

Bear Markets: Taiwan

A summary of the findings of: ‘*A Study on the Trade in Bear Products in Taiwan: 2002*’ published by EAST, September 2002.

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After several studies during the 1990s and publicity in Taiwan concerning the bear bile trade and treatment of bears on Chinese farms, this study aimed to ascertain whether Taiwan’s TCM shops remain “potential providers” of bear products. EAST researchers visited TCM shops randomly and asked if there were any bear products for sale. The conversations and interactions between the researchers and the shop keepers or dealers were video taped and a record was made. A total of 201 TCM shops were visited, and 11 samples of products were collected during the period of July and August, 2002.

Background

There are reportedly more than 10, 000 Traditional Chinese Medicine (TCM) shops in existence on this small island. However, most of them are not legally registered with the Department of Health (DOH), Executive Yuan. According to Medical Law (Article 103.2), those TCM shops which existed prior to the 5th February 1993, and are able to obtain a certificate to prove their existence from “any” public authority agency, are entitled to register with the DOH.

However, the deadline for applying for registration is not defined in the regulation. In addition, most of the shops acquire their certificate from the local police office (which is, of course, one kind of public authority), registration schemes for TCM shops in Taiwan seem open to all, with no control or enforcement of the law.

Nevertheless, only 5,100 TCM shops were reportedly registered with the DOH by June 2002. So, more than half of the TCM shops in Taiwan, according to Medical Law, are “black market stores” (illegal store).

Furthermore, according to Medical Law (Art.No.28), medicines and the trading of them in TCM shops, is subject to the management of stationed Chinese Medicine Doctors or pharmacists or

EAST Survey of Taiwanese TCM shops (July–August 2002)

- **Total number of shops visited: 201**
- **Shops that did not sell bear products: 140 (69.7%)**
- **Shops that sold bear bile powder (in branded boxes): 15 (7.5%)**
- **Shops that sold bear bile powder (in loose packages) Including those that also quoted prices of manufactured bear bile products (TCM with bear bile in the ingredients): 16 (7.9%)**
- **Shops that sold intact bear gall bladders [including those that also quoted prices (No. 27) and mentioned that they also had manufactured bear bile products]: 15 (7.5%)**
- **Shops that might have sold the products to friends or acquaintances [including those that quoted prices or mentioned that they also had manufactured bear bile products]: 15 (7.5%)**
- **Total number of shops that sold bear products: All types of products and suspected sales of products: 61 (30.6%)**

druggists who have studied a relevant Chinese medicine course. However, according to the Committee on Chinese Medicine and Pharmacy (CCMP), a part of the DOH, currently only 440 TCM shops meet the requirements. Others are family run, “master- and- follower” types of businesses, with long standing customers.

Following WSPA’s 1999 investigation of Chinese Bear Farming (see pages 22–52, and a letter campaign (to the President of PRC, Jian, Tse-Min, research on the markets of bear bile products in Indonesia, the Philippines, Singapore, Japan, Malaysia, Australia, Canada, United States and England have been carried out in recent years.

Taiwan, due to its close link, both geographically and historically with China, has been importing 90% of its Chinese medicine from mainland China since the latter opened its doors to trade in the last 10 years. Taiwan is also considered one of the major consumers of Chinese bear bile and gall bladder. Although politically, China considers Taiwan as one of its provinces, it is practically a Nation-to-Nation relationship in terms of Customs and Trading. In addition, although not a member of CITES, Taiwan does follow CITES regulations. Therefore imports of endangered species and their products violates Wildlife Conservation Law, as well as CITES regulations.

There are even Taiwanese businessmen running or at least investing in some bear farms in both Guangdong and Sichuan provinces, in China. Their attempts to sell bear bile products back to Taiwan, is understandable. Fortunately, the CCMP’s appeal to the public for “No Endangered Species Products in Medicine” and promotion of “Alternatives” has a high profile. TV advertising and electronic boards outside the office of CCMP state “*For the conservation of wildlife, please use alternatives with similar effectiveness instead*”, and “*Humans bring extinction to endangered species*”.

