●           |         |            |
| SAUDI ARABIA | ●    | ●         | ●          |         | ●         |       |         | ●          | ●           |         | ●          |
| UAE          |      |           | ●          |         |           |       |         |            | ●           |         |            |

**Protection for species** is not provided through a single national list of protected species but rather through several lists under different laws with different purposes. This is not uncommon but creates **potential for gaps and conflicts**. All countries in the GCC include cheetahs in at least one list.

All countries in the Gulf Region have an anti-money laundering law, but **predicate offenses** are only **partially or indirectly related to wildlife trade crimes**. UAE uses an all-crimes approach but only criminalizes certain wildlife related species and acts. Qatar mentions ‘environmental offenses’ and ‘illegal trading in any other commodities’ as money laundering predicate offenses but does not expressly reference wildlife in either context.

# Annex 1: IWT Species & Routes

This section aggregates information on documented IWT routes that involve the GCC, listing source, transit, and destination countries for more than (20) protected species.

The summary highlights the current wildlife trade networks but also the need to improve and harmonize laws across a landscape much larger than the Gulf Region.



## African grey parrot

*Psittacus erithacus*

| SOURCE  | TRANSIT  | DESTINATION   |
|---|--|---|
| <ul style="list-style-type: none"> <li>Cameroon</li> <li>Côte d'Ivoire</li> <li>DR Congo</li> <li>Ghana</li> <li>Guinea</li> <li>Nigeria</li> </ul> | <ul style="list-style-type: none"> <li>Egypt</li> <li>Ethiopia</li> <li>Jordan</li> <li>Iraq</li> <li>Singapore</li> <li>Turkey</li> </ul> | <ul style="list-style-type: none"> <li>Bahrain</li> <li>Jordan</li> <li>Kuwait</li> <li>Qatar</li> <li>Saudi Arabia</li> <li>UAE</li> </ul> |

### Sources:

- [Trade in wild-sourced African grey parrots: Insights via social media](#)
- [Illegal online trade in endangered parrots: A groundbreaking investigation](#)
- [Inferring patterns of wildlife trade through monitoring social media: Shifting dynamics of trade in wild-sourced African Grey parrots following major regulatory changes](#)



## Saker Falcon

*Falco cherrug*

| ORIGIN   | TRANSIT   | DESTINATION   |
|--|---|---|
| <ul style="list-style-type: none"> <li>Jordan</li> <li>Kazakhstan</li> <li>Mongolia</li> <li>Pakistan</li> <li>Russia</li> <li>Saudi Arabia</li> </ul> | <ul style="list-style-type: none"> <li>no data</li> </ul> | <ul style="list-style-type: none"> <li>Bahrain</li> <li>Jordan</li> <li>Kuwait</li> <li>Qatar</li> <li>Saudi Arabia</li> <li>UAE</li> </ul> |

### Sources:

- [The illegal trapping of large falcons in Jordan](#)
- [Illegal trade of raptors in the Russian Federation](#)
- [Poachers' paradise: Gulf hunts fuel Pakistan falcon trafficking](#)
- [Saker Falcon \(\*Falco cherrug\*\) Global Action Plan](#)



## Peregrine Falcon

*Falco peregrinus*

| ORIGIN   | TRANSIT   | DESTINATION   |
|--|---|---|
| <ul style="list-style-type: none"> <li>Georgia</li> <li>Jordan</li> <li>Libya</li> <li>Pakistan</li> <li>Pakistan</li> <li>Russia</li> </ul> | <ul style="list-style-type: none"> <li>Egypt</li> </ul> | <ul style="list-style-type: none"> <li>Bahrain</li> <li>Jordan</li> <li>Kuwait</li> <li>Qatar</li> <li>Saudi Arabia</li> <li>UAE</li> </ul> |

- Saudi Arabia

**Sources:**

- [Conserving migrating raptors in western Georgia](#)
- [The illegal trapping of large falcons in Jordan](#)
- [Bird Trapping in Egypt and Libya](#)
- [Poachers' paradise: Gulf hunts fuel Pakistan falcon trafficking](#)

