

## **Summary of the Special Investigation Team (SIT) Report (September 11, 2025):**

### **Judicial Mandate:**

The SIT's mandate was to examine compliance with all relevant laws, including the Wildlife (Protection) Act, CITES, and financial and animal welfare regulations, and to determine the veracity of the claims made against Vantara.

### **Scope of Investigation and Outcome:**

The SIT conducted a comprehensive inquiry, consulting domestic and international authorities including the Central Zoo Authority (CZA) and CITES Management Authorities and carried out an on-site inspection of Vantara's Jamnagar facilities. Based on the evidence, it concluded that all complaints, articles, and reports relied upon by the petitioners were "unfounded, baseless, and devoid of any factual or legal foundation".

### **Key Findings and Clearance:**

#### **1. Legal Compliance:**

- All 40,633 animals, including 275 elephants, were acquired in full compliance with Indian and international laws.
- Allegations of wildlife smuggling, financial misconduct, and money laundering were rejected.
- All imports were verified as non-commercial and conducted under valid CITES permits.
- Invoice-related allegations were dismissed, as the documents were standard CIF invoices used only for customs valuation.

#### **Animal Welfare Standards:**

- Vantara's welfare, veterinary, and husbandry practices met or exceeded CZA standards. The facility received the Global Humane Certified™ Seal of Approval, recognizing it as a global leader in ethical zoological care.
- Claims that Vantara was a private vanity collection was rejected; its scale, manpower, and breeding programs showed genuine conservation intent.
- Proximity to industrial areas posed no welfare or environmental risk due to modern, internationally comparable habitat management systems.

## **Recommendations:**

- **Public Access:** Expedite the opening of Vantara's zoological and elephant facilities for limited public access to strengthen transparency and public trust.
- **Global Benchmarking:** Seek membership with the World Association of Zoos and Aquariums (WAZA) to align with international conservation standards.

## **Significance:**

The report completely exonerates Vantara, affirming it as a legally compliant and globally accredited wildlife rehabilitation institution. It underscores the finality of findings by statutory and scientific authorities and reinforces that wildlife conservation initiatives when lawfully established deserve judicial protection from speculative or repetitive litigation.

## SUMMARY

**In Re:** W.P.(C) No. 783/2025 & W.P.(C) No. 779/2025 (PIL-W), and Order dated 25-08-2025 passed therein

**Subject:** Summary of the investigations, findings and recommendation of Special Investigation Team, concerning allegations against operations of *Vantara / Greens Zoological Rescue and Rehabilitation Centre (GZRRC)* and *Radhe Krishna Temple Elephant Welfare Trust (RKTEWT)*.

### **1) Background**

This Special Investigation Team (hereinafter referred to as 'SIT') constituted by virtue of common order dated 25.08.2025 of the Hon'ble Supreme Court of India in W.P.(C) No. 783/2025 & W.P.(C) No. 779/2025 (PIL-W). By the said order, the Supreme Court of India called upon the SIT to examine various questions specified in paragraph 6 of the Order, it is made clear in paragraph 8 of the Order of the Supreme Court that the nature of the responsibility entrusted to the SIT is only to assist the Court as a Fact Finding Inquiry Body to enable the Court to pass any further order in the pending Writ Petitions mentioned above. In substance. The SIT has neither any authority nor responsibility to adjudicate upon any one of the issues involved in the abovementioned Writ Petitions.

### **2) Sources Considered by the SIT:**

- 2.1** SIT dealt with various "complaints", "articles", "submissions", "news reports", and "stories" concerning Vantara, annexed to the petition or received post the Order dated 25.08.2025, from India as well as abroad".
- 2.2** A list of the persons / organizations / entities, and their "complaints", "articles", "submissions", "news reports", and "stories", which are considered and examined are referred in the Tables in **Schedule 'A'** hereto.

**2.3** SIT heard all those who availed personal audience physically as well as virtually. Some complainants chose not to avail any personal audience. A few journalist even refused cooperation.

**2.4** It also dealt with and considered the earlier reports available on investigations / inspections conducted.

**2.5** Services of independent experts and conservation organizations were also availed for such verification, inspection and examination. The SIT sought assistance Mr. Mohit Jangid Deputy Director ED (IRS) and chartered accountant, for considering the matter from the perspective of financial irregularities, Mr. Maheep Kumar, Former PCCF-WL (Maharashtra) and Mr. Abhishek Kumar (serving IFS formerly Zoo Director) for considering animal welfare and husbandry standards.

**2.6** It also examined various functionaries of Vantara including the key management personnel as well as the purported donors.

**2.7** The SIT undertook a comprehensive examination of oral and documentary evidence and regulatory / statutory records provided against or in defence by Vantara entities, and reviewed the same as per extant laws and judicial precedents.

**2.8** SIT also interacted and deliberated with a wide slate of authorities in India, including:

- i. Ministry of Environment, Forest and Climate Change
- ii. Department of Animal Husbandry and Dairying
- iii. The CITES Management Authority of India
- iv. The CITES Scientific Authority of India
- v. The Central Zoo Authority
- vi. Central Bureau of Investigation
- vii. Wildlife Crime Control Bureau
- viii. Customs, Department of Revenue
- ix. Directorate of Revenue Intelligence
- x. Enforcement Directorate
- xi. Collector, Jamnagar
- xii. Superintendent of Police, Jamnagar

- xiii. Chief Wildlife Warden, State of Gujarat
- xiv. Chief Wildlife Warden, Delhi
- xv. Chief Wildlife Warden, State of Arunachal Pradesh
- xvi. Chief Wildlife Warden, State of Tripura
- xvii. Directorate General Foreign Trade
- xviii. Animal Quarantine and Control Services

**2.9** Vantara has placed before the SIT communications from various foreign CITES Management Authorities with regard to the export permits issued by them:

- i. CITES authorities in D.R. Congo,
- ii. CITES authorities in UAE,
- iii. CITES authorities in Indonesia
- iv. CITES authorities in Syria
- v. CITES authorities in Qatar

Independently, SIT also emailed the statutory CITES body of Democratic Republic of Congo (DRC) to ascertain the veracity of CITES certificates issued by them. In this regard, DRC CITES Management Authority confirmed the certificates issued and highlighted that none of the transaction is commercial in nature.

