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COMMENTS AND RECOMMENDATIONS FOR PROPOSALS TO AMEND CITES APPENDIX I AND II:

CoP17 | 2016

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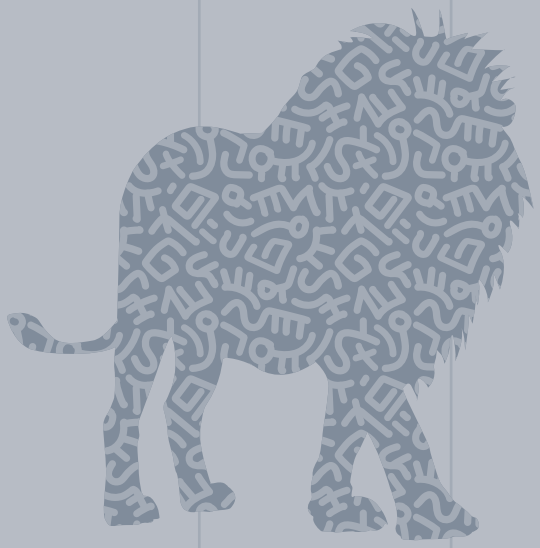
COMMENTS AND RECOMMENDATIONS FOR PROPOSALS TO AMEND CITES APPENDIX I AND II:

17th Conference of the Parties, Johannesburg, South Africa (24 September – 5 October 2016)

PROPOSAL NO.	SPECIES COVERED BY PROPOSAL	ENGLISH COMMON NAME	RECOMMENDATIONS
4 Chad; Ivory Coast; Gabon; Guinea; Mali; Mauritania; Niger; Nigeria; Togo 	*Panthera leo*	Lion	**SUPPORT** **Transfer all African populations of *Panthera leo* from Appendix II to Appendix I** • In 2015, the IUCN conducted an assessment of lion populations, and based on the best available scientific data, inferred a 43% loss over the past three lion generations, or a 43% loss over 21 years (from 1993 to 2014). This mirrors global estimates concluding that there could be fewer than 20,000 lions left in Africa. • Development and expanding human populations – with commensurate expansion of land needed for livestock and crops – have led to increased interactions and conflict with lions, which in turn have led to retaliatory killings when lions predate livestock or attack humans. Additionally, a robust trade in lion products and trophy hunting has been linked to certain population declines where the exploitation is most intense. • Past assumptions that lion populations in Africa are healthy and plentiful have been proven wrong by recent surveys and analyses that point to a dire and worsening situation. A precautionary approach should be taken, starting by eliminating easily identifiable and significant threats, such as unsustainable trade.
7 Swaziland	*Ceratotherium simum simum*	Southern White Rhino	**OPPOSE** **To alter the existing annotation on the Appendix II listing of Swaziland's white rhinos, to permit a limited and regulated trade in white rhino horn collected from natural deaths, recovered from poached Swazi rhino, and harvested horn from a limited number of white rhino in the future in Swaziland** • By 1977, all African rhinoceros species were listed on CITES Appendix I and all international commercial trade in rhinos and their products was prohibited. In 1994, the South African population of the southern white rhino was downlisted to Appendix II, but only for trade in live animals to "approved and acceptable destinations" and for the (continued) export of hunting trophies. In 2004, Swaziland's southern white rhinos were also downlisted to CITES Appendix II but only for live export and for limited export of hunting trophies according to specified annual quotas.