In the latter part of 2000, WSPA and EAST launched a “Liberty” campaign in Taiwan, almost universally the media described the scenes of bear farming in China as “cruel” and “brutal”, instead of accepting it as a “conservation” issue as they had done before. The campaign also provoked a lot of responses from the public.

Literature Review : The trade of bear gall products in Taiwan

In 1991, Judy A. Mills and Christopher Servheen investigated 34 Chinese medicine shops at De-Hua Street, Taipei and found that 30 out of 34 shops sold bear gall (88.2%)¹. Among the four shopkeepers who said they did not have bear gall, one claimed that the practice was against the owner’s Buddhist beliefs. Another said he did not wish to break the new conservation law, and another said his shop had just opened so he hadn’t yet had time to stock bear gall. The fourth refused to answer any questions.²

In 1994, Keith Highley & Suzie Chang Highley of Earth Trust, sponsored by HSUS, undertook an investigation into the trade in bear gall products in Taiwan (assisted by the Life Conservationist Association) and published the report “*Bear Farms and Trade in China and Taiwan*”².

Among 44 Chinese medicine shops investigated:

- Shopkeepers from 27 shops (61.4%) either possessed or could obtain bear galls and were willing to sell them either whole or in prescription form to investigators.
- 11 (25%) said they did not have bear gall bladders in their possession.
- 5 (11.4%) possessed bear gall bladders but were not willing to sell them because of government pressure.
- 1 (2.3%) stocked only farmed bile crystals.



Electronic message outside the office of Committee of Chinese Medicine and Pharmacies, DOH promotes conservation. Messages have specifically urged people to use alternatives.

In only 7 instances were prices given per qian(3.75grams), fen(0.375grams)or for whole gall bladders:

Prices per fen were NT\$300(US\$11)/0.375 grams(NT\$26.50=US\$1.00).

Prices per qian were NT\$2000(US\$75), NT\$2800(US\$106), NT\$3000(US\$113).

One pharmacist offered 3 qian at NT \$1500(US\$57)(i.e. NT\$500 (US\$19.23) per qian). However, this price seems to be too low for authentic bear gall bladder expected price (5-6 times lower than expected).

This report also described three situations:

1) The pharmacists told the investigators that sources of bear gall bladders were China, United States and North America. Only one physician defended China's bear farms. He said "*people shouldn't even think about importing gall bladders from North America*". He believed it makes more sense to use milked bile because it is cheaper, more profitable in the long run, and it "*keeps bears alive*".

2) Most of the pharmacists and physicians interviewed felt that the quality of bile extracted from captive bears was inferior. One physician strongly believed that because of the difference in diet between captive and wild bears, bile from farmed bears was inferior. "*Asiatic black bears produce the best gall bladders,*" he said, "*but any gall obtained from a wild bear is better than from a farmed animal*".

3) Some physicians believed bile from China's farmed bears was injected into pig gall bladders and, other physicians said that bile from pigs is injected into bear gall bladders. It was generally believed that importers, wholesalers, distributors and pharmacists could readily differentiate between real and false bear gall bladders. However, consumers could not usually tell the difference and were at the mercy of the pharmacists.

In 1994, an investigation of 40 Chinese medicine shops was carried out by the Environmental Investigation Agency (EIA) in UK, finding 35 shops (87.5%) selling bear gall bladders.

In March 1994, the Food & Drug Inspection Service (FDIS), of the DOH randomly chose 64 TCM shops in 6 local counties and cities and undertook and found that 32 (50%) sold gall bladders. 35 samples were collected from among 28 shops and sent for forensic analysis. The results were :

- Genuine bear gall bladder - 24 samples (68.6%)
- Genuine gall bladder from farmed bears - 2 samples (8.6%)
- Miscellaneous (other species) gall bladder - 8 samples (22.9%)⁴

In July 1994, the DOH subcontracted a scholar to undertake a questionnaire survey³. A total of 8,400 letters were sent with questionnaires asking TCM shops about their stocks of bear gallbladder and sales. 525 completed questionnaires were received (6.3%). These revealed:

No stock - 219 (41.7%)	
Less than 5 qian (18.75 grams)	61 (11.6%)
5 qian (18.75 grams) to 1 Lian (37.5 grams)	78 (14.9%) ⁵
1 to 3 Lian (37.5-112.5 grams)	50 (9.5%)
3 to 5 Lian (112.5 - 187.5 grams)	32 (6.1%)
5 to 10 Lian (187.5 - 375 grams)	16 (3.0%)
10 lian to 1 gin (375 - 600 grams)	17 (3.2%) ⁶
1 to 3 gin (600 - 1800 grams)	7 (1.3%)
3 gin and above (1.8 kg +)	7 (1.3%)

In other words, about 268 respondents (51%) reported having bear gallbladder in stock. Although likely, this does not necessarily mean that they were still selling them. The report finally estimated the total stock of bear gall bladder in Taiwan is somewhere between 311 to 1109 kilograms³.

With regard to sales, the 1994 survey found :

- Still selling bear gallbladder — 400(76.2%)
- No sales — 108(20.6%)

The report finally pointed out that the percentage of TCM shops that were still selling bear gallbladder in Taiwan was somewhere between 50% to 76.2%³.

Attention should be paid to two additional responses:

1) Responses to “what percentage of sales might you lose when the sales of genuine bear gallbladder is totally banned?”, were:

- Less than 5 % — 126 (24.0%)
- 5% to 10% — 89 (17.0%)
- 10% to 20%—53 (10.1%)
- No influence – 165 (31.4%)
- Unknown – 4 (0.8%)

In other words, more than 55.4% (291) of the respondents considered that the “total ban of bear gallbladder” had no influence or represented a less than 5% loss in their sales.



Bear bile products available in Taiwan.

2) Responses to “How long would the stock of bear gall bladder last before being sold out after it was totally banned?” were:

- One year – 100 (19.0%)
- Two years – 34 (6.5%)
- Three years – 13 (2.5%)
- Over three years – 39 (7.4%)
- Do not want to sell – 99 (18.9%)
- Unknown – 3 (0.6%)

In other words, only 9.9% (52) of respondents considered that three or more years were needed before their stock of bear gall bladder was sold out.

However, the ban on bear gall bladders (Wildlife Conservation Law 1994), which was in place by this time, was for “wildlife conservation” rather than “animal welfare”. Therefore, the so-called “milked” bear bile was considered a compromise between TCM shoppers and the Administration (DOH).

It also explains why TCM consumers still argue that “conservation” was conflicting with their survival and “work rights”, when the Libearty campaign was launched again, and government officials as well as Chinese Medicine doctors once more insisted that there were alternatives to bear products at the end of 2000 and early 2001. TCM shoppers also appealed to the government that “farmed bear bile” should be allowed to be imported and sold “according to CITES” and they questioned what should the government do: “save humans” or “save animals?”⁴.

In the summer of 1995, the DOH subcontracted Professor Pesus Chou, Community Medicine Research Center & Institute of Public Health (CMRC&IPH), National Yang-Ming University, to conduct the most comprehensive research to date. It is regrettable that the DOH did not continue such a research project (for example every 3 - 5 years), thus updating the data and understanding the interaction between government policy and communities.

The study population, 200 TCM doctors and 400 TCM shops was determined by stratified random sampling from 2,600 registered TCM doctors and over 8,000 TCM shops registered in Taiwan.

In 1998, the *Chinese Journal of Public Health* published Professor Chou's study:

*"A study of traditional physicians and pharmacists on use of endangered animals in traditional medicine in Taiwan"*⁵. With regard to the bear products, the following messages were considered most important :

1) Percentage of use by interviewed TCM doctors & dealers. (1998 survey)

TCM doctors using genuine bear gallbladder

1992-1993: 23.0%

1994-1995: 4.6%

Percentage of use reduced 80.0%

TCM doctors – miscellaneous gallbladder

1992-1993: 14.5%

1994-1995: 5.3%

Percentage of use reduced 63.5%

TCM dealers – genuine bear gallbladder

1992-1993: 38.7%

1994-1995: 3.0%

Percentage of use reduced 92.3%

TCM dealers – miscellaneous gallbladder

1992-1993: 30.1%

1994-1995: 6.0%

Percentage of use reduced 80.1%

2) Influence on income after prohibition of bear gallbladder (1998 survey)

TCM doctors

No influence 89.3%

5% & less 7.3%

5%-10% 2.0%

10%-20% 1.3%

TCM dealers	
No influence	69.2%
5% & less	13.0%
5%-10%	6.7%
10%-20%	11.0%

3) Interviewed TCM doctors & dealers who considered there were alternatives (1998 survey)

TCM doctors	— 58(38.7%)
TCM dealers	— 93(31.1%)

4) TCM doctors & dealers who considered there were alternatives and recognised the effectiveness of the alternative (1998 survey)

TCM doctors, n=58	
close	— 31.0%
partially	— 63.8%
unable to replace	— 5.2%

TCM dealers, n=93	
close	— 33.3%
partially	— 63.4%
unable to replace	— 3.2%

The study concluded: Most TCM doctors and dealers consider some medicines of unique effectiveness and are therefore not replaceable with alternatives. However a higher percentage of TCM doctors and dealers felt that Bear gall bladders, Rhino horns and Tiger bones have alternatives available. Although alternatives are accepted, it is with the recognition that they have only partial effectiveness. Due to the government pressure on the ‘cracking down of the use’, the doctors and dealers have to make use of alternatives and use ‘quantity’ to compensate for ‘quality’.

The Environment and Animal Society of Taiwan (EAST) study in 2002

The study concentrated on the sale of “bear products” in TCM shops in Taiwan. TCM shopkeepers were questioned about bear products for sale (all products being promoted as ‘bear products’ were treated as genuine)

Although more than 10,000 TCM shops reportedly exist in Taiwan, this study focuses on three major areas: Taipei, Taichung and Kaoshiung, for these are traditionally wholesale TCM markets. In particular, Di-Hwa Street in Taipei, Chung Shan Road and Chen Gung Road in Taichung, and San Fong Chung Street (so-called Chung street), Fu Yeh Road and Chien Kwo 4th Road were main areas where TCM shops were located. Some of these TCM shops were also importers. Most of them also carried out retail business, but this depended on the quantity of each individual purchase, as the pricing structure could be very different.

However, considering that urban development may also have had an effect on the re-location of TCM shops, this study was also extended to some suburban areas, such as Hsin Dien, Pei Tou in Taipei city; Yung Ho, Pan Chiao in Taipei county; Tsau Tun, Da Li in Taichung county; and some TCM shops located outside of San Fong Chung Street in Kaoshiung city.

Researchers visited TCM shops randomly and asked if there were any bear products for sale. The conversations and interactions between the researchers and the shop keepers or dealers were video taped and a record was made. A total of 201 TCM shops were visited, and 11 samples were collected during the period of July and August, 2002.

TCM shop locations

Greater Taipei Area: Divided by Hsia Hai Chen Hwang (the God of the hell) Temple, from Ming Sheng West Road to Nan King East Road, was called the De-Hua “South street” and from Ming Sheng West Road up to Taipei Bridge was called De-Hua “North street”. This long extended street had a great many shops selling all sorts of goods. But most of them were TCM shops.

A lot of TCM shops were also located in the nearby surrounding area, such as Ming Sheng West Road and Kwei Swei Street, however the size of these shops was usually much smaller. The total number of TCM shops in this area was around 200 to 230, and 66 of these shops were randomly selected and visited by the researchers. A further 32 TCM shops were selected and visited by researchers, which were located in the suburban area Pan Chiao, Yung Ho; Hsin Dien and Pei Tou.

Great Taichung Area: Many TCM shops were located in the Chung Shan Road and Chen Gung Road in Taichung city, a total of around 20 to 25 shops. This area differed from the TCM wholesale market area in Taipei and Kaoshiung. Many of the TCM shops in Taichung now sold so-called “Scientific Chinese Medicine (SCM)”, some even sold more than one brand of SCM.

Reviewing catalogues of SCM, the investigators found that animal product ingredients were popular. Whether these SCM actually contained genuine bear products was questionable. A total of 52 shops were randomly selected and visited.

Kaoshiung: Similar to De-Hua Street in Taipei, San Fong Chung Street was a market place for all kinds of goods traditionally used for Chinese. Among them, were many TCM shops. In addition there were 20 to 25 more TCM shops located in the nearby area - Fu Yeh Road and Chien Kwo 4th Road. A total of 51 TCM shops were randomly selected and visited in Kaoshiung area.

TCM shops involved in the bear bile trade

Out of the 201 shops visited on 2002, 46 (22.9%) clearly appeared to either still “sell or promote” bear bile products. Out of 201 shops visited, there were 15 shops (7.5%), which doubted that they would “sell or promote” bear bile products if they did not recognise that the “inquirer” and/or “customer” was “sincere” or “genuine” (NFS, not for stranger)¹³. Two shops mentioned that some shops only sold endangered animal products to “old acquaintances”. Some shops said that they did not sell bear products themselves but would like to help, and some others sold SCM or ITCM (International TCM), such as Wu Bao San (WBS).

In other words, there were still 30.3% of TCM shops who provided or had the potential to provide bear products. Nationally this could be extrapolated as some 3,000 TCM shops in Taiwan (30.3% of 10,000) still offering “incentives” to support bear farms in China.

In previous studies, when asked “*what percentage of sales might be lost when the sale of genuine bear gall bladder is totally banned*”, 24% of TCM shops who replied to the DOH questionnaire claimed “*Less than 5 %*” (DOH, 1994). When students asked “*what affect would the prohibition of bear gall bladder have on income?*”, 96.6% of TCM doctors said there will be “*No influence*” or “*Less than 5%*”, and 82.2% of TCM dealers said “*No influence*” or “*Less than 5%*”. (DOH, Chou, 1998)⁵.

Prices quoted during the EAST study

a) Bear Bile Powder in Boxes

Shop	Names (omitted)	NT\$	US\$
5		1 支 1 錢 600 1 盒 10 支 6000	18.18/qian (4.85/gram) 181.81/box
7		1 支 1 錢 700 1 盒 5 支 3500 散裝 1 分 300	21.21/qian (5.66/gram) 106.06/box 9.09/fen (24.24/gram)
16		1 支 1 錢 600 1 盒 10 支	18.18/qian(4.85/gram)
50		1 盒 10 支 2~3000	60.60~90.90/box
62		1 盒 1 支 10 支裝 1800	54.55/box
63		1 支 300 1 盒 1 錢 10 支裝 3000	9.09/inner box 90.91/box
64		1 瓶 1 兩 1500	45.45/lian (1.21/gram)
96		散裝 1 分 300 1 支 100	9.09/fen(24.24/gram) 3.03/inner box
99		未詢問到價格	NA
106		1 盒 1500	45.45/box
124			2.42/fen (6.45/gram)
132		1 支 1 分 250	7.58/fen (21.21/gram)
134		1 支 150	4.55/inner box
149		1 支 300	9.09/inner box
181		1 支 1 錢 600	18.18/qian (4.85/gram)
198		1 支 1 分 100 1 盒 20 支 1600	3.03/fen (8.08/gram) 48.48/box

16 cases

b) Bile Powder in loose packages:

Shop	(Names Omitted)	NT\$	US\$
3		1 錢 1500 1 兩 1 萬多	45.45/qian (12.12/gram) 303.03/lian (8.08/gram) ²³
4		1 分 200	6.06/fen (16.16/gram)
11			7.58/fen (20.21/gram) ²⁴
20		1 分 250 元 1 錢 2500	7.58/fen (20.21/gram) 75.76/qian (20.21/gram)
22			7.58/fen (20.21/gram) ²⁵
33		1 分 100	3.03/fen (8.08/gram)

²³ Same products but price much less if buy large quantity

²⁴ The shop quoted price and later claimed "no Sell".

²⁵ The shop quoted price and later claimed "no stock".

NB: In the full report that has been presented to the Taiwanese authorities, all shops selling bear bile products are identified, for the purposes of this report they are identified only by a number.

Prices quoted during the EAST study (continued)

Shop	(Names Omitted)	NT\$	US\$
49		1 錢 200 1 兩 2000	6.06/qian (1.62/gram) 60.6/lian (1.62/gram)
55		未詢問到價格	NA
78		1 分 150	4.54/fen(12.11/gram)
82		1 分 350	10.61/fen (28.29/gram)
102		1 兩 300 1 錢 30	9.09/lian (0.24/gram) 0.90/qian (0.24/gram)
126		1 分 180	5.45/fen (14.53/gram)
137		1 分 180	5.45/fen (14.53/gram) 6.06/inner box
150		1 分 200	6.06/fen (16.16/gram)
154		1 分 100 多 1 錢 1800	3.03/fen (8.08/gram) 54.55/qian (14.55/gram)
155		1 錢 3800	115.15/qian (30.71/gram) 9.09/fen (24.24/gram)
163		1 錢 250	7.57/qian (2.02/gram)
166			3.03/fen (8.08/gram) ²⁶
199		1 分 300	9.09/fen (24.24/gram)

19 cases

C) Intact bear gall bladders

Shops	Names (omitted)	NT\$	US\$
6		1 分 300	9.09/fen (24.24/gram)
27		1 分 150	4.55/fen (12.13/gram)
34		1 分 400	12.12/fen (32.32/gram)
42		1 分 250	7.58/fen (20.21/gram)
43		1 錢 300	9.09/qian (2.42/gram)
51		1 兩 8000	242.42/lian (6.46/gram)
86		1 錢 1500	45.45/qian (12.12/gram)
89		1 錢 5000	151.52/qian(40.41/gram)
94		1 分 400	12.12/fen (32.32/gram)
122		未詢問到價格	NA
124		1 分 250	7.58/fen (20.21/gram)
148		未詢問到價格	NA
166		未詢問到價格	NA
167		1 分 200 1 錢 2000	6.06/fen (16.16/gram) 60.6/qian (16.16/gram)
171		未詢問到價格	NA

15 cases

²⁶ Price quoted for loose pack, but also claimed that they have intact gall.

When asked “How long would your stock of bear gall bladder last after it is totally banned”, 9.9% of TCM shops who replied to DOH’s questionnaire claimed that they would need “three or more years”³. Seven years have now past, and 22.89% of TCM shops were still selling bear products.

Although leaders of TCM Associations keep saying that they are trying to save people’s lives by selling endangered animals products, this study found that in only 3 out of the 201 shops visited (1.5%) shop keepers asked the “consumers” to provide a TCM doctor’s Medical Certificate or Written Diagnosis before they sold their bear products.

The possession of farmed bear bile powder (crystals) increased from only 2.3%² to almost 7.5% (sold in powder in boxes), an increase of 3.2 times. The market is now occupied by farmed bear bile, at least in Taiwan. Despite the prevalence of farmed bear bile (with its associated animal cruelty), the issue of whether fewer wild bears are being caught or poached remains questionable. (The price of intact gall bladder remains high and valuable to TCM communities, and bear cubs could be poached for breeding stock in the bear farms.)

Coincidentally, among a total of 61 TCM shops that were selling or had the potential to sell bear products, there were 61 shops that provided quotes for various bear products (they did not necessarily provide quotes for the products they had in stock). There were at least four different types of bear products that were provided by TCM shops.(see Appendix - 3)

Among the 61 cases of bear products that were mentioned and/or quoted, 25% (n=15) were intact gall; 26% (n=16) were bear bile powder sold in boxes (imported from Hong Kong/China), and 32% (n=19) were claimed to be bear bile powder but the product origin was unknown. Also, 18.03% (n=11) were manufactured bear bile products (TCM (ITCM) with bear bile in the ingredients). Some shops sold 2 or 3 different kinds of products. Some mentioned bear products or prices but later claimed “not to sell” and investigators thought they may only sell to friends or acquaintances.

a) Intact bear gall bladder: 15 cases.

The prices quoted varied from as high as US\$151.52/qian(US\$40.41/gram)to as low as US\$9.09/qian (US\$2.42/gram). Most shop keepers did not want to reveal the origin of the product. Compared to the product origin, of intact bear gall bladders, claimed by TCM shops in 1991 (Mills & Servheen, 1991), this situation had changed significantly¹⁶.

Prices quoted during the EAST study (continued)

d) Wu Bao San

Shops	NT\$	US\$
27	12000/方	363.64/prescription
33	100/分	3.03/fen (8.08/gram)
70	8000/兩 800/分	242.42/lian 2.42/fen (6.46/gram)
82	15000/兩 150/分	454.55/lian 4.54/fen (12.12/gram)
87	NA	NA
89	NA	NA
90	7500/兩 75/分	227.27/lian 2.27/fen (6.06/gram)
138	28000/方	848.48/prescription
113	NA	NA
144	2000-3000/兩	60.61-90.91/lian (1.62/gram)
183	NA	NA

11 cases

NT\$: US\$= 33 : 1 (Sep. 2002)

NA : Not available

b) Bear Bile Powder (crystal) in boxes with brand names: 16 cases

The prices quoted varied from as high as US\$9.09/fen to as low as US\$1.82/fen. The products mainly originated from: China - Sichuan, Deer Farm; Hong Kong (Hang Fat Sino-Drugs, Bai Chen Tan, others. However, products imported from Hong Kong also meant that they had originated from China and the business was owned by Taiwanese.

c) Bile Powder (crystal) in loose packages: 19 cases

The prices quoted varied from as high as US\$115.15/qian (US\$30.71/gram) to as low as US\$0.9/qian(US\$0.24/gram), representing nearly a 128 times price difference.

Most shops did not want to mention the product origin.

d) Manufactured bear bile products (TCM with bear bile in the ingredients), such as “Wu Bao San”: 11 cases

Prices quoted ranged from the highest US\$3.03/fen (US\$8.08/gram) to the lowest US\$0.61/fen (US\$1.62/gram).

Table: bear products found in the survey

Type of products	Number	% of total	Product Origin
Intact bear galls	15	24.6%	No where ¹⁴
Bear bile powder Sold in boxes	16	26.2%	Sichuan, China Hong Kong
Bear bile powder Sold in loose pack	19	31.2%	No where, same as above
Manufactured bear bile products (TCM with bear bile ingredients)	11	18%	Own made Or STCM ¹⁵

Genuine or counterfeit products?

Generally, it could not be confirmed during the study if a product which was sold as being of bear origin, was genuine or not. However the product packaging (if any) did reveal whether they were produced in the bear farms in China, which WSPA investigated in 1999 (Sichuan, Deer Farm).

According to Keith Highley², physicians considered that gall bladders provided could be either “*pig gall bladder injected with farm bear bile powder*” or “*farm bear gall bladder injected with pig bile*”. It is generally believed that importers, wholesalers, distributor and pharmacists can readily differentiate between real and false bear gall bladders. However, consumers usually could not tell the difference and were at the mercy of the pharmacists they frequented. There were shops which expressed the same concern.

Those TCM shops that sold “genuine” bear products were of course violating Wildlife Conservation Law 1994. Those that sold “counterfeit” products were also violating Medical Law. (Art.No. 53).

Even if some products are counterfeit, unless they are clearly labelled as such, they are still part of the same industry perpetuating the suffering of farmed bears and threatening the survival of wild ones. Indeed, the message that “there are alternatives to bear products” was being diminished.



Bear bile crystals found on sale in Taiwan.

The meaning of wildlife conservation education

The opportunity to obtain bear products from TCM shops in Taiwan has decreased significantly from the high 88.2% (Mills & Servheen, 1991) in the period 1991/1994, compared to 30.4% in 2002. It is quite encouraging as this reduction by more than half (65.6%) has occurred within 10 years. Recognition should be given to the Committee of Chinese Medicine and Pharmacies, DOH, for their endeavours to promote alternatives by means of TV advertisements, electronic bulletins, etc.

However, we must not ignore the fact that TCM communities were still struggling to acquire legitimacy for the use of farmed bear bile. For example, Mr. Jin-Yi Lin, the president of the Taipei TCM Commerce Association stated that: *“The farmed bear already in great quantity in China, and captive breeding continue, if we can milk the bear bile without killing them, and the techniques improve gradually and more humanely, thus it is a great contribution to both conservation and medication”*.

It actually reflects the fact that Environmental ethics have occupied the main stream in Taiwan (and Asian countries at large), whereas the Animal ethics have been sacrificed by the compromise between Conservation and TCM commerce and/or the industry’s profit. Therefore animal welfare, no longer a conservation issue should be addressed more in the future.

Along De-Hua Street, 15 out of 66 shops visited (22.7%) sold bear products. This is a drop from the high of 88.2% (Mills & Servheen, 1991), representing a reduction of 74.2%.

However, only 20 out of 201 shops visited (9.9%) mentioned “endangered species” as the reason why they did not sell bear products.

In total, only 10 out of 201 shops visited (5%) mentioned the law or related law enforcement as reasons not to sell bear products when speaking with consumers.

In total, 12 out of 201 (6%) shops visited mentioned the law and/or conservation but still suggested consumers tried other shops, instead of suggesting alternatives.

Although two shops did suggest to investigators that there were alternatives, TCM doctors in two other TCM clinics/shops were still trying to sell bear products to investigators. This reflects the view that TCM doctors and TCM dealers, who recognised that there were alternatives to bear gall bladder, remained few in number and very few of them viewed the alternatives as suitably effective (DOH, Chou, 1998).

Scientific Chinese Medicine (SCM) and the bear bile trade

In the past, De-Hua Street in Taipei, Chung Shan Road/Chen Gung Road in Taichung and San Fong Chung Street in Kaoshiung were major market places of TCMs. Due to urban development and changes in life style, plus the exclusion of Traditional prescription and Chinese Medicine from the National Health Insurance (NHI) Schemes, together with the promotion of so-called Scientific Chinese Medicine (SCM), the use of so-called “Water-Baking Medicine” (raw ingredients that are boiled to produce the medicine) declined significantly, first from prescriptions of TCM doctors, and then this effected the marketing of TCM materials.

The so-called “Drink-Pill Ointment, Pill and Powder (Yin-Pien, Dan, Gau, Wan, San) was traditionally the main foundation of TCM. The content can be varied depending on the patient, symptoms, seasons, etc, in other words it is a pro-holistic way of medication. Whereas the so-called SCM is just like western medicine: the ingredients are fixed, one product for all. A few activists in the TCM community are striving to gain the inclusion of TCM foundations in the NHI Schemes, as they argue that these prescriptions and formations of TCM have a better cure and lower cost. However, the quality and cost of such prescriptions varies from time to time, and therefore the possibilities are very limited. In other words, SCM will become more and more popular.

This study found some of the SCM products contain derivatives from endangered animals, including bear products. Attention should be paid to the regulation of the materials and production of SCM. The “Prohibition of using endangered animal derivatives” should be included in the regulation of GMP (Good Manufacturing Practices) medicine manufacturers to prevent SCM from becoming a joint-offender of animal welfare and wildlife conservation.

A total of 11 out of 201 shops visited (5.5%) currently sold or had the potential to sell SCM or ITCM, such as Wu Bao San (WBS), which contains endangered animal products or their derivatives, such as bear gall bladder, musk, etc.

Loopholes in the management of the TCM trade

Half of the TCM shops have no registration with the DOH, and only 400 are being managed by qualified pharmacists and/or druggists. In the legal shops the products are more expensive and the trade is more restricted. The illegal shops provide lower cost products and trade is uncontrollable, thus threatening both conservation, and public safety (unsafe medication).

Further more, the DOH announced its new “Regulation on Inspection and registration schemes on Imports of Chinese Medicine (SCM)” on Dec. 1 1999. This was because of Taiwan’s WTO admission and therefore the market should be opened to any herbal medicine from around the world, although the Good Manufacturing Practices (GMP) standards remain the minimum standard. SCM that are made in China might use a lot of bear bile or gall bladder for their ingredients, and therefore this could become another significant loophole²¹. The DOH should take responsibility to monitor SCM made in China (as well as in Taiwan) to ensure they are not violating conservation and CITES regulations.



Examples of different packaging for bear bile products available for sale in Taiwan.

Recommendations

- Strict law enforcement should be continued and carried out by the government, especially for those shops that had large quantities of bear products in stock.
- Public Education on animal welfare, as well as wildlife conservation, must be continued, and can be carried out by NGOs.
- The link between wildlife in captivity and wildlife poaching should be well addressed.
- Alternatives to the use of bear gall bladder and/or bear bile should be actually promoted to the TCM communities, including doctors, dealers, academics and consumers.

References:

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