**2.10** Technical assessment and verification of legal acquisition of all exotic species and strict compliance with CITES, was thus conducted.

**2.11** The suitability of the facility of Vantara to house and care for exotic species, including those listed in Appendix to CITES, was also examined through experts.

**2.12** The site inspection was made, *inter alia*, to verify the animal husbandry standards, green spaces in the facility, veterinarian facilities, separation of the refinery and effects, and to verify the alleged claims of google earth imagery showing non-availability of requisite space for housing the animals.

**2.13** Both the abovementioned bodies were called upon to produce before the SIT all the relevant documents with respect to each of the animals in their custody. The relevant documents in the context of the inquiry being documents pertaining to the mode of the acquisition, the source from which they were acquired, the appropriate permission and clearances required for acquiring those animals.

**2.14** 'Vantara' has placed before the SIT, 13 number of volumes containing the above information. All those volumes are filed as annexures with the report and are being forwarded to the Supreme Court of India along with this report.

**2.15** All issues / aspects including animal husbandry, veterinary care, animal welfare, mortality and causes thereof, climate conditions, location near an industrial zone, creation of vanity or private collection, breeding, conservation programme and use of biodiversity resources, misutilisation if any of water and carbon credits, wildlife smuggling, and financial/anti-money-laundering aspects were examined.

**2.16** Plethora of highlighted issues regarding (i) repatriation of an orangutan to Indonesia, (ii) transfer of an elephant named Madhuri, (iii) transfer of Spix's Macaw from Germany to India, (iv) payment of money for purchase of animals transferred from Germany, South Africa, Czech Republic, Mexico, UAE and Venezuela (v) transfer of chimpanzees from a sanctuary in DC Congo, (vi) transfer of a mountain gorilla and (vii) association with persons of dubious background being associated with Vantara are holistically examined by SIT.

**2.17** Technical assessment and verification of legal acquisition of all exotic species and strict compliance with CITES was conducted. The suitability of the facility to house and care of exotic species, including those listed in Appendix to CITES, was also examined in consultation with experts.

**2.18** The SIT has undertaken a comprehensive examination of oral, documentary evidence including relevant regulatory records and also various judicial decisions in respect of the allegations and apprehensions,

and thoroughly investigated each of the issues in fact finding exercise in compliance with the Orders passed by the Hon'ble Supreme Court.

**3. Basis of allegations and material in support thereof:**

**3.1** Most of the allegations levelled either by Petitioner or Intervenor or journalist pivots on the following:-

- (i) Media reports, both Indian and foreign.
- (ii) Trade data available in public domain.
- (iii) Opinions, complaints and articles if NGOs, conservationist.

**4) Summary of findings and conclusions:**

SIT summarises its findings in terms of the TOR enumerated by the Hon'ble Supreme Court in the subject Order:

**4.1 Re: (a) acquisition of animals from India and abroad, particularly elephants:**

**(b) compliance of Wild Life (Protection) Act, 1972 and rules for zoos made thereunder:**

**(c) International Convention on Trade of Endangered Species of Flora and Fauna (CITES) and compliance with import/export laws and other statutory requirements concerning imports/exports of live animals:**

**4.1.1** The SIT has undertaken a comprehensive examination of oral, documentary evidence including relevant regulatory records and also various judicial decisions to conclude that –

- (i) The acquisition of animals by Greens Zoological Rescue and Rehabilitation Centre from within India from its inception have been carried out in regulatory compliances without any violation of the provisions of the Wild Life (Protection) Act 1972, Recognition of Zoo Rules 2009, guidelines of the Central Zoo Authority, Indian Penal Code / BNSS and Prevention of Money Laundering Act, 2002.
- (ii) The acquisition of 29,274 animals by Greens Zoological Rescue and Rehabilitation Centre and of 6,034 animals by Radhe Krishna

Temple Elephant Welfare Trust by way of imports from different countries from its inception have been carried out in regulatory compliances without any violation of the provisions of the Wild Life (Protection) Act 1972, Recognition of Zoo Rules 2009, guidelines of the Central Zoo Authority, CITES requirements, Foreign Trade (Regulation and Development) Act, 1992, Customs Act, 1962, FEMA, 1999, Indian Penal Code / BNSS and Prevention of Money Laundering Act, 2002.

- (iii) Each of the imports has undergone multi-layered and multi-jurisdictional verifications. Each import is verified by the (i) Central Zoo Authority which is also the CITES Scientific Authority, (ii) Wildlife Division of the Ministry of Environment, Forest and Climate Change, (iii) Department of Animal Husbandry and Dairying, (iv) CITES Management Authority of India, (v) the CITES Management authority of the country in which the exporting / donor entity is situated, (vi) Director General of Foreign Trade, (vii) Wildlife Crime Control Bureau, (viii) Animal Quarantine and Control Services and (ix) Customs assessment.
- (iv) None of the numerous authorities in India and abroad, support the allegations. Instead, these Authorities have expressed satisfaction on the issues of compliances and regulatory measures.
- (v) The acquisition of 5 elephants by Greens Zoological Rescue and Rehabilitation Centre and 270 elephants by Radhe Krishna Temple Elephant Welfare Trust from its inception have been carried out in compliance with the provisions of the Wild Life (Protection) Act 1972 and not in violation of any other law. The SIT has found, in one particular case concerning an elephant known as 'Madhuri' from Kolhapur, Maharashtra, that the acquisition was not sought by the Radhe Krishna Temple Elephant Welfare Trust (RKTEWT). The transfer took place pursuant to an order of the Bombay High Court, which upheld the decision of the High-Powered Committee. The

said High Court Order was later affirmed by the Hon'ble Supreme Court.