 **Black & White Rhino**  
*Diceros bicornis and Ceratotherium simum*

| ORIGIN  | TRANSIT  | DESTINATION  |
|---|--|--|
| <ul style="list-style-type: none"> <li>▪ Angola</li> <li>▪ Mozambique</li> <li>▪ Namibia</li> <li>▪ South Africa</li> <li>▪ Zambia</li> <li>▪ Zimbabwe</li> </ul> | <ul style="list-style-type: none"> <li>▪ Qatar</li> <li>▪ Turkey</li> <li>▪ UAE</li> </ul> | <ul style="list-style-type: none"> <li>China</li> <li>Vietnam</li> <li>Laos</li> </ul> |

**Sources:**

- [C4ADS Air Seizure Database](#)
- [PENDANTS, POWDER AND PATHWAYS: A rapid assessment of smuggling routes and techniques used in the illicit trade in African rhino horn, TRAFFIC](#)

 **Cheetah**  
*Acinonyx jubatus*

| ORIGIN   | TRANSIT  | DESTINATION  |
|--|--|--|
| <ul style="list-style-type: none"> <li>▪ Ethiopia</li> <li>▪ Kenya</li> <li>▪ Somalia</li> <li>▪ Somaliland</li> <li>▪ Uganda</li> <li>▪ Tanzania</li> </ul> | <ul style="list-style-type: none"> <li>▪ Yemen (key transit country)</li> <li>▪ Saudi Arabia</li> <li>▪ and others in Middle East</li> </ul> | <ul style="list-style-type: none"> <li>Bahrain</li> <li>Egypt</li> <li>Kuwait</li> <li>Qatar</li> <li>Saudi Arabia</li> <li>UAE</li> </ul> |

**Sources:**

- [Cheetah Conservation Fund, Legal Atlas and IFAW – Legal Intelligence for Cheetah International Trade, funded by DEFRA](#)
- [Black Market Brief: Live Cheetahs - report by Global Initiative Against Transnational Organized Crime](#)

 **Pangolin**  
*(various)*

| ORIGIN   | TRANSIT  | DESTINATION  |
|--|--|--|
| <ul style="list-style-type: none"> <li>▪ Cameroon</li> <li>▪ Ivory Coast</li> <li>▪ Nigeria</li> </ul> | <ul style="list-style-type: none"> <li>▪ Qatar</li> <li>▪ UAE</li> </ul> | <ul style="list-style-type: none"> <li>China</li> <li>Laos</li> <li>Vietnam</li> </ul> |

**Sources:**

- [In Plane Sight: Wildlife Trafficking in the Air Transport Sector, C4ADS](#)



## Nile Crocodile

*Crocodylus niloticus*

### ORIGIN

- Egypt<sup>1</sup>
- South Africa
- Uganda<sup>2</sup>
- Zambia
- Zimbabwe

### TRANSIT

- no data

### DESTINATION

Saudi Arabia  
UAE  
other Middle East countries<sup>3</sup>

#### Sources:

- [World trade in crocodylian skins 2013-2015 Prepared as part of the International Alligator and Crocodile Trade Study](#)



## Chimpanzee

*Pan troglodytes (including four sub-species)*

### ORIGIN

- Burundi
- Cameroon
- Central African Republic
- Congo
- DRC
- Nigeria
- Rwanda
- South Sudan
- Tanzania
- Uganda

### TRANSIT

- no data

### DESTINATION

Bahrain  
Jordan  
Kuwait  
Qatar  
Saudi Arabia  
UAE

#### Sources:

- [Shepherd, D. Chimpanzee Trade<sup>4</sup>](#)



## Ivory

From the African Elephant (*Loxodonta africana*)

### ORIGIN

- Angola
- DR Congo
- Kenya
- Malawi
- South Africa
- Zimbabwe

### TRANSIT

Bahrain  
Jordan  
Kuwait  
Qatar  
Saudi Arabia  
UAE

### DESTINATION

- China
- Vietnam
- Malaysia
- Thailand

#### Sources:

- [In Plane Sight: Wildlife Trafficking in the Air Transport Sector, C4ADS](#)

<sup>1</sup> Including illegal, wild caught

<sup>2</sup> Listed as the main exporter of farmed crocodiles by CITES.

<sup>3</sup> Data deficient

<sup>4</sup> Article references Middle East generally, no breakdown of specific countries.

# Annex 2: Laws to Combat IWT

## Bahrain

**Wildlife Laws:** Bahrain has two (2) laws directly related to wildlife trade – the Trade in Endangered Species Law and the Protection of Wildlife Decree.

