

CITES CoP19 recommendations



ifaw

Summary

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



Photo: Jen Prebeck / © IFAW

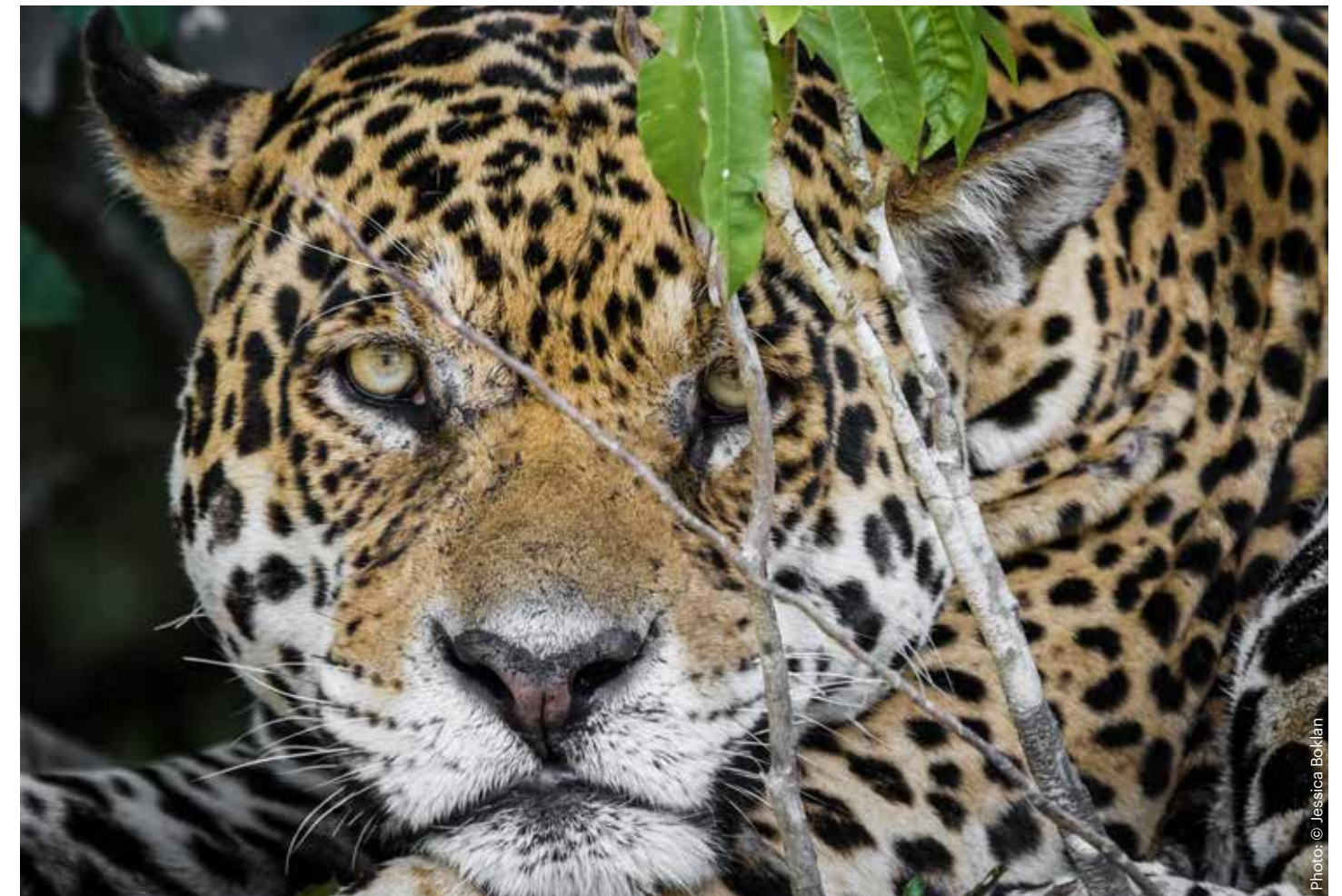


Photo: © Jessica Boklan

ifaw recommendations: 19th meeting of the Conference of Parties (CoP19) of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)

This briefing outlines recommendations from IFAW (International Fund for Animal Welfare) on selected working documents and proposals under consideration at CITES CoP19. The numbering corresponds to the relevant agenda item. The name of the document proponent is given in parentheses.

