



Position Statement for CITES Standing Committee (SC70)

1-5 October 2018, Sochi, Russian Federation

Why we're at the Standing Committee meeting:

The **Wildlife Conservation Society (WCS)** is a global conservation organization that takes a science-based approach to the protection of wildlife and wild places. WCS's 'on-the-ground' presence across the globe enables us to address multiple aspects of wildlife exploitation and trade, including wildlife crime, in source, transit and consumer countries. WCS is a strong supporter of CITES and will be represented at the seventieth meeting of the CITES Standing Committee (SC70) in Sochi, Russia, by international wildlife and policy experts. We look forward to meeting with Parties and other conservation partners during SC70, and to advancing the conservation of CITES-listed species. To learn more about WCS and our work, visit www.wcs.org.

In this document:

This document captures WCS's experience and our perspective on some of the documents and proposed decisions for species and issues that we work on. Items are presented in the order of the SC70 agenda.

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How to contact us:

WCS will be represented at CITES SC70 by a small delegation led by **Dr. Susan Lieberman**, WCS Vice President for International Policy. Should you have any questions or concerns regarding WCS, or our position on any agenda item to be considered during SC70, please contact **Dr. Lieberman** (slieberman@wcs.org) and **Alfred DeGemmis**, WCS International Policy Program Coordinator (adegemmis@wcs.org).



WCS at the 70th meeting of the CITES Standing Committee

The **Wildlife Conservation Society (WCS)** is a global conservation organization working to save wildlife and wild places through science, conservation action, education, and inspiring people to value nature. We envision a world in which wildlife thrives in healthy lands and seas, valued by societies that embrace and benefit from the diversity and integrity of life on earth. Our field programs in more than 60 countries in Asia, Africa, the Americas, and the Pacific build on more than 100 years of experience and scientific and technical expertise across the globe. To learn more about WCS, visit www.wcs.org.

WCS's 'on-the-ground' presence across much of the globe enables us to address wildlife exploitation and trade, including wildlife crime, along the trade chain in source, transit and consumer countries. Our field research and conservation efforts support the design and implementation of science-based conservation and management strategies that will not only conserve and protect species, but also enhance sustainability in the exploitation of species while improving benefits to local communities and economies through sustainable use regimes where relevant and appropriate.

WCS is a strong supporter of CITES, has staff who have attended all meetings of the Conference of the Parties since CoP7 in 1989, and will be represented by international wildlife and policy experts at the seventieth meeting of the CITES Standing Committee in Sochi, Russia (SC70). Our views on the agenda items are based on the best available scientific and technical information, including information from our field and country programs around the world. We have not included recommendations for species we do not work on, or those that are found in countries where we do not work. We also are still analyzing some documents and consulting our field experts, and may have updated recommendations closer to SC70.

Decisions made by Parties to CITES over the course of the meeting will have profound implications for the future of species conservation and sustainable development. We look forward to meeting with Parties and other conservation partners during SC70, and to advancing the conservation of species subject to international trade. Should you have any questions or concerns regarding WCS, or our position on any agenda item to be considered during the meeting, please contact **Dr. Susan Lieberman**, WCS Head of Delegation, at slieberman@wcs.org and **Alfred DeGemmis** at adegemmis@wcs.org.





Strategic Matters

11. Revision and Replacement of the CITES Strategic Vision 2008-2020: Report of the Working Group [[Doc. 11](#)]

WCS appreciates the submission of this document by Canada, as Chair of the intersessional working group on this issue, and thanks Canada for the excellent chairing of working group. WCS has extensive experience with wildlife trade and wildlife trafficking, CITES implementation, and many other multilateral fora, and we have been pleased to participate in this intersessional work with the goal of sharing our expertise and experience as the new CITES Strategic Vision 2021-2030 is developed. WCS worked closely with many governments in the development of the UN Sustainable Development Goals (SDGs), and strongly supports the 2030 Sustainable Development Agenda (including the Goals and Targets that are relevant to biodiversity conservation). Through our programs in more than 60 countries, we are committed to collaborating with government partners in the delivery of the SDGs. We are also developing technical advice to Parties to the Convention on Biological Diversity (CBD) on a post-2020 framework for biodiversity conservation. We support the recommendations in this document to revise Resolution Conf. 16.3 (Rev. CoP17) as proposed, and to present the draft decisions to CoP18.