The Trade in Endangered Species Law creates the domestic obligations for CITES implementation and enforcement. Beyond listing protection for designated species, the law provides enforcement powers including examining permits, inspection of shipments and documenting trade.<sup>5</sup> The combination of laws addresses five (5) of eleven (11) IWT trade chain elements, including: taking, storing, importing, exporting, welfare and trade generally (see Figure 3).

**Anti-Money Laundering and IWT:** Bahrain’s AML Law uses an all-crimes approach defining predicate offense as ‘any activity which is a crime whether in the State of Bahrain or in any other State.’<sup>6</sup> Its application to wildlife trade will depend on the crimes defined in the related laws, some of which were not available in this rapid review.

## Jordan

**Wildlife Laws:** Jordan has at least four (4) laws regulating wildlife and some aspects of wildlife trade. The primary law is the Wildlife and Bird Protection and Hunting Act (Wildlife Act), which is implemented by the Wildlife Protection and Hunting Instruction (Wildlife Regulation). Supplementing these, and adding critical criminal provisions, is the Environmental Protection Law. The combination of laws, however, still has gaps and inconsistencies. The Wildlife Act references ‘wildlife’ and ‘wild animals,’ but it does not list or define which animals are protected. It also regulates transportation but only for the ‘transfer’ of wild birds. The Wildlife Regulation does not further clarify. The Environmental Protection Law specifically prohibits poaching, sales, and possession of wildlife,<sup>7</sup> three elements of the IWT trade chain (see Figure 3). Another element, either advertising and/or exhibition of wildlife may also be prohibited, depending on the judiciary’s interpretation of the law’s ban on “showing [wildlife] dead or alive.”<sup>8</sup>

**Anti-Money Laundering and IWT:** Jordan’s AML law uses an all-crimes approach but also specifically lists some predicate offenses, including violations of international agreements.<sup>9</sup> The application money laundering charges to illegal wildlife trade therefore depends on the crimes defined in related laws. The Environmental Protection Law may provide some of these predicates, defining ‘environmental crime’ broadly as any act ‘adversely affecting the elements of the environment’ and anything that violates the act itself.<sup>10</sup> Specific acts further prohibited by this law include those mentioned in the preceding section, as well the more

---

<sup>5</sup> Bahrain, Regulating and Controlling International Trade in Endangered Species Law, Art. 21.

<sup>6</sup> Bahrain, Anti-Money Laundering Law, Art. 2.

<sup>7</sup> Jordan, Environmental Protection Law, Art. 12.

<sup>8</sup> Jordan, Environmental Protection Law, Art.12.

<sup>9</sup> Jordan, Anti-Money Laundering Law, Art. 4.

<sup>10</sup> Jordan, Environmental Protection Law, Art. 2.

generally phrased ‘destruction of wildlife,’ to the extent it disrupts the balance of nature, including ‘trafficking’ inside nature reserves.<sup>11</sup>

## Kuwait

**Wildlife Laws:** Kuwait has two (2) laws directly related to wildlife and wildlife trade, the Endangered Species Resolution and the Environmental Protection Law.

Compared to other GCC countries, Kuwait’s wildlife laws provide a broader, but not yet complete, foundation for the regulation and criminalization of IWT. The primary wildlife trade related law, the Endangered Species Resolution, serves as the country’s CITES implementing Law regulating imports, exports, and the permit system.<sup>12</sup> The Environmental Protection Law regulates the management of the environment including prohibiting hunting, catching, harming, and transporting ‘wild organisms’ without exception.<sup>13</sup> It further prohibits trade of endangered species under CITES.<sup>14</sup> Together, these two laws address six (6) of eleven (11) IWT trade chain elements, including: poaching, sales acquisition, transport, exhibition, performances, scientific research, and trade generally (see Figure 3).

**Anti-Money Laundering and IWT:** Kuwait’s AML Law uses an all-crimes approach defining predicate offenses as ‘any act constituting a crime.’<sup>15</sup> As with other jurisdictions that take this approach, its application to wildlife trade will depend on the crimes defined in related laws.