▲ Closeup of a jaguar in Brazil.

◀ Zebras, elephants and wildebeests in Amboseli, Kenya. Healthy populations of herbivores are key to maintaining the savanna ecosystem.



Photo: © Brian Gratwicke

summary recommendations - working documents

The table below summarizes IFAW's recommendations. For some agenda items, further detail can be found in the full IFAW briefing available at g.ifaw.org/CITES-CoP19.

document number and title	ifaw recommendation
4.2 Proposed amendment to Rule 26 (Botswana and Zimbabwe)	<p>Oppose</p> <p>This document proposes that Parties' votes on proposals are weighted by the proportion of an animal or plant population present within their borders. Such a proposal is against the principle established in international treaty law of one Party, one vote and would be near-impossible to implement from a practical perspective.</p> <p>Additional information can be found in the full IFAW briefing available at g.ifaw.org/CITES-CoP19.</p>

▲ White spotted Cochran glass frog (*Sachatamia albomaculata*) on leaf.



Photo: © 2021 Ilan Elgrably / Shutterstock

document number and title	ifaw recommendation
12. World Wildlife Trade Report (South Africa)	<p>Oppose</p> <p>This document proposes the development of a report between each CoP on a range of aspects surrounding international trade in CITES-listed species. While the content of the report may be useful for some policy-makers, it does not serve a CITES-specific purpose and, given limited funding, duplicating work already being done and/or doing work that is related but not necessary to implement the CITES agenda is of low priority. The proposed reporting also seems to overemphasize the monetary value of products in trade, yet the value of products is not a clear indicator of either the sustainability or legality of trade, which are the primary concerns of CITES.</p> <p>Additional information can be found in the full IFAW briefing available at g.ifaw.org/CITES-CoP19.</p>
18. United Nations World Wildlife Day	<p>Support</p> <p>This document summarizes activities around World Wildlife Day, including the IFAW-sponsored Youth Art Contest. IFAW looks forward to continuing this partnership in future years.</p>
23.2 One Health and CITES: human and animal health risks from wildlife trade (Côte d'Ivoire, Gabon, The Gambia, Liberia, Niger, Nigeria and Senegal)	<p>Tentative support with amendments</p> <p>IFAW supports the general intent of Document 23.2, which recommends Parties act with greater urgency to address disease transmission risks in wildlife trade. However, IFAW does not support the establishment of a CITES One Health Expert Panel, but rather recommends Parties are directed to other similar external sources to ensure they are addressing risks appropriately. IFAW has suggested amendments to the proposed Resolution and Decisions to this effect.</p> <p>Additional information can be found in the full IFAW briefing available at g.ifaw.org/CITES-CoP19.</p>

▲ A dusky shark (*Carcharhinus obscurus*) swims in the Mediterranean Sea.



Photo: © Jiri Prochazka - stock.adobe.com

document number and title	ifaw recommendation
<p>37. Wildlife crime linked to the internet</p> <p>(Secretariat)</p>	<p>Support in part</p> <p>Combating wildlife crime linked to the internet, a concerning and growing source of illegal wildlife trade, should continue to be prioritized by CITES Parties. IFAW supports Parties utilizing available resources to prioritize such efforts, and recommends the use of available information gathered by experts and NGOs, rather than tasking the Secretariat to use limited resources to research similar information.</p> <p>Additional information can be found in the full IFAW briefing available at g.ifaw.org/CITES-CoP19.</p>
<p>43.2 Making non-detriment findings for specimens of Appendix II species taken in the marine environment not under the jurisdiction of any State</p> <p>(United Kingdom of Great Britain and Northern Ireland)</p>	<p>Support</p> <p>The proposed actions in this document would assist in building capacity and closing a gap in the implementation of Appendix II listings for species taken from the high seas.</p> <p>Additional information can be found in the full IFAW briefing available at g.ifaw.org/CITES-CoP19.</p>
<p>47. Specimens produced through biotechnology</p> <p>(Standing Committee and Secretariat)</p>	<p>Support with amendments</p> <p>The document proposes amendments to Resolution 9.6 (Rev. CoP16) on Trade in Readily Recognizable Parts and Derivatives to clarify that any products, whether or not produced through biotechnology, should be regulated by the treaty if they meet the definition of “readily recognizable.” However, IFAW recommends Parties do not seek to define the term “biotechnology,” nor proceed with the proposed workshop.</p> <p>Additional information can be found in the full IFAW briefing available at g.ifaw.org/CITES-CoP19.</p>

▲ The tree pangolin (*Phataginus tricuspis*), also known as the white-bellied pangolin or three-cusped pangolin, the most common of the African forest pangolins.



