

Vantara Submits Transformative Wildlife Commitments Putting Conservation in the Wild at the Heart of Its Mission

Jamnagar, India, 19th August 2026 -- Vantara has today submitted a set of voluntary commitments to the CITES Management Authority of India, strengthening its governance, transparency and due diligence in wildlife conservation.

The commitments — sent to the Indian CITES Management Authority and filed with the Indian Supreme Court for overall compliance — will ensure full confidence in Vantara's adherence to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and mark a decisive shift in focus from ex situ conservation toward in situ conservation, supporting wildlife within their range states — with a greater focus on India as part of this shift.

Vantara's Governing Council being announced today has closely reviewed the critiques, observations and constructive suggestions raised by organisations, experts, journalists and other stakeholders over time. In response, the Council has endorsed or recommended a series of measures to strengthen Vantara's governance, transparency, due diligence and conservation practices. Vantara has accepted these recommendations in full and is committed to implementing them as part of a stronger framework guiding its future work.

At the same time, Vantara remains steadfast in its belief that every life matters, a principle that guides both the care it provides to animals at its Jamnagar campus and the expertise, resources and support it is increasingly extending to wildlife conservation in source countries.

Vantara is choosing to hold itself to standards beyond what the law requires, in order to build trust and confidence with national authorities, the CITES Parties, Standing Committee and Secretariat, and the wider conservation community, through significantly strengthening transparency, governance and due diligence across all of Vantara's operations.

These measures include:

Conservation in India and in range states:

- Prioritise rescue, rehabilitation and conservation within India, and expand support for State Forest Departments, rescue centres, conservation breeding and zoo modernisation.
- Redirect its international efforts toward strengthening rescue centres, veterinary hospitals and conservation programmes in range states, rather than relocating animals.
- Create a dedicated international fund to support wildlife conservation in countries of origin, with in country technical support also being provided.

Transparency and accountability:

- Publish internal procedures and submit six-monthly progress reports to the CITES Management Authority.
- Invite CITES Management Authority inspections and maintain an open-door policy.
- Expand structured engagement with media, conservation organisations and NGOs.

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- Publicly acknowledge and implement constructive external recommendations where appropriate.
- Deepen engagement with the conservation community and media and respond to criticism through dialogue, transparency and evidence — not litigation.

Verification and governance:

- Fully document and verify the complete provenance and acquisition history of every specimen.
- Establish an independent international CITES Due Diligence Committee, comprised of former CITES Secretariat senior officials and leading wildlife experts.
- Introduce a mandatory three-stage review for any future acquisition.
- In addition to the CITES Due Diligence Committee, establish an Advisory Board and a Global Governing Council, as the peak governing body, to strengthen oversight.
- Appoint Mr. John E Scanlon AO, former Secretary General of CITES and renowned environmentalist as the inaugural independent Chair the Governing Council.
- Appoint Dr. Kushal Konwar Sarma to the Governing Council, on whom the Padma Shri was conferred in 2020, Professor and Head of the Department of Surgery and Radiology at the College of Veterinary Science, Guwahati, with the Chairman to appoint the two remaining Council members.
- Established an Office of Compliance and Due Diligence, headed by Mr Ajit Kulkarni — a former Indian Forest Service officer and former Executive Director of the Sri Chamrajendra Zoological Gardens, Mysuru — which is autonomous of management and answerable to the Chairman of the Governing Council.
- Pursue internationally recognised accreditation and benchmarking with leading zoological and conservation organisations.

Import restrictions:

- Withdraw all pending applications to import live animals.
- Make no new import applications until India's new CITES Standard Operating Procedure (SOP) is in force, the CITES Management Authority has confirmed Vantara has fully implemented its voluntary commitments.
- Consult the CITES Management Authority before any future import application, even once the SOP is in place.
- Permanent commitment not to import on the basis of a CITES re-export certificate, subject only to a narrow welfare exception (where at least seven years have passed since the animal's original import), which itself requires clearance through Vantara's new three-tier review and the Governing Council before any application is made.
- Maintain policy to not import wild-caught animals from range states and continue prioritising assistance to animals within their countries of origin instead.
- Not import great apes, big cats or any Appendix I listed species from a range state of that species, including from a captive breeding facility.
- Consider only importing animals from a zoo registered with or recognised by the government of the exporting state, or accredited by a recognised international or regional association of zoological institutions, or from a facility registered with the CITES Secretariat, or in the course of a conservation breeding programme undertaken in cooperation with a range state.



Every Life Matters

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Within twelve months from last import (5 June 2027), every policy, every new body and every procedure described in Vantara's letter, as briefly summarised here, will be in place and working and applied to our future operations.

Alongside its strengthened governance and due diligence framework, Vantara has committed to a structured five-year conservation programme that will increasingly place the capabilities developed at Jamnagar at the service of wildlife conservation across India and, where invited by competent authorities, in range States internationally. The programme will include a long-term One Plan approach integrating in-situ and ex-situ conservation; human-wildlife conflict mitigation using capacity building, wildlife corridors, AI-enabled monitoring, drones and early-warning systems; habitat restoration, reforestation and protection of wildlife corridors; wild-animal healthcare within natural landscapes; and conservation breeding, rewilding and release programmes. Vantara will also support rescue and rehabilitation centres, strengthen zoological and conservation institutions, and provide veterinary, scientific, technical and infrastructure expertise to governments and recognised conservation partners.

A central objective of the programme is to create lasting conservation capacity rather than stand-alone interventions. Vantara will expand training for veterinarians, biologists, protected-area managers, animal keepers, curators, mahouts and government officials; develop its proposed wildlife university, including scholarships for at least 50 students annually; strengthen diagnostic, genetic and wildlife-health capabilities; support domestic and farm-animal welfare; and scale up providing technical and financial support to credible conservation organisations, including those that have may previously questioned or criticised Vantara. Taken together, the five-year commitments are intended to build enduring relationships and leave behind stronger institutions, trained professionals, restored habitats, improved wildlife-health and rescue infrastructure, and conservation programmes increasingly measured by successful recovery and release into the wild.

Vivaan Karani, CEO of Vantara, said: “Vantara was built in India because this is where we were able to bring together, at scale, the veterinary and scientific expertise, specialised infrastructure, resources and execution capability required to provide complex and long-term care for animals”.

“As we have grown, we have also learned. We have listened carefully to the critiques and suggestions made by many voices, and we have taken them in the spirit in which they were offered — as an opportunity to improve. Wherever animals can be effectively supported in their own countries, we increasingly believe our resources should travel rather than the animals. The capabilities developed in India can increasingly support wildlife authorities, veterinarians and conservation programmes in range States around the world”.

“This represents a new chapter for Vantara — one with an even greater focus on India’s wildlife, conservation in countries of origin, independent oversight and transparency. Ultimately, we want to be judged not by how many animals come to Vantara, but by how many animals are helped where they belong, the species recovered in the wild, the people trained, the countries supported and the science and expertise we are able to share”, Mr Karani added.

Read Vantara's full open letter to the Indian Management Authority [here](#).

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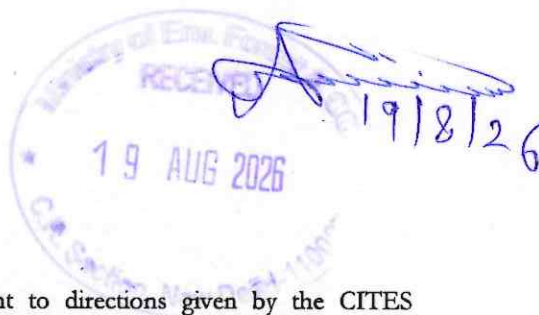
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Date: 19 August 2026

To,
The CITES Management Authority of India
Ministry of Environment, Forest and Climate Change
Indira Paryavaran Bhawan, Jor Bagh Road
New Delhi – 110 003



Hon'ble Sir,

Subject: Detailed representation by Vantara pursuant to directions given by the CITES Management Authority and action taken on each item of guidance.

Reference:

- (i) Recommendations of the Standing Committee at its 79th meeting, Samarkand, Uzbekistan, on SC79 Doc. 6.3.4;
- (ii) Orders and Judgments of the Hon'ble Supreme Court of India dated 15 September 2025, 09 March 2026 and 27 May 2026;
- (iii) Office Memorandum bearing F. No. WL-3/48/2026-WL dated 13 July 2026; and
- (iv) Vantara's letter dated 16 July 2026.

* * *

1. This letter is addressed in response to the Office Memorandum at (iii) above, and to the directions which the Office of the CITES Management Authority of India ("CMA India") has issued to Vantara from time to time.
2. Following the directions issued by CMA India and the Director General of Forests and Special Secretary, Ministry of Environment, Forest and Climate Change, and having regard to the suggestions and recommendations of the mission of the CITES Secretariat which visited Vantara's facility, Vantara has strengthened and further institutionalised its governance, expertise and procedures. Vantara is grateful for that guidance. This letter records, item by item, the action taken in response.
3. The paragraphs which follow set out the governance, expertise and procedures now in place, the roadmap of further action and initiatives being established and the unconditional commitments which Vantara undertakes for the future. This letter is issued in furtherance of our letter at (iv) above and the commitments made therein are reiterated herein.
4. Vantara considers it appropriate to place, at the outset, the action taken in response to the suggestions and recommendations referred to above. Vantara has accepted that guidance and has addressed, or is addressing, each item in the manner and to the stage set out below.
5. In addition thereto Vantara has undertaken additional measures which are set out from paragraph 38 onwards. These additional measures, broadly, are (i) A moratorium of twelve months (implemented internally with effect from 05 June 2026, being the date upon which the last import physically took

place) upon any application for import, during which enhanced governance expertise and due diligence procedures established internally will be brought into working order and Vantara will undertake structured outreach, pursue international accreditation and benchmarking; (ii) to make no fresh application (none having been made since February 2026), all pending applications have been withdrawn and in-situ alternatives having been considered in each case and several being implemented in the range State itself; (iii) to make no application until the Standard Operating Procedure ("SOP") is published by CMA India in terms of the Order of the Hon'ble Supreme Court of India, and none thereafter without following the new and enhanced internal due diligence procedures; (iv) not to import any great ape, big cat or any Appendix I listed specimen from a range State of the species concerned, including from a captive breeding facility; (v) not to import any animal taken from the wild in any range State and instead consider assisting such animals where they stand, by treatment, placement and lifetime care in that country, working with local organisations and with that country's authorities (subject to the limited exception recorded in paragraph 41(b) below); (vi) not to undertake any import upon a CITES re-export certificate (subject to a very limited exception and the review recorded in paragraph 41(a) below); and (vii) not to consider any import save from a recognised and accredited zoological facility or CITES registered facility or in the course of a conservation breeding programme undertaken in cooperation with a range State, and that too subject to compliance with the SOP to be published by CMA India and only upon meeting the rigorous protocols of Vantara's enhanced governance expertise and due diligence procedures. To these are added an important clarification that every one of these measures mentioned applies to every animal, whether it is listed in Appendix I, in Appendix II or in Appendix III of the Convention or is not listed in any Appendix at all.

6. The measures recorded in this letter reflect a prospective strengthening of Vantara's practices, formulated with the advice of senior experts over the last nine months. They are intended to place Vantara's future work on an enhanced and independently verifiable footing and to respond constructively to the expectations reflected in the guidance of CMA India, the Secretariat's mission and the Standing Committee.

7. Meanwhile, the table below sets out each item of guidance, the action which Vantara has already taken upon it and the stage of the said action. Each entry is elaborated in the paragraphs which follow and Vantara respectfully requests CMA India to take the same on record.

Sr#	Guidance of the Secretariat's mission	Action already taken by Vantara	Status
1	Import procedures to be reviewed and made more systematic before any import.	1. Vantara's last application for import was made in February 2026 and since then it has not made any application. 2. All pending applications for imports stand withdrawn and in-situ work considered in each range State with work in many such States having begun. 3. A strong and robust internal due diligence procedure has been created as a matter of Vantara's policy which will consider proposals for imports after passing through three very stringent layers of a	Implemented and operating.

Sr#	Guidance of the Secretariat's mission	Action already taken by Vantara	Status
		CITES Due Diligence Committee, an Advisory Board and eventually a Governing Council. 4. Application would be made only after the approval of this three-tier institutional structure to CMA India as per the SOP to be published. 5. A legal acquisition finding will be obtained and placed upon record by Vantara itself before any application is made, and where the Convention requires a non-detriment finding, the finding of the Scientific Authority of the exporting State will be obtained and placed upon record as well. These requirements apply to every animal, whether or not it is listed in any Appendix of the Convention. Where an animal is not so listed, equivalent documentation will be obtained and placed upon record to the same standard, as described in paragraph 25. 6. An entirely new compliance and governance team has been constituted, as recorded in this letter, and proposals will hereafter be examined with the assistance of conservationists, government institutions and non-governmental organisations.	
2	Controls to be reinforced so that animals traded in violation of the Convention, or under source and/or purpose codes which do not meet the established criteria, are not received.	1. As a matter of policy Vantara has resolved and undertaken: (i) not to import any animal upon a re-export certificate, subject only to the limited exception and the review recorded in paragraph 41(a). (ii) not to import any animal taken from the wild in any range State, and to divert resources instead to their in-situ care, treatment and placement, subject only to the limited exception recorded in paragraph 41(b). (iii) not to import any great ape, big cat or any Appendix I listed specimen from a range State of the species concerned, including from a captive breeding facility.	Implemented and operating.