## Qatar

**Wildlife Laws:** Qatar has five (5) laws that directly address wildlife and some aspects of wildlife trade. The primary law is the Dangerous Animal Law, which utilizes a permit system to regulate the legal trade in wildlife, including cheetahs.<sup>16</sup> Wildlife in zoos, circuses, exhibitions, and scientific research is, however, exempt from the permit scheme. Supporting legislation includes the Hunting Law, Endangered Species Trade Law, Wildlife and Natural Habitats Protection law (Wildlife Protection Law), and the Environmental Law. The Hunting Law regulates what and when species can be hunted while the Wildlife Protection Law and Environmental Protection Law prohibit acts that harm endangered or threatened species.<sup>17</sup> The Endangered Species Trade Law is the CITES implementing law regulating the import, export, and permit system used for legal trade in designated species.<sup>18</sup>

Based on the translatable laws, Qatar appears to regulate five (5) of eleven (11) elements within IWT: poaching, transportation, possession, and trade generally (see Figure 3).

**Anti-Money Laundering and IWT:** Qatar is the only GCC country that uses a predicate offense approach in its AML legislation, providing a list of specific offenses that may act as a basis for money laundering charges. Those most closely related to wildlife trade include

---

<sup>11</sup> Jordan, Environmental Protection Law, Art. 12.

<sup>12</sup> Kuwait, Endangered Species Resolution, Art. 1.

<sup>13</sup> Kuwait, Environmental Protection Law, Art. 100.

<sup>14</sup> Kuwait, Environmental Protection Law, Art. 101.

<sup>15</sup> Kuwait, Anti-Money Laundering Law, Art. 1.

<sup>16</sup> Qatar, Dangerous Animal Law, Art. 2.

<sup>17</sup> Qatar, Hunting Law, Art. 2-3; Wildlife and Natural Habitats Protection Law, Art. 4; Environmental Protection Law, Art. 9.

<sup>18</sup> Qatar, Endangered Species Trade Law, Art. 3-4.



‘environmental offenses’ and ‘illegal trading in commodities.’<sup>19,20</sup> The AML law does not, however, define or provide a list of crimes that would constitute an environmental crime. Among the laws that may apply is the Environmental Protection Law, but this law focuses on pollution, sustainability, hazardous materials, sustainable environment, and environmental disasters. While it defines the environment to include animals, it is not written to protect them within a trade or ownership context. This review was not able to access an interpretation that would clarify whether an environmental offense would extend to wildlife trade crimes.

## Saudi Arabia

**Wildlife Laws:** Saudi Arabia has three (3) laws regulating wildlife and some aspects of wildlife trade. The primary law is the CITES Implementing Law, regulating imports, exports, and permit systems. Supplemental legislation includes the Wildlife Hunting Law and the Environmental Law. Both regulate natural resources and provide specific regulation for using wildlife. The Wildlife Hunting law limits what species can be taken and implement a licensing system. The Environmental Law prohibits killing, hunting, or trading wildlife threatened with extinction.<sup>21</sup> From the translatable laws, Saudi Arabia primarily regulates four (4) of eleven (11) elements within IWT, including import, export, and trade generally (see Figure 3).

**Anti-Money Laundering and IWT:** Saudi Arabia’s AML Law has an all-crimes approach. Its application to wildlife trade depends on wildlife related crimes defined in other laws. The CITES Implementing Law, Wildlife Hunting Law, and Environmental Law are likely applicable as they all prohibit specific acts and provide a penalty system for wildlife and wildlife trade violations.

## UAE

**Wildlife Laws:** The United Arab Emirates (UAE) has six (6) laws regulating wildlife and some aspects of wildlife trade. Unlike other GCC countries, the primary law is the Dangerous Animal Possession Law (as opposed to a broader wildlife law), which prohibits the ownership, possession, trading, and breeding of listed animals.<sup>22</sup> The Environmental Protection Law supplements this by prohibiting the transportation and selling of wild animals without a license.<sup>23</sup> Further, the UAE has three (3) separate regulations to implement its CITES obligations, including the Implementing Law, Implementing Regulation, and the Foreign Trade of Endangered Species with Non-CITES Member States. Finally, the Animal Welfare Law imposes licensing requirements and health standards on exhibitions and animal markets.<sup>24</sup> As a whole, the UAE regulates the greatest number of IWT trade chain elements (8 of 11) including poaching, sales acquisition, advertising, transportation, possession, exhibition and performances, science, and trade generally (see Figure 3).