- (vi) The manner of acquisition of 40,633 animals in all by Vantara entities - Greens Zoological Rescue and Rehabilitation Centre and Radhe Krishna Temple Elephant Welfare Trust, is without any breach / violation of the (i) Wild Life (Protection) Act 1972, (ii) Recognition of Zoo Rules 2009, (iii) Guidelines of the Central Zoo Authority, (iv) Foreign Trade (Regulation and Development) Act, 1992, (v) Customs Act, 1962, (vii) FEMA, 1999, (viii) Indian Penal Code, 1860 or the Bhartiya Nyay Sanhita, 2023, (ix) Prevention of Money Laundering Act, 2002 or the (x) provisions of the Convention on International Trade in Endangered Species of Wild Fauna and Flora.
- (vii) The SIT finds that the mere numerical volume of imports is not, in itself, indicative of illegality. Articles citing incredulity expressed purportedly by some zoo directors of foreign zoos are unfounded; capacity is assessed and sanctioned by the Central Zoo Authority. So long as carrying capacity is duly certified and legal documents are in order, the number of acquisitions cannot be treated as a violation.

**4.2 Re: "(d) compliance with standards of animal husbandry, veterinary care, standards of animal welfare, mortalities and causes thereof"-**

- 4.2.1** The SIT, with the assistance of experts, concludes that the standards of animal husbandry, veterinary care, standards of animal welfare at Greens Zoological Rescue and Rehabilitation Centre, and Radhe Krishna Temple Elephant Welfare Trust are fully compliant with the prescribed guidelines.
- 4.2.2** The experts have concluded and the SIT, based on its own visual inspection of the facilities, has no reason to believe otherwise that the standards of animal husbandry, veterinary care, standards of animal welfare at Greens Zoological Rescue and Rehabilitation Centre and

Radhe Krishna Temple Elephant Welfare Trust are of the highest international standards. The facilities do not merely adhere to prevailing benchmarks, but also meet and, in several aspects, exceed CZA benchmarks in the field of zoological management and conservation.

- 4.2.3** In this context satellite / drone imagery relied upon in articles / complaints were ground-truthed against plans and on-site inspection, the allegation of concrete-dominant housing was found to be incorrect.
- 4.2.4** The SIT further records the outcome of the independent audit conducted by the Global Humane Society (GHS), the world's largest and most respected certifier of animal welfare. A team of seven international experts, Dr. Manuel Walter Garcia Hartmann (Germany), Dr. Judy St. Leger (United States), Mr. Thomas Otten (United States), Ms. Pernilla Anna Catarina Mosesson (Sweden), Dr. Stephen Grey Stafford (United States), Mr. William Glenn Young Jr. (United States), and Ms. Jill Amanda Nizan (United States), undertook a nine-day on-site evaluation at Vantara in 2025, comprehensively reviewing veterinary care, nutrition, enrichment, habitat design, conservation breeding, emergency preparedness, and staff culture. The audit found that Vantara not only complied with but exceeded internationally recognised benchmarks. Elephants were observed rehabilitated through positive reinforcement and enrichment without any coercive instruments; big cats were maintained in enriched enclosures with natural diets and exercise systems; birds and primates displayed healthy behaviours consistent with species-typical needs; and staff culture consistently reflected the principle that 'animals come first'. On this basis, GHS awarded Vantara the Global Humane Certified™ Seal of Approval, valid for a five-year term. The conferral of this certification is of particular significance: it independently validates that Vantara operates at the highest international standards of welfare and conservation, and positions it as a global exemplar of humane zoological practice.
- 4.2.5** Similarly assessments have been carried out by CITES Management authorities of different countries such as South Africa, Thailand etc.

- 4.2.6 Moreover there is a robust mechanism in place where the Central Zoo Authority periodically checks and inspects the Vantara facilities. Such inspections are also carried out by the Chief Wildlife Warden of the State of Gujarat.
- 4.2.7 The SIT has concluded that grant by Central Zoo Authority to GZRRC for a carrying capacity of 75,000 animals is in accordance with law.
- 4.2.8 The SIT, with the assistance of experts, concludes that the mortalities occurring within these facilities are attributable to natural biological causes, consistent with global zoological trends. They are not, in any manner, the result of deficiencies in husbandry, veterinary care, or welfare standards. Statistical analyses demonstrate alignment with the best-managed zoological institutions worldwide. The statutory procedures required to be followed under the rules in case of death of any animal in the possession of 'Vantara' are complied with.

**4.3 Re: "(e) complaints regarding climatic conditions and allegations concerning location near an industrial zone:**

- 4.3.1 Based on expert inputs, environmental data and inspection, the SIT finds that the climatic conditions at the site are very congenial for the species housed and do not adversely affect their health or welfare. The climatic history juxtaposed with mortality records does not reflect extremes or adverse trends. The Air Quality Index has been found to be within acceptable standards. Expert inputs record that modern habitat management systems, including temperature and humidity control, water and air quality measures, and vegetation planning, further ensures that the animals are maintained in safe, suitable and appropriate conditions.
- 4.3.2 The SIT also notes that the facilities are in close proximity to a large residential township, several villages and dense residential areas. Thus, the location is already inhabited by human populations without adverse health or ecological impacts. In this context, the allegation of

unsuitability due to proximity to an industrial zone is not borne out. The experts have highlighted that globally it is not unusual for zoological establishments to be situated within or near urbanized or industrialized areas. For example the *Bronx Zoo* in New York, the *Tierpark Berlin* in Germany, and the *London Zoo* in Regent's Park. These Zoos operate successfully in the heart of major metropolitan centres. Moreover it is emphasized that several protected areas and reserves across the world are located alongside industrial activity such as *Hluhluwe–iMfolozi Park* in South Africa, which has long coexisted with nearby coal mining operations; the *Doñana National Park* in Spain, a UNESCO World Heritage Site, bordered by agricultural and industrial zones; the *Everglades National Park* in the United States which lies adjacent to urban areas and agricultural lands.