Sr#	Guidance of the Secretariat's mission	Action already taken by Vantara	Status
		2. The three-tier institutional structure which is now Vantara's internal procedure backbone will assess based on scientific and other evidence whether source and purpose codes declared are correct and the same shall be tested against Resolution Conf. 12.3 (Rev. CoP19) and its annexes, legal acquisition against Resolution Conf. 18.7 (Rev. CoP19), and captive-breeding claims against Resolution Conf. 10.16 (Rev. CoP19) before a file may move at all and the chain of lawful acquisition is traced back to the country of origin in every case.	
3	In situations where animals are in peril, in-country support of the kind GZRRC has itself provided is to be preferred: it "would allow for additional time to conduct due diligence verifications" while the animal is kept alive, and it carries lasting conservation benefit for the species in its country of origin (SC79 Doc. 6.3.4, para. 76).	1. Adopted as Vantara's working principle and made permanent. Where Vantara is asked to assist an animal abroad, it will first explore in-country assistance with the competent authorities and established local institutions in that country. 2. Vantara has already acted upon this in cases of Colombia (invasive hippopotamus population issue) and engagements in other countries such as Brazil, Indonesia, Venezuela, the Democratic Republic of the Congo and Zimbabwe. 3. In the Democratic Republic of the Congo Vantara has offered a wildlife hospital and support to the zoological institutions of that Government, and in Venezuela a dedicated wildlife hospital and a rescue and rehabilitation centre in each case to be administered by the competent authority of that country.	Implemented and operating.
4	Processes and procedures to be improved, as confirmed to the mission by the Indian Management and Scientific Authorities (SC79 Doc. 6.3.4, para. 77).	1. Vantara will abide by SOP to be published by CMA India in terms of the Order of the Hon'ble Supreme Court of India dated 27 May 2026 in letter and in spirit. 2. Over and above that Procedure, in cases where Vantara has not adopted a policy of total restraint, Vantara has framed its own internal policy, carrying three layers of assessment, verification and due diligence.	Internal policy framed and being implemented. SOP by CMA India is awaited and will be complied with in letter and spirit.

Sr#	Guidance of the Secretariat's mission	Action already taken by Vantara	Status
		3. No proposal to acquire any animal will proceed at any stage without the prior written approval of the Governing Council.	
5	Trade data discrepancies between exporting and importing Parties to be reviewed, clarified with the Secretariat and corrected in the CITES Trade Database as appropriate (SC79 Doc. 6.3.4, para. 34 and related paragraphs).	While reconciliation of the CITES Trade Database is a matter for the Parties and the Secretariat, Vantara has of its own motion done two things. It has extracted from its own records the shipment by shipment particulars of every import made by it, including permit numbers, declared quantities and quantities actually received, and has placed those particulars before this Authority so that they may be reconciled with exporter reported data and with the CITES Trade Database. It has also carried out a taxonomic reconciliation of the annual inventory it maintains with the Central Zoo Authority of India and has harmonised the classification of species and sub-species recorded in it.	Completed at Vantara's end.
6	The importing facility not to become, however unwittingly, a driver of illegal trade or of demand.	1. To eliminate all possibility of such allegations, a policy of self-discipline and self-restraint has been adopted on a permanent basis where no animal is to be considered from the wild in any range State save in the limited circumstance recorded in paragraph 41(b), no great ape, big cat or any Appendix I listed specimen from a range State of the species concerned, nothing upon a re-export certificate save in the limited circumstance recorded in paragraph 41(a), and no 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, or in the course of a conservation breeding programme undertaken in cooperation with a range State. 2. Over and above this, a twelve month moratorium effective from 05 June 2026, being the date upon which the last animal was physically received from outside India at Vantara, has been put in place internally by Vantara for working of its internal procedure.	Implemented and operating.

Sr#	Guidance of the Secretariat's mission	Action already taken by Vantara	Status
		3. To this is added the three-layer verification, with a CITES Due Diligence Committee whose specific charge is to ensure that Vantara never receives an illegally traded animal, including of a species not yet listed under the Convention, and never, however unwittingly, becomes a driver of illegal trade or of demand.	
7	Outreach to the conservation community and sharing of scientific information.	1. An outreach programme is already in place. Scientists, veterinarians, zoo professionals, government delegations and media teams from India and abroad have visited Vantara. 2. An open invitation has been extended to several media organisations and to non-governmental organisations to come, to see, to question Vantara directly and to tell it what it should be doing differently. 3. Where a suggestion is adopted, Vantara will say so publicly and give credit to the organisation which made it. Vantara's answer to criticism will be engagement, information and access.	On going
8	Confidence to be built by submitting Vantara's operations to examination by independent experts of international standing.	1. Vantara sought and obtained a wholly independent assessment of its operations under the Convention, with recommendations, from Mr. John E. Scanlon AO, renowned environmentalist and former Secretary-General of the CITES Secretariat, who has been advising Vantara in an independent capacity with effect from April 2026 and whose recommendations Vantara is implementing in full. 2. Vantara has also opened its facilities to scientists, veterinarians, zoo and museum professionals, government delegations and media teams from India and abroad.	Completed. Implementation of recommendations continuing.

8. Vantara requests CMA India to treat the second and third columns of the table above as commitments given to it, and to hold Vantara to them. Vantara submits further that if the Secretariat or this Authority is of the view that any item of guidance has not been captured above, or that any action recorded above falls short of what was intended, Vantara may kindly be told so, and Vantara undertakes to act upon the same forthwith. Where the table records a measure as implemented and

operating, Vantara means that the policy has been adopted and is in force and that the body concerned has been constituted. The appointments which remain to be made to the CITES Due Diligence Committee, to the Governing Council and to the Advisory Board will be completed and notified to this Authority. In the event of any difference between the table and paragraphs 38 to 42 of this letter, those paragraphs shall prevail.

The strengthened compliance and governance framework at Vantara

9. Vantara places this framework before everything else in this letter, because everything else in this letter flows from it. Over the last nine months Vantara has built a new team for compliance and governance, drawn from persons of standing in the administration of the Convention, in veterinary science, in conservation biology and in zoological governance. That team is the fountainhead of the progress recorded in these pages, and the bodies described below are the form which its counsel has taken.

10. The Convention, the Resolutions of the Conference of the Parties and the practice developed by the Parties, the Secretariat and its committees continue to evolve, including in relation to source and purpose codes, captive-breeding claims and legal acquisition findings. Vantara has accordingly strengthened the specialist expertise dedicated to these matters and embedded that expertise within the governance structure described below.

11. Over the past year Vantara held discussions with a number of organisations in India and abroad before deciding whom to take advice from. The choice was made independently and on merit. In April 2026 Vantara approached Mr. John E. Scanlon AO, former Secretary-General of the CITES Secretariat and renowned environmentalist, and asked him for an independent report on Vantara with recommendations. Mr. Scanlon is an environmental lawyer who has served international conservation for more than three decades, including with the International Union for Conservation of Nature and the United Nations Environment Programme, before leading the CITES Secretariat as its Secretary-General from 2010 to 2018. He has since led and advised international wildlife initiatives across Africa and Asia, and is regarded as among the foremost authorities in the world upon the Convention. He was engaged on terms which secured his independence. He visited Vantara several times and submitted his report. Vantara has undertaken to implement his recommendations. He was then asked to continue in an independent capacity, to oversee the work described below and to chair the Governing Council, and he has agreed.

12. Accepting his recommendation Vantara has set up a compliance function of its own for the Convention, so that the standards the Convention applies are built into Vantara's own procedures. It rests on three bodies. Every proposal to acquire an animal passes through all three, in this order: first the CITES Due Diligence Committee, then the Advisory Board, and last the Governing Council. Each records its view in writing. If any one of them is not satisfied, the proposal goes no further. No stage may be skipped. Vantara adds that this function is not confined to the Convention. These bodies are charged with regard to every law, regulation and standard which bears upon the animals in Vantara's care, under the Convention and outside it, because Vantara's object is not the minimum which compliance requires but the most which the welfare of animals can be given.

The first body: the CITES Due Diligence Committee

13. The Committee is headed by Mr. Jonathan Barzdo, formerly Chief of Governing Bodies of the CITES Secretariat. Its other members are Dr. Boon Allwin, a wildlife veterinarian holding a doctorate in wildlife science, with more than nine years of experience in zoo and conservation practice, a specialist in the medicine of big cats and the author of more than forty peer-reviewed publications; Dr. Riyazahmed Fatemohamadbhai Kadivar, a senior wildlife veterinarian of more than twenty years' standing at the Sakkarbaug Zoological Park, Junagadh, who has spent his career upon the veterinary and breeding management of the Asiatic lion and upon the conservation breeding and reintroduction of endangered Indian species including the Indian grey wolf and the Lesser Florican; Dr. Charu Churamani, a veterinarian holding a postgraduate degree in veterinary public health from the All India Institute of Hygiene and Public Health, Kolkata, whose work lies in disease investigation, laboratory diagnostics and preventive medicine; and Dr. Nikita Salian, a wildlife veterinarian holding a postgraduate degree in wildlife medicine from the Bangalore Veterinary College, formerly a veterinary officer at the Bannerghatta Biological Park, Bengaluru, a member of the IUCN Crocodile Specialist Group, whose experience spans the rescue of leopards, sloth bears, elephants and reptiles, the neonatal care of wild species and the medicine of reptiles, in which she has made a particular study. They sit on the Committee because of their standing in their own fields and not because of any post they hold at Vantara. Further members, from India and abroad, will be added as the Governing Council may advise.

14. Every proposal comes to the Committee first. It decides whether the animal may lawfully be brought to Vantara at all. It examines whether the declared source is lawful and biologically plausible, whether the source and purpose codes proposed to be declared are correct, whether the chain of acquisition can be traced to the country of origin, whether every entity in the transaction is of good standing, and whether the acquisition is sustainable, testing each against the Convention and the relevant Resolutions. The Committee further examines whether the proposal serves a purpose of rescue, of preservation or of conservation breeding. The Committee also keeps Vantara's procedures under review and drafts new ones, trains Vantara's staff, and advises which institutions abroad are of good standing. Its standing charge is to see that Vantara never takes in an illegally traded animal, including of a species not yet listed under the Convention, and never becomes a reason for illegal trade.

15. The Committee consults the specialists whom Vantara has engaged to lead particular areas of its scientific work. They hold no seat on any of the three bodies and are engaged for their science alone. They are:

a. Dr. Adrian Tordiffe, Associate Professor in Veterinary Pharmacology at the University of Pretoria and Director of the Onderstepoort Veterinary Academic Hospital, a registered Veterinary Wildlife Specialist and a former member of the CITES Scientific Authority of South Africa, among the foremost authorities on cheetah health, nutrition and physiology, long associated with Project Cheetah, who leads Vantara's cheetah conservation programme;

b. Dr. Paul Funston, lion ecologist and conservation biologist, formerly Senior Director of the Lion Programme and Regional Director for East and Southern Africa at Panthera and now Executive Director of African Lion Conservation, a member of the IUCN Cat Specialist Group and of the IUCN Red List Panel for Lions, who advises on lions and other large carnivores; and

c. Mr. Ignacio Fernando Esquerro Sastre, primatologist, formerly a collection planner for the European Endangered Species Programme, who leads Vantara's work on primates.

16. Vantara has separately engaged field, veterinary and conservation specialists for its in-situ work in India.

The second body: the Advisory Board

17. The Advisory Board consists of Dr. Manilal Valliyate, formerly Chief Executive Officer of PETA India; Dr. Balachandran Ramanathan, a senior veterinarian with nearly four decades of clinical experience and a specialist in herd health; and Professor Matti Kiupel, Professor of Pathology at the College of Veterinary Medicine, Michigan State University, and a Diplomate of the American College of Veterinary Pathologists, who has published more than four hundred peer-reviewed papers in veterinary and comparative pathology.

18. The Board looks beyond the source and purpose codes. It examines the scientific and conservation case for the proposal, the standard of care the animal will receive at Vantara, and what alternatives exist in the country where the animal now is. A veterinary team sent by the Board visits the animal and reports to it. The Board then records its own reasoned view and places it, with the whole record, before the Governing Council. The Board also advises Vantara on its conservation and rescue priorities, on the standard of care and husbandry at its facilities, and on its work in range States.

The third body: the Governing Council

19. The Governing Council is chaired by Mr. Scanlon and will have up to four members besides the Chairman. One has been appointed. He is Dr. Kushal Konwar Sarma, on whom the Padma Shri was conferred in 2020, Professor and Head of the Department of Surgery and Radiology at the College of Veterinary Science, Guwahati, known across Asia as the elephant doctor. Dr. Sarma has spent his working life on the health and welfare of the Asian elephant. He treats several hundred elephants a year, has handled more than one hundred and thirty rogue captive elephants, has assisted in the capture, treatment and translocation of wild elephants, and holds health and vaccination camps at Orang, Nameri and Manas National Parks. The remaining members will be chosen by the Chairman, and not by Vantara's management, and will be persons of international standing in wildlife conservation, in law and policy, in animal welfare or in zoological governance.