**Anti-Money Laundering and IWT:** UAE’s AML Law uses an all-crimes approach with ‘any act constituting an offense or misdemeanor’ both inside and outside the State qualifying as a

---

<sup>19</sup> Qatar, Money Laundering and Terrorism Financing Law, Art. 2.

<sup>20</sup> Wingard J. and M Pascual. (2019) *Following the Money: Wildlife Crimes in Anti-Money Laundering Laws. A review of 110 jurisdictions.*

<sup>21</sup> Saudi Arabia, Environmental Law, Ch.5.

<sup>22</sup> UAW, Dangerous Animal Possession Law, Art. 3.

<sup>23</sup> UAE, Environmental Protection Law, Art. 12.

<sup>24</sup> UAE, Animal Protection Law, Art. 18.

predicate offense.<sup>25</sup> Laws that are likely applicable include in the Dangerous Animal Possession Law, CITES Implementing Laws, Animal Protection Law and Environmental Protection Law. Each of these mentions wildlife in some form and provides penalties and fines for violations.

---

<sup>25</sup> UAE, Anti-Money Laundering Law, Art. 1.

# Annex 3: Legal Frameworks

All listed laws can be found in the Legal Atlas platform in the [Wildlife Trade](#) topic.

## BAHRAIN

|  |  |
|--|--|
| <a href="#">Protection of Wildlife Legislative Decree, 1995</a>                                | <b>Bahrain's Protection of Wildlife Legislation</b> (1995)<br><b>pending translation</b>   |
| <a href="#">CITES Implementing Law, 2012</a>   | <b>Bahrain's CITES Implementing Law</b> (2012)<br><b>superseded</b>  |
| <a href="#">Law Regulating and Controlling International Trade in Endangered Species, 2021</a> | <b>Bahrain's Regulating and Controlling International Trade in Endangered Species Law</b> (2021)<br>The Law Regulating and Controlling International Trade in Endangered Species creates the domestic obligations for CITES implementation and enforcement. The regulation of imports and exports (Art. 6-7) is implemented through a permit system. Beyond listing protection for designated species, the law provides enforcement powers including examining permits, inspection of shipments and documenting trade (Art. 21). Penalties for violations are provided for under Art. 23-30 and include the confiscation of objects used in the commission of the crime. |
| <a href="#">Animal Welfare Law, 2014</a>   | <b>Bahrain's Animal Welfare</b> (2012)<br><b>pending translation</b>   |
| <a href="#">Anti-Money Laundering Law, 2001</a>  | <b>Bahrain's Anti-Money Laundering Law</b> (2001) defines predicate offense under Art. 2 as 'any activity which is a crime whether in the State of Bahrain or in any other State'. Its application to wildlife trade depends on the crimes defined in other laws, e.g., its CITES Implementing law and Protection of Wildlife Legislation.   |

## JORDAN

|  |   |
|--|---|
| <a href="#">Environmental Protection Law, 2017</a>                 | <b>Jordan's Environmental Protection Law</b> (2017) is the umbrella law for the management of environment and natural resources. Under Art. 12, harm to wildlife that could terminate species, selling, or showing them dead or alive is prohibited if it has a negative impact on the 'balance of nature.'   |
| <a href="#">Wildlife and Bird Protection and Hunting Act, 1973</a> | <b>Jordan's Wildlife and Bird Protection and Hunting Act</b> (1973) affects wildlife trade by restricting the killing of protected species (Art. 144) and preventing animal cruelty (Art. 150). Hunting areas and periods are restricted to areas approved by the Minister under Art. 147.  |
| <a href="#">Wildlife Protection and Hunting Instruction, 2003</a>  | <b>Jordan's Wildlife Protection and Hunting Instruction</b> (2003) is directly relevant to wildlife trade as it regulates the hunting of wildlife. Art. 8 restricts when and where animals are allowed to be hunted. Arts. 10 and 12 prohibit the trade, display, possession and transfer of wild animals both alive or dead. Art. 13 prohibits the entry or removal of any wild animals. |
| <a href="#">Animal Welfare Regulation Law, 2007</a>                | <b>Jordan's Animal Welfare Regulation</b> (2007)<br><b>pending translation</b>  |
| <a href="#">Anti-Money Laundering Law, 2007</a>                    | <b>Jordan's Anti-Money Laundering Law</b> (2007) defines predicate offense under Art. 4 as any crime punished by felony penalty within the Kingdom or any legislation that considers proceeds to be subject to money laundering. In addition, crimes from international agreements that consider proceeds of crimes   |

to be money laundering is a predicate offense. While the act does not list or mention wildlife or environmental crimes, the definition of predicate offense may allow for the law to apply in such circumstances.