**4.4 *Re: (f) complaints regarding creation of a vanity or private collection, breeding, conservation programs and use of biodiversity resources:***

**4.4.1** The SIT has examined the allegation regarding the creation of a vanity or private collection, as well as allegations concerning breeding, conservation programmes, and the use of biodiversity resources. On a detailed review of facts, records, and expert material, the SIT finds no basis to support the allegation of a vanity collection. The operations of the GZRRC and the RKTEWT are conducted with the scale, professionalism, and governance of a large institutional enterprise. Both organisations maintain Memoranda of Understanding with several State Governments in India, with foreign countries, and with authorities in foreign jurisdictions. The institutions employ nearly 3,000 personnel, including a significant number of globally recognised experts and specialists in the fields of animal husbandry, veterinary science etc. The SIT observes that the existence of such extensive human resources, infrastructure, and output is inconsistent with the notion of a vanity or private collection.

**4.4.2** With respect to conservation and breeding programmes, the SIT records

that the Greens Zoological Rescue and Rehabilitation Centre (GZRRC), which is the only institution undertaking structured conservation breeding initiatives, is operating fully in accordance with law. While these programmes are in their early stages, the SIT finds that they have been designed on sound scientific and conservation principles and merit adequate time for results to materialise on the ground. These efforts reflect the institution's commitment not only to national objectives but also to globally coordinated species recovery initiatives. These steps clearly underscore its role as a serious conservation actor rather than a vanity enterprise.

**4.4.3** In addition, the SIT notes that the Cheetah conservation and breeding programme at GZRRC has begun to show encouraging results with the birth of 17 Cheetahs. The above result makes the SIT believe that over a period of time, Vantara would contribute to India's own cheetah rewilding objectives. Parallel initiatives are underway for the conservation breeding of clouded leopards and snow leopards, both of which are species of high ecological significance. Further, the programme for the Asiatic lion has been designed to strengthen the genetic base of this emblematic species; the structured breeding of vultures and gharials is also being carried out in line with established national recovery plans. Taken together, GZRRC has initiated conservation breeding programmes for 41 endangered species, reflecting both the breadth and seriousness of its commitment to ex-situ conservation, and long-term species survival.

**4.4.4** The SIT has particularly inspected the issues as regards the Spix Macaw. All export permits are found to be valid and all import permits are issued lawfully. The said birds are loaned to GZRRC for assisting ACTP's conservation breeding program. GZRRC has committed that the objective is to rewild the range areas of the said Macaws. The SIT also notes that now GZRRC has established contact directly with the Brazilian authorities. Their deliberations are at a preliminary stage; GZRRC has expressed its commitment to directly engage with Brazil in a manner

assisting the program for rewilding. The SIT does not find any illegality in this context.

**4.4.5** Vantara entities GZRRRC/RKTEWT, operating lawfully and at international standards, have established a modern day “Noah’s Ark” that can (i) stabilize vulnerable / confiscated fauna, (ii) run evidence-based conservation breeding, and (iii) support reintroductions in cooperation with States and global partners.

**4.4.6** The SIT also examined allegations under the Biological Diversity Act, 2002. It finds that the provisions of the Act are not attracted to the activities of GZRRRC and RKTEWT. The allegations of violation under this head are misconceived, lacking in substance, and do not merit serious consideration. The SIT is of the view that such claims are unfounded and do not require further inquiry. Neither the Petitioners nor Interveners could bring to the notice of the SIT any violation of the Biological Diversity Act, 2002.

#### **4.5 (g) complaints regarding misutilisation of water and carbon credits:**

**4.5.1** The SIT has examined the complaints alleging misutilisation of water resources and carbon credits. On careful review of the records, expert inputs, and governing legal frameworks, SIT finds these allegations to be wholly baseless and lacking even the semblance of factual or legal foundation. The claims are not merely unfounded, but are hyperbolic. They appear to have been advanced only to attract attention. After all, sensational allegations gain visibility.

**4.5.2** The SIT is of the considered view that such complaints amount to a waste of institutional time and resources. They are no more than attempts at securing a “15 minutes of fame” for the persons making them. The SIT therefore rejects these allegations in their entirety as

frivolous and undeserving of further inquiry.

4.6 Re: (h) complaints regarding allegations of breach of different provisions of law, trade in animals or animal articles, wildlife smuggling etc. as made in the articles/stories/complaints referred to in the petitions as well as generally;

(i) complaints regarding issues of financial compliance, money laundering etc.

(j) complaints regarding any other subject, issue or matter germane to the allegations made in these Petitions.

4.6.1 The SIT called for information, documents and evidence from Petitioners, intervener, authors/media outlets whose articles are annexed to the Petition. The SIT also received several emails with diverse allegations which have been examined.

4.6.2 A list of complaints / News Article / stories / Information / submissions which were considered in detail are in **Schedule A** hereto.

4.6.3 On examination of the complaints / the news reports referred to therein/ and all accompanying references, the SIT finds that no credible, tangible or prosecutable evidence, material, or documentation has been produced in support of the allegations. Complainants and authors were afforded an opportunity to substantiate their claims. The limited material submitted was scrutinised but does not disclose the commission of any offence. One journalist expressly stated an unwillingness to cooperate with courts or authorities. Others furnished only news clippings and secondary articles which, in themselves, constitute hearsay. At no stage was any material produced that would qualify as material evidence for any further investigation, much less a prosecution or penal measure. The allegations rest wholly on conjecture and surmises on secondary reporting, and activist commentary, none of which meet even a *prima facie* threshold. Having considered the entirety of the material placed before it, the SIT

has not found anything that would *prima facie* disclose the commission of any offence to warrant further action. The complaints are, therefore, devoid of merit.

**4.6.4** All other complaints, articles, videos, and related materials not specifically addressed have also been examined and are **liable** to be rejected in **limine**. They are found to be wholly baseless, devoid of even the semblance of factual or **legal** foundation, and verge of being imaginary. These appear to have been advanced merely to attract attention, on the premise that sensational allegations are more **likely** to gain visibility.