20. The Council will have overall supervision and prominence in Vantara's conservation, rescue and compliance work. On every proposal to acquire an animal it considers the reports of the Committee and of the Board, examines anything else it considers necessary, and records its own decision. That decision binds Vantara. No animal of any species, whether listed in any Appendix of the Convention or not, may be acquired at any stage without the prior written approval of the Council.

21. The assessment of each of the three bodies is written down and kept at Vantara, and is available to this Authority, and to any other authority, on request. No application to import will be made until all three have recorded their satisfaction. Even then, Vantara will place the complete record of all three before this Authority, for its consideration and guidance, before the application is made.

The Office of Compliance and Due Diligence

22. The three bodies are served by an office within Vantara, the Office of Compliance and Due Diligence. It is not part of Vantara's management and takes no instructions from it. Mr. Ajit Kulkarni, a former officer of the Indian Forest Service and formerly Executive Director of the Sri Chamarajendra Zoological Gardens, Mysuru, holds independent charge of it as Special Director. He reports to the Chairman of the Council, and through the Chairman to the Council, and to no one else at Vantara. He holds office for a fixed term of three years and may be removed only by the Council, only for cause and only by an order recording reasons in writing, of which this Authority will be informed.

23. The work of the office is routine but necessary. It keeps the compliance manual, the standard operating procedures and the record of every undertaking given in this letter. It maintains the permit and provenance register, in which the acquisition chain of each specimen, the permits, the legal acquisition finding and, where the Convention requires one, the non-detriment finding are recorded. It acts as secretary to the three bodies, without a vote at any of them, and checks that each has completed its assessment and put it in writing before a file moves on. It carries out internal audit, with access at any time and without notice to any facility, record, system or person at Vantara. It may stop a proposal at any stage and require it to be looked at again, and it may do so without reference to Vantara's management. It receives complaints, including through a confidential channel open to Vantara's own staff and to persons outside Vantara. It trains staff on the Convention, including by drawing upon members of the CITES Due Diligence Committee, on the Resolutions and on Vantara's own procedures. It reports to the Council every quarter and to this Authority every year on compliance with the undertakings in this letter, and the annual report will be placed on Vantara's website. The Special Director may write to this Authority directly on any matter of compliance, in such manner as this Authority may permit, without anyone's leave, and nothing will follow within Vantara from his having done so.

24. Over and above the SOP which this Authority is to publish, and independently of it, Vantara has framed its own internal policy, which carries three layers of assessment, verification and due diligence. For any import which Vantara may hereafter propose, this internal policy operates in addition to the scrutiny of this Authority and takes nothing away from it. No application will leave Vantara unless it has passed all three layers:

- a. Assessment of legal, ethical and sustainable acquisition: the lawful and ethical acquisition of the animal, the chain of acquisition traced back to the country of origin, the permit chain, the source and purpose codes declared as tested against Resolution Conf. 12.3 (Rev. CoP19) and its annexes, the legal acquisition finding as tested against Resolution Conf. 18.7 (Rev. CoP19), and captive-breeding claims as tested against Resolution Conf. 10.16 (Rev. CoP19) and the standing of every entity in the transaction. This layer further examines the species, the lawfulness and the biological plausibility of the declared source, the breeding capacity of the exporting facility, the sustainability of the acquisition and the conservation case for moving the animal at all. Where the animal is not listed in any Appendix of the Convention, this layer examines the equivalent documentation described in paragraph 25 below. This layer is examined by the CITES Due Diligence Committee.
- b. Scientific and veterinary verification: identity, age, sex, permanent identification, medical and vaccination history, welfare, biosecurity and where relevant the parentage of the animal, including DNA parentage testing wherever the same can be obtained. A veterinary team will visit the location of the animal and submit its report. This layer is examined by the Advisory Board, which also undertakes in-depth diligence upon the species and upon the alternatives available in the country where the animal is.
- c. Due diligence and oversight: review of reports and conclusions, ensuring the reports of the CITES Due Diligence Committee and the Advisory Board are robust and follow their terms of reference and final decision based on the reports provided. This layer is examined by the Governing Council, which will also examine every other aspect which in its judgment requires examination.

25. Vantara adds two specific requirements which it imposes upon itself, over and above whatever the Standard Operating Procedure may require. First, before any application is made Vantara will itself obtain and place upon its record a legal acquisition finding in respect of the specimen, tracing the acquisition of that animal lawfully to the country of origin. Secondly, where the Convention requires a non-detriment finding, it will obtain and place upon its record the finding of the Scientific Authority of the exporting State, and where the Convention requires no such finding, or where the species or the circumstances warrant it, an independent scientific study upon whether the proposed movement is capable of causing any detriment to the survival of the species in the wild. Vantara will not act upon the assurance of the exporting facility alone upon either matter. Where an animal is not listed in any Appendix of the Convention, so that the Convention requires no permit, certificate or finding in respect of it, Vantara will nonetheless obtain and place upon its record equivalent documentation, being proof of the lawful acquisition of the animal traced to the country of origin, proof of its lawful export under the law of the exporting State and a scientific assessment of the effect of the proposed movement upon the species in the wild, to the same standard as if the animal were listed.

26. The checklist which each tier must satisfy before a proposal may travel further is maintained by the Office of Compliance and Due Diligence and will be furnished to this Authority on request. Vantara will be glad to be told what more it should contain.

Background

27. Vantara's attention was drawn by CMA India to the mission of the CITES Secretariat which visited its facility in September 2025. The mission recorded concerns and observations arising from complaints, media reports and representations by non-governmental organisations, and encouraged engagement and confidence-building. It also addressed the need for stronger and more systematic due diligence before an import, the treatment of source and purpose codes, captive-breeding claims and legal acquisition findings, and the consideration of in-country assistance as an alternative to moving an animal. CMA India asked Vantara to consider and act upon that guidance. Vantara has done so in the manner set out in the table above and in the paragraphs which follow.

Vantara today: Enhanced diligence

28. Vantara grew from the belief that every life matters and not from any plan. That belief runs through the more than four thousand people who work at Vantara. Vantara has not sought attention and for a long time it went about its work without explaining itself to anybody. Even today, as it builds India's first wildlife university, its object is not attention but action. Vantara now understands that this very quality left a silence about itself.

29. Vantara wishes to state one matter plainly. The number of animals at Vantara has never been its mission, nor does Vantara regard the animals as mere collection. Its work has developed through individual rescue, welfare, conservation, preservation and conservation circumstances as they arose. Vantara's future direction is therefore deliberately centred upon further widening its ongoing contribution towards in-situ assistance, species recovery, conservation outcomes, capacity building and the welfare of animals already in its care. The animals in Vantara's care are not trophies and they are not treated as trophies. They are not held in order to be counted, they are not held in order to be displayed and they are not spoken of as an achievement. Each of them is an individual animal which needed care and received it. The measure of Vantara's work is what becomes of that animal, and what becomes of its species, and not the fact that the animal is at Vantara.

30. Vantara therefore states its position for the future in these terms. Its ambition shall be measured not by how many animals come to Vantara but how many animals are assisted where they belong, by the species which are recovered in the wild, by the veterinarians, curators and keepers who are trained, by the range States which are supported and by the science which is shared without charge. That is the next chapter of Vantara's work, and Vantara asks this Authority, the Secretariat and the Parties to hold it to that measure.

31. A substantial part of Vantara's work has also taken place outside public attention: wild animal ambulances and rescues across India, treatment of animals brought to it, disaster-relief work during floods, training of mahouts, keepers and veterinarians, conservation education for school children and support to rescue centres. Vantara records this context not by way of self-congratulation but so that the measures in this letter are read alongside the continuing day-to-day work of the institution.

32. What Vantara places before this Authority is a strengthened and more institutionalised framework for compliance and due diligence. Its purpose, its people on the ground and its commitment to the animals in its care remain unchanged. The framework adds independent governance and specialist expertise to the decision-making process, so that future decisions of the kind addressed in this letter are taken through the structures described below rather than by any individual acting alone.

33. Over the last nine months, persons with substantial experience in the administration of the Convention, veterinary science, conservation biology and zoological governance have joined Vantara's compliance and governance bodies. Their role is to bring independent scrutiny, specialist advice and international experience into Vantara's decision-making. The enhanced approach recorded in this letter has been developed with their advice and will continue to be reviewed in light of evolving practice and the guidance of the competent authorities.

34. Vantara records that its prior imports were undertaken on the basis of the applicable legal and regulatory framework and the permits issued by the competent authorities concerned. Without seeking to enter into discussions on interpretation, Vantara has chosen prospectively to adopt the enhanced verification and due-diligence standards set out below. It does so to strengthen confidence, improve traceability and place future decision-making on a more independently verifiable footing.

35. It may assist this Authority if Vantara states plainly what it is. The work described in this letter is carried on by two entities, the Greens Zoological Rescue and Rehabilitation Centre and the Radhe Krishna Temple Elephant Welfare Trust. The Wild Life (Protection) Act, 1972 defines a zoo so as to include a rescue centre, and such entity is recognised as a zoo under that Act by the Central Zoo Authority, which determines carrying capacity and other features. Vantara's work is centred upon rescue, treatment, rehabilitation, welfare and conservation, and it is not operated for gate collections or dependent upon display. Its facilities are regularly open to scrutiny by the competent regulators and have also been examined by the High Powered Committee, the Special Investigation Team constituted by the Hon'ble Supreme Court and the mission of the CITES Secretariat, independent animal-welfare specialists and scientific and veterinary professionals from India and abroad. Vantara has additionally invited media and non-governmental organisations which have raised questions about its work to visit and engage directly, subject always to legitimate requirements of animal welfare, biosecurity and safety. The affairs of the two entities have besides been examined, and upheld, by the Hon'ble Supreme Court of India and by several High Courts of the country, as recorded later in this letter.

36. As to where Vantara is going, it sets out its objects in the short, the medium and the long term, so that it may be held to them. In the short term Vantara will continue the rescue, rehabilitation, the treatment and the welfare of animals within India, releasing animals back into the wild wherever that is possible, and will complete the establishment of its in-situ work in the States in which it has begun and will work towards a standard of animal husbandry and welfare which matches the best that is practised anywhere in the world. To that end it will continue the training of its own veterinarians, curators, biologists and keepers and will offer the same training free of cost to the zoos and the forest departments of the country. In the medium term Vantara will build a body of research and of research and development, in veterinary science, in vaccines and diagnostics, in conservation genetics and in the study of animals both in-situ and ex-situ and will publish what it learns. In the long term Vantara wishes to work shoulder to shoulder with the leaders of conservation across the world, in in-situ and in ex-situ conservation alike, as one contributor among many and not as an institution apart.

37. As further set out below, Vantara has undertaken a series of voluntary measures and additional safeguards. For an institution whose primary purpose includes rescue, some of those restraints are substantial. Vantara accepts them because it considers that transparent, independently verifiable safeguards will strengthen confidence in its future work. Vantara respectfully places the following before this Authority.

Vantara's undertakings and voluntary measures

38. The last application for import made by Vantara was in February 2026. Since then, Vantara has made no application for the import of any animal. All pending applications stand withdrawn and in each such case, Vantara has considered implementing in-situ alternatives, some of which are briefly described in this letter. The last animal physically received from abroad arrived at Vantara on 05 June 2026, under a permission which had been granted prior to February 2026, and no animal has been received from abroad since that date.

39. As directed, Vantara undertakes that it will make no application for import until CMA India issues the Standard Operating Procedure settled with the approval of the CITES Secretariat, as has been directed by the Hon'ble Supreme Court of India. Vantara awaits the publication of that Procedure and will conform to it in letter and in spirit. Vantara takes the commitment a step further still, and undertakes that even after such Procedure is issued, it will make no application for import without first consulting CMA India.

40. So that there is no room for doubt, Vantara states the position in the plainest terms. Vantara has halted the receipt of animals from abroad in terms of what is set out in this letter. That halt is not confined to specimens listed in the Appendices of the Convention. It extends to every wild animal of every species, listed or unlisted. The only movements which Vantara would consider at all are those falling within the permanent undertakings set out below. Even in that situation Vantara will not decide the matter for itself. The proposal will pass through all three bodies described above, it will not proceed without the prior written approval of the Governing Council and the complete record will be placed before this Authority for its consideration and guidance before any application is made.

41. As a permanent commitment that carries no end date, Vantara undertakes to CMA India as under:-

- a) **Re-export certificates:** Vantara will not apply to import and will not import, an animal on the basis of a CITES re-export certificate. The only exception which Vantara reserves to itself is where not less than seven years have elapsed from the date

upon which the animal was originally imported into the country which now proposes to re-export it, and the movement is required for the welfare of that animal, as for instance where an animal was transferred to a circus or to a like establishment and has since been retired from it. Even in such a case the proposal will pass through each of the three tiers described in this letter, will require the prior written approval of the Governing Council and will be placed before this Authority before any application is made. This commitment will be reviewed by the Governing Council after August 2027 and once all the measures outlined in this letter are fully operational. No relaxation of this commitment shall take effect unless this Authority has first approved the relaxation in writing.