16. Demand reduction strategies to combat illegal trade in CITES-listed species: Report of the Secretariat [[Doc. 16](#)]

WCS welcomes the efforts of Parties to implement and share strategies to reduce demand for illegally traded specimens of CITES-listed species. WCS strongly supports strategic, evidence-based demand reduction efforts, and particularly those that affect consumer behavior change through legal and regulatory reform as a demonstrably effective, short-term, and cost-effective means of reducing the threats to species from illegal wildlife trade. Where intelligence and market research reveal that legal domestic markets provide cover for laundering of illegal wildlife products, we strongly encourage Parties to close them as a means of reducing opportunities for laundering of illegal wildlife products (thus reducing incentives for illegal trade). In all cases, we encourage Parties to focus on evidence-based, measurable strategies that are culturally sensitive, and that are specific to the species/commodity in question and the demographics and motivations of the targeted consumers.

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17. Livelihoods and food security: Report of the working group [\[Doc. 17\]](#)

WCS appreciates the submission of this document by Namibia, as Chair of the Standing Committee's intersessional working group on Livelihoods and Food Security. WCS supports the Universal Declaration of Human Rights and the Strategic Objectives of the UN Food and Agriculture Organization (FAO), and works to enhance the livelihoods of local communities in our field programs across the globe. We concur that conservation is the most successful when local communities obtain livelihood, cultural, and spiritual benefits from healthy wildlife populations, and that unsustainable or illegal uses of wildlife can undermine these benefits. WCS recognizes that it is important to understand the value of wildlife to nutrition, income, and livelihoods, and notes that commercial wild meat trafficking can impoverish subsistence livelihoods of local communities. Therefore, wildlife management programs should take into consideration whether offtake is sustainable and is based on sound scientific information, while finding ways to support communities whose food security may be affected if sustainability is not possible (including through efforts to foster sustainable alternatives to wild meat, and efforts to combat wildlife trafficking). As such, we are pleased to be a partner in a European Commission-funded, multi-country, FAO-led partnership to help African, Caribbean, and Pacific countries to shift from wild meat to alternative sources of protein.

These efforts and issues are critical, but are not necessarily within the remit of CITES. The working group report highlights two alternatives. WCS believes that the most expeditious alternative is recommended by "Group 2" -- not to amend existing CITES resolutions or to develop a stand-alone resolution, but rather to address these critical issues through other means, including through implementation of the UN Sustainable Development Goals, and also through including these issues, as appropriate, in the CITES Strategic Vision.

18. Community Awareness of Wildlife Trafficking: Report of the Secretariat

[\[Doc. 18\]](#)

WCS appreciates that the work on this issue is ongoing. WCS has extensive experience working with and alongside local communities in Asia, Africa and Latin America that live near source populations of wildlife and are directly impacted by unsustainable and/or illegal wildlife trade, and would be pleased to provide input to the consultant. We note that it is not only those rural communities living near wild animals and plants, but also communities along the trade chain that are negatively impacted by wildlife trafficking, through the ability of wildlife criminals to weaken rule of law, the convergence of wildlife crime with other forms of organized crime and corruption, etc. Improved enforcement which disrupts and ultimately deters criminal activity will therefore reduce threats to rural and other populations living alongside wild species of plants and animals. Lastly, we recommend that the consultant's report be disseminated widely upon completion, as it will have valuable insight for many Parties to CITES.





19. Cooperation with other biodiversity-related conventions [[Doc. 19](#)]

WCS appreciates this update on ongoing efforts to improve coordination and cooperation between CITES and other biodiversity-related multilateral agreements. WCS appreciates the openness of the CITES Parties, in enabling the provision by NGOs of technical expertise on issues related to wildlife conservation and management, environmental law, etc., and we encourage other members of the Biodiversity Liaison Group (BLG) to pursue ongoing efforts to open their processes to wider civil society input.

WCS supports the updating of the CITES Strategic Vision to reflect the targets currently established within the 2030 Agenda for Sustainable Development and the SDGs. We encourage the CITES Secretariat and the BLG to engage with multilateral decisions on the post-2020 framework for biodiversity, including the 2030 targets to be adopted at CBD CoP15 in 2020. We note that the Second Bogis Bossey Dialogue for Biodiversity (March 2018) resulted in a consensus that the global community needs “*one key overarching post-2020 biodiversity narrative that can form an umbrella for the contributions of others, including Multilateral Environmental Agreements (MEAs) such as CITES.*” We agree, and stress that the target should focus on the retention of nature and intact landscapes and seascapes, and that CITES implementation can help deliver on such a target.