**4.6.5** In the course of its inquiry, the SIT interacted with and obtained inputs from the Collector, Jamnagar; the Superintendent of Police, Jamnagar; the Secretary (Forest), Government of Gujarat; the Chief Wildlife Wardens of Gujarat, Assam, Arunachal Pradesh and Tripura; as well as the Central Bureau of Investigation; the Enforcement Directorate; the Wildlife Crime Control Bureau; the Director General (Forests), Ministry of Environment, Forest and Climate Change; the Directorate of Revenue Intelligence; the Department of Customs; the CITES Management Authority of India; the Animal Quarantine and Control Services; the Department of Animal Husbandry; and the Central Zoo Authority. Upon careful consideration of the allegations, the responses of these central and state authorities, and its own independent assessment, the SIT finds no merit in any of the allegations. No breach or violation has been found of the Wild Life (Protection) Act, 1972; the Recognition of Zoo Rules, 2009; the guidelines of the Central Zoo Authority; the Foreign Trade (Regulation and Development) Act, 1992; the Customs Act, 1962; the Indian Penal Code, 1860 or the Bhartiya Nyay Sanhita, 2023; the Prevention of Money Laundering Act, 2002; or the Convention on International Trade in Endangered Species of Wild Fauna and Flora.

**4.6.6** None of the numerous Authorities in India and abroad, could support **wild** and **speculative** allegations. Rather they expressed satisfaction on the

issues of compliances and regulatory measures.

- 4.6.7** The physical inspection of the facilities and the animal welfare conditions also belied the speculative apprehensions.
- 4.6.8** Before accepting any animal and its acquisition, not only requisite due diligence is performed, but also Indemnity from 'Donor Zoo' / 'Transferor' is specifically insisted and kept in records.
- 4.6.9** The records of all communications/documentation regarding the acquisition are duly preserved and maintained by Vantara entities.
- 4.6.10** No irregular cash/crypto flows, and no engagement with smugglers or unlicensed intermediaries has been brought out. Therefore the SIT concludes that the allegation made are baseless. The acquisitions are neither vitiated nor tainted by fraud, misrepresentation, or contravention of law.
- 4.6.11** There is no credible, tangible and prosecutable material to prove any wrongful act concerning the possession or acquisition of animals by any 'Donor Zoo' of any foreign country. However, suspicions have been raised qua local commercial acquisition of animals by 'Donor Zoo' of foreign countries. Based thereon doubts are raised on permissibility of commercial acquisition by 'Donor Zoo' within domestic laws applicable in the respective foreign country.
- 4.6.12** In any case, it is verified that the exports by such 'Donor Zoo' to Vantara entities in India are under valid CITES permit and 'non-commercial' transaction permitted by concerned Government Agency under requisite permissions and clearances. Once the concerned foreign government agencies have allowed such exports and the import thereof is accepted all the concerned authorities in India, there is no reason for Vantara entities or the Indian Statutory Authorities either to go behind the permits /

clearances / certificates issued abroad, to investigate / ascertain the issue of possession and acquisition of "Donor Zoo" being compliant of domestic laws of the respective foreign country. The SIT is in complete agreement with the stand of Vantara that any further inquiry into this matter by SIT is neither permissible nor practicable.

**4.6.13** Based on the contents of the affidavits filed before us by the management of donor zoos, where animals are procured by "Donor Zoo" in accordance with the law applicable to them and transferred to Vantara entities, once the export is under a valid export permit, such transfer or donation cannot be treated as a contravention of Indian law or CITES. Similarly, if an independent donor by himself / itself or along with an exporting / donor entity / zoo elects to fund release of animals from a facility, such as an overcrowded breeding farm, canned or trophy hunting in their own jurisdiction and effect a non-commercial zoo to zoo transfer, such activity / philanthropy, is lawful, when accompanied by valid export / import permits along with a host of permissions issued domestically, referred to above. It is pertinent that what is the law of that country would be a question of fact under international law.

**4.6.14** Once an export permit exists and is issued by the competent authority, there exists a statutory presumption of validity under Indian law. Allegations of corruption or maladministration by CITES officials, or by other Authorities in exporting jurisdictions, even if assumed, cannot create liability for Vantara. The entities are entitled to rely upon permits and clearances issued by competent Authorities abroad; Indian law does not require or empower them to police the probity of foreign governments.

**4.6.15** In a case where the exporting / donor entity / zoo export has been charged for any infraction or breach etc in its own jurisdiction or otherwise, such infraction cannot be imputed to Vantara entities if the import is backed by CITES export permits and the host of Indian clearances.

**4.6.16** It is verified that every import into India by Vantara entities is under valid CITES permits for such international transfer of animals from 'Zoo' to 'Zoo', under a host of proper permissions, import licence, CITES compliance and customs clearances.

**4.6.17** In so far as complaints regarding an orangutan and its repatriation to Indonesia are concerned, the SIT found that the said animal was not acquired by Vantara. But infact the same was transferred by the authorities to GZRRC for care pending the process of repatriation. The said animal was found to be affected by rhinovirus and is presently receiving treatment at Vantara. The authorities in India and Indonesia are in co-ordination for completing the process of repatriation. Vantara has extended its support and co-operation for the same.

**4.6.18** The allegation that certain invoices cited by news reports are proof of payment is also an allegation without any basis in law. Each export is associated with an Invoice, which on examination is found to effectively be a CIF (Cost, Insurance and Freight) invoice. It merely indicates the cost of insurance and freight as is required to be described for any import (even ones' own pet, much less an animal at a zoo) for customs purposes only.

