

CITES CoP18 elephant proposals



ifaw

**convention on international trade in
endangered species of wild fauna and flora**



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ifaw recommendations:

18th meeting of the Conference of Parties (CoP18) of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)

elephant proposals and working documents

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proposals for amendment of the appendices

There are three proposals to alter the listing of African elephants on the CITES Appendices:

- 1 CoP18 Prop. 10 (Zambia) to downlist Zambia's elephants to Appendix II for the purposes of ivory stockpile sales, and exports of hunting trophies, hides and leathers.**
- 2 CoP18 Prop. 11 (Botswana, Namibia, Zimbabwe) to amend the existing annotation for the App II listing of elephants in Botswana, Namibia, South Africa and Zimbabwe to allow stockpile sales at any date in the future.**
- 3 CoP18 Prop. 12 (Burkina Faso, Côte d'Ivoire, Gabon, Kenya, Liberia, Niger, Nigeria, Sudan, Syrian Arab Republic and Togo) to list all African elephant populations on Appendix I of CITES, thereby preventing any commercial international trade in ivory.**

The three proposals present contrasting visions for the conservation of African elephants. On the one hand (Props. 10 and 11), the use of ivory stockpile sales to attempt to satisfy demand for ivory and generate proceeds to fund elephant conservation in selling countries, and on the other hand (Prop. 12), total protection of elephants from any commercial international trade in ivory.

sales of stockpiled ivory

IFAW believes that any legal market in ivory presents opportunities for the laundering of illegal ivory. We have yet to see any evidence that legal ivory trade can be adequately controlled, internationally or domestically, to prevent this happening. It is for this reason that we believe the focus of CITES Parties at this time should be on closing domestic markets for ivory (see comments on Doc. 69.5 below).

Proponents of previous 'experimental' ivory stockpile sales claimed such sales would satisfy market demand for ivory and reduce poaching. These sales did no such thing – in fact, they did the opposite, with poaching escalating dramatically in the decade following the last sales. Africa has lost approximately 144,000 savannah elephants, equivalent to 30% of the savannah elephant population¹, and forest elephant populations have declined by more than 60%². Recent analysis appears to show a clear correlation between the 2008 ivory stockpile sales and the increase in illegal trade and elephant poaching. Researchers demonstrate how the international announcement of the stockpile sale corresponded with an abrupt increase of approximately 66% in illegal ivory production across two continents, and an estimated



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increase of approximately 71% in ivory smuggling out of Africa, while corresponding patterns were absent from natural mortality and alternative explanatory variables³.

It does not make sense to repeat that experiment when the poaching crisis remains so severe today. It is understandable that southern African countries are keen to generate more resources for elephant and wildlife conservation, given the burden they bear of the largest elephant populations on the continent. IFAW acknowledges the efforts these countries have undertaken to conserve wildlife. However, the international community needs to find ways of supporting those efforts that do not risk stimulating demand for ivory and creating further cover for illegal ivory trade.

144,000

Approximately 144,000 savannah elephants have been lost, equivalent to 30% of the savannah elephant population since the previous sale of stockpiled ivory

71%

An estimated increase of approximately 71% in ivory smuggling out of Africa following the previous sale of stockpiled ivory

¹ Chase MJ, Schlossberg S, Griffin CR, Bouché PJC, Djene SW, Elkan PW, Ferreira S, Grossman F, Kohi EM, Landen K, Omondi P, Peltier A, Selier SAJ, Sutcliffe R. 2016. Continent-wide survey reveals massive decline in African savannah elephants. *PeerJ* 4:e2354 <https://doi.org/10.7717/peerj.2354>

² John R. Poulsen, Cooper Rosin, Amelia Meier, Emily Mills, Chase L. Nuñez, Sally E. Koerner, Emily Blanchard, Jennifer Callejas, Sarah Moore, Mark Sowers. Ecological consequences of forest elephant declines for Afrotropical forests. *Conservation Biology*, 2018; DOI: 10.1111/cobi.13035. Available at: <https://onlinelibrary.wiley.com/doi/abs/10.1111/cobi.13035>

³ Solomon Hsiang, Nitin Sekar. 2016. Does Legalization Reduce Black Market Activity? Evidence from a Global Ivory Experiment and Elephant Poaching Data. National Bureau of Economic Research. NBER Working Paper No. 22314. DOI: 10.3386/w22314. Available at: <https://www.nber.org/papers/w22314>

proposals for amendment of the appendices

It should also be noted that it is not immediately apparent which country would be an approved CITES trading partner for any future ivory stockpile sales. China and Japan were approved as trading partners for the 2008 sales. China has since closed its domestic market for ivory. Japan continues to operate a legal domestic market for ivory. However, in recent years, and even after updates to Japan's ivory regulations, significant concerns have been repeatedly expressed about the security of Japan's domestic ivory market, casting doubt over whether Japan would again be approved as a trading partner for stockpile sales.