We note that there is increasing cooperation between the CITES and CMS Secretariats, and Parties to both Conventions, on the implementation of the Joint Work Programme 2015-2020, including through the CITES-CMS African Carnivores Initiative. We strongly encourage relevant range States to attend the first meeting in November 2018, but we note that many of the trade-related issues facing certain African carnivores also depend on the cooperation of transit and consumer States. We encourage the African Carnivores Initiative to address this key aspect as well.

WCS also notes that the topic of illegal wildlife trade has been addressed in other multilateral fora, including the 42nd Session of the World Heritage Committee in Manama, Bahrain in July 2018, which [acknowledged illegal wildlife trade as a threat](#) to many of the world’s natural World Heritage sites. We encourage strengthened cooperation between the CITES Secretariat and the World Heritage Centre, as well as between national focal points in countries where illegal wildlife trade threatens the Outstanding Universal Value of natural and mixed World Heritage sites.

23. United Nations World Wildlife Day: Report of the Secretariat [[Doc. 23](#)]

WCS appreciates growth of World Wildlife Day as an important opportunity to communicate the importance of wildlife to a global audience. WCS has been an active participant in World Wildlife Day celebrations in many countries, including intergovernmental discussions at United Nations headquarters in New York City and engagement with our government partners in multiple countries. It was a pleasure to work with Parties, the CITES Secretariat, and various IGOs on World Wildlife Day 2018, focused on big cats. We strongly support the proposed theme of “marine species” for World Wildlife Day 2019. WCS is actively engaged in ocean protection, sustainable fisheries, and marine species conservation in more than 20 countries. We have been actively involved in assistance with CITES implementation for marine species, including commercially exploited aquatic species recently included in Appendix II. We look forward to continuing these efforts and ensuring that marine and freshwater species are not threatened by international trade. World Wildlife Day 2019 will be an excellent opportunity to continue this conversation. We also support the draft amendments to Resolution Conf. 17.1, as proposed by the Secretariat.



Interpretation and Implementation Matters

25. National Laws for Implementation of the Convention [[Doc. 25](#)]

WCS appreciates the significant work that has been done by the Secretariat on the CITES National Legislation Project, including the development of the web portal, compilation of extensive legislative information, analysis of the situation in countries of concern, and the provision of legal advice and assistance. WCS works through our country programs with many of the Parties who are currently in Category 2 and 3 of the CITES National Legislation Project to strengthen their national legislation for implementation of their CITES obligations and commitments. With adequate resources and where appropriate, we stand ready to support Parties to ensure that domestic legislation meets that standards required by CITES, and to ensure that trade does not threaten species in the wild.

26. National Reports

26.1 Submission of National Reports [[Doc. 26.1](#)]

WCS notes that submission of annual reports is an obligation of all CITES Parties, pursuant to Article VIII of the Convention. The analysis of trade and evaluation of impacts of international trade on CITES-listed species on a global scale cannot properly be undertaken without accurate and timely annual reports. WCS encourages Parties to submit their annual reports, and supports the actions in the document pursuant to Resolution Conf. 11.7 (Rev. CoP17) recommended by the Secretariat.

26.3 Annual Illegal Trade Reports: Report of the Secretariat [[Doc. 26.3](#)]

WCS welcomes the requirement in Resolution Conf. 11.17 (Rev. CoP17) for Parties to submit an annual illegal trade report, which will greatly enhance Parties' understanding of the scope of wildlife trafficking and Parties' responses, and enable research and analyses on wildlife crime. WCS also welcomes the adoption of UN General Assembly (UNGA) Resolution [A/RES/71/326](#) in September 2017 ("*Tackling illicit trafficking in wildlife*"), which encourages all member States to enhance their recording and monitoring of both seizures *and successful prosecutions*. CITES annual illegal trade reports will directly contribute to implementation of this UNGA Resolution.