Photo: © Vanessa Mignon

document number and title	ifaw recommendation
<p>48. Definition of the term “appropriate and acceptable destinations”</p> <p>(Standing Committee)</p>	<p>Support in part</p> <p>The Standing Committee asks Parties to approve the two non-binding guidances on appropriate and acceptable destinations and adopt several Decisions relating to collection and discussion of Party experiences using non-binding guidance on the same issue.</p> <p>Additional information can be found in the full IFAW briefing available at g.ifaw.org/CITES-CoP19.</p>
<p>50. Disposal of confiscated specimens</p> <p>(Standing Committee)</p>	<p>Support</p> <p>IFAW thanks the Secretariat for their work to identify the needs of Parties to better manage the treatment of live confiscated animals. In particular, IFAW notes that less than half of Parties surveyed have a decision-making procedure when live confiscations occur. To better address this, IFAW supports the recommendations put forth in this document for CoP19 approval.</p>
<p>65. Sharks and Rays</p> <p>(Standing Committee)</p>	<p>Support</p> <p>IFAW thanks Parties for the significant effort put into effective implementation of CITES shark and ray listings and successes to date. IFAW also recognizes the AC, SC and CITES Secretariat’s efforts to continue to provide support for Parties seeking to better implement these listings, as evidenced by the Decisions put forward in this document. There will always be room for improvement. It is particularly important for CITES to agree to proposed Decision 19.DD to conduct a study on the mismatch between the trade recorded in the CITES database and what should be expected based on catch levels.</p>

▲ Reef manta ray swimming in the ocean.



Photo: Paolo Torchio / © IFAW

document number and title	ifaw recommendation
<p>66.1 Implementation of Resolution Conf. 10.10 (Rev. CoP18) on Trade in elephant specimens</p> <p>(Secretariat)</p>	<p>Support in part</p> <p>This document contains draft Decisions on: reporting on domestic ivory markets; analysis of information on mammoth ivory markets; actions to tackle illegal trade in Asian elephants (parts and live elephants); and reporting on ivory stockpile management. IFAW urges Parties to support the Decisions on mammoth ivory and Asian elephants. Regarding domestic ivory markets, IFAW urges Parties to adopt the variations on the Decisions proposed in Document 66.3. For ivory stockpiles, IFAW urges Parties to adopt the versions of the Decisions proposed in Document 66.2.1.</p>
<p>66.2.1 Ivory stockpiles: implementation of Res. Conf. 10.10 (Rev CoP18)</p> <p>(Benin, Burkina Faso, Equatorial Guinea, Ethiopia, Gabon, Kenya, Liberia, Niger, Senegal and Togo)</p>	<p>Support</p> <p>This document proposes additional Decisions and a new reporting form to enhance the reporting and security of ivory stockpiles with the goal of improving the responses to and compliance with Resolution Conf. 10.10 (Rev. CoP18) paragraph 7. IFAW supports these additions as important reminders of the need to report on ivory stockpile quantities as one means of mitigating leakage and entry into black markets.</p> <p>Additional information can be found in the full IFAW briefing available at g.ifaw.org/CITES-CoP19.</p>