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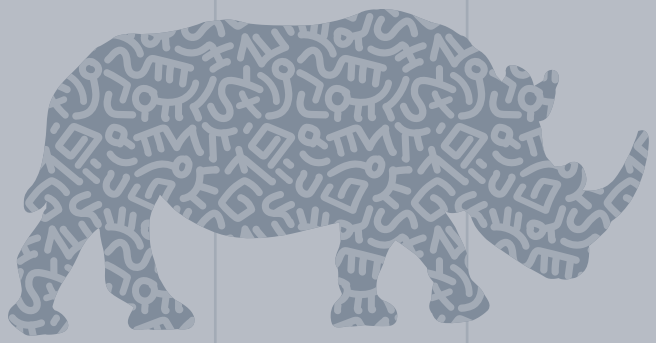			• Rhino poaching has increased dramatically in recent years, notably in South Africa, but also in Zimbabwe and Kenya, in response to rapidly increasing black market prices for rhino horn. In 2007, 13 rhinos were recorded poached in South Africa. By 2011, 448 rhinos were poached and in 2014 poaching in South Africa had risen to 1,215 animals killed - a 9,000% increase in poaching in less than ten years. • Current poaching rates have effectively stalled growth in rhino numbers at the continental level. Illegal trade in rhino horn has also reached the highest levels since the early 1990s and in 2014 nearly 2,000 rhino horns are estimated to have gone into illegal trade. Comparatively speaking, the illegal supply of rhino horn out of Africa is now more than 30 times greater than what was observed in the early 2000s. The notion that demand could be furnished through legal sales is fallacious and cannot be substantiated. On the contrary, experts suggest that legal trade will increase demand, which could have serious ramifications for wild rhino populations.
8 **Bangladesh** 	*Manis crassicaudata*	Indian Pangolin	**SUPPORT** **Transfer from Appendix II to Appendix I** • All pangolin species have been on Appendix II since 1994, with the four Asian species assigned zero-export quotas in 2000. • It is nearly impossible to distinguish which species loose scales belong to without expensive genetic testing. Thus, the current protection scheme can cause confusion for customs officials who cannot determine what species is being traded. • As Asian pangolin populations continue to dwindle, demand has shifted towards African species. In the last few years, seizures of shipments containing tons of pangolin scales originating in Africa and destined for Asia have become regular occurrences. In addition, some legal trade of African pangolins continues to occur. • Over 1 million pangolins have been taken from the wild and illegally traded in the past decade. Considering that pangolins are slow growing mammals, the rate at which they are being killed is wholly unsustainable and could result in the loss of entire populations within the next generation.
9 **India; Nepal; USA; Sri Lanka**	*Manis crassicaudata*	Indian Pangolin	**SUPPORT** **Transfer from Appendix II to Appendix I** • See comments on Proposal 8

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10 Philippines; USA	*Manis culionensis*	Philippine Pangolin	**SUPPORT** **Transfer from Appendix II to Appendix I** • See comments on Proposal 8
11 USA; Vietnam	*Manis javanica*	Sunda Pangolin	**SUPPORT** **Transfer from Appendix II to Appendix I** • See comments on Proposal 8 • Pangolin populations in China and Viet Nam have been decimated by poaching, and in some areas, are considered commercially extinct. Both species with ranges in those countries are rated "Critically Endangered" on the IUCN's Red List of Threatened Species.
	Manis pentadactyla	Chinese Pangolin	
12 Angola; Botswana; Chad; Ivory Coast; Gabon; Guinea; Kenya; Liberia; Nigeria; Senegal; South Africa; Togo; USA	*Manis tetradactyla*	Long-tailed Pangolin	**SUPPORT** **Transfer from Appendix II to Appendix I** • See comments on Proposal 8
	Manis tricuspis	White-bellied Pangolin	
	Manis gigantean	Giant Pangolin	
	Manis temminckii	South African Pangolin	
13 EU; Morocco	*Macaca sylvanus*	Barbary Macaque	**SUPPORT** **Transfer of *Macaca sylvanus* from Appendix II to Appendix I** • This is in accordance with Resolution Conf. 9.24 (Rev. CoP16), Annex 1, paragraph Ci: a marked decline in the population size in the wild which has been observed as ongoing or as having occurred in the past (but with potential to resume). • The species has been categorized as "Endangered" on the IUCN Red List since 2008 based on an estimated population decline exceeding 50% over the last three generations (24 years). This decline is expected to continue in the future. • An estimated 6,500 to 9,100 Barbary macaques are left in highly fragmented areas in Morocco and Algeria. The number in Morocco stands at 6,000-7,000. Average population density has declined by 50-80% over the last 30 years. • Habitat loss and fragmentation are regarded as the main threat; the illegal trade in live macaques for the live pet trade is also a significant danger to the wild *M. sylvanus* population. Most of the specimens taken from the wild are for the international pet trade. Spain is the main entry point in Europe. A transfer to Appendix I will support the two range states and Europe in their measures to protect the species.