As we and others noted during SC69, we consider the Guidelines and the report itself to be overly focused on seizures. We also note that when enabled by legislation and international cooperation and as opposed to a seizure, a controlled delivery presents the opportunity for enhanced evidence-gathering. Seizures are important to record, but information related to investigations, prosecutions and case outcomes provide meaningful measures of the status and progress of how countries are tackling wildlife crime. Requiring prosecution information is fully consistent with the aforementioned UNGA Resolution. We understand that information as to the disposition of a case may come later than a seizure, but we strongly urge the Standing Committee, and Parties, to focus upon responses which reflect the whole criminal justice process. We strongly recommend that Parties be asked to indicate whether an investigation is underway and whether a case is being pursued and we recommend that Parties submitting seizure data also be required to inform the Secretariat of the disposition of the case, whenever it is completed.



27. Compliance Matters

27.1 Guidance for verifying the legal acquisition of CITES-listed specimens to be exported [Legal Acquisition Findings] [[Doc. 27.1](#)]

WCS welcomes this document submitted by the Secretariat, and this important initiative. A great deal of attention has been focused in past years on the role of the Scientific Authority and non-detriment findings; after more than 40 years since CITES entered into force, it is highly appropriate that the Parties are now focusing on the issue of verification of legal acquisition. This is connected to the ever-increasing attention of the CITES Parties to combating illegal wildlife trade, which we appreciate.

WCS was pleased to have been able to attend and actively participate in the international workshop in June 2018 on this issue organized by the Secretariat, and hosted and generously funded by the European Union. We strongly support the development of guidance, practical tools, and information to assist CITES Management Authorities in fulfilling their obligations under the Convention to verify the legal acquisition of specimens of CITES-listed species prior to the issuance of relevant permits and certificates.

We note that although most Parties have legislation prohibiting acquisition of CITES-listed specimens in contravention of national laws, and prohibiting export of any CITES-listed specimens taken in contravention of any national law, from our experience guidance to Parties on fulfilment of this pivotal requirement of the treaty is important, and welcome. We support the draft resolution and guidance in the document submitted by the Secretariat. We have a few suggestions that will improve the document, which we will share in detail during SC70.

It should be clarified that in the case of countries that operate under a federal system (e.g., Argentina, Australia, Canada, Germany, Mexico, the United States, and others), the Management Authority should also determine that the specimen was not taken from the wild in violation of any state, provincial, or territorial law or regulation; that is particularly the case where the state, province, or territory has legal authority for the management of its wildlife and has its own laws and regulations pertaining to the use of wildlife. We also believe it should be clarified that when considering legal acquisition, Parties are encouraged to also consider relevant international obligations under treaties to which they are Party.

If a working group is established on this issue during SC70, WCS would be pleased to join it. We look forward to continuing to work closely with CITES Parties on this critical issue.





27. Compliance Matters (Continued)

27.3 Application of Article XIII

WCS greatly appreciates this document, and the efforts of the Secretariat to utilize the provisions of Article XIII of the Convention. WCS supports the use of compliance measures designed to enhance Parties' implementation of and compliance with the Convention; there is a long history of CITES Parties adopting and implementing such measures. Many Parties have taken important steps to fulfil their obligations under the Convention and comply with its requirements; it vital that full attention be paid to those that are found to be seriously out of compliance, and to promote enhanced political commitment to effective implementation of the CITES treaty. WCS urges the Standing Committee to address these serious issues of non-compliance, *equitably* and transparently, and fully implement the appropriate provisions of Resolution Conf. 14.3 (on compliance procedures).

27.3.1 Application of Article XIII in Lao PDR [[Doc. 27.3.1](#)]

WCS appreciates the submission of this document by the CITES Secretariat, and the efforts of the Government of Lao People's Democratic Republic (PDR) to meet all reporting deadlines proposed at SC69. WCS has active site-based conservation and anti-trafficking programs in Lao PDR, and we work closely with our government partners to improve domestic implementation of CITES and enhance wildlife law enforcement. We commend the Government of Lao PDR for recent steps taken to respond to recommendations of the CITES Standing Committee, including the issuance of PM Order No. 5/2018 and efforts to strengthen penalties for wildlife trafficking, establish inter-agency mechanisms for CITES implementation, audit existing tiger farms, document seizures and pursue bilateral and multilateral enforcement actions. WCS is committed to continuing to work with the Government of Lao PDR to address remaining gaps in its implementation of CITES, and to combat wildlife trafficking.