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<p>66.2.2 Establishing a fund accessible to range states upon non-commercial disposal of ivory stockpiles</p> <p>(Kenya)</p>	<p>Support</p> <p>Kenya proposes to have the Standing Committee establish a working group to set up a fund that would compensate elephant range states, both Asian and African as necessary, for disposing of ivory stockpiles in such a way that they no longer retain any commercial value, while receiving support for elephant conservation in return. Such a proposal offers an interesting pathway forward, and an opportunity to break the cycle of repetitive discussions at each CoP relating to ivory stockpile sales and elephant listings.</p> <p>Additional information can be found in the full IFAW briefing available at g.ifaw.org/CITES-CoP19.</p>
<p>66.3 Implementing aspects of Resolution Conf. 10.10 (Rev CoP18) on the closure of domestic ivory markets</p> <p>(Benin, Burkina Faso, Equatorial Guinea, Ethiopia, Gabon, Liberia, Niger, Senegal and Togo)</p>	<p>Support</p> <p>This document proposes slight modifications to renew Decisions on domestic ivory markets, including the consideration of additional information beyond that provided by Parties. As such, it is an improvement on the draft Decisions proposed by the Secretariat in Document 66.1 Annex 1. Furthermore, it proposes a new Decision (19.DD) to ensure future ETIS reports include an analysis of ivory seizures connected to Parties with a legal domestic market. Such an analysis has so far not been produced despite requests from the Standing Committee to the MIKE/ETIS Technical Advisory Group (see Document 66.6, para.11).</p>
<p>66.4.1 International trade in live elephant specimens: proposed revision of Resolution Conf. 10.10 (Rev CoP18)</p> <p>(Benin, Burkina Faso, Equatorial Guinea, Ethiopia, Liberia, Niger, Senegal and Togo)</p>	<p>Support</p> <p>Benefits for <i>in situ</i> conservation of African elephants can only be achieved by keeping elephants in their natural range, where they can form productive parts of the ecosystems to which they belong. Inserting a clear statement of intent on this matter into Resolution Conf. 10.10 is a simple and logical step to capture the intent of Parties as expressed at CoP18.</p> <p>Additional information can be found in the full IFAW briefing available at g.ifaw.org/CITES-CoP19.</p>
<p>66.4.2. Clarifying the framework: Proposal of the European Union</p> <p>(European Union)</p>	<p>Reject</p> <p>The language proposed in Document 66.4.1 contains a simpler way of addressing the issue of live elephant trade in Resolution Conf. 10.10, and the Secretariat proposes a clearer way forward for addressing the issue of references to resolutions in annotations and reservations to annotations in Document 88. IFAW urges Parties to adopt these solutions instead; they address these issues at CoP19 rather than further delaying decisions, as proposed by the EU in this document.</p> <p>Additional information can be found in the full IFAW briefing available at g.ifaw.org/CITES-CoP19.</p>
<p>66.7 Review of the National Ivory Action Plan process</p> <p>(Malawi, Senegal and United States)</p>	<p>Support</p> <p>Document 66.7 proposes a review of the NIAP process, highlighting a number of issues that could benefit from a comprehensive review, including: a lack of reporting, reliance on self-assessment, lack of integration with other CITES processes and the ICCWC framework. A review would enable the NIAP process to maintain its important role in helping Parties tackle elephant poaching and ivory trafficking, while ensuring the process does not become a box-ticking exercise.</p> <p>Additional information can be found in the full IFAW briefing available at g.ifaw.org/CITES-CoP19.</p>

◀ African elephant with a bird on its back.