A series of recent reports from TRAFFIC⁴ have shown how Japan's legal ivory market is providing opportunities for illegal trade, concluding that changes to Japan's regulations were "limited in terms of coverage and effect" leaving "critical loopholes in the law", and also identifying an increase in illegal ivory exports from Japan and high non-compliance by ivory businesses.



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⁴ See <https://www.traffic.org/site/assets/files/11142/slow-progress-japan-ivory-markets-1.pdf>; <https://www.traffic.org/publications/reports/ivory-towers-japans-ivory-trade/>; and <https://www.traffic.org/publications/reports/system-error-reboot-required-review-of-online-ivory-trade-in-japan/>



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on which appendix do elephants belong?

In respect of the appropriate Appendix for the listing of African elephants, in general, IFAW does not support the split-listing of species on different CITES Appendices. It creates unnecessary problems for enforcement, where it is often difficult to distinguish between the origins of split-listed species, especially with respect to parts and derivatives. Also, many animals in the wild, particularly highly migratory ones like elephants, do not adhere to national boundaries determined by humans. A recent paper on African elephants highlights this issue very clearly, showing that 76% of Africa's elephants belong to transboundary populations.⁵

In this respect, there is a strong case to support the listing of all elephants on Appendix I of CITES. At the continental level, African elephants meet the criteria for listing on Appendix I, in particular in relation to the decline of African elephants in the past decade, as demonstrated by the proposal of Burkina Faso, Côte d'Ivoire, Gabon, Kenya, Liberia, Niger, Nigeria, Sudan, Syrian Arab Republic and Togo.

However, IFAW recognises this proposal comes with the risk of possibly inspiring reservations to the uplisting of elephant populations currently on Appendix II. This was a significant factor influencing some Parties to oppose a similar proposal at CoP17. If both elephant range states and potential ivory consumer nations take out a reservation to the change, it could create an ivory trading regime outside the bounds of CITES control, which could present further enforcement difficulties and opportunities for the laundering of illegal ivory.

76%

A recent paper on African elephants shows that 76% of Africa's elephants belong to transboundary populations

⁵ Keith Lindsay, Mike Chase, Kelly Landen, Katarzyna Nowak. 2017. The shared nature of Africa's elephants. *Biological Conservation* 215 (2017) 260–267. <https://doi.org/10.1016/j.biocon.2017.08.021>



In IFAW's view, rather than engaging in protracted and divisive discussions on competing uplisting/downlisting proposals, the international community should focus on supporting the delivery of the African Elephant Action Plan agreed by all African elephant range states, and on implementing previous CITES decisions on reducing demand and closing domestic markets.

While the poaching crisis remains so severe, focus at this time should be on stopping poaching and illegal trade, as well as reducing consumer demand. This includes finding additional resources for range states to fund conservation in their countries, in ways that do not risk stimulating demand for ivory and opening up further opportunities for illegal trade. This has been the focus of IFAW's work on elephant conservation and wildlife crime (see box).

Further concerted effort is required to close domestic markets and reduce demand, as backed previously by Parties to CITES at CoP17. Addressing the cover provided by remaining legal markets for ivory trafficking and improving enforcement should be top priorities. To that end, IFAW urges Parties to focus their attention on supporting document 69.5 on closure of domestic ivory markets and on ensuring the National Ivory Action Plan process functions as effectively as possible (see discussion of both issues below under Working Documents).

ifaw's work around the world to conserve elephants and combat wildlife crime

southern africa

IFAW works with the governments of Malawi and Zambia to develop counter-poaching law enforcement capacity focused on the transboundary landscape conservation area covering Kasungu, Lukusuzi and Luambe national parks. We are also working to help local communities co-exist with wildlife on the boundary of Liwonde National Park, Malawi and partnering to return orphaned elephants to the wild in Zambia and Zimbabwe.

east africa

IFAW's innovative tenBoma project in Kenya and Uganda helps communities identify wildlife crime networks through community level reporting, then works with wildlife protection services to investigate, dismantle and arrest criminal syndicates. We also train rangers to investigate poaching incidents, assist local communities with human wildlife-conflict mitigation strategies, and work with border officials along the Kenyan/Tanzanian border to intercept wildlife traffickers. IFAW has also worked with Maasai communities, leasing land from more than 2,600 community members to protect 26,000 acres of critical elephant migratory linkages between Amboseli and Kilimanjaro National Parks in Kenya and Tanzania.

west africa

IFAW is working in Benin to develop canine units to combat wildlife crime in the port and airport of Cotonou. The programme trains dogs - some of whom come from French shelters and local communities - to detect animal parts such as ivory and pangolin scales, as well as training their handlers who are also enforcement officers. IFAW is also pioneering the rehabilitation and release of orphaned elephant calves in Burkina Faso.

asia: demand reduction

IFAW has worked with the government and a range of key opinion leaders in China to reduce demand for wildlife products, including ivory. We also monitor wildlife markets online and offline, and share intelligence with law enforcement agencies.

asia: elephant habitat

In India, through our partner the Wildlife Trust of India, IFAW is helping to conserve the Greater Manas landscape for elephants and other wildlife, rescuing and rehabilitating elephants and other wildlife through our centre in Kaziranga and working to protect 101 critical elephant corridors throughout the country.

enforcement training

IFAW conducts trainings with enforcement agencies around the globe, in source, transit and consumer nations in Africa, the Middle East and East Asia to help prevent wildlife crime, including ivory trafficking. Since 2005, IFAW has conducted 130+ trainings, involving more than 5,700 participants in over 40 countries.

cybercrime

Since 2004, IFAW has been exposing the scale of wildlife trafficking on the internet. We are working with technology companies to ensure that trafficked animals and illegal wildlife products do not appear online. In March 2018, together with partners WWF and TRAFFIC, IFAW launched the Coalition to End Wildlife Trafficking Online, which includes more than 30 of the world's leading e-commerce, technology and social media companies.



working documents on elephants

doc. 69.1

Implementation of Resolution Conf. 10.10 (rev. CoP17) on Trade in elephant specimens (Secretariat)

Doc. 69.1 provides a summary from the Secretariat on various aspects of implementation of Res. Conf. 10.10 and recent Decisions related to trade in elephant specimens. It includes draft Decisions for the consideration of the CoP in relation to: management of ivory stockpiles, Asian elephants and the National Ivory Action Plan (NIAP) process.

management of ivory stockpiles:

Doc. 69.1 (Annex I) proposes draft Decision 18.AA. This asks the Standing Committee to review guidance on management of ivory stockpiles and to make recommendations to CoP19. As discussed under Doc. 69.4 below, Parties called for guidance for the management of ivory stockpiles more than four years ago and it is deeply concerning that such guidance is still not available. IFAW strongly urges Parties to support the proposals in Doc. 69.4, to convene an in-session working group to review the guidance during CoP18 and prevent any further delays, rather than adopt draft Decision 18.AA.

asian elephants:

Doc. 69.1 proposes (in Annex I) draft Decisions 18.BB and 18.CC, which extend the Decisions agreed at CoP17 in relation to trade in Asian elephants and expand the scope to include parts and derivatives, not just live elephants, in response to concerns raised about trade in Asian elephant skin. IFAW urges Parties to endorse these draft Decisions. IFAW also encourages Asian elephant range states, as well as all Parties implicated in trade in Asian elephants and their parts, to report on measures taken to address such trade.

national ivory action plans (NIAPs):

Doc. 69.1 reports on the ongoing implementation of the NIAP process since the last CoP, including countries newly required to produce NIAPs and those that have exited the process. Doc. 69.1 also highlights how the ETIS report (Doc. 69.3) will be used to formulate recommendations on country participation in the NIAP process for consideration by the Standing Committee at SC71 the day before the CoP. These countries are discussed briefly below under Doc. 69.3.

| working documents on elephants

Doc 69.1 (Annex 3) also proposes amendments to the NIAP Guidelines. While many of the clarifications are welcome, IFAW urges Parties to insist on additional changes to the Guidelines to ensure the NIAP process is fully focused on reducing the impacts of ivory trade and poaching on elephants:

- Step 1(a) of the Guidelines provides that the ETIS report is the foundation for identifying countries to participate in the NIAP process. While the ETIS report is invaluable for the insights it provides, there is often a time lag with reporting and the ETIS report is only as good as information reported to ETIS by Parties. Therefore, it should be open to the Standing Committee to consider other relevant information that is new or may not have been reported to ETIS when making decisions about which countries to include in the NIAP process.
- Under step 4, assessments on progress should be based on the impacts of actions identified in NIAPs – i.e. has elephant poaching reduced? Are more criminals being prosecuted for ivory trafficking? – rather than just an assessment of the percentage of actions that have been undertaken, as is currently the case. The NIAP Guidelines already call for the use of performance indicators to measure the “impact of the actions in the NIAPs”, such as data on elephant poaching, ivory seizures, successful

prosecutions and any relevant indicators from the ICCWC Indicator Framework for Combating Wildlife and Forest Crime. Therefore, the assessments of implementation of NIAPs should be more directly linked to these impact indicators.

- Step 4(c) suggests the Secretariat undertake NIAP assessments ‘in cooperation with experts, if needed,’ and step 5(b) encourages the Secretariat to engage relevant experts on assessments of whether Parties exit the NIAP process. IFAW believes greater use of external experts would relieve some of the burden on the Secretariat of administering the NIAP process and lead to more robust assessments of NIAPs. Rather than simply encouraging engagement of experts, IFAW believes Parties should instruct the Secretariat to retain consultants or create a NIAP Technical Advisory Group to help undertake and review NIAP assessments.

Doc 69.1 also includes a request from the Secretariat to incorporate the cost associated with monitoring and supporting the NIAP process in the CITES Trust Fund budget, including the creation of a Compliance Support Officer post, to support the implementation of NIAPs and other CITES compliance processes. In addition to this step, and as recommended above, IFAW believes the burden on the Secretariat in assessing NIAPs could be relieved further by greater use of technical experts, by retaining consultants or through the creation of a Technical Advisory Group.

ifaw urges parties to **insist on additional changes to the guidelines to ensure the NIAP process is fully focused on **reducing the impacts of ivory trade and poaching** on elephants**

doc. 69.2

Report on Monitoring the Illegal Killing of Elephants (MIKE) (Secretariat)

Doc 69.2 presents an update on the work of the Monitoring the Illegal Killing of Elephants (MIKE) programme established under Resolution Conf. 10.10. Under MIKE, information on elephant carcasses is collected from over 60 sites in 30 African elephant range states and 28 sites in 13 Asian elephant range states. The MIKE programme evaluates relative poaching levels based on the Proportion of Illegally Killed Elephants (PIKE) found at these sites. PIKE levels above 0.5 are of concern, as this is the estimated threshold above which elephant populations are likely to be in decline, based on the assumption that the illegal annual offtake is likely to be higher than the number of elephants born annually in a naturally increasing population.

The MIKE report notes an increase in PIKE in Southern Africa, including Botswana, South Africa, Zambia and Mozambique. PIKE levels remain particularly high in Central and West Africa (where data is available). The trend of declining PIKE has continued in East Africa, which is welcome, although the report notes that this subregional trend is heavily influenced by two sites in Kenya (Tsavo Conservation Area and Samburu-Laikipia MIKE site), both of which have been heavily impacted by natural mortalities from drought, which may skew PIKE figures downwards.

CoP is simply requested to take note of the MIKE report.



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doc. 69.3

Report on the Elephant Trade Information System (ETIS) (Secretariat)



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Doc 69.3 presents an updated analysis by TRAFFIC of information contained in the Elephant Trade Information System (ETIS). The analysis for the 10-year period from 2008-2017, commencing with the year in which the second CITES-approved, one-off sale of ivory occurred, shows that nearly 400 tonnes of ivory were seized during the last decade.

Although the number of ivory seizure cases reported to ETIS for 2017 continues the downward trend since 2015, the authors note that late and incomplete reporting of seizure data to ETIS by Parties characterises the 2017 dataset, with another 179 seizure cases for 2017 reported since closure of the database for the current analysis and open source data suggesting that the true number of seizure records could be considerably greater than reported by Parties.

It is also concerning to note that despite Parties recommending at CoP16 that large seizures should be forensically tested, only 21 of 107 (approximately 20%) of large seizures (500kg+ of ivory) have been assessed forensically, hampering the ability of the international community to more accurately assess the locations of elephant poaching.

The ETIS analysis also shows a continued decline in large seizures of raw ivory but an increasing trend in the medium raw ivory weight class suggesting this may reflect changing trade dynamics, particularly the apparent emergence of illegal ivory processing within Africa for the export of products to Asian markets.

The analysis shows the overall quantity of ivory in illegal trade, by weight, has decreased, but cautions that this could simply reflect declining average tusk weights in heavily poached elephant populations experiencing ongoing attrition, thus potentially masking stable or even increasing levels of illegal off-take.

Part III of the ETIS report identifies the following as countries of concern, for potential inclusion or retention in the National Ivory Action Plan (NIAP) process:

- Category A: Malaysia, Mozambique, Nigeria and Vietnam
- Category B: Kenya, Tanzania, Uganda, Chinese Mainland and Hong Kong SAR
- Category C: Democratic Republic of the Congo (DRC), Congo, South Africa, Cameroon, Gabon, Zimbabwe, Angola, United Arab Emirates, Ethiopia, Cambodia, Singapore, Laos, Turkey and Burundi.

IFAW observes the following:

- The situation in Vietnam is described as having “worsened considerably”, with the country now becoming the leading destination for illicit ivory, surpassing China, including Hong Kong SAR.
- Parties which exited the NIAP process at SC70 (China, Kenya, Tanzania and Uganda) continue to be flagged in the ETIS report as Category B countries of concern.
- Other countries identified as being of concern by ETIS at both CoP16 and now at CoP18, but which are not currently participating in the NIAP process include: Singapore, South Africa and UAE.

- Zimbabwe, Turkey and Burundi have been flagged as new countries of concern.
- Japan is no longer included in any category, despite the ETIS analysis highlighting the poor performance of Japan for law enforcement and its significant domestic market, factors that are used as justifications for inclusions of other countries, such as DRC, Mozambique, Nigeria, Lao PDR and Cambodia. Furthermore, the CoP17 ETIS report noted “regulatory loopholes and lapses” in Japan and ongoing evidence of ivory being illegally exported to China in significant quantities and in multiple shipments, none of which were detected in Japan prior to their export. According to recent investigations by TRAFFIC⁶, none of these issues have been addressed, yet Japan is absent from the countries of concern list in the CoP18 ETIS report.

CoP is simply requested to take note of the ETIS report. Decisions on which countries participate in the NIAP process are taken by the Standing Committee. IFAW notes with concern that in the documents submitted to the Standing Committee, the Secretariat is recommending no additional Parties be included in the NIAP process. This does not seem appropriate given the range of concerns about ongoing ivory trafficking expressed throughout the ETIS report.

analysis shows a continued decline in large seizures of raw ivory but an increasing trend in the medium raw ivory weight class suggesting this may reflect changing trade dynamics

⁶ See <https://www.traffic.org/site/assets/files/11142/slow-progress-japan-ivory-markets-1.pdf>; <https://www.traffic.org/publications/reports/ivory-towers-japans-ivory-trade/>; and <https://www.traffic.org/publications/reports/system-error-reboot-required-review-of-online-ivory-trade-in-japan/>

doc. 69.4

Ivory stockpiles: Implementation of Resolution Conf. 10.10 (rev. CoP17) on Trade in elephant specimens (Burkina Faso, Chad, Côte d'Ivoire, Gabon, Jordan, Kenya, Liberia, Niger, Nigeria, Sudan and Syrian Arab Republic)

Parties called for practical guidance for the management of ivory stockpiles over four years ago at SC65 in 2014. That such guidance is still not available to Parties is lamentable, given the stakes and that funding was provided by IFAW and other NGOs at SC69 upon request of the Secretariat to expedite this request.

Doc. 69.4 draws attention to these delays, and offers a solution for hastening the fine-tuning of the draft guidance produced by TRAFFIC through the creation of an in-session

working group during the CoP. The document further highlights that Parties often do not comply with the stockpile reporting requests found in Res. Conf. 10.10 (Rev. CoP17), which results in an incomplete understanding of potential leakage from government and privately held stockpiles. In response to these concerns, the document proposes two Decisions in addition to the recommendation of an in-session working group for review of the stockpile management guidance. The draft Decisions mandate the Secretariat to distribute the guidance and to report to the Standing Committee those Parties that do not fully comply with the stockpile reporting obligations so that the Standing Committee can make appropriate recommendations. Furthermore, the Decisions require the Secretariat to produce reports quantifying ivory stockpiles at the regional level.

IFAW strongly urges Parties to support the proposals in Doc. 69.4. The urgency of practical guidance for ivory stockpile management cannot be understated, and the proponents offer a practical solution for moving the work forward by capitalising on the presence of all stakeholders and concerned Parties. IFAW also agrees that reporting on ivory stockpiles pursuant to Res. Conf. 10.10 (Rev. CoP17) warrants further scrutiny by the Standing Committee and supports the draft Decision that requires review of those Parties that are not fulfilling the reporting request.



doc. 69.5

Implementing aspects of Resolution Conf. 10.10 (Rev. CoP17) on the closure of domestic ivory markets (Burkina Faso, Chad, Côte d'Ivoire, Gabon, Jordan, Kenya, Liberia, Niger, Nigeria, Sudan and Syrian Arab Republic)

Doc. 69.5 recognises the important steps many Parties have already taken to close domestic ivory markets in line with decisions taken in various forums on the closure of domestic ivory markets including the last CITES CoP and Resolution 11 at the IUCN World Conservation Congress in 2016. IFAW congratulates such Parties for these efforts.

Nonetheless, some domestic legal ivory markets remain, and exceptions and loopholes in certain legal regimes contribute to illegal ivory trade, which is driving poaching. The current wording in Res. Conf. 10.10 (Rev. CoP17) suggests that certain domestic markets may not contribute to poaching or illegal trade. This is in contrast to a number of pieces of recent research⁷ indicating that the shifting of supply and marketplaces, the difficulty of enforcing regimes with loopholes and exceptions, and the vast online marketplace create a landscape that makes it impossible to say that certain domestic ivory markets do not contribute to poaching or illegal trade.

In response to these concerns, Doc. 69.5 proposes amendments to Res. Conf. 10.10 to clarify that all domestic ivory markets must close; that enforcement must be scaled up; and that States should register all ivory subject to any narrowly tailored exceptions to

market closures. Further, Doc. 69.5 proposes Decisions that ask the Secretariat to report on Parties' progress in implementing these requests and provide for Standing Committee to recommend appropriate measures in response to the Secretariat's report.

IFAW strongly urges Parties to support these amendments. The closure of domestic markets under the strictest regulation is a necessary complement to supply side efforts to curb poaching and illegal trade. The failure to take steps to bring markets under control, especially in the European Union and Japan, should be addressed in line with the risk such domestic markets pose for elephants, and the Standing Committee should have access to the full suite of compliance measures to address recalcitrant actors in this regard.

The closure of domestic markets under the strictest regulation is a necessary complement to supply side efforts to curb poaching and illegal trade

⁷ See for example, <https://cites.org/sites/default/files/eng/com/sc/70/Inf/E-SC70-Inf-18.pdf>; <https://www.traffic.org/site/assets/files/11142/slow-progress-japan-ivory-markets-1.pdf>; https://s3.amazonaws.com/avaazimages.avaaz.org/AVAAZ_EUROPES_DEADLY_IVORY_TRADE.pdf.

doc. 104

Review of Resolution Conf. 10.9 on Consideration of proposals for the transfer of African elephant populations from Appendix I to Appendix II (Secretariat)

Following CoP17, the Standing Committee was tasked with reviewing whether Res. Conf. 10.9 was still necessary. Res. Conf. 10.9 established a process for reviewing proposals to transfer African elephant populations on the CITES appendices. This was introduced before the latest revisions to Res. Conf. 9.24 (Rev. CoP17) on Criteria for amendment of Appendices I and II, which have largely made Res. Conf. 10.9 redundant. Nearly all members of the intersessional working group, including from across African range states, shared this view. The working group therefore favoured the repeal of Res. Conf. 10.9, based on the belief that Res. Conf. 9.24 (Rev. CoP17) provided sufficient guidance. IFAW shares this view and urges Parties to repeal Res. Conf. 10.9 as recommended in Doc. 104.

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International Fund for
Animal Welfare

Elephant proposals:
CITES CoP18

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