We agree with the Secretariat that more needs to be done by the Government of Lao PDR to finalize and adopt a revised Penal Code, in order to address insufficient penalties as prescribed under the Wildlife and Aquatic Law, and we strongly urge Lao PDR to provide further evidence of prosecutions and sentencing of wildlife traffickers in future reports to the Standing Committee. We remain concerned that the Scientific Authority of Lao PDR may unable to issue independent, science-based non-detriment findings for key species, and we believe that further efforts on developing CITES-implementing laws (legislation or PM decrees) will support this endeavor. We were pleased to join a workshop convened by the Department of Forestry on this matter, and steady ready to provide further assistance as necessary.

We look forward to supporting the Party in the delivery of an audit of existing tiger farms and moving towards the establishment of a Committee on Tiger Farms. On this, we note that the Prime Minister's Order No. 05/2018 in May 2018 explicitly directs the government to combat commercial farming of Appendix I-listed species, and the Government of Lao PDR will need to ensure that any transition to safari parks or zoos does not in any way open the door to release of tigers to commercial trade. We urge the Government of Lao PDR to move forward with the finalization and adoption of the wildlife farming guidelines to guide this effort, with explicit language prohibiting commercial breeding of Appendix I species.



27. Compliance Matters (Continued)

27.3 Application of Article XIII (Continued)

29.3.2 Application of Article XIII in the Democratic Republic of the Congo [[Doc. 27.3.2: Report of DRC](#)] [[Doc. 27.3.2: Report of the Secretariat](#)]

WCS welcomes the submission of the reports by the Democratic Republic of the Congo (DRC) and the Secretariat, and appreciates the summary of progress that has been made on the implementation of CITES and the enforcement of laws prohibiting illegal trade in DRC.

We believe that the steps taken following Ministerial Order No. 024 (in August 2017) to relocate the CITES Management Authority to the Institut Congolais pour la Conservation de la Nature (ICCN) has been accompanied by positive developments. We commend DRC on increasing capacity for record-keeping and submission of trade data, as well as the new rules ensuring that all export certificates are filed with the CITES Secretariat per the recommendation of CITES SC69. We also appreciate that DRC is not issuing export permits for African grey parrots (*Psittacus erithacus*). We encourage DRC to develop and implement a National Action Plan to promote the conservation of this species in the wild. We also urge DRC to remove its reservation to the inclusion of the species in Appendix I.



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WCS is pleased to see the enforcement efforts reported on as part of the work under the new inter-agency Task Force to Combat Illegal Wildlife Trade, while noting that these seizures represent significant evidence that illegal trade in African grey parrots, elephant ivory and pangolins is ongoing. We urge DRC to continue with these enforcement efforts, including bilateral and multilateral enforcement cooperation with Parties such as Turkey, China and others. Furthermore, we note that information on successful convictions and sentencing is lacking in the report provided, and we encourage further detail on this in reporting on compliance or illegal trade under CITES.

(Continued)



27. Compliance Matters (Continued)

27.3 Application of Article XIII (Continued)

29.3.2 Application of Article XIII in the Democratic Republic of the Congo (Continued)

We remain concerned about the increase in export of species without science-based non-detriment findings, including those identified by the 30th meeting of the Animals Committee. We believe that increased capacity of the CITES Scientific Authority is essential to the export of any significant volume of specimens taken from the wild. We appreciate the finding of the Secretariat that “challenges remain regarding the setting and management of export quotas and the development of the scientific basis and capacity for the making of non-detriment findings.” WCS stands ready to work with DRC to help strengthen its scientific and species-management capacity, and urges donors to support this effort.

WCS shares the concern in the report of the Secretariat that DRC is considering commercial exports of *Cercopithecus dryas*, which, although it is in Appendix-II, is listed as ‘Critically Endangered’ on the IUCN Red List of Threatened Species, with a population of only several hundred animals. It is not possible to make a possible NDF for this species based on available scientific information, and we recommend that the Standing Committee urge DRC to amend its quota accordingly.