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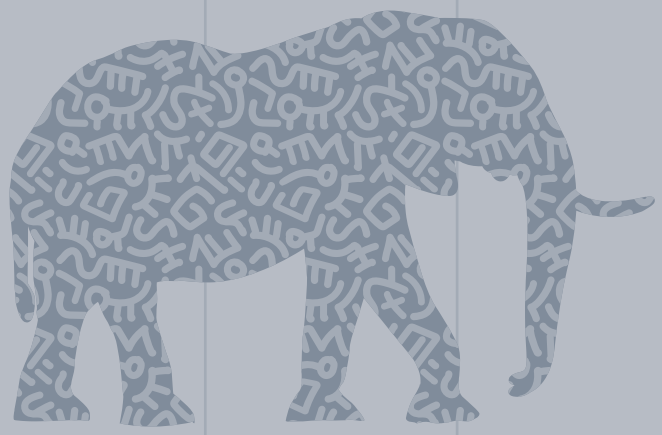
14 Namibia 	*Loxodonta africana*	African Elephant	**OPPOSE** **Delete all annotations from Namibia's Appendix II listing of *Loxodonta africana*, thereby allowing trade in Namibia elephant ivory** • Recent analyses of poaching and illegal trade trends suggest there has been a steady increase in elephant poaching since 2006, peaking in 2011. In 2010-2012, an estimated 35,000-50,000 elephants were killed annually for their ivory. While poaching rates have stabilized in some populations, overall, levels remain unsustainably high. In particular, poaching levels in West and Central Africa are cause for major concern: Some populations could face extirpation in the next few years if trends continue. Further, there are suggestions that the poaching wave that hit East Africa, notably Tanzania and Kenya, over the past decade, is moving south and that populations in southern Africa are under increasing threat. This is particularly significant given that southern Africa is home to approximately 60% of Africa's continental elephant population. • Given current poaching trends and the associated illicit trade to meet demand in the Far East, notably China, as well as a growing body of evidence which suggests that a legal, regulated trade would not be able to meet market demand, it is difficult to see how establishing so-called "controlled trade in all elephant specimens, including ivory" or "establishing open market sales of elephant ivory" for whatever purported reason would protect African elephants from over-exploitation from trade.
15 Namibia; Zimbabwe	*Loxodonta africana*	African Elephant	**OPPOSE** **Remove all annotations from Zimbabwe's Appendix II listing of *Loxodonta africana*, thereby allowing trade in Zimbabwe elephant ivory** • See comments on Proposal 14
16 Benin; Burkina Faso; CAR; Chad; Ethiopia; Kenya; Liberia; Mali; Niger; Nigeria; Senegal; Sri Lanka; Uganda	*Loxodonta africana*	African Elephant	**SUPPORT** **Inclusion of ALL populations of *Loxodonta Africana* in Appendix I (i.e., transfer from Appendix II to Appendix I of the populations of Botswana, Namibia, South Africa and Zimbabwe)** • Given the current poaching crisis, coupled with poor progress in stemming global demand for ivory, enhanced protective measures for wild elephant populations are necessary. Despite increased global awareness and numerous positive international efforts to draw attention to the elephant crisis, poaching and associated illicit trade continues to escalate.

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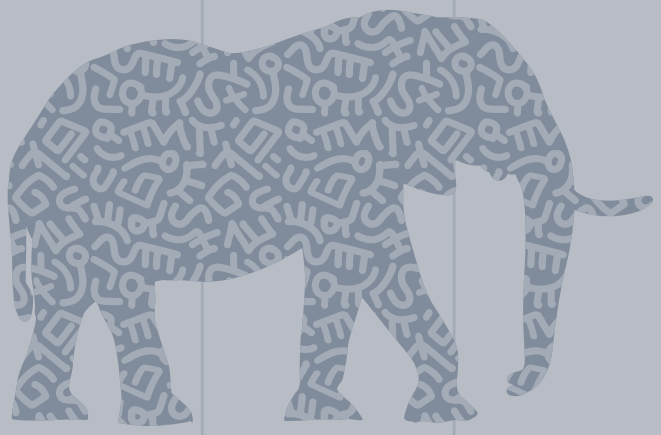			• While in and of itself, a decision to place all elephant populations back on Appendix I will not necessarily result in a decrease in poaching in the short-term, the longer-term consequences of such a decision would be to send a strong precautionary message to both consumers and the enforcement community. • IFAW urges CITES Parties to focus on assessing and prioritizing elephant conservation needs across Africa and to use and strengthen existing mechanisms such as the African Elephant Action Plan (AEAP) and associated African Elephant Fund (AEF) to support these priorities, thereby taking the focus away from controversial trade negotiations. Therefore, IFAW opposes CoP17 Prop.14 and CoP17 Prop.15 and supports CoP17 Prop.16 to include all populations of *Loxodonta africana* in Appendix I.
19 Angola; Chad; EU; Gabon; Guinea; Nigeria; Senegal; Togo; USA 	*Psittacus erithacus*	African Grey Parrot	**SUPPORT** **Transfer of *Psittacus erithacus* from Appendix II to Appendix I** • The African grey parrot is considered the third most internationally-traded, wild-harvested bird, with their populations in decline in at least 14 out of 18 range countries. • A CITES Significant Trade Review of African grey parrots in 2006 showed that exports from 1994 to 2003 represented a harvest of potentially up to 21% of the wild population annually. • Trade-associated declines are due to over-harvesting arising from the use of poorly-founded quotas; poor management and regulation of trade, including exceeded quotas, fraudulent permit use, false reporting of code C, stolen permits, photocopied permits, reused permits due to limited capacity and resources of authorities; high pre-export mortality from poor handling; and a large illegal trade due to weak enforcement. • Based on legal trade data, it is estimated that over 1.3 million African greys were exported from range states between 1975 and 2013. However, due to deplorable transit conditions, parrot mortality rates average 40-60% thus making the true estimate of captured African greys at 2.1-3.2 million during this period.
42 Bahamas; Bangladesh; Benin; Brazil; Burkina Faso; Comoros; Dominican Republic; Egypt;	*Carcharhinus falciformis*	Silky Shark	**SUPPORT** **Inclusion of *Carcharhinus falciformis* in Appendix II** • Due to its slow growth, late maturity, and production of few young, *C. falciformis* is vulnerable to overexploitation by fishing and has experienced significant and ongoing population declines throughout its range.