- b) **Animals from the wild:** Vantara will not apply to import and will not import an animal from the wild in any range State. Where Vantara is asked to meet such an animal that is in distress abroad or is asked to help it, Vantara will aim to help it where it stands and aim to provide treatment, placement and lifetime care in a facility in that country, working with local organisations and with that country's authorities. If a case ever arises in which an animal's welfare truly demands that it be moved, and nothing at source is able to care for it, or if Vantara is a part of any conservation plan with the range State itself, Vantara will not decide that question for itself. It will place the facts before its internal decision making bodies now formed and thereafter consult with this Authority before proceeding.
- c) **Great apes, big cats and Appendix I species:** Vantara will not import any great ape, any big cat or any specimen of a species listed in Appendix I from a range State of the species concerned, including from a captive breeding facility. For clarity, the restraint upon specimens of Appendix I species is where the exporting country is a range State of the species concerned, that is, where the species naturally occurs in that country.
- d) **Exporting Facility:** No import will be considered by Vantara unless it originates from a zoo registered with or recognised by the Government of the exporting State, or accredited by a recognised international or regional association of zoological institutions, or from a facility registered with the CITES Secretariat, or in the course of a conservation breeding programme undertaken in cooperation with a range State.
- e) **Application to every animal:** Every voluntary undertaking recorded in this paragraph, and every procedure, safeguard and commitment recorded anywhere in this letter, applies to every animal without exception. It applies whether the animal is listed in Appendix I, in Appendix II or in Appendix III of the Convention, and it applies equally to a wild animal which is not listed in any Appendix at all. Where an animal is not listed in any Appendix, so that the Convention requires no permit, certificate or finding in respect of it, Vantara will obtain equivalent documentation to the standard described in paragraph 25 above. Vantara states this specifically so that there may be no doubt upon the point.
- f) **Application to Vantara as a whole:** In this letter the expression Vantara means the Greens Zoological Rescue and Rehabilitation Centre and the Radhe Krishna Temple Elephant Welfare Trust together, and every facility and programme under their

ownership, control or management. Vantara further undertakes that it will not receive, accept or take into its care any animal brought into India by any donor, sponsor, trust, company or other person for Vantara or at its instance, unless every undertaking, procedure and safeguard recorded in this letter has first been complied with in respect of that animal as though Vantara were itself the importer.

42. Vantara undertakes that any import of any animal whether listed in CITES Appendix or not, shall not be resumed unless and until each of the conditions set out below has been satisfied and each of the further matters recorded below has been complied with:-

- a. the SOP has been finalised and published by this Authority pursuant to the Order dated 27 May 2026 of the Hon'ble Supreme Court of India;
- b. this Authority has thereafter expressly approved, in writing, that Vantara has satisfactorily implemented its commitments as set out in this letter and may make such an application. Vantara will not treat the publication of the SOP as itself permitting it to apply;
- c. Even then, Vantara will not treat approval to make such an application as licence. Every application thereafter will be made strictly in accordance with the SOP as this Authority may prescribe it, and strictly in accordance with Vantara's own internal procedure described in this letter, which is additional to it and stricter than anything required of Vantara, and no such application will be made without the prior written approval of the Governing Council.
- d. And independently of everything above, for a period of twelve months with effect from 05 June 2026, while Vantara builds the governance, the expertise and the procedures described in this letter it will in any case make no application to import any live animal, even if the Standard Operating Procedure were to be finalised sooner and even if this Authority's approval were to come sooner. That period is a minimum and not a term. Upon the advice of its Governing Council and of its global advisory, Vantara may extend it, and a decision to continue the moratorium, if recommended by the Governing Council, will be implemented. Where Vantara is now approached about an animal abroad, its answer is in-country assistance and not consideration of import.

Vantara's work within India

43. Vantara's first priority now is the rescue, treatment, rehabilitation, rewilding and conservation of wildlife within India. It runs more than one hundred wild animal ambulances across the country and has carried out more than fifteen thousand rescues here. Vantara's care is not confined to wildlife. It is setting up a separate branch for domestic animals, through which it will provide veterinary services to domestic and farm animals in need, including stray dogs, cattle, equines and other animals, and will work with like-minded organisations upon their vaccination, treatment and welfare.

44. To carry that priority forward, Vantara will, in each case subject to and under the direction or approval of the competent statutory authorities:

- a. work with and support State Forest Departments in the management of human-wildlife conflict, in such manner as they may require;

- b. support capacity-building at transit treatment centres and rescue centres where such assistance is sought;
- c. assist with improvements to existing rescue centres and welfare infrastructure where identified by the competent authorities;
- d. support the establishment of further rescue centres where the competent authorities identify a need, for the treatment and, wherever possible, return to the wild of injured and displaced animals;
- e. undertake conservation breeding of species that can be rewilded in India, in every case under and subject to conservation breeding programmes approved by the Central Zoo Authority and of species identified in consultation with the Central Zoo Authority, the Government of India and the State Governments concerned; and
- f. make Vantara's technical, veterinary and other resources available, where sought, to support initiatives identified by the Central Zoo Authority, the State Governments and Indian zoological institutions, in the manner set out in the paragraph that follows.

45. The offers set out below are intended to complement, and not to supplant, the work and statutory responsibilities of the Central Zoo Authority, State Governments, Forest Departments and zoological institutions. Vantara will provide such assistance only where it is sought or approved by the competent authority concerned. The forms of assistance presently available include the following:

- a. **Training and capacity building:** hands-on training for animal keepers and caretakers, biologists and veterinary officers, in animal housing, nutrition, enrichment, behavioural observation and record-keeping.
- b. **Nutrition:** sharing, and where asked assisting in the formulation of, species-specific and region-specific animal diet charts, including supplementation.
- c. **Neonatal care:** sharing Vantara's standard operating procedures for neonatal care and for the hand-rearing of young animals.
- d. **Design and development:** assistance with the design of animal enclosures and feed-storage facilities and with the design of new zoos being established.
- e. **Financial assistance:** for zoos in need, towards the construction of animal enclosures and of feed-storage facilities.
- f. **Conservation breeding:** workshops on conservation breeding programmes; the maintenance of studbooks for species held under such programmes and the transfer of animals from Vantara's collection to Indian zoos, wherever the Central Zoo Authority so approves and the receiving institution is suitable.
- g. **Animal transport:** Vantara maintains a pool of purpose-built animal transport vehicles and will make them available, free of cost, to any zoo which the Central Zoo Authority may direct.
- h. **Systems and technology:** access to the ANTZ animal records management platform, upon terms which give Vantara no interest of any kind in the revenues of the zoo concerned.

- i. **Conservation education:** assistance in developing education programmes, in collaboration with Indian zoos already working in this field.
- j. **Diagnostics and laboratory services:** access to Vantara's cryopreservation facility and to its molecular and diagnostic laboratories, where that would be of use.
- k. **Veterinary consultation:** consultation in the diagnosis and the treatment of disease, by telephone, by video conference or by a visit in person and at short notice.
- l. **Veterinary infrastructure:** assistance in strengthening the veterinary hospitals and treatment facilities of Indian zoos, in design, in equipment and in the training of their staff.
- m. **Welfare improvements:** assistance, where it is sought, in developing written animal welfare assessment protocols.

46. Vantara is establishing a university dedicated to wildlife, the foundation ceremony for which was performed on 9 April 2025. In keeping with the mission's guidance concerning the sharing of scientific information, it is conceived as a centre for conservation education, research and veterinary sciences and will offer formal education, research and professional training in wildlife veterinary science, animal husbandry, conservation biology, zoo management and wildlife law and policy. Its programmes are intended to complement existing national capacity and to be available, where useful, to State Forest Departments, zoos, transit treatment and rescue centres, non-governmental organisations and other institutions engaged in wildlife conservation and welfare. Alongside it, Vantara conducts education drives, workshops and training sessions for zoo and forest personnel across India, free of cost.

47. The University will besides institute a scholarship programme under which not fewer than fifty students will be trained every year at no cost to themselves.

48. Alongside the University, Vantara is building scientific infrastructure intended to serve the country and the wider scientific community rather than Vantara alone. It would preserve DNA, gametes and embryos of endangered species for conservation genetics and species recovery; house a venom and toxin research centre, directed at anti-venom research, at the cataloguing of venomous species and at biotechnology applications; a diagnostic laboratory for zoonotic diseases; and a laboratory information management system, together with machine-learning and bio-acoustic research on animal behaviour. Vantara will make the facilities and the findings of this work available to Indian institutions and to the authorities. Vantara draws besides upon India's own traditions of medicine. It works with the Institute of Teaching and Research in Ayurveda at Jamnagar, an Institution of National Importance under the Ministry of Ayush, on the use of Ayurvedic preparations in the treatment, the rehabilitation and the palliative care of animals, alongside modern veterinary medicine and never in substitution for it. The object of that work is that the benefit of India's traditional science should, in time, be available for the treatment of wildlife everywhere in the world.

49. So that this work is carried on by people whose whole occupation it is, Vantara is establishing dedicated departments within its own organisation for in-situ conservation, for community relations, for reintroduction and rewilding and for the welfare projects which it supports outside its own facilities. Each department will have its own head, its own budget and its own reporting line to the Advisory Board. The University will carry corresponding schools and centres, so that the subjects are taught and researched as well as practised, and so that the young people who will do this work in the next generation are trained in India. The outreach which Vantara has undertaken, and the collaborations which it has entered into with institutions in India and abroad, will be carried by these departments and by the University together, and not by any single individual.

50. Upon both ex-situ and in-situ conservation, and upon animal welfare, Vantara works with the Government of India and the State Governments in the manner and to the extent that they may require. Vantara also supports the field directly: it has funded twenty-five non-governmental organisations engaged in ground-level conservation and welfare work, and it will continue to expand that support, subject always to due diligence on the record, the governance and the genuine conservation purpose of the organisation concerned. A dedicated fund for this support is being established, and its modalities will be settled by the Governing Council.

51. Vantara is keen to be a part of three of India's threatened species, the cheetah, the Great Indian Bustard and the Lesser Florican. Vantara will undertake such work on these as the Central / State Governments may consider useful. Vantara seeks no land and no proprietary interest in any of this work. In this work, as in the rest, Vantara will be commencing collaboration with like-minded non-governmental organisations of proven record.

52. So far as the cheetah is concerned, Vantara has constituted a dedicated team for studying the rewilding of the cheetah in India, working under the guidance of Dr. Adrian Tordiffe, who has for many years worked on the veterinary management of the species and on its reintroduction. In every case Vantara's teams will function on the directions of the Government of India and of the State Governments concerned.

53. In the North Eastern States Vantara is engaged upon two matters, each of which is at a stage of discussion with the State Government concerned. It has offered to help in setting up rescue and rehabilitation centres for wildlife, together with reforestation of degraded land in and around those landscapes, so that animals which are treated have habitat to return to. Vantara has separately taken up the condition of the captive elephants employed in logging operations in the North East. These animals work in difficult terrain, and Vantara has offered to provide their treatment and their nutrition, to train the mahouts who handle them and to take into lifetime care such of them as are found unfit for further work, keeping them within the North East itself, in the landscape to which they belong.

54. With the Forest Department of Gujarat, Vantara has proposed a dedicated hospital for the Asiatic lion, to add to the veterinary care available within that landscape. The object of that hospital is treatment and return, so that lions which are treated may, wherever possible, be released back into the wild. Vantara is likewise in discussion with the Governments of Karnataka, Kerala and Telangana upon rescue centres, upon the upgrading of existing facilities and upon veterinary support for the wildlife of those States. Vantara records one further undertaking in connection with all such work. No forest land is to be diverted for any facility of this kind, and Vantara seeks no proprietary interest in any land on which such a facility may be built. Vantara will extend the same offers to other State Governments as they may desire.

55. Vantara's work on Indian species is not confined to the large and the well known. Together with the Turtle Survival Alliance Foundation India, Vantara is supporting a field programme for the years 2026 to 2030 along the Ganga and the Brahmaputra, for ten riverine and forest species, most of which are classified as critically endangered or endangered. They are the Asian Giant Tortoise, the Black Softshell Turtle, the Northern River Terrapin, the Red crowned Roofed Turtle, the Three Striped Roofed Turtle, the Narrow headed Softshell Turtle, the Crowned River Turtle, the Tricarinate Hill Turtle, the Gharial and the Gangetic River Dolphin. The work is carried on in Assam, Tripura, Manipur, Nagaland, West Bengal, Uttar Pradesh and Rajasthan, and in each case under the permission of the State Forest Department concerned or under a Memorandum of Understanding executed with it. Not one animal in this programme leaves India. The whole of it is rescue, breeding and release within the rivers and forests to which these species belong. Vantara mentions these small animals deliberately. For some of them the wild population had fallen to a few temple ponds and their disappearance would have been noticed by almost nobody. A commitment that every life matters must include the lives which nobody sees.

56. Two of these programmes may be described, because they show what the work actually consists of. The Asian Giant Tortoise is the largest land tortoise of mainland Asia and fewer than five hundred adults are believed to survive in the whole of the Indo Myanmar landscape. Since 2017, in Nagaland, fifteen founder animals were rescued from village holdings and more than one hundred hatchlings have since been produced, and young tortoises have been released into community managed forests with the participation of village councils and Community Reserve Committees. The programme has now been extended to Manipur, where twenty-eight tortoises were hatched in 2025. The Black Softshell Turtle is endemic to the Brahmaputra and was at one time believed to be extinct in the wild, surviving only in a few temple ponds of Assam. Since 2018 more than two thousand five hundred eggs have been rescued from those ponds and more than one thousand young turtles have been raised and released into the Brahmaputra. A women's collective known as the Kaso Sakhi, meaning the friends of the turtles, has been formed in the riverine villages, so that the protection of the species carries a livelihood with it.