We are very concerned with elements of the Secretariat’s report (Doc. 27.3.2.1) regarding authorization of trade in pangolin parts. The Secretariat states that it has been informed about the issuance of permits authorizing the exports of pangolin scales. Since all pangolins were transferred to Appendix I at CoP17, and the pre-Convention date for all species of *Manis* are 1975 and 1976, we do not believe that any exports of pangolin scales or other parts can be authorized for primarily commercial purposes. We remind the Standing Committee that SC69 adopted the decision (see the [Summary Record of SC69](#)) that “in the interim and until a decision is made by CoP18, Parties should treat specimens, including stockpiles, of Appendix I species of pangolin obtained when the species was listed in Appendix II, as Appendix I specimens and regulate trade in accordance with Article III of the Convention.” Therefore, we urge to SC to reinforce that the only legal exports of pangolin specimens should be those that are fully compliant with Article III of the Convention, and that stockpiles cannot be exported for primarily commercial purposes (unless it can be demonstrated that they were legally acquired prior to the pre-Convention dates of 1975 and 1976).

WCS stands ready to continue to collaborate with ICCN and other partners in DRC to increase compliance with CITES and engage in efforts to combat illegal wildlife trade. We urge Parties to provide further technical and financial support to DRC for implementation of the CITES Convention, including outstanding recommendations under Article XIII.



27. Compliance Matters (Continued)

27.3 Application of Article XIII (Continued)

27.3.4 Introduction from the sea of sei whale (*Balaenoptera borealis*) by Japan [[Doc. 27.3.4](#)]

WCS appreciates the Secretariat bringing the issue of non-compliance with the CITES treaty, regarding introduction from the sea from the North Pacific population of the sei whale (*Balaenoptera borealis*, CITES Appendix I) by Japan. WCS is very concerned that large volumes of specimens from the North Pacific population of the sei whale have been introduced from the sea by Japan, and are used for primarily commercial purposes. Japan has not entered a reservation to the inclusion of this population in Appendix I, and therefore is obligated to fully comply with the Convention, including Article III.

WCS strongly agrees that since Japan allows, and indeed encourages, the sale of the meat and blubber of sei whales, an Appendix I species, that it introduces from the sea, these transactions are not wholly non-commercial, and therefore do not qualify for the issuance of Appendix I certificates of introduction (pursuant to Article III paragraph 5(c) of the Convention and in line with Resolution Conf. 5.10 (Rev. CoP15), Definition of 'primarily commercial purposes'). WCS urges the Standing Committee, in fulfilment of its obligations under Resolution Conf. 14.3, to take strong, immediate action on this non-compliance by Japan, and this action should remain in place until such time as Japan halts the introduction from the sea of specimens of meat and blubber of sei whales from the North Pacific population. Anything else would create a dangerous precedent for CITES.

We also respectfully note that Japan is a wealthy, developed country, with strong governance and sufficient capacity and resources to effectively implement CITES. We believe that all matters before the Standing Committee should be treated with transparency and equity, and without prejudice; in light of the detailed report of the Secretariat and facts at hand, insufficient action at SC70 on this matter could be perceived to reflect a lack of equity.

27.3.5 Application of Article XIII in Nigeria [[Doc. 27.3.5](#)]

WCS welcomes the submission of this document by the Secretariat, as well as the efforts by the Secretariat and the Government of Nigeria to plan and undertake an extensive technical mission. WCS works closely with the Government of Nigeria and relevant authorities on intelligence-driven anti-poaching and law enforcement efforts, among other interventions, at Yankari Game Reserve in Bauchi State, as well as Cross-River National Park and the broader landscape in Cross River State.

We share some concerns about the capacity of Nigeria's CITES Authorities to undertake non-detriment and legal acquisition findings for certain species, in part due to a decentralized structure. We urge the Standing Committee to adopt the recommendations presented, including strengthening of the legal and regulatory framework at state and federal levels, chain-of-custody management for CITES-listed specimens, and increased inter-agency cooperation to both strengthen control of legal trade and to identify and dismantle criminal networks engaged in illegal trade of CITES-listed specimens. We also welcome the recommendation that Nigeria develop a national strategy to combat corruption within key agencies and at key transit points for illegally traded wildlife products.



27. Compliance Matters (Continued)

27.4 National Ivory Action Plan (NIAP) Process: Report of the Secretariat

WCS appreciates the documents on National Ivory Action Plans (NIAPs) that have been submitted, and commends those Parties that have taken positive steps taken to develop and implement their NIAPs. In addition to our national, regional, and global work to combat ivory trafficking, WCS works with our government and other partners in the field on the conservation of elephants in the wild in Asia (including Cambodia, India, Indonesia, Lao PDR, Malaysia, Myanmar, Thailand, and Viet Nam) and Africa (including Cameroon, Democratic Republic of the Congo, Ethiopia, Gabon, Nigeria, Republic of the Congo, Rwanda, South Sudan, Tanzania, and Uganda). We are consulting our country programs on the NIAP documents, posted on 13 September, and we look forward to discussing recommendations and analyses with Parties during the Standing Committee meeting.