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EU; Fiji; Gabon; Ghana; Guinea; Guinea-Bissau; Maldives; Mauritania; Palau; Panama; Samoa; Senegal; Sri Lanka; Ukraine			• *C. falciformis* have declined by over 70% in almost every area they are found and for which data, ecological risk assessments, and stock assessments are available. • The Atlantic population is believed to have declined by 90% over the last 40 years since the 1950s. • The Indian Ocean population is believed to have declined by 50 to 90% over the last 20 years. • The Pacific Ocean population is believed to have declined by 67% in less than 20 years. • The greatest threat to the silky shark is unsustainable levels of fisheries mortality in target shark fisheries, as a utilized bycatch, particularly of industrial tuna fisheries on the high seas, and a discarded bycatch species. • The fins of this species are valuable and products from these fisheries enter international trade. • The FAO expert panel concluded that the available evidence supports their inclusion in CITES Appendix II. • Appendix II listings will ensure that international trade data is accurately recorded, as required to achieve sustainable management under FAO's International Plan of Action for Sharks. • Appendix II listings will require exporting countries to undertake Non-Detriment Findings before specimens can be exported to ensure that trade is not detrimental to the species' survival. • Appendix II listings will enable international trade monitoring at the species level for the above-mentioned species and might trigger it for other shark species as well.
43 Bahamas; Bangladesh; Benin; Brazil; Burkina Faso; Comoros; Dominican Republic; Egypt; EU; Fiji; Gabon; Ghana; Guinea; Guinea-Bissau; Kenya; Maldives; Mauritania; Palau; Panama; Samoa; Senegal; Seychelles; Sri Lanka; Ukraine	*Alopias* spp.	Thresher Shark	**SUPPORT** **Inclusion of the genus *Alopias* spp. in Appendix II** • The biology and very low intrinsic reproductive rate of Alopias spp. makes them among the most vulnerable of all shark species to anthropogenic mortality worldwide, whether as a target or bycatch species. • Threshers are the family at highest risk of extinction of all pelagic sharks. • Worldwide, the *Alopias* species complex has declined by over 70% in almost every area they are found. • The bigeye thresher shark has exhibited population declines throughout its range in every area where sufficient species-specific historical and current population data exist. Data shows populations declines of: - 70-80% in the Atlantic Ocean within the last three-generation period; - Over 80% decline in the Indian Ocean within the last three-generation period; - Over 80% decline in the Pacific Ocean within the last three-generation period.