**4.6.19** The allegation of certain persons associated with exporting/donor zoos or entities such as Mr. Martin Guth and Mr. Nazeer Cajee are found to be without substance. Purported messaging 'screenshots' or 'chats' attributed to Mr. Martin Guth are non-probatative, are without authentication. They do not implicate any Vantara entities. SIT notes that many others named and associated with Vantara who are not even charged let alone convicted of any wildlife related activity are portrayed as convicts. A very heavy emphasis has been laid by complainants and media on a past conviction of Mr. Martin Guth, decades ago, for actions having no connection with wildlife. It is worth remembering the adage that

*'every saint has a past, every sinner – a future'.* Such imaginative claims are based on suspicion whether an Indian facility can match such scales and standards based on white man's prejudice against India. But at the end, there is no material, cogent or legally admissible, to treat Vantara as being responsible, directly or indirectly, of any breach or offence, criminal or otherwise.

**4.6.20** In respect of D.R. Congo, the SIT reviewed the MoU, before-and-after photographic documentation, records of visits, the allegation of sourcing chimpanzees from a sanctuary etc. The records were found satisfactory and the allegation of sourcing animals from wild or sanctuaries such as chimpanzees were found to be baseless. There have been visits of officers to Vantara before finalisation of the transfer. There is no evidence found that any person named Oliver Trebaticky is involved in so far as Vantara is concerned. The records were found satisfactory, and the allegation of sourcing animals from wild or sanctuaries such as chimpanzees was found to be baseless. There exists an MOU between the authorities in Congo and Vantara which has several welfare and conservation aimed objects including upgrading the existing zoos in Congo, training and capacity building a zero management, which is already being undertaken.

**4.6.21** In respect of UAE and particularly Kangaroo Animal Shelter and Capital Zoo, the SIT interacted with the management of Kangaroo Animal Shelter and Capital Zoo, received response from CITES management authority from UAE. SIT examined records and found that the allegations of alleged round tripping of animals, payments for animals etc is incorrect. The said entities, during the course of questioning, have denied being sellers of animals or traders of animals. They and have clearly stated that their transfers are "zoo to zoo transfers", especially in so far as endangered species are concerned. The said entities, during the course of questioning, stated that as devout adherents of Islam, they consider it part of their religious duty and obligation to extend service towards animals,

including providing rescue and refuge for them. It was also mentioned that similarly religious persons extend assistance for the said purpose with the aim of providing relief to animals. In particular, the SIT obtained clarification from all concerned, particularly as regards the gorilla and records that the donor zoo Capital Zoo shall communicate with authorities governing it for the correction in the sub-species classification of the said gorilla.

**4.6.22** In respect of allegations regarding exporting / donor entity / zoo and specimen from Venezuela, there is an MOU between the exporting / donor entity / zoo and Vantara in this regard and the transfers are clearly seen to be non-commercial zoo to zoo transfers. The said entities, during the course of questioning, also stated that one of the objectives, other than decongestion of zoos, is also to have a secondary stable and reserve population outside range habitats. The SIT has examined the exporting / donor entity / zoo export permits and related documents. It was found that the specimen were of captive bred, transfers were not commercial, and as such, the transfer does not breach any provision of law or CITES. In so far as allegations concerning Mr. Nazeer Cajee and Mystic Monkeys, South Africa is a jurisdiction where trophy hunting and associated transfers are lawful. It was explained that certain animals are secured from such facilities with the support of independent donors who purchase them to prevent their untimely death. This model of donor-funded rescue cannot be equated with commercial trade. Mr. Cajee has also stated that he was offered USD 150,000 by persons claiming to be from media etc, to share information against Vantara, while the SIT expresses no opinion on this aspect, similar allegations were made by other zoo owners which transferred animals to Vantara. Therefore, such statements which cast doubt on the credibility of such allegations.

**4.6.23** In respect of allegations regarding exporting / donor entity / zoo and specimen from South Africa, the SIT has examined the exporting / donor

entity / zoo export permits and related documents and found that the specimen were of captive bred, the transfers were not commercial, and, as such, the transfer does not breach any provision of law, or CITES.

- 4.6.24** In respect of allegations trying to associate seizures at airports in India and other form of smuggling live or dead animals with Vantara are found to be wholly without any factual basis as confirmed by inputs from authorities.
- 4.6.25** In any event, there is no credible, tangible and admissible material to show complicity or knowledge of wrongful act, if any, done by 'Donor Zoo', to attract liability, criminal or otherwise, on Vantara entities. Presumption of Innocence is hallmark of criminal jurisprudence. It cannot be ignored in this regard merely on the basis of imaginative allegations.
- 4.6.26** Vantara had been repeatedly subjected to various litigations in different Courts in alleged public interest, with repetitive speculative allegations without any credible, tangible and substantial evidence, despite their lawful efforts without any commercialisation. The operations of GZRRC and RKTEWT emerge as legally compliant.
- 4.6.27** Here the SIT also notes that some of the complaints have gone to the extent of questioning the functioning of all departments of the government both Indian and foreign. The Complainants have also made allegations against the functioning of the court appointed High Powered Committee. They have equally castigated various High Courts by making contemptuous allegations regarding various proceedings and process followed by the Courts. Such allegations deserve not just complete rejection but depreciation.

## **5. Recommendations on the basis of findings:**

In light of the fact finding exercise, the SIT submits for consideration of the

Hon'ble Court that –

- (a) The “complaints”, and complaints based on “articles”, “submissions”, “news reports”, and “stories” which are considered and examined (referred in the Tables in **Schedule ‘A’**) hereto may please be considered for appropriate orders as has already been observed by this Hon'ble Court in paragraph 4 of the Order dated 25.08.2025;
- (b) Appropriate orders as regards speculative allegations for sensationalism against authorities, courts and committee's may please be considered by the Hon'ble Supreme Court.
- (c) The Hon'ble Court may also consider directing Vantara;
  - (i) expediting its zoological park portion with reasonable time, or alternatively / meanwhile, in consultation with the Central Zoo Authority and the Chief Wildlife Warden of the State of Gujarat, some portions of the rescue centres and elephant camp at GZRRC and RKTEWT may be opened for public access, without compromising on welfare requirements as such measures would enhance transparency, accountability, and public trust, mitigating perceptions of secrecy and thereby reinforcing confidence in the institutions' work.
  - (ii) Pursue benchmarking and membership with World Association of Zoos and Aquariums (WAZA), European Association of Zoos and Aquaria (EAZA), and Association of Zoos and Aquariums (AZA), and collaborate with specialist groups for conservation planning, with the objective of fostering constructive engagement with established institutions and enhancing international confidence in the institutions work.