In general, WCS is a strong supporter of the NIAP process; we consider it to be one of the most useful initiatives under CITES to date to address the ivory issues that threaten African and Asian elephants in the wild. WCS has helped, or is now helping, a number of Parties develop and/or implement NIAPs (or NIRAPs), and is committed to continuing to assisting Parties with implementation (with a view towards removing them from the NIAP process when appropriate).

We appreciate the amendments adopted at CoP17, now in Res. Conf. 10.10 (Rev. CoP17) and its Annexes. However, we remained concerned about some aspects of the NIAP process, including decision-making process of the Secretariat and Standing Committee in terms of which Parties identified by ETIS are included in the NIAP process, and whether or not external experts have been consulted in the development of NIAPs and the evaluation of progress reports. We are also concerned that some Parties either have made limited progress, if any, or have not even reported as required.

As we noted at CoP17 and SC69, WCS believes a better approach to assessing progress with Parties' implementation of their NIAPs would be to conduct independent assessments of progress through country visits by suitable qualified experts. WCS believes that such a process of independent assessment of progress could be facilitated by CITES retaining consultants as it did during the original NIAP development period.

We congratulate Parties who have made demonstrable progress on implementing their NIAPs, including in particular the efforts of China and Hong Kong SAR to close their domestic ivory markets or to provide a legislative timeline for closure of their market in the near future. Many other Parties, representing source, transit and/or destination countries for elephant ivory, have demonstrably tightened legal frameworks or increased enforcement cooperation and effort.

We also commend China on not only changing its domestic policies to respond to this crisis, but also on engaging Chinese nationals in foreign countries such as Uganda to ensure that they comply with domestic and international laws on trade in elephant ivory. WCS has been working with the public and private sector Chinese entities and businesses in countries such as Uganda to develop best practices to combat wildlife trafficking that are widely applicable across the continent.

(Continued)



27. Compliance Matters (Continued)

27.4 National Ivory Action Plan (NIAP) Process: Report of the Secretariat (Continued)

However, information presented under agenda item 49 (elephants) demonstrates that increased effort is required to address the illegal killing and trade in elephants.

WCS strongly urges Parties to continue closing any markets, legal or illegal for elephant ivory, in particular border regions in countries such as Lao PDR, Viet Nam and Myanmar. Research leading up to and since SC69 documented ivory and other wildlife products online and in physical markets with little oversight in these areas, as well as the activities of criminal syndicates engaged in wildlife trafficking. While there has been some enforcement action in these regions, there is still evidence of physical and internet-enabled commerce in ivory products in countries in Southeast Asia, even publicly in places such as airports. We also support the closure of markets in African countries, as there is some recent evidence of ivory being processed in Africa for export.

We strongly urge Parties to: revise their NIAPs to address the evolving threats as necessary, and for Parties who are successfully implementing their NIAPs to build on their success, even if removed from the NIAP process, by assisting other Parties to implement their own NIAP commitments. We urge Parties to focus NIAPs and the evaluation of progress on outcomes (protection of elephants in the wild) rather than actions taken. Parties should not see NIAPs as punitive, but rather use the process to take further needed actions to help combat ivory trafficking.

Regarding Parties that were considered for inclusion in the NIAP process, we believe that Japan and Singapore should be included in the NIAP process due to the opportunity that their legal domestic markets present for laundering of illegal ivory. We do not believe that the risk of these markets and their role as transit countries should be overlooked in the NIAP process and we suggest that the Standing Committee decide to include them in the process. We note that Singapore is considering closure of their domestic legal market, and we strongly support this action (in addition to increased surveillance of shipments transiting through the country).

Finally, we strongly urge Parties and the Secretariat to post NIAPs to the CITES website to increase opportunities for enforcement cooperation and capacity building.