## KUWAIT

- Environment Protection Law, 2014** **Kuwait's Environmental Protection Law + Amendment** (2014, 2015) is the umbrella legislation for the management of environment and natural resources. Section 5 focuses on biodiversity with Ch.1 on endangered wild organisms. Under Art. 100, the hunting, catching, harming, transport, and acquiring of wild organisms is prohibited unless an exemption is provided. Art. 101 prohibits the trade of endangered species as specified by CITES.
- Trade in Endangered Species Resolution, 2003** **Kuwait's Endangered Species Resolution** (2003) affects wildlife trade as it creates the domestic obligations and enforcement for the international agreement for legal trade. Under Art. 1 the law regulates the import and export of species through a permit system designated under CITES.
- Animal Welfare Law** **Sources confirm passage of law but no online copy has so far been located for review.**
- Anti-Money-Laundering Law, 2013** **Kuwait's Anti-Money Laundering Law** (2013) uses an all-crimes approach by defining predicate offense under Art. 1 as 'any act constituting a crime'. While the act does not list or mention wildlife or environmental crimes, the definition of predicate offense may allow for the law to apply in such circumstances.

## QATAR

- Environmental Protection Law, 2002** **Qatar's Environmental Protection Law** (2002) is the umbrella legislation for the management of environment and natural resources. Art. 2 states the purpose of the law is to protect, develop, and use the natural environment for future use and benefit of society. Art. 9 oversees the treatment of species threatened by extinction.
- Wildlife and Natural Habitats Protection Law, 2004** **Qatar's Wildlife and Natural Habitats Protection Law** (2004) affects wildlife trade by protecting endangered species, rehabilitating natural habitats, and providing for a penalty system. Art.4 prohibits hunting, taking, transporting, or damaging species in ways that would harm, damage, or destroy them.
- Hunting Law, 2002** **Qatar's Hunting Law** (2002) affects wildlife trade by providing limited regulation on what species can be hunted (Art. 3), when they can be hunted (Art. 2), and what equipment can be used (Art. 2). Art. 4 provides for the authority to seize and investigate violations that may later receive a listed penalty.
- Endangered Species Trade Law, 2006** **Qatar's Endangered Species Trade Law** (2006) affects wildlife trade as it creates the domestic obligations and enforcement for the international agreement for legal trade. Art. 3-4 regulates the import and export of species through a permit system designated under CITES. Beyond listing protection for designated species, the law provides penalties for violations (Art. 13-17).
- Animal Welfare Law: Penal Code Law, 2004** **Qatar's Animal Welfare Law: Penal Code** (2002) chapter 8 focuses on crimes committed on animals with Art. 393 criminalizes two specific acts and provides relevant penalties. Art. 395 oversees general animal welfare and treatment.
- Dangerous Animal Law, 2019** **Qatar's Dangerous Animal Law** (2019) affects wildlife trade under Art. 2 where it regulates the ownership, possession, trading and breeding of dangerous

animals including overseeing protection from harm, and preventing escape. To enforce this goal Art. 8-12 establish penalties for violations and requirements to inform relevant departments when new species are owned.

Combating Money  
Laundering and Terrorism  
Financing Law, 2010

**Qatar's Money Laundering and Terrorism Financing Law (2010)** uses a predicate offense approach with a list of offenses under Article 2. Art. 2 states one of the predicate offenses is any included in international conventions ratified by the State, environmental offenses, and illegal trading of commodities.

## SAUDI ARABIA

[Environmental Law, 2020](#)

**Saudi Arabia's Environmental Law (2020)** is an umbrella legislation for the management of environment and natural resources. Chapter 5 covers wildlife and states that the competent authority indicates the wildlife organisms that are threatened with extinction and that it is prohibited to kill, hunt, or trade with them, their derivatives, or their products.

[Wildlife Conservation  
National Commission Law](#)

**Saudi Arabia's Wildlife Conservation National Commission Law** [pending translation](#)

[Wildlife Hunting Law,  
1999](#)

**Saudi Arabia's Wildlife Hunting Law (1999)** affects wildlife trade by providing regulation on what species can be hunted, when they can be hunted, and what equipment can be used. While not directly related to Trade itself, the act provides general protection to wild animals. Under Art. 6 penalties are also provided.