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			• The proportion of thresher shark fins appearing in the Hong Kong shark fin market has declined 77-99% in the past ten to 15 years. • The FAO expert panel concluded that the available evidence supports inclusion in Appendix II. • Appendix II listings will ensure that international trade data is accurately recorded, as required to achieve sustainable management under FAO's International Plan of Action for Sharks. • Appendix II listings will require exporting countries to undertake Non-Detriment Findings before specimens can be exported to ensure that trade is not detrimental to the species survival. • Appendix II listings will enable international trade monitoring at the species level for the above-mentioned species and might trigger it for other shark species as well.
44 Bahamas; Bangladesh; Benin; Brazil; Burkina Faso; Comoros; Costa Rica; Ecuador; Egypt; EU; Fiji; Ghana; Guinea; Guinea-Bissau; Maldives; Mauritania; Palau; Panama; Samoa; Senegal; Seychelles; Sri Lanka; USA	*Mobula* spp.	Devil Rays	**SUPPORT** **Inclusion of the genus *Mobula* spp. in Appendix II** • Though global population numbers are unknown for *Mobula* spp., global genus-wide declines have been recorded and dramatic local declines observed in the Indo-Pacific over only 10 to 15 years. • *M. japanica* and *M. tarapacana* are caught in commercial and artisanal, target and bycatch, fisheries throughout their global range in the Atlantic, Pacific and Indian Oceans. • The high and increasing value of gill plates has driven increased target fishing pressure for all *Mobula* spp. in key range states, with many former bycatch fisheries having become directed commercial export fisheries. The gill plates, used by mantas and mobula rays to filter food from the water, are highly valued in international trade. • While there are no historical baseline population data, new research on the scale and impacts of mobulid fisheries in Sri Lanka, India, Indonesia, the Philippines, Peru, and Guinea and continued strong demand for mobulid gill plates in China strongly suggest recent, marked increases in rates of depletion for these species during the past decade. • The FAO expert panel concluded that the available evidence supports inclusion in Appendix II. • Appendix II listings will ensure that international trade data is accurately recorded, as required to achieve sustainable management under FAO's International Plan of Action for Sharks.

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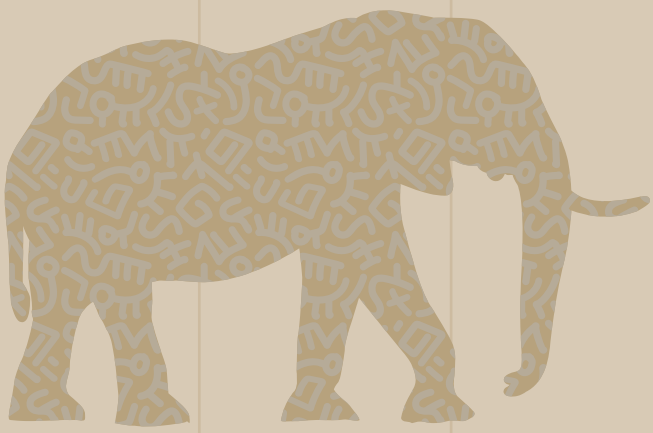
DOCUMENT NO.	SPECIES COVERED BY DOCUMENT	ISSUE	RECOMMENDATIONS
Doc. 57.2 Angola et al	*Loxodonta africana*	Ivory Markets	**SUPPORT** **Closure of domestic markets:** • "all Parties and non-Parties, particularly those in whose jurisdiction there is a legal domestic market for ivory, or any domestic commerce in ivory, adopt all necessary legislative, regulatory and enforcement measures as a matter of urgency to close their domestic markets for commercial trade in raw or worked ivory, or any domestic commerce in ivory."
Doc 57.3 Benin	*Loxodonta africana*	Ivory Stockpiles	**SUPPORT** **Ivory stockpiles:** • "Parties maintain an inventory of government-held stockpiles of ivory and, where possible, of significant privately held stockpiles of ivory within their territory, and inform the Secretariat of the level of this stock each year before 28 February, indicating: the number of pieces and their weight per type of ivory (raw or worked); for relevant pieces, and if marked, their markings in accordance with the provisions of this Resolution; the source of the ivory; and the reasons for any significant changes in the stockpile compared to the preceding year" and; "all Parties with government-held ivory stockpiles: • Destroy all ivory which is surplus to bona fide scientific, educational, enforcement or identification purposes, after taking forensic samples to determine its origin, in order to prevent the ivory from entering the market and to send a clear message that the poaching of elephants and trafficking in ivory must end; and • Establish protocols to continue destroying such ivory that may be acquired in the future."



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Doc 57.4 Burkina Faso et al	*Loxodonta africana*	Trade in Live Elephants	**SUPPORT** **Trade in live elephants:** • "all elephant range States have in place legislative, regulatory, enforcement, or other measures to prevent illegal and detrimental trade in live elephants and to minimize the risk of injury, damage to health or cruel treatment of live elephants in trade;" • Requests that Parties agree that, "in relation to trade in live elephants taken from the wild, the only recipients that should be regarded as "appropriate and acceptable" (as referred to in Resolution Conf. 11.20) and "suitably equipped to house and care for" those elephants in accordance with Article III, Para 3(6) of the Convention are in situ conservation programmes or secure areas in the wild within the species' natural range, except in the case of temporary transfers in emergency situations."