(iii) Adopt a proactive public-information plan including briefings with accredited media and civil-society experts.

Dated this 11<sup>th</sup> day of September, 2025

Justice Jasti Chelameswar, Chairman

Justice Raghvendra Singh Chauhan

Hemant Nagrale

Anish Gupta, Member Secretary

**Schedule A**

<b>Item No.</b>	<b>Category</b>	<b>Date</b>	<b>Complainant / Author / Publisher</b>	<b>Subject Matter</b>
1	Writ Petition	06.08.2025	C.R Jaya Sukin	Diverse allegations stated in Memo of Writ Petition No. 783 of 2025 regarding acquisition of animals.
2	Writ Petition	09.08.2025	Dev Sharma	Diverse allegations stated in Memo of Writ Petition No. 779 of 2025 regarding acquisition of animals, gene bank, use of carbon credits etc.
3	Intervention Application & Submissions / Complaint before SIT	12.08.2025 31.08.2025 02.09.2025	S. Muralidharan	<p>Allegations regarding acquisition of Elephants in general.</p> <p>Email citing circumstantial evidence alleging offence under PMLA and requesting SIT to call for information from Customs, DGFT, ED and Forest Department (Gujarat).</p> <p>Allegation that petitions filed in court are by 'Vantara benami'.</p>
4	Intervention Application & Submissions / Complaint before SIT	08.09.2025	Afroz Begum	Allegations regarding acquisition of Elephant named 'Hiragaj'
5	Third Party Complaint	06.03.2025	Wildlife Animal Protection Forum of South Africa (WAPFSA)	Allegations that Vantara zoo has amassed thousands of wild animals from South Africa and other countries under questionable CITES processes, questioning large-scale imports of lions, tigers, cheetahs, giraffes and more, raising concerns about legality, welfare, and conservation value.
6	Media Report	20.03.2024	Published in Himal South Asia by M. Rajshekhar	Report titled 'The Costs of Reliance's Wildlife Ambitions' On Vantara project, tracing

				elephant and exotic wildlife transfers, rapid accumulation of thousands of animals, legal and conservation controversies, and global CITES-linked sourcing from India, Africa, Latin America and beyond.
7	Media Report	14.07.2021	Published in Newslaundry by Sourodipto Sanyal Report titled 'Tigers from Mexico, panthers from Assam: The making of Reliance's animal farm'	On government clearances for Reliance's Jamnagar zoo to import endangered species from Mexico and acquire black panthers from Assam, raising questions on policy, conservation priorities, and private ownership
8	Media Report	16.03.2024	Published in The Straits Times by Rohini Mohan Report titled 'Critics not wild about private zoo set up by Indian billionaire Ambani's youngest son'	On Vantara project, its scale of elephants, big cats, herbivores and reptiles, described as rescue yet criticised over sourcing, legality, and billionaire-led conservation
9	Media Report	31.01.2025	Published in Animals 24-7 by Merritt Clifton Report titled 'Vantara: Billionaire-built zoo/sanctuary has conservationists in a dither'	On 3,000-acre sanctuary, its accumulation of thousands of rescued animals, future breeding and public access plans, and debates over whether it is a zoo or genuine sanctuary

10	Media Report	05.04.2024	Published in Hindustan Times by Jayashree Nandi Report titled 'Animal transfers need better scrutiny, activists tell Centre'	On concerns about elephant transfers, smuggling of exotic animals, and activist allegations directed at Vantara, urging stricter CITES and ownership scrutiny
11	Media Report	13.03.2025	Published in Süddeutsche Zeitung by Christoph Cadenbach, Sebastian Erb, Lima Fritsche, Mauritius Much & David Pfeifer Report titled 'The billionaire and his 181 lions'	On Vantara's vast animal imports, veterinary facilities, and alleged role in fuelling global wildlife trade, drawing on import data of tens of thousands of animals from dozens of countries.
12	Media Report	27.06.2025	Published in Süddeutsche Zeitung by Christoph Cadenbach, Sebastian Erb & Mauritius Much Report titled 'The King of Parrots'	On the Spix's Macaw reintroduction and Martin Guth's rise from German parrot breeder to ACTP head, exploring his alleged enrichment from rare bird trade, connections with criminal networks, and purported role as procurer for India's Vantara zoo.  Along with  RENTAS - Summary of Süddeutsche Zeitung's investigation into Vantara and ACTP/Martin Guth, flagging concerns over rare-bird transfers and global wildlife trade links.

13	Media Report (Podcast)	2025	Podcast by Süddeutsche Zeitung (Episode 6) Report titled 'The Wildlife Dealer'	On journalist David Pfeifer's visit to Vantara, threats from management, alleged intimidation and surveillance, investigation into fake zoos in the UAE and Czech animal dealers, and leaked WhatsApp chats suggesting Martin Guth's involvement in procuring primates, parrots and other protected species for Vantara
14	Media Report	16.03.2025	Published in Armando.Info by the Investigative Team Report titled 'An oil maharajah receives offerings of Venezuelan fauna'	On exports of 1,800+ Venezuelan animals under CITES permits to Reliance's Vantara, involving endangered species, invoices, and links between Venezuela's Ministry of Ecosocialism and Ambani's project
15	Media Report	16.08.2025	Published by Pro Wildlife Report titled 'Tens of thousands of wild animals for private zoo in India'	On Vantara's mass imports of over 35,000 animals of 730+ species between 2023–24, including primates, big cats and great apes, sourced from Africa, Latin America, UAE and Germany, raising concerns on legality, CITES compliance, breeding plans, welfare, and industrial refinery setting
16	Media Report	12.04.2025	Published on Medium by Daniel Stiles Report titled 'Dodgy deal between wildlife DRC'	On the controversial transfer of endangered chimpanzees from DRC to India's Vantara, allegations of misusing CITES permits and 'captive-bred' codes, ICCN's role, resistance from sanctuaries, reports of corruption