[CITES Implementing Law,  
2000](#)

**Saudi Arabia's CITES Implementing Law (2000)**  
[pending translation](#)

[Animal Welfare Act, 2013](#)

**Saudi Arabia's Animal Welfare Act (2013)** does not directly mention wildlife or wildlife trade. However, the law oversees the general well-being of animals. Art. 1 defines animals broadly and may be interpreted to include wildlife that is owned by individuals or organizations. Fines and penalties are provided for under Ch. 4.

[Anti-Money Laundering  
Law, 2021](#)

**Saudi Arabia's Anti-Money Laundering Law (2021)** uses an all-crimes approach. While the act does not list or mention wildlife or environmental crimes, the definition of predicate offense under Art. 1 may allow for the law to apply in such circumstances.

## UAE

[Environmental Protection  
Law, 1999](#)

**UAE's Environmental Protection Law (1999)** is the umbrella legislation for the management of environment and natural resources. While the law does not specifically mention wildlife trade, Art. 12 prohibits possession, transport, sell or roam of wild animals without a license from Competent Authorities. Wildlife receives protection within a marine environment (Art. 17) and as part of natural resources (Art. 64).

[CITES Implementing Law,  
2002](#)

**UAE's CITES Implementing Law (2002)** affects wildlife trade as it creates the domestic obligations and enforcement for the international agreement for legal trade. Art. 4 of this law regulates the import and export of species through a permit system designated under CITES. Beyond listing protection for designated species, the law provides confiscation powers (Art. 32), scientific agency (Art. 5), and provides penalties for violations (Art. 25-33).

|  |  |
|--|--|
| <a href="#">CITES Implementing Regulation, 2003</a>                                    | <b>UAE's CITES Implementing Regulation (2003)</b> affects wildlife trade as it creates the domestic obligations and enforcement for the international agreement for legal trade. Art. 4 of this law regulates the import and export of species through a permit system designated under CITES. Beyond listing protection for designated species, the law creates a managing authority (Art. 5), scientific agency (Art. 6), and provides penalties for violations (Art. 16).                           |
| <a href="#">Foreign Trade of Endangered Species with Non-CITES Member States, 2012</a> | <b>UAE's CITES Implementing Law (2012)</b> affects wildlife trade as it ensures trade from non-CITES countries receives regulation and species are still protected. Art. 1 requires such States to use CITES approved permits and holds them to equal standards.   |
| <a href="#">Animal Protection Law, 2007</a>  | <b>UAE's Animal Protection Law (2007)</b> affects wildlife trade by regulating the care, treatment, and wellbeing of animals including wildlife. Ch. 11 Art. 18 on exhibitions and markets of animals specifically ensures licenses and health standards for exhibiting animals including for trading purposes. It also provides penalties for violations of the act.  |
| <a href="#">Dangerous Animal Possession Law, 2016</a>                                  | <b>UAE's Dangerous Animal Possession Law (2016)</b> affects wildlife trade as it regulates the ownership, possession, trading and breeding of dangerous animals including overseeing protection from harm, animal welfare, and transmission of disease. Art.3 prohibits owning, possessing, trading or breeding dangerous animals. There is an exception under Art. 4 for facility licensing. To enforce this goal the law establishes penalties under Ch. 6 for violations and licensing obligations. |
| <a href="#">Anti-Money Laundering and Anti-Terrorism Law, 2018</a>                     | <b>UAE's Anti-Money Laundering Law (2018)</b> defines a predicate offense as 'any act constituting an offense or misdemeanor under the laws of the State'. While there is no explicit mention of wildlife crimes, Art. 1 defines predicate offense as any offense or misdemeanor under the laws of the state committed both inside and outside when the act is punishable in both countries. This would include crimes from the dangerous animal possession law and animal protection law.             |

**Legal Atlas®** is a platform for global legal intelligence. Our platform houses wildlife trade related legal frameworks for more than 80 countries. We are regularly engaged in reviews, analyses and legal development covering numerous interrelated topics, like organized crime, anti-money laundering, and wildlife disease. To learn more, contact us at [info@legal-atlas.net](mailto:info@legal-atlas.net)