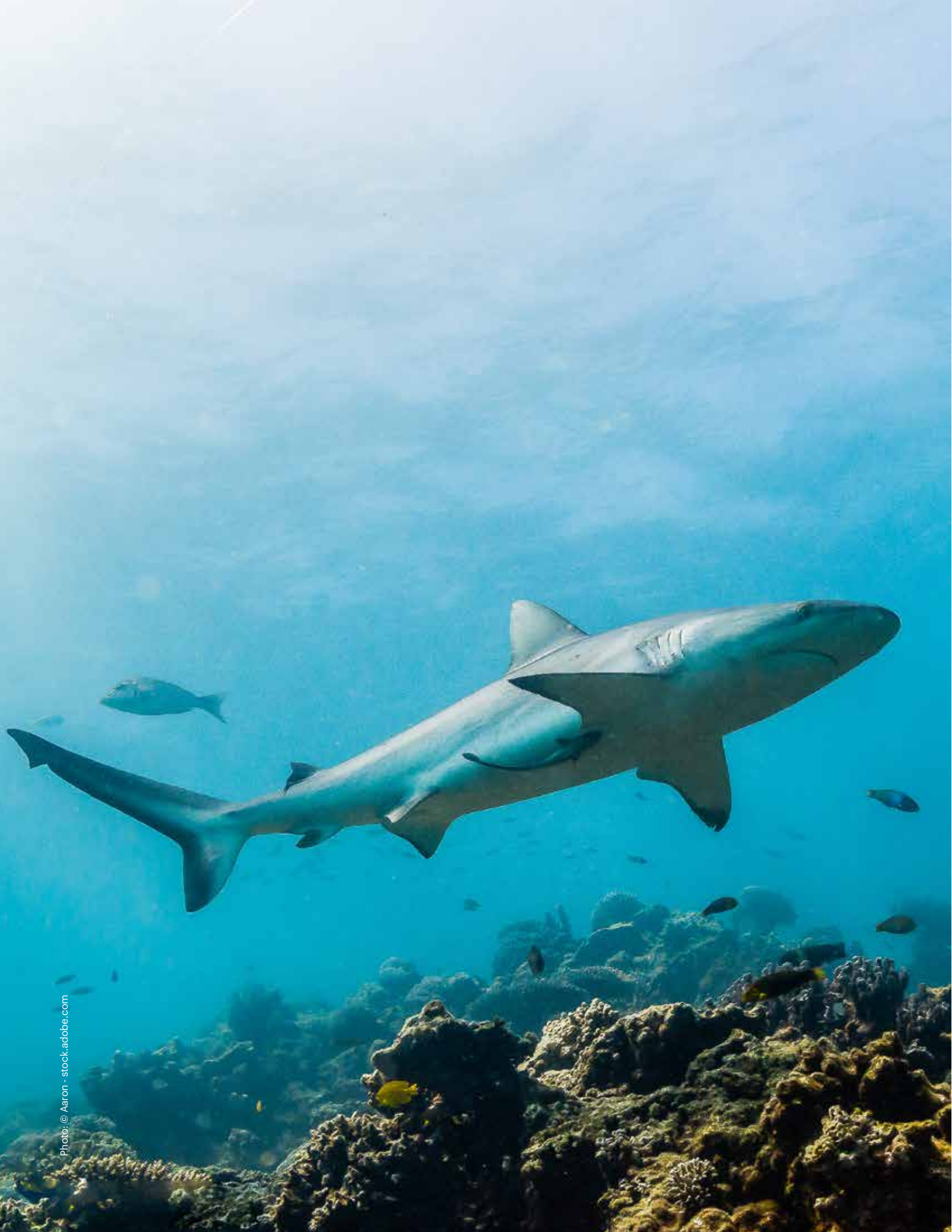


Photo: © Aaron - stock.adobe.com

document number and title	ifaw recommendation
<p>83. Identifying species at risk of extinction for CITES Parties</p> <p>(The Gambia, Liberia, Nigeria and Senegal)</p>	<p>Support with amendments</p> <p>Adoption of this document would create a system for Parties to be provided with regularly updated information on threatened and endangered species that potentially could benefit from CITES listings. IFAW suggests some small changes to the proposed Decision text to ensure the developed lists remain objective.</p> <p>Additional information can be found in the full IFAW briefing available at g.ifaw.org/CITES-CoP19.</p>
<p>87.1 Proposed amendments to Resolution Conf. 9.24 (Rev CoP17)</p> <p>(Eswatini)</p>	<p>Oppose</p> <p>This document proposes the amendment of CITES listing criteria to consider the impact of listings on livelihoods and food security. However, given the intent of CITES to regulate international trade and not local use, as well as the individual rights of Parties to determine how to tailor the implementation of CITES listings to national circumstances, the proposed changes to the CITES listing criteria in Document 87.1 is unlikely to result in tangible benefits to IPLCs. However, adding the proposed criteria would introduce further uncertainty into discussions on listing proposals and would likely limit the ability of Parties to take international action to stop commercial trade in highly endangered species at a time when swift action to ensure international trade does not contribute to biodiversity loss is a necessity.</p> <p>Additional information can be found in the full IFAW briefing available at g.ifaw.org/CITES-CoP19.</p>
<p>87.2 Aquatic species on the CITES Appendices—proposals for an updated approach for listing sharks and rays</p> <p>(Senegal)</p>	<p>Support</p> <p>This document outlines how the biological criteria for aquatic species does not effectively account for slow growing species such as sharks and rays when setting population decline thresholds for qualification for listing. The recommended changes to the footnote on aquatic species in the CITES listing criteria are scientifically sound and should be adopted by Parties at CoP19.</p> <p>Additional information can be found in the full IFAW briefing available at g.ifaw.org/CITES-CoP19.</p>

◀ Grey reef shark swimming over hard coral reef.