			authorities and Vantara in India'	and trafficking, legal threats by Vantara, and international calls for CITES scrutiny
17	Complaint / Information submitted to SIT	28.08.2025	By P. Raxter	Allegations of removal of specimen from natural habitats, high volume, questioning need for rescue of animals, issuance of CITES permit using source code C where no captive breeding facilities exist. Allegations on purchase of monkeys, Galapagos land and fiji crested iguanas. Preponderance of traders named in adverse media reports. Import of 32 chimpanzees re-exported from Iraq, Egypt, Kuwait, Cameroon etc.
18	Information submitted to SIT	29.08.2025	Shubhobroto Ghosh	Request for recommendations strengthening rehabilitation of elephants utilizing Vantara.
19	Complaint / Information submitted to SIT	28.08.2025	Naresh Kadyan	Allegations on unlawful transfers of elephants to Vantara.
20	Complaint / Information submitted to SIT	02.09.2025	Trishala Ashok	Allegations with respect to transfer of chimpanzees from DC Congo as reported by Ofir Drori of Eagle Enforcement, network NGO.
21	Media Report and Complaint / Information submitted to SIT	05.09.2025	Mahesh Deka	Editor of online news agency Mahesh Deka's submissions contained allegations on transfer of elephants from north east, the transfer of seized animals from Assam zoo to Vantara's facility, lack of legal clearances,

				questionable rescue claims, wild origins, suspicious origins, unsuitable conditions and animal welfare issues at Vantara, financial irregularities and commercial exploitation.
22	Complaint / Information submitted to SIT	04.09.2025  07.09.2025	Sharath R Babu	<p>Allegation regarding one Mr. Anil Garg being an advisor to Vantara, unlawful transfer of elephants to Japan etc.</p> <p>Allegation that none of Vantara's animal imports entered India through the designated entry points under the Wildlife (Protection) Act, 1972, despite over a thousand animals being imported, and further claiming personal knowledge through interactions with transporters and customs officials about irregular wildlife shipments, raising it as purported vital evidence of possible illegality and enforcement lapses.</p>
23	Complaint / Information submitted to SIT	05.09.2025	M. Rajshekhar	Journalist of article mentioned at Item No. 6 above with additional information in form of another news report dated 31.08.2025 regarding ex-wildlife warden of Uttarakhand permitting transfer of 4 elephants.
24	Complaint / Information submitted to SIT	05.09.2025	Debi Goenka Conservation Action Trust	Allegations regarding location, permissibility of activity, handling of animals by visitors, employment of former government officers, validity of permissions, lack of transparency, bio security risk, and request to SIT to engage with

				several departments and peruse their records.
25	Complaint / Information submitted to SIT	01.09.2025	Unnamed complaint regarding animals from DC Congo	Allegation that Slovak national Oliver Trebaticky in collusion with DRC officers has engaged in smuggling or commercial trade.
26	Complaint / Information submitted to SIT	05.09.2025	Klaus Meyer	Allegation that Vantara is a private breeding centre and referencing discussions on online German speaking forums, lack of public oversight and independent regulation etc and that welfare standards are opaque. Allegation with reference to zoochat community with google earth and satellite imagery.
27	Complaint / Information submitted to SIT	08.09.2025	Bheem Bansal	Allegation that Vantara was involved for animals / gibbons (dead) seized at Bangalore Airport.
28	Complaint / Information submitted to SIT	10.09.2025	Marta Kowalska	Allegation that there may be high mortalities, cruelty, mutilation of animals, use of animals for entertainment purpose etc and request to question vets.
29	Complaint / Information submitted to SIT	02.09.2025	Dhiraj Mirajkar	Allegation of illegal possession of baby orangutan at Vantara.
30	Complaint / Information submitted to SIT	06.09.2025	Ram Singh	Allegations highlighting delays in Vantara's facility construction, with animals including aquatic species, penguins, and apes housed in temporary, inadequate enclosures,

				raising urgent welfare concerns."
31	Complaint / Information submitted to SIT	06.09.2025	Maaten Vos	<p>Alleging that Vantara zoo is illegally acquiring animals and failing to pay pet traders and suppliers, with claims of coercion, bypassing legal channels, and procurement of exotic species from local markets—raising concerns of animal welfare violations, financial misconduct, and the need for urgent investigation.</p>
32	News Report	12.04.2025	Aathira Perinchery The Wire	<p>Published in The Wire by Report titled 'Congo Chimps at India's Vantara: A Case of Capture From the Wild?'</p> <p>On allegations that nine chimpanzees imported by Vantara from the Democratic Republic of Congo were wild-caught (despite being labelled "captive-bred"), highlighting potential misuse of code-C CITES permits, links with Kinshasa Zoo irregularities, and broader concerns about wildlife trafficking under the guise of rescue.</p>
33	News Report	10.04.2025	Published in Africa Geographic by Daniel Stiles	<p>Report titled 'How DRC's endangered chimpanzees end up in a billionaire's Indian zoo'</p> <p>On the alleged transfer of wild-caught chimpanzees from the DRC to India's Vantara under falsified "captive-bred" CITES permits, with Ofir Drori of EAGLE stating that there are "no great ape breeding facilities in Africa,"</p>

				implying the origin must be wild, and linking the transfers to Vantara/GZRRC.
34	News Report	01.09.2025	Published in Currency News by Daniel Stiles	Report titled "Exposed: The big business of selling South Africa's big cats to Ambani's Indian mega-zoo.
35	Complaint / Information submitted to SIT	09.2025	Four Paws & Other NGOs.	On allegations of transfer of animals and welfare conditions along with similar complaints also addressed to CITES Secretariat.
36	Complaint / Information submitted to SIT	09.09.2025	Raju Shetty	Complaint about transfer of Elephant Madhuri from Kolhapur to Vantara.