27. Compliance Matters (Continued)

27.5 Malagasy ebonies and palisanders and rosewoods [[Doc. 27.5.2](#)] [[Doc. 27.5.1 A3](#)]

WCS considers the Malagasy timber trade to be a highly important issue and has a long history of working in a number of forest sites negatively impacted by the illegal timber trade. We stand ready to assist the Malagasy government in addressing this issue. WCS have a few comments we would like to make in relation to the stockpile verification mechanism and business plan as currently proposed:

1. We congratulate the efforts of the Government of Madagascar to prepare the business plan, and welcome the position expressed in the Business Plan that implementation of the Plan should not act as a catalyst for new harvesting or laundering of existing cut stocks.
2. To this end, we are extremely concerned by the proposal to offer financial incentives as a means of securing stockpiles not yet under control.
 - a. This proposal sends the wrong message to offenders and would-be offenders by demonstrating that financial rewards are possible in response to criminal actions. It also opens the door to corruption in a period of political sensitivity in Madagascar given Presidential elections planned for later this year, and could encourage further illegal logging to occur before or during the stockpile verification process.
 - b. We share the Secretariat's concern about the expense of the Business Plan implementation and note that the costs of the proposed financial incentives represent over 80% of the costs of the implementation of Phase 1 of the Business Plan. We also note that to date no financing has been secured for the Business Plan, and the Plan provides only general statements about where financing is likely to be obtained, meaning that its implementation is as yet not assured. Removing the financial incentives would also render the costs of the Business Plan implementation more realistic and likely to be financed.
 - c. We therefore recommend that the Standing Committee requests that Madagascar removes this action from the proposed stockpile verification process.
3. We are also concerned about the progressive nature of the sales proposed under the Business Plan. Once the bulk of the stocks in the SAVA Region are sold, then we are concerned that there will be little impetus for the Government to continue to implement the remainder of the Business Plan actions.
4. We welcome the proposal from Madagascar (p. 52 of Annex 3) to ring-fence 50% of the proceeds of any sale to actions in favour of forests. We would like to request, however, that there is further discussion as how this funding is organized. As currently proposed, the distribution of this funding is split into smaller payments to various administrations which is unlikely to result in any substantial benefits to forest conservation while creating significant transaction costs. We also note and question the proposed payments to informers, which creates concerns due to the potential for corruption in such a scheme. We instead recommend that the proceeds of any sale go to an independently and transparently managed trust fund to ensure accountability and that law enforcement, restoration and conservation activities are privileged in the use of the funds.

We note that the Secretariat's report (SC70 Doc. 27.5.2) invites the Standing Committee to approve the use plan. Due to the concerns we have highlighted above we strongly recommend that the Standing Committee does not approve the use plan without substantial amendments which address the issues we have highlighted. Furthermore, whilst we appreciate the continued progress made by the Malagasy government to address this issue, we believe more still needs to be done before the conditions for a sale have been met. We fully support the Secretariat's position that the current trade suspension should not be lifted at this time. We would be pleased to join an in-session working group to discuss this issue further, if one is established.



30. Enforcement

30.1 Enforcement Matters: Report of the Secretariat [[Doc. 30.1](#)]

WCS appreciates the summary submitted by the Secretariat of all the efforts undertaken by the Parties, the Secretariat, ICCWC partners, intergovernmental organizations (IGOs), and NGOs, to combat trafficking in wildlife. However, poaching and trafficking in wildlife continue, facilitated by corruption and weak governance, and far more work still needs to be done. WCS encourages renewed and strengthened action across the entire illegal wildlife trafficking chain, including protection, monitoring, science, and management on the ground to stop poaching, engagement with local communities, scaled up anti-trafficking, prosecutorial and anti-corruption efforts, and enhanced, science-based and sophisticated efforts to change consumer behavior.

We note that corruption at all levels facilitates wildlife crime, and undermines the rule of law, good governance, and sustainable development. We welcome this needed attention to the scourge of corruption, and the willingness of Parties to take action to address and counter it. We welcome the news that UNODC has taken the lead for ICCWC on developing An Integrity Guide for Wildlife Management Agencies, and we look forward to reviewing this guide in advance of SC70. We support the integration by States of their obligations under CITES, including those under Res. Conf. 17.6, with their obligations under both the UN Convention Against Corruption (UNCAC) and the UN Convention against Transnational Organized Crime (UNTOC). We urge those CITES Parties that are not Parties to UNCAC to consider ratifying that treaty and