Photo: © IFAW

summary recommendations - species proposals

species proposals	ifaw recommendation
<p>2. Transfer the population of southern white rhinos in Namibia from Appendix I to Appendix II with the following annotation: for the exclusive purpose of allowing international trade in</p> <p>a) live animals for <i>in situ</i> conservation only; and</p> <p>b) hunting trophies.</p> <p>All other specimens shall be deemed to be specimens of species included in Appendix I and the trade in them shall be regulated accordingly.</p> <p>(Botswana and Namibia)</p>	<p>Oppose</p> <p>77% of the Namibian southern white rhino population is in private ownership and it is unclear whether exchange of genetic material occurs between the privately held rhinos and the rhinos in national parks, yet Namibia includes all privately-owned rhinos in its population estimate for wild rhinos. The remaining 285 rhinos that exist in national parks qualify as a very small population under CITES guidelines, meaning an Appendix I listing may remain justified.</p> <p>Additional information can be found in the full IFAW briefing available at g.ifaw.org/CITES-CoP19.</p>
<p>3. Remove the existing annotation for the Eswatini population of white rhinos</p> <p>(Eswatini)</p>	<p>Oppose</p> <p>Removal of the annotation would allow trade in rhino horn. As with ivory, any legal market for rhino horn creates enforcement problems by providing legal cover for the laundering of illegal products and potentially stimulates demand. The availability of rhino horn in the marketplace will significantly undermine years of demand reduction work and the strides consumer nations in Asia have taken to implement domestic bans on rhino horn trade.</p> <p>Additional information can be found in the full IFAW briefing available at g.ifaw.org/CITES-CoP19.</p>

▲ Two white rhinos in Namibia.



Photo: Julika Rieglar / © IFAW

species proposals	ifaw recommendation
<p>4. Amendment to Annotation 2 pertaining to the elephant populations of Botswana, Namibia, South Africa and Zimbabwe</p> <p>(Zimbabwe)</p>	<p>Oppose</p> <p>Amendment of the existing annotation for these elephant populations would allow ivory stockpile sales to approved trading partners at any point in the future. Previous “experimental” ivory stockpile sales did not satisfy market demand nor reduce poaching. There is no evidence that legal ivory trade can be adequately controlled, and any legal market in ivory presents opportunities for the laundering of illegal ivory. IFAW urges Parties to consider instead the approach outlined in Document 66.2.2 as a way of providing revenue for range states with ivory stockpiles needing support for elephant conservation without introducing a risk of renewed poaching. Such an approach represents an opportunity to break the cycle of continuous discussions at each CoP relating to ivory stockpile sales.</p> <p>Additional information can be found in the full IFAW briefing available at g.ifaw.org/CITES-CoP19.</p>
<p>5. Transfer the African elephant populations of Botswana, Namibia, South Africa and Zimbabwe from Appendix II to Appendix I</p> <p>(Burkina Faso, Equatorial Guinea, Mali and Senegal)</p>	<p>Abstain</p> <p>While IFAW recognizes that African elephants at the continental level meet the Appendix I criteria given recent declines, an uplisting will not change the status quo regarding ivory trade, which is not allowed. If anything, an Appendix I listing will most likely inspire reservations to the uplisting, creating a situation where ivory trade could potentially take place outside of CITES control, which would be extremely dangerous for elephant conservation, much like stockpile sales.</p> <p>Additional information can be found in the full IFAW briefing available at g.ifaw.org/CITES-CoP19.</p>

▲ Elephants grazing by the water in Matabeleland North, Zimbabwe.