57. Vantara proposes to place that capacity upon a permanent footing. It is establishing a dedicated cell within its organisation for the support of wildlife law enforcement, which will function under the CITES Due Diligence Committee and will offer four things to the authorities. First, it will hold capacity in readiness at all hours to receive, to treat and to give lifetime care to animals seized anywhere in India, at Vantara's own cost and upon the request of any enforcement agency or court. Secondly, it will provide forensic and veterinary support to those agencies, including the identification of species and sub-species by morphology and by DNA, the determination of age and origin, the examination of seized material and the giving of expert evidence, at no charge. Thirdly, it will train enforcement personnel and customs and forest officers in the identification and the handling of live specimens, and will make trained wildlife detection dogs and their handlers available where they are wanted. Fourthly, it will share with the authorities whatever it learns of the patterns of trafficking which come to its notice. Vantara offers the same assistance to the authorities of other countries, and will do so through this Authority and, where appropriate, through the CITES Secretariat, so that it is never itself the channel of such information.

58. Vantara also puts its design and veterinary capacity at the service of small rescue centres which are doing good work with very little. On 12 August 2026 a team from Vantara visited Dr. Prakash Amte's Animal Ark at Hemalkasa in Bhamragad, in the Gadchiroli district of Maharashtra, which has cared for rescued animals for many years alongside a fifty bed hospital and a school of more than six hundred

children. Vantara has offered to design and to build, at its own cost, such enclosures, veterinary spaces and supporting facilities as that institution may need, should it wish to seek recognition under Section 38H of the Wild Life (Protection) Act, 1972. Vantara seeks no interest of any kind in that institution.

59. Vantara mentions all of this work for one reason only. It has been suggested in some quarters that an institution of Vantara's size must show a conservation benefit and not merely an accumulation of animals. Vantara accepts that test without reservation, and asks to be judged by it. Every programme described above is carried on within India, upon Indian species, with the permission of the authority concerned, and in almost every case in partnership with a State Forest Department or with an organisation already working in the field.

60. The scale of Vantara's work may be stated shortly, and the particulars underlying each of these figures are available to this Authority upon request. Over the years its rescue, translocation and field engagements have extended to seventeen States of India and to a number of other countries, though by far the greater part of the work is within India. Vantara takes part in habitat restoration programmes across several landscapes, in each case with the authority concerned. Its capacity-building programmes, student education and outreach, veterinary training programmes, mahout training, keeper development and the convention of the Indian Association of Wildlife Veterinarians have together reached a very large number of persons. Its Rescue Rangers conservation education programme has engaged more than one hundred thousand children across ten cities, upon human-wildlife coexistence, wildlife smuggling, ocean life and climate change. Its disaster response capability, of more than two hundred trained members available around the clock, has assisted a large number of people and animals in the floods of this year.

61. Vantara has extended its elephant welfare work in India. It has completed an Elephant Welfare Outreach Programme across eight locations in the North Eastern States and the Andaman and Nicobar Islands, under which one hundred and eighty-two elephants were supported and two hundred and forty-two mahouts were engaged and trained in preventive veterinary care, in first aid, in humane handling and in the management of musth. With the Government of Rajasthan, Vantara is to establish an Elephant Treatment and Care Facility at Hathi Gaon, Jaipur, comprising a hospital, a nutrition centre and hydrotherapy, together with a retirement and care centre for elderly elephants. Vantara has also made a grant to the Elephant Protection Initiative (EPI) Foundation to support its human elephant conflict work and to enable a wide range of delegates, including from all thirteen Asian elephant range States, not fewer than five African elephant range States and youth representatives, to participate in upcoming global conferences on human wildlife conflict and to enable the EPI Youth Ambassadors Programme to be extended to India. In the field, Vantara deploys rapid-response veterinary teams, thermal drone surveillance and community engagement to address human-elephant conflict and to promote coexistence. Vantara has separately entered into a Memorandum of Understanding dated 15 November 2025 with the International Elephant Foundation, to which the Radhe Krishna Temple Elephant Welfare Trust is also a party, for cooperation on elephant health, behaviour, nutrition, reproductive biology, disease management and rehabilitation, upon collaborative research into genetics, welfare assessment, pathology and disease surveillance and upon the training of veterinarians, biologists, mahouts and wildlife personnel. The campus of the Trust houses an elephant hospital in which advanced lifesaving and palliative surgical procedures are carried out for the more than two hundred elephants entrusted to it by State Governments, by organisations and by individuals.

62. Vantara is besides donating Hospital and Diagnostic Labs on Wheels, being mobile veterinary units which take diagnosis and treatment to the animal instead of bringing the animal to the hospital, for deployment with the authorities, departments and organisations which need them. Vantara's intention

is a fleet of one hundred and fifty fully staffed units. Its initial plan is to have one hundred of them running on the ground across India within the next three years, and the full fleet within five.

63. None of this is a promise about the future. It is already how Vantara works, and it has responded wherever disaster has struck, across various States. When Upper Assam flooded in July and August 2026, among the worst such events the region has seen in years, driving hundreds of thousands of people and their livestock from their homes across Sivasagar, Charaideo and the districts around them, Vantara deputed a disaster relief team of two hundred persons, of whom thirty-nine were experienced in the rescue and care of animals, into the affected areas. Where the roads had gone, they travelled for hours by tractor and by boat to reach villages which the water had cut off. They set up temporary relief camps so that help would be within reach of stranded livestock and wildlife. They gave urgent treatment, preventive care and nutritional support, fed thousands of flood-affected animals and assisted local wildlife wherever they found it, working beside the State authorities and the other agencies in the field. That is the priority described in this section, and that is the infrastructure and the manpower which Vantara is putting behind it.

64. Vantara remains equally committed to the lifetime care of every animal already in its charge. Alongside that, and as its new team has guided, it will concentrate on ex-situ conservation and on scientifically managed, duly approved breeding programmes, and will give each animal the best care it is capable of giving. Vantara wishes to be clear about the purposes which the animals already in its care serve, because that question has been asked of it. Every one of them is entitled to lifetime care and will receive it, whether or not it is of any use to anybody. Beyond that, and only where it is consistent with the welfare of the individual animal, the collection serves four further purposes. It supports conservation breeding of species which can be rewilded in India, in every case under programmes approved by the Central Zoo Authority. It supports veterinary science and research, so that what is learned at Jamnagar is available to those treating the same species elsewhere. It supports education. And it holds a reserve of genetic material, kept for the species and not for Vantara. Through the genetic resource bank and the cryobanking work described above, and through whole genome sequencing of the animals held, Vantara is building a genetic reserve which it will make available, without charge, to any range State, government or recognised institution anywhere in the world which requires it for the recovery of a species. Where an animal is ever transferred from Vantara it will be transferred only with the approval of the Central Zoo Authority, only to an institution which that Authority certifies as suitable to receive it, and never for consideration. Every such transfer will be made only upon the prior approval of the Central Zoo Authority and of this Authority, only under such permits and certificates as the Convention and the law of India require, and only after the proposed transfer has been examined by the CITES Due Diligence Committee and the record placed before this Authority. In this sense the collection also serves as a second captive reserve population of the species concerned, held for the species and not for Vantara.

65. A question which is fairly asked of any institution which promises lifetime care is who will pay for it in thirty years. Vantara answers it in this way. Vantara is supported by its sponsoring entities, among which is one of the oldest and largest industrial houses of India, in existence since the nineteen sixties, and that support has never faltered. Vantara mentions this only so that this Authority may know that the undertaking of lifetime care which Vantara has given is one which it has the means to keep. Beyond that support, and quite apart from it, a considerable number of persons and institutions of standing, in India and abroad, have of their own accord offered to commit funds to this work, and Vantara records with gratitude that it has never yet had occasion to call upon a single one of them. The animals therefore do not depend upon one source alone. The funds which sustain them are philanthropic, they are

committed for the long term, they seek no return of any kind, and the accounts of the two entities are audited and are available to this Authority upon request.

Assistance within range States and countries of origin

66. As CMA India has guided Vantara, and with the assistance of the experts now engaged, Vantara will direct its resources to rescue, treatment, conservation and preservation within range States, rather than to moving animals into India. Vantara does not put itself forward as assisting any country. It will endeavour to work with and to support, in whichever way it usefully can, institutions public and private, and bodies governmental, semi-governmental and non-governmental, in India and abroad, always at their invitation and through the competent authority of the country concerned.

67. To that end, and where it is wanted, Vantara will offer design and technical assistance, training, or a contribution towards the cost of building and running wildlife hospitals and rescue centres in the countries of origin themselves.

68. That commitment is not an intention. It is already in operation, under instruments signed with public institutions abroad. Under a Memorandum of Understanding dated 7 July 2025 with the Zoological Park Organization of Thailand, whose six zoological parks are members of the World Association of Zoos and Aquariums, Vantara is to support that Organization's captive breeding, research and conservation programmes in Thailand by upgrading its veterinary hospital and its animal enclosures, by enhancing its wildlife biobank and by conducting training workshops for its veterinarians, zookeepers, curators and management.

69. Under a Memorandum of Understanding dated 29 June 2026 with the National Forestry Office of the Republic of Costa Rica, being the public institution which formulates that country's National Forestry Policy under National Forest Law No. 7575 of 1996, Vantara has established a framework of cooperation for ten years. It covers wildlife rescue and rehabilitation, conservation breeding and species recovery, ecosystem restoration, joint research in wildlife health and veterinary medicine, conservation genetics, biobanks, veterinary diagnostics and disease surveillance and the training and exchange of veterinarians, researchers and wildlife professionals.

70. In Indonesia, Vantara offered to place trained wildlife detection dogs, with expert handlers, at the disposal of the Indonesian authorities for their anti-trafficking work. It offered to support the upgrading of government-managed wildlife rescue centres and to strengthen the medical infrastructure of wildlife hospitals there, including those for elephants and other large mammals. It further offered to coordinate with that Ministry the safe and lawful repatriation to Indonesia of any confiscated animal of Indonesian origin found in India. Vantara also records that there is an understanding between Taman Margasatwa Ragunan (of the National Zoo of Indonesia) and the Greens Zoological Rescue and Rehabilitation Centre. The Ministry of Forestry of Indonesia has separately conveyed its appreciation to the Greens Zoological Rescue and Rehabilitation Centre for the care given to a rescued baby orangutan from Thane in Maharashtra. That Ministry recorded the ecological importance of the orangutan and the protection it enjoys in Indonesian law, appreciated the standards of animal welfare and the professional expertise of the team, described the arrangement as a model of international collaboration and called for strengthened international collaboration for the welfare of critically endangered species. Vantara has offered to carry that collaboration further, by assistance with vaccines against elephant endotheliotropic herpesvirus for Indonesia's elephants, which has been given, by the

design and donation of elephant ambulances, by help in setting up an elephant hospital in Indonesia, by support for reforestation and for programmes for endangered species, by diagnostic laboratory support, and by working with like-minded conservation organisations of that country, in every case with and through the competent Indonesian authorities. Every animal treated at any hospital or rescue centre so set up will be treated in Indonesia and, wherever possible, released back into the wild in Indonesia.

71. Where any established institution of good standing anywhere in the world would find Vantara's assistance useful, and where the competent national authority of that country concurs, Vantara will give that assistance gladly and without expecting anything in return. Every such engagement will be pursued with and through the national authority concerned, and will be reported to this Authority.

72. Vantara is in touch with the competent authorities of several countries, with a view to supporting wildlife within those countries rather than moving it out of them. These engagements are at varying stages and none of them stands concluded except where an instrument is named in this letter. Particulars of each will be furnished to this Authority as and when formalised. Some of them are the following.

- a) **Brazil** — collaboration with the Brazilian authorities in support of the programme for the reintroduction, conservation breeding and recovery of the Spix's Macaw (*Cyanopsitta spixii*);
- b) **Indonesia** — assistance with vaccines and veterinary support, with the establishment of a rescue centre, an understanding with Taman Margasatwa Ragunan (the National Zoo of Indonesia) and the offers recorded in paragraph 70 above;
- c) **Venezuela** — Vantara has offered to design, to build and to equip a dedicated wildlife hospital and a rescue and rehabilitation centre for the wildlife of Venezuela, to provide the veterinary training required to run them and to bear the cost of doing so. Vantara has proposed that both facilities be owned and administered by the competent authority of that country and that its own role be confined to design, to construction, to training and to the raising and provision of the funds required. A joint plan of action is being worked out with the authorities of that country;
- d) **The Democratic Republic of the Congo** — Vantara has offered to establish a wildlife hospital and to support the zoological institutions run by that Government, by the supply of veterinary equipment and medicines, by the training of veterinarians and keepers and by assistance with the upgrading of enclosures and of quarantine facilities, which is already under way. Vantara has recorded with the authorities of that country that it seeks the movement of no animal out of the Congo, and that the whole of its assistance is directed to the care of animals within the Congo itself;
- e) **Zimbabwe** — a sanctuary and wildlife care centre for elephants, together with support for animal welfare and protection. A team from Zimbabwe has visited Vantara, and a joint plan of action is being worked out with the authorities of that country;
- f) **Kenya** — Vantara is in dialogue with the authorities concerned upon support for wildlife within Kenya;

- g) **Costa Rica** — the ten-year framework recorded in paragraph 69 above, together with research, education and training centres to be developed in both countries; and
- h) **Thailand** — the support recorded in paragraph 68 above.
- i) **Rwanda** — Vantara has proposed to the Government of Rwanda a programme of technical, scientific and veterinary assistance which would be carried out entirely on site. The proposal is at the stage of discussion. Nothing in it requires any animal to leave Rwanda.

73. In every one of these, the object is rescue, rehabilitation, relief, care and wildlife conservation in place and wherever necessary the building of capacity within the range State where the animals are. Not one of them contemplates moving an animal to India.

74. Vantara sent a team to Colombia in connection with the invasive population of common hippopotamus there. What is to be done is for the Government of Colombia to decide. Vantara has conveyed that, if it would be of use, it would be glad to help design a facility in which males and females are housed apart, to give veterinary and husbandry advice for it and to contribute towards the cost of building it. If the proposal is finalised, the facility would be built as a hippo sanctuary, in which the animals already in Colombia live out their lives while further breeding is prevented, and Vantara will provide the expertise to design that facility and the solutions to build it, as early as the Government of Colombia may desire.

75. Vantara respectfully submits that this is, in practical terms, the very course the Secretariat itself commended at paragraph 76 of SC79 Doc. 6.3.4, where it observed of in-country support of the kind GZRRC has itself provided that it “... would allow for additional time to conduct due diligence verifications ...” while the life of the animal is preserved, and that support of that kind carries lasting benefit for the conservation of the species in its own country of origin. Vantara has adopted that observation as its working principle, and this letter makes it permanent.

76. Vantara’s scientific collaborations are being built on the same footing. By a Memorandum of Understanding dated 30 July 2026 with one of the foremost natural history museums in the world, Vantara has entered into a ten-year framework for collaborative research in biodiversity, taxonomy, genetics, wildlife health and conservation science, for the exchange of scientific expertise, publications and training and for public engagement initiatives to advance understanding of biodiversity conservation internationally.

77. Vantara asks this Authority to note a feature common to these instruments, because it goes to a concern that has been raised about Vantara. Each records upon its face that the collaboration is non-commercial. The Memorandum with the National Forestry Office of Costa Rica states that the collaboration under it “is non-commercial in nature and does not envisage profit-sharing or commercial exploitation of wildlife resources”. The Memorandum with that museum establishes “a non-commercial framework of cooperation”, records that the Parties “do not seek to enter into any commercial use of wildlife” and provides that it “shall remain non-commercial at all times”. Each instrument further subjects every activity under it to the applicable laws of both jurisdictions and to the relevant international conventions. The Memorandum with the International Big Cat Alliance and the agreement with the University of Georgia are to the same effect, each providing that it creates no financial obligation upon either party and that each party bears its own costs. These are not Vantara’s descriptions of its own conduct. They are terms which foreign public institutions have required, and to which Vantara has subscribed.

The record of examination by the judicial and the executive branches

78. Vantara's affairs have been examined again and again, by both the judicial and the executive branches of the Indian State, and Vantara has cooperated fully with every one of those examinations.

a. Before the Hon'ble Supreme Court of India, upon three occasions. A Special Investigation Team constituted by the Hon'ble Court examined Vantara's affairs and found no violation of any domestic law or of the Convention. That finding was accepted by the Order and Judgment dated 15 September 2025 in C.R. Jaya Sukin v. Union of India and Others [Writ Petition (Civil) No. 783 of 2025] and the connected matter. An application to reopen the investigation was dismissed on 09 March 2026, and a further application seeking reopening and consequential action, in Karanartham Viramah Foundation v. Union of India and Others [Miscellaneous Application No. 32519 of 2026], was dismissed on 27 May 2026. Earlier, in Kanhaiya Kumar v. Central Zoo Authority, the Hon'ble Supreme Court upheld the legal status of the Greens Zoological Rescue and Rehabilitation Centre and dismissed the allegations of commercialisation. Vantara places this record before this Authority for information and not by way of any submission upon the powers of this Authority.

b. Before several High Courts, at different points of time. In Muruly M.S. v. State of Karnataka, the Karnataka High Court, by its judgment dated 06 June 2022, held the Radhe Krishna Temple Elephant Welfare Trust to be a bona fide entity pursuing a laudable object and upheld the transfer of elephants to it. That view was affirmed by the Hon'ble Supreme Court by its order dated 01 August 2022, and again in 2023 SCC OnLine SC 224. In Sudipa Nath v. Union of India, the Tripura High Court constituted the High Powered Committee by its order dated 07 November 2022, approved the transfer of elephants subject to verification and categorically rejected the allegation that elephants had been procured from the wild. In Kaustuvmani Kakati v. State of Assam, the Gauhati High Court, by its judgment dated 25 January 2023 in PIL No. 6 of 2023, upheld the transfers before it and found no illegality. In A. Vishwanath v. State of Tamil Nadu, the Madras High Court, by its judgment dated 10 August 2022, upheld the crocodile rescue and the facilities of the Greens Zoological Rescue and Rehabilitation Centre. In Halar Utkarsh Samiti Trust v. State of Gujarat, the Gujarat High Court found that Centre to be fully compliant. In PETA India v. Asiad Circus, the Delhi High Court approved the care given by the Trust to a rescued hippopotamus. And in Swasthishri Jinsen Bhattarak Pattacharya Mahaswami Sanstha Math (Karveer) v. Union of India and Others, 2025 SCC OnLine Bom 2674, the Bombay High Court, by its judgment dated 16 July 2025, upheld the transfer of an elephant to the Trust, recorded that the High Powered Committee had conducted a careful examination of the material. The Special Leave Petition against that judgment was dismissed by the Hon'ble Supreme Court on 28 July 2025.

c. By the executive branch, regularly and as a matter of routine. Each of the two entities is assessed twice each year by the Central Zoo Authority, by the State Wildlife and Forest Department and by the Department of Animal Husbandry and Dairying. The Central Zoo Authority has separately inspected each of them on the renewal of its recognition and on the determination of its carrying capacity. The High Powered Committee constituted under the orders of the Hon'ble Supreme Court makes regular visits and inspections.

79. Vantara does not recite this record by way of defence to the present process, and it recites it without complaint against anybody. It recites it because an institution which has been examined so often and found compliant so often, and which is nevertheless still not always fully understood, must accept that

legal vindication alone will not answer those who continue to ask questions of it. Something more is required, and this letter sets it out.

80. Vantara adds one clarification, so that nothing is left unsaid. There exist, in various countries, establishments in which animals may lawfully be kept and lawfully be sold. Over the last five years animals have come to Vantara from fur farms and skin farms, from recognised and registered breeders, from hunting ranches, from crowded private facilities, and from private zoos and keepers who could not, or did not wish to, keep them. In many of these cases the animals were bought by donors, and were then gifted or donated to Vantara, by persons who wanted those animals to have a better life. Vantara records this openly, because there is nothing in it to hide. Every such receipt was under valid documentation, and the Hon'ble Supreme Court of India has upheld the lawfulness of such donations in the two passages set out below. In the past, on transactions said to bear a commercial character, the position is this, and Vantara states it plainly. The manner in which Vantara acquired its animals, and the legal character of those acquisitions, are matters that have been examined by the Hon'ble Supreme Court of India on three separate occasions, considered, upheld and settled. Looking forward, Vantara has bound itself by its undertakings given at the outset of this letter. The question has been put to Vantara specifically in relation to animals which were purchased abroad by donors and were thereafter donated to Vantara, and Vantara answers it by setting out what the Hon'ble Supreme Court of India has already held on that very subject in its Order dated 27 May 2026. At paragraph 9(v) of that Order the Hon'ble Court held as follows.

"At its summary paragraph 4.6.13, the SIT recorded the principle that where animals are procured by a donor entity in accordance with the law applicable to it and transferred to respondent Nos. 5 and 6 under a valid export permit, no contravention of Indian law or of the Convention can be alleged and that donation by an independent donor who may fund the release of animals from overcrowded, small, congested breeding facilities, zoos or canned or trophy-hunting facility, by acquiring the same in its own jurisdiction as long as permitted by the law applicable to him and thereafter effects a zoo-to-zoo transfer under valid export and import permits and the requisite domestic permissions, is not invalid and is lawful."

"The structure of donor-funded acquisitions animals purchased lawfully by foreign donors from licensed commercial breeders in their own jurisdiction and donated to respondent Nos. 5 and 6 is lawful at source and no offence of money laundering or round tripping would arise in such cases. We accord particular weight to the principle articulated at paragraph 146, that an irregularity, if any, by a donor or exporting entity within its own domestic jurisdiction does not translate into liability for the Indian recipient institution, once the import is supported by valid export and import permits."

81. Vantara nonetheless records that by the undertakings in this letter, there exists no foundation to harbour the apprehension surrounding such facilities. Vantara has never purchased any animal and it never will, much less from such an establishment.

82. Upon the larger premise that an acquisition by a zoo through commercial means is somehow impermissible, the Hon'ble Court held at paragraph 10 of the same Order that the provision which regulates the acquisition of animals by a zoo is Section 38I of the Wild Life (Protection) Act, 1972, that so long as the permission of the Central Zoo Authority is taken and, in the case of imports, the legal process of CITES is followed, the question whether the foreign exporter acts with a commercial intent is largely beside the point, and that "Even a transfer styled commercial, if made for or to a zoo, rescue centre or conservation breeding centre, falls principally to be treated as a zoological transfer and not as a commercial one." Vantara places that holding before this Authority for completeness of the record and not as any submission upon the meaning of Article III of the Convention or upon Resolution Conf. 5.10 (Rev. CoP15), which are matters for this Authority, for the Secretariat and for the bodies of

the Convention. Vantara undertakes that hereafter the commercial or non-commercial character of every acquisition, and of every antecedent transaction in the chain, will be examined at each of the three tiers and disclosed in full to this Authority.

83. Vantara places these findings before this Authority not by way of contest with anybody, but because the question has been asked of it and it is right that the answer of the highest court of the country should be before this Authority. Vantara adds at once that it does not rest upon that answer. The question is in any event one of the past and not of the future. Under the self-adopted restraints recorded at the outset of this letter Vantara will make no application to import any animal at all for the present, and when the procedure described in this letter comes into operation the complete acquisition chain of every specimen, including the manner and the character of its acquisition by any donor, will be traced to the country of origin, will be examined at each of the three tiers and will be placed before this Authority before any application is made.

84. Vantara adds, for the removal of any doubt, that nothing in this letter is to be read as casting doubt upon the decisions, the competence or the good faith of the Management Authority, the Scientific Authority or any other authority of any exporting Party under the Convention. Vantara holds every such authority in respect, and the commitments recorded in this letter are made so that the work of those authorities, and of this Authority, is made easier and never harder. Vantara is a young organisation. It acted upon the knowledge and the advice it had, its conduct has been upheld wherever it has been examined, and upon the recommendations since received it has chosen, of its own accord, the stricter course which this letter records.

85. Vantara also places on record that, of its own motion and before the mission of the Secretariat visited it, Vantara had sought inspection and accreditation from Global Humane. That course accords with the guidance of the mission that Vantara should submit its facilities to outside examination, and Vantara has resolved to seek further external assessment besides. The delegation deputed to Vantara consisted of five zoological and veterinary professionals, namely Mr. Brad Andrews, Dr. Judy St. Leger, Dr. Grey Stafford, Mr. Glenn Young and Mr. Tom Otten.

86. Global Humane has conducted two separate rounds of inspection at Vantara. Upon each occasion Vantara welcomed the delegation, afforded it complete and unrestricted access to every facility, record and person which it asked to see, and cooperated fully with its examination. Upon the conclusion of that process Global Humane conferred upon Vantara the Global Humane Conservation Certified distinction.

87. Vantara places on record one further assessment, and it does so because it came from a Management Authority under this very Convention. In June 2025 a delegation of five wildlife management professionals of the Israel Nature and Parks Authority, which is the CITES Management Authority of the State of Israel, visited Vantara. By his letter dated 8 July 2025 Mr. Ori Linial, Head of the Wildlife Trade and Maintenance Supervision Unit of the Law Enforcement Division of that Authority, recorded on behalf of the delegation its observations on the standard of care, on veterinary oversight and staff training and on the design of the enclosures and facilities. That letter is held by Vantara and will be furnished on request. Vantara does not suggest that this assessment binds anybody. It places it before this Authority because it was made by officers whose daily work is the administration of the Convention.

88. Vantara states one further matter about that visit, so that nothing is left out. One of the purposes of the delegation was to assess a proposal for the transfer of a group of macaques from Israel to Vantara. Vantara records that it is not pursuing that proposal, that no application has been made in respect of it and that none will be made unless and until every condition set out in this letter has been satisfied. That proposal, like every other, now stands subject to the self-adopted restraints and to the three tier procedure described in this letter and to the prior approval of this Authority.

89. Vantara has also received professional advice from directors of leading European zoological institutions who visited its facilities. By a letter dated 20 December 2024 written on behalf of three such directors, Vantara received observations concerning enclosure design and husbandry, including suggestions for further innovation in the design of facilities for larger mammals and birds. Vantara has incorporated those observations into its continuing enclosure-design programme and will report the progress of that work to this Authority. Vantara records this advice as an example of the external professional input which it seeks and acts upon as part of continuing improvement.

90. A further assessment came from the accreditation community of the United States. Mr. John Seyjagat, formerly Executive Director of the Zoological Association of America, an association of some seventy accredited facilities and more than nine hundred and fifty members, visited Vantara twice between 2024 and 2026. He records that he came upon invitation and that his purpose was curiosity and fact checking. By his letter he recorded his observations on the enclosures and holding areas he inspected, on animal housing, on the staff and on the diagnostic work carried out in house. Upon his second visit, in February 2026, he brought with him members of the leadership of several zoological institutions of the United States.

91. Vantara draws attention, in that letter, not to what is said in its favour but to the suggestion made in it. Mr. Seyjagat observed that Vantara is young and has some way finding still to do, and that it could be of additional help to species of concern by contributing the genetics of its collection to international species survival breeding programmes. Vantara has accepted that suggestion. It is the reason why the genetic reserve described earlier in this letter is offered without charge to any range State, government or recognised institution which requires it, and it is reflected in the Vision Plan recorded below. Vantara records the suggestion, and the name of the person who made it, because it intends to be an institution which says where its improvements have come from.

92. Vantara is a member of EARAZA, SEAZA and GUZI, and is considering what further collaborations and memberships it should pursue, including the benchmarking and membership recommended by the Special Investigation Team. In particular, Vantara has resolved formally to pursue accreditation with the leading associations and federations. In the interest of transparency, Vantara's own internal procedures will be revised, updated where necessary, published and made publicly available so that their operation can be assessed independently by the international community. Vantara adds that the permanent restraints and the three-tier procedure described in this letter were framed with the acquisition and welfare standards of such bodies in view, and that Vantara will conform its intake, record-keeping and animal management to the requirements applicable to their members, whether or not those requirements are imposed upon Vantara by law.

93. Vantara does not work alone, and it does not wish to. Within India it works with the Central Zoo Authority, the National Tiger Conservation Authority, Project Elephant, the Department of Animal Husbandry and Dairying, the Gujarat Forest Department, the Governments of Telangana, Haryana, Chhattisgarh, Maharashtra and Rajasthan, the Madhya Pradesh Tiger Foundation Samiti, the Bombay Natural History Society, the Madras Crocodile Bank Trust and the Institute of Teaching and Research

in Ayurveda under the Ministry of AYUSH, among others. Internationally it works with the Institut Congolais pour la Conservation de la Nature, the Parks and Wildlife Management Authority of Zimbabwe, the Department of National Zoological Gardens of Sri Lanka, the Zoological Park Organization of Thailand, the International Big Cat Alliance, the International Elephant Foundation, the Association for the Conservation of Threatened Parrots, Global Humane, the University of Georgia, the Field Museum of Natural History and Nature's SAFE. Every one of these engagements is available for examination by this Authority. Vantara states one thing about these instruments in the strongest terms it can. Its Memoranda of Understanding with countries and with public institutions are not paper. Each one is a working commitment entered into with a government or with a body answerable to a government, each one is available to this Authority, and Vantara asks to be judged by their performance.

94. Three of these engagements may be mentioned in particular, because each was settled with an institution answerable to a government or to a public body. By a Memorandum of Understanding dated 19 December 2025 Vantara has agreed to assist the International Big Cat Alliance, being the coalition of range and non range countries established for the conservation of the seven big cats of the world, upon the rewilding and restoration of big cat habitats, upon best practice in species management and veterinary care and upon capacity building and policy work. That instrument expressly provides that no rewilding activity may be initiated without all necessary approvals of the competent Indian authorities, including the Ministry of Environment, Forest and Climate Change, the Central Zoo Authority and the State Forest Departments concerned, and that any movement of an animal shall be undertaken strictly in accordance with the Wild Life (Protection) Act, 1972 and the guidelines of the Central Zoo Authority.

95. By an International Cooperative Agreement dated 18 December 2025 with the Board of Regents of the University System of Georgia, acting for the University of Georgia, Vantara has established a framework for academic, scientific and technical cooperation in wildlife medicine, conservation breeding, rescue and rehabilitation and veterinary public health, for the exchange of faculty, scientists, veterinarians and students and for the development of training curricula in wildlife welfare, biosecurity and conservation management. That agreement also records that every activity under it which involves wildlife or field based research shall be undertaken with the approvals of the Central Zoo Authority, of the Ministry of Environment, Forest and Climate Change and of such other regulatory bodies as may be required.

96. Taken as a whole, Vantara presently has institutional projects in hand in a number of countries. Some of them are governed by executed Memoranda of Understanding and the remainder are at the stage of drafting or of discussion. Particulars of each will be furnished to this Authority on request. Vantara mentions them not as an achievement but because every one of these engagements is capable of being examined, and because Vantara wishes this Authority to know the whole of what it is doing and with whom.

97. Vantara will invite, and actively work with, non-governmental and not-for-profit organisations of proven record in India and abroad engaged in genuine conservation in place. Such organisations hold field expertise and community relationships which Vantara does not have. Vantara will identify, engage and support such organisations through technical assistance, capacity building, funding or otherwise, always subject to due diligence on their record, governance and genuine conservation purpose. To that end, and so that this work is not dependent upon any single decision of Vantara, Vantara will establish and maintain a dedicated fund for conservation, rescue and welfare work in range States and for the

support of such organisations. The fund will be guided by an expert advisory committee, and its modalities will be settled, published and communicated to this Authority.

98. Vantara adds one thing further. Not every intervention which improves the lives of animals carries a conservation benefit which can be measured, and Vantara does not think that such work is therefore of lesser worth. It is willing to support projects whose object is the welfare of large numbers of animals, including the support of sanctuary organisations which are doing that work already. Where the bodies of the Convention call for a practice to be phased out, and where governments seek assistance in doing so, Vantara is willing to lend its resources, its veterinary capacity and its facilities to that work. Vantara does not put itself forward as the leader of any such effort. Work of that kind succeeds only when governments, the Convention bodies, the sanctuary community and industry act together, and Vantara offers itself as one willing pair of hands among them.

99. Vantara records one further matter. Upon the advice of its new team and upon the suggestion of the Chairman of the Governing Council, Vantara has begun to engage with the public, with people and institutions of standing, and with governments, to explain its work, to advocate the cause of animal welfare and of conservation, and to build alliances for that cause, where useful with the assistance of advisers and organisations experienced in public engagement and in international institutional processes. Vantara is besides directing a growing share of its resources to non-governmental organisations working in the field, so that the cause is served in many hands and not in one. Advocacy for animals is a legitimate public activity. Vantara conducts it openly, in accordance with law. Vantara is liaising with like-minded persons and organisations, and it is working with the Government and under its guidance, so that this joint cooperation serves the cause well. Some of these advisers were engaged for a simple reason. Conversations which ought to happen do not always begin on their own. Vantara engaged persons who could begin those conversations, introduce Vantara to institutions and individuals it had not reached, and bring people on board for the cause, so that the case for animal welfare and conservation is heard in rooms where Vantara itself was not yet known.

Concerns raised within the conservation community, and Vantara's answer

100. Over the last two years certain organisations concerned with wildlife have placed detailed concerns about Vantara in the public domain. Vantara does not name them here, deliberately, because a discussion about standards should not be reduced to a dispute between institutions. Vantara has read and considered those concerns carefully. Whether or not it agrees with every allegation or inference, it recognises the importance of engaging substantively with the underlying issues of provenance, due diligence, welfare, conservation purpose and transparency. Vantara responds to those issues as follows.

a. Upon the concern that acquisitions may have borne a commercial character: Vantara has bound itself, prospectively and permanently, by the restraints recorded at paragraph 41 above.

b. Upon the concern that animals brought to Vantara may be bred, or held for breeding in facilities away from the main collection: Vantara records that it undertakes conservation breeding only under, and subject to, programmes approved by the Central Zoo Authority, and only of species identified in consultation with the Central Zoo Authority and the Governments concerned. Vantara does not breed, and will not breed, for volume, for display or for commerce. Studbooks will be maintained for every species held under such a programme and animals will be exchanged

with other Indian zoos wherever the Central Zoo Authority so approves and the receiving institution is suitable.

c. Upon the concern that the welfare of the animals in Vantara's care ought to be independently and verifiably established: Vantara has itself sought out independent verification and not merely submitted to it. The Global Humane delegation described above has inspected Vantara twice, with unrestricted access. The regulatory examinations recorded at paragraph 78(c) above continue as a matter of routine.

d. Upon the concern that, where practicable, an animal in difficulty may be better assisted in the country where it is rather than moved across the world: Vantara has made in-country assistance a working principle. Where support is requested, Vantara will first explore solutions with the competent authorities and established local institutions in that country. The engagements described in this letter are directed to supporting facilities, programmes and capacity identified or approved by those authorities, rather than displacing existing national institutions.

e. Upon the concern that an institution of this scale should demonstrate conservation benefit rather than be measured by accumulation: Vantara agrees that conservation benefit is an appropriate measure of its future work and asks to be judged by that standard. Its work within India, set out at paragraphs 43 to 65 above, is directed to that objective.

f. Upon the concern that Vantara ought to be measured against independent international benchmarks rather than against its own: Vantara has taken the course recorded at paragraph 92 above.

Engagement with the conservation community

101. The process described in this letter has reinforced Vantara's decision to further strengthen, formalise and subject its systems to greater independent scrutiny. It has added specialist international expertise and the governance arrangements described above, and has incorporated useful observations received from regulators, experts, civil society and other stakeholders. Vantara regards that process as one of continuing institutional development rather than as a concluded exercise.

102. Drawing upon the advice of the current membership of the Governing Council, Vantara warmly welcomes the engagement of non-governmental organisations in its work and, as it carries the paradigm shift recorded in this letter into effect, it will look to how it can direct resources to such organisations working in range States.

103. Vantara respects the media, and recognises the necessary role a free press and an engaged civil society play in wildlife conservation and animal welfare. It equally recognises that the organisations which have questioned its work are, in the main, moved by a genuine concern for animals, a concern Vantara shares. There is more common ground here than the last two years have suggested. Vantara respects every independent journalist and media house, and it respects every non-governmental organisation and every individual working for animals. The Chairman of its Governing Council, who leads Vantara's global advisory framework, has advised Vantara to make this paradigm shift, and Vantara has agreed, because conservation, preservation and the protection of animals are its only aim. Where reporting and comment, including by those who have written critically of Vantara, has

sharpened its systems, Vantara acknowledges that contribution, and its doors remain open to every one of them.

104. Vantara is therefore extending invitations to media organisations and non-governmental organisations to visit, engage directly and share their observations and suggestions. Such engagement will be considered seriously and in good faith, consistently with animal welfare, biosecurity, safety, privacy and other legitimate operational requirements. That invitation is not for observation alone. Vantara's dedicated fund, its laboratories, its veterinary teams, its transport and its training programmes are open to non-governmental and not-for-profit organisations of proven record which wish to work with it, and Vantara would count it a privilege to stand behind the work of organisations which have spent decades in the field. Vantara does not ask that they agree with it. It asks only that the animals gain.

105. Vantara has also opened its facilities to scientists, veterinarians, zoo and museum professionals, representatives of governments and zoological associations, academic institutions and media organisations from India and abroad. These visits have included independent specialists and institutional delegations with experience in wildlife medicine, animal welfare, zoological management and conservation. Vantara does not rely upon any such visit as an endorsement. It records them only as part of its broader commitment to external scrutiny and engagement, and will make the relevant details available to this Authority on request.

106. Where a suggestion from a media organisation, non-governmental organisation, scientific expert or other stakeholder is adopted in Vantara's procedures, standards of care or conservation programmes, Vantara will acknowledge that contribution. Vantara's objective is that its standards should continue to benefit from constructive external engagement, including from organisations that have questioned its work.

107. Vantara also records, as its considered policy, that its answer to fair criticism, and even to criticism it believes to be mistaken but honestly made, will be engagement, information and access, and not litigation. Where Vantara believes a published statement to be mistaken, its first response will still be to place the facts and the record before those who published it.

108. Vantara gives this Authority its unequivocal commitment that it will continue to follow every applicable law. It further undertakes that it will at all times respect this Authority as the Management Authority of India under the Convention, and will comply with its decisions and directions.

109. The measures described in this letter are directed not merely to internal strengthening, but to placing before this Authority a framework whose operation can be verified, to contributing, where requested and under the leadership of the competent authorities, to conservation work in India and in range States, and to addressing substantively the concerns identified by CMA India, the Secretariat's mission and the Standing Committee.

110. Vantara respectfully welcomes the recommendations made by the Standing Committee at its 79th meeting. The measures set out in this letter are intended to respond substantively to those recommendations and to the guidance of the Secretariat's mission. Vantara respectfully invites this Authority, the Secretariat and the Parties to assess the operation and effectiveness of those measures on the basis of the record as it develops.

The last five years

111. Before Vantara describes what it will do, it describes what it has done, because the next five years must be read against the last five. Over the last five years Vantara took in animals with all its heart. It took them in because they were injured, orphaned, seized, unwanted or in danger where they stood, and it cared for them with everything it had. There was good intention in all of it, and those acquisitions were made under the permits issued by the competent authorities of the exporting States and of India, as the proceedings recorded earlier in this letter have confirmed. What Vantara has since added, and what this letter now records, is a new chapter that will have a formal governance structure through which decisions will hereafter be taken. A word may be said upon why these animals came to India at all. Each of them needed care, and in many cases lifetime care, which someone had to be willing and able to give. Vantara had built in India the hospitals, the quarantine facilities, the space and the trained hands which that care required, and it had the means to sustain it. The animals came to India because Vantara was able and willing to care for them, and that purpose has not changed. Vantara believed, and was guided, that this was the best welfare it could give, and it still believes that every life matters. It has now taken a new turn and the next five years are devoted to it.

112. The record of those years is set out in detail earlier in this letter, and it may be stated shortly here. More than fifteen thousand rescues across the country, carried out by more than one hundred wild animal ambulances. The care of more than two hundred elephants, the largest elephant hospital of its kind. Disaster relief in floods in several States of India. The rescue, breeding and release of endangered turtles and tortoises into the rivers and forests to which they belong. Support to species recovery programmes. Conservation education which has reached more than one lakh children, training given free of cost to zoos and forest departments, and support to twenty-five non-governmental organisations working in the field.

113. As an organisation Vantara now has to enhance itself, and it is doing so. It is drawing more and more like-minded people to its side, in India and abroad, and the governance recorded above is the first fruit of their counsel. The next five years, set out immediately below, represent a paradigm shift for Vantara, a shift it looks to make with the conservation community.

Vantara's commitments for the next five years

114. The measures recorded so far in this letter are, for the most part, self-discipline by voluntary restraints, being things which Vantara will not do. Vantara does not wish to mention these alone, because the same are not a programme. Vantara therefore sets out below what it undertakes to do over the next five years, and asks this Authority to hold it to this as it holds it to the rest. Each of these commitments is capable of being examined, each is to be pursued with the approval and under the supervision first internally from its Governing Council and thereafter with the approval and under supervision of the statutory authorities and the Governments concerned, and each will be reported to this Authority. The last five years, recorded immediately above, are the foundation of this programme. The next five years are its paradigm shift.

- a. **A long term Vision Plan built upon the One Plan approach.** Vantara will prepare and publish a long term Vision Plan founded upon the One Plan approach to conservation, under which ex-situ and in-situ work are planned together for species population rather than pursued as separate disciplines. The animals in Vantara's care, its

veterinary science, are of real value only if they serve populations in the wild, and the Vision Plan will state, species by species, how that link is to be made. Vantara will place the Plan before this Authority and before the Central Zoo Authority, and will publish it.

- b. **Mitigation of human-wildlife conflict, in India and abroad.** Vantara will support need based measures to prevent and to reduce conflict between people and wild animals, in India and in other countries where such support is sought. This is where the interests of rural communities and of conservation most often collide. The following are some of the activities/tasks which Vantara intends to take up while assisting concerned authorities in their man-animal conflict mitigation measures.
- i. Capacity Building. Vantara will impart capacity building training programmes to field staff, vets and other officials of concerned authorities (e.g., Forest Department in India) in wildlife aspects of forest management including wild animals rescue and rehabilitation.
 - ii. Assist in development of Artificial Intelligence based technology and tools which are useful in conflict prevention and mitigation.
 - iii. Assist in developing technology and tools in identifying wild animals crossings and wild animal corridors thereby minimise the cases of road kills, accidents and other conflicts by adopting appropriate preventive measures.
 - iv. Assist in developing AI integrated drones which would help in monitoring the movement of wild animals and during rescue and relief operations, and in safeguarding villagers and human populations from wildlife attack, which is as much the object of conflict mitigation as the safety of the animal.
 - v. Assist in development and use of web based technology which would assist in quick and time bound processing of compensation and ex-gratia to victim families of man-animal conflict. Vantara will besides work with the authorities to help ensure that adequate compensation and rehabilitation reach the families whose lives have been upended by such conflict.
 - vi. Develop, in collaboration with concerned authorities, School of Architecture, NGOs, etc., the rural housing and crop protection technology and tools (solar fence, advance warning systems, etc.) which are effective against wild animals and at the same time safe to wild animals as well.
 - vii. Assist in organising awareness programmes on man-animal conflict including the issue of Snake Bite prevention and mitigation.

- viii. Assist research institutes in developing effective anti-venom to major venomous snakes especially of India so as to minimise human mortality due to snake bite.

c. **In-situ conservation in India and abroad.** Vantara will assist concerned authorities in their conservation efforts through following interventions.

- i. Assist in restoration and expansion of wildlife habitats through scientific habitat management practices including reforestation, afforestation and grassland management works.
- ii. Wildlife Corridors, assist in establishing or protecting wildlife corridors which are very crucial for seasonal migration and distribution of wildlife.
- iii. Acquire, without any commercial object, farm land and other private non-forest land, and reforest it, so as to create corridors and enhanced forest for wildlife. Any such land will be held for conservation and not for gain, and no forest land will be diverted for it.
- iv. Assist in developing AI based technology to effectively counter poaching and other threat to wildlife and their habitat.
- v. Assist in capacity building of people residing in and around Forest Areas in alternate livelihood skills (tailoring, catering, web designing, electrician, dairy, agriculture, horticulture, hospitality etc) so that their dependency on forest decreases.
- vi. Assist in developing stakeholder engagement programmes whereby the active support of stakeholders especially of local community is secured and sustained.
- vii. Set up a wildlife protection and innovation centre at Jamnagar which, in collaboration with stakeholders, develops technology and tools useful for in-situ and ex-situ conservation and for man-animal conflict mitigation. Within the next five years this will include an artificial intelligence capability with satellite imaging, so that villagers can be alerted before wildlife raids a crop or enters a village.

d. **Wild animal health care facilities, in India and abroad.** Vantara will create need based facilities for the health care of wild animals, so that veterinary care is available within the landscape where the animals are. The object is twofold, being the treatment of the individual animal and the surveillance and containment of disease. Pathogens do not respect the boundary between wild populations, captive animals, livestock and people, and a wildlife health facility is as much a public health asset as a conservation one. Vantara's diagnostic laboratory for zoonotic diseases and its pathology capacity will

be placed at the service of this work, and its findings shared with the authorities. The dedicated hospital for the Asiatic lion proposed to the Forest Department of Gujarat, the facilities under discussion with various other Indian States, and the wildlife hospitals offered to Venezuela and to the Democratic Republic of the Congo, are instances of this commitment, the first being a proposal awaiting the concurrence of the State Government and the others being offers awaiting the response of the countries concerned. Vantara will donate "Hospital and Diagnostic Labs on Wheels" to organisations and departments to facilitate on site diagnosis and treatment of wild animals within their natural habitat landscape. The Hospital and Diagnostic Labs on Wheels recorded earlier in this letter are part of this commitment, with the intended fleet of one hundred and fifty fully staffed units.

- e. **Conservation Breeding, Rewilding and Release:** Vantara will undertake conservation breeding, rewilding and release programmes for endangered species only under and subject to conservation breeding programmes approved by the Central Zoo Authority, and only for species identified in consultation with the Central Zoo Authority, the Government of India and the State Governments concerned, and abroad only with the prior permission of the statutory authorities and the Governments concerned. The purpose is release. Animals bred under these programmes are intended to go into the wild to support natural populations, and Vantara treats a programme which does not lead there as incomplete. That purpose governs how the work is done, by parent rearing, minimal human contact, acclimatisation, genetic profiling and selection for diversity, and transition facilities in remote locations before soft release. Vantara does not breed, and will not breed, for volume, for display or for commerce. These programmes serve a further purpose which Vantara states openly. They maintain within India a second captive reserve population of endangered species, so that if a wild population is ever struck by disease or by catastrophe, a healthy and genetically documented population exists from which recovery can be attempted. Vantara has never sold an animal and it never will. Nothing bred at Vantara will ever be sold or transferred for consideration. Joint cooperation agreements with Governments are being worked out for such programmes, so that breeding and release into the wild proceed under formal frameworks. Vantara will pursue these conservation and rewilding efforts as a continuing programme, measured year upon year, so that they are made a proper and lasting success in the years to come.
- f. **Rescue centres, in India and abroad.** Vantara is willing to establish need based rescue centres, in India and in other countries, for the rescue, the treatment and, where an animal cannot be returned to the wild, the lifetime care of animals. Abroad, Vantara's consistent position, recorded throughout this letter, is that such a centre should be owned and administered by the competent authority of the country concerned, with Vantara's role confined to design, construction, equipment, training and funding. The proposals in the North Eastern States, and the offers made in respect of Zimbabwe, Venezuela and Colombia, are each of this character, and in each the object is that animals remain within their own country and geographic range.
- g. **Upgradation of ex-situ conservation institutes/Zoological Facilities.** Vantara will assist ex-situ conservation and zoological institutes owned by the Governments, and those run by non-governmental and other organisations, in developing modern, animal and visitor friendly facilities, husbandry practices, veterinary care, the design and

maintenance of e-portals for visitor management, scientific management of animal data, in developing AI based tools for animal health management. Vantara will also provide necessary capacity building training to zoo architects, engineers, animal care takers, biologists, Veterinarians and other officials on scientific management of zoological facilities. All such technical advice, architectural advice and medical assistance will be given free of cost, and Vantara will besides assist such institutions in raising the funds their development requires. The object of the whole of it is that animal welfare at India's rescue centres, zoos and captive facilities stands at the highest standard, matching and, wherever possible, bettering the best in the world.

- h. **Capacity building.** Vantara will undertake the training of staff, officers, protected area managers, veterinarians, curators, biologists, keepers and mahouts, in association with Governments and other organisations in India and abroad. This is the commitment Vantara regards as the most durable of the nine, because a trained veterinarian or protected area manager continues to serve long after any single programme has ended, and because trained people are needed everywhere that conservation work is done. The wildlife university, the training offered free of cost to the zoos and forest departments of India, and the workshops conducted with partner institutions abroad are all directed to this end.
- i. **Care of domestic animals.** Vantara will operate a separate branch for domestic animals, providing veterinary services to domestic and farm animals in need, including stray dogs, cattle, equines and other animals, and working with like-minded organisations upon vaccination and welfare programmes for them.
- j. **Support to like minded organisations.** Vantara will support conservation organisations of proven record in India and abroad which are working for wildlife, through technical assistance, capacity building, funding or otherwise, subject always to due diligence on their record, their governance and their genuine conservation purpose. Vantara has already funded twenty-five such organisations and is establishing a dedicated fund for this work, whose modalities will be settled and communicated to this Authority. Vantara does not require that such an organisation agree with it, and it will support good work done by those who have criticised Vantara as readily as by those who have not. Vantara's motto is that every life matters, and that principle is not the property of any one institution. Vantara will besides commend such organisations to its own donors and well-wishers, and will help mobilise support for them, through its dedicated fund and beyond it.

115. Vantara offers these nine commitments as a programme and not as a list of aspirations. Each of them has been taken up in some measure, whether by work already in progress or by proposals which Vantara has placed before the authority concerned and which await its concurrence, as this letter records. Vantara asks this Authority to measure it against them over the coming five years, and to say at any time if the Authority considers that Vantara should be doing more, or doing it differently.

116. Vantara states, finally, what this programme is intended to be worth to India at the end of five years. If these commitments are kept, India will have in Vantara a permanent capacity built for the country and not for one institution: a wildlife university sending trained veterinarians, biologists and

managers into service every year, with not fewer than fifty of them trained on scholarship, diagnostic, genetic and forensic infrastructure open to every zoo, forest department and enforcement agency, wild animal health care available within the landscapes where it is needed, breeding programmes whose measure is release and whose further service is a second reserve population of endangered species, rescue centres owned and run by the authorities concerned with Vantara behind them, and a body of published science available to all. None of that will belong to Vantara alone, and that is its point. Vantara asks to be measured, at the end of five years, by what it has added to the strength of others.

117. Vantara commits itself to the programme of measures set out above. Within twelve months from this letter, every policy, body, procedure and other measure described in this letter will be in place and working. Throughout that period, Vantara will make no application to import any live animal.

118. So that these commitments are open for all to see, Vantara will, once this Authority has taken this letter on record, place the commitments recorded in it on Vantara's own website and platforms. Vantara will also submit this letter before the Hon'ble Supreme Court of India in the proceedings related to the Order dated 27 May 2026.

119. Vantara states, in terms, that the commitments in this letter are given to be held to. They are not statements of intention, and Vantara will not withdraw from any of them unilaterally. If Vantara should fail in any of them, it accepts that this Authority may take that failure into account in dealing with any application which Vantara may make.

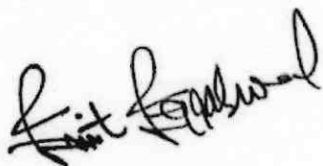
120. This programme is a floor and not a ceiling. Any stricter or further direction of this Authority or of the Hon'ble Supreme Court of India will prevail over it and Vantara will conform to that direction without waiting for this letter to be amended.

121. Vantara closes with gratitude. It is deeply grateful to CMA India for the direction, the patience and the clarity with which this Authority has guided Vantara through this exercise, and it conveys, through this Authority, its respectful gratitude to the mission of the CITES Secretariat and to the Standing Committee, whose observations set this work in motion. Vantara was asked to look at itself. It has done so, and it is a better institution for having been asked. The measures recorded in this letter are Vantara's answer, offered with humility and in earnest of that gratitude.

Yours faithfully,

For Vantara

(Greens Zoological Rescue and Rehabilitation Centre and Radhe Krishna Temple Elephant Welfare Trust)



Amit Aggarwal
President- Regulatory Affairs