Photo: © Sista - stock.adobe.com

species proposals	ifaw recommendation
<p>23. Alligator snapping turtle and common snapping turtle as lookalike (<i>Macrochelys temminckii</i> and <i>Chelydra serpentina</i>) in Appendix II</p> <p>(United States)</p>	<p>Support</p> <p>An endemic species to the United States, the alligator snapping turtle is in high demand in international markets for its meat and is likely to be “quasi-extirpated” in the next 50 years without a sufficient change in its management. An Appendix II listing is highly warranted.</p> <p>Additional information can be found in the full IFAW briefing available at g.ifaw.org/CITES-CoP19.</p>
<p>34. Glass frogs (<i>Centrolenidae</i> spp.) in Appendix II</p> <p>(Argentina, Brazil, Costa Rica, Côte d’Ivoire, Dominican Republic, Ecuador, El Salvador, Gabon, Guinea, Niger, Panama, Peru, Togo and United States)</p>	<p>Support</p> <p>Currently, approximately 50% of all glass frog species evaluated by the IUCN Red List are threatened with extinction. Within the Centrolenidae family, 10 species are Critically Endangered, 28 are Endangered, and 21 are Vulnerable species. Popular in the international pet trade, an Appendix II listing is needed to prevent international trade contributing to further population declines.</p> <p>Additional information can be found in the full IFAW briefing available at g.ifaw.org/CITES-CoP19.</p>
<p>37. Requiem sharks (<i>Carcharinidae</i> spp.) in Appendix II</p> <p>(Panama, Bangladesh, Colombia, Dominican Republic, Ecuador, El Salvador, European Union and its Member States, Gabon, Israel, Maldives, Senegal, Seychelles, Sri Lanka, Syrian Arab Republic, United Kingdom of Great Britain and Northern Ireland)</p>	<p>Support</p> <p>The nineteen species of requiem shark proposed for Appendix II listing are all IUCN assessed as Critically Endangered or Endangered. The proposal also includes the rest of the Carcharinidae family as lookalikes because in their most commonly traded forms (as fin and meat), they are difficult to visually differentiate. Thus, a family-level listing is justified and will significantly simplify and aid enforcement efforts.</p> <p>Additional information can be found in the full IFAW briefing available at g.ifaw.org/CITES-CoP19.</p>

▲ Alligator snapping turtle with its mouth open wide.



Photo: © Avi Klapter

species proposals	ifaw recommendation
<p>38. Small hammerhead sharks (<i>Sphyrnidae</i> spp.) in Appendix II</p> <p>(European Union, Brazil, Colombia, Ecuador and Panama)</p>	<p>Support</p> <p>Both on the merit of the bonnethead’s Endangered status and with lookalike issues throughout the family, there is a clear case for adopting this listing. An Appendix II listing will help prevent continued declines of hammerhead species due to unregulated trade and will facilitate enforcement of existing CITES listings of other hammerhead species.</p> <p>Additional information can be found in the full IFAW briefing available at g.ifaw.org/CITES-CoP19.</p>
<p>40. Guitarfish (<i>Rhinobatidae</i> spp.) in Appendix II</p> <p>(Israel, Kenya, Panama and Senegal)</p>	<p>Support</p> <p>Six species of guitarfish are proposed for listing, with the rest of the Rhinobatidae family being proposed as lookalikes. Each of these species are suffering declines of 60–99%. The fins of shark-like rays, including guitarfish, are found in global trade, and considering their vulnerability to overexploitation in coastal fisheries, their slow life history, and the highly threatened status of the proposed species, they warrant the management that an Appendix II listing would provide.</p> <p>Additional information can be found in the full IFAW briefing available at g.ifaw.org/CITES-CoP19.</p>
<p>42. Thelenota (pineapple sea cucumber, giant sea cucumber, and red lined sea cucumber) in Appendix II</p> <p>(European Union, Seychelles and United States)</p>	<p>Support</p> <p>Global demand for sea cucumbers has increased dramatically over the last 25 years. Some of the most valuable species in trade are currently Thelenota. One of the Thelenota species is experiencing population declines of up to 90% in parts of its range, and the other two are considered so rare that all exploitation should be avoided. Without sufficient CITES management, species such as Thelenota will continue to experience population declines and an Appendix I listing may be warranted in the future.</p> <p>Additional information can be found in the full IFAW briefing available at g.ifaw.org/CITES-CoP19.</p>

▲ School of scalloped hammerhead sharks.

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for Animal Welfare

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About IFAW (International Fund for Animal Welfare)

IFAW is a global non-profit helping animal and people thrive together. We are experts and everyday people, working across seas, oceans and in more than 40 countries around the world. We rescue, rehabilitate and release animals, and we restore and protect their natural habitats. The problems we're up against are urgent and complicated. To solve them, we match fresh thinking with bold action. We partner with local communities, governments, non-governmental organizations and businesses. Together, we pioneer new and innovative ways to help all species flourish. See how at ifaw.org

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Cover photo: © Shane Gross
Gray reef shark swimming underwater on Father's Reef, Papua New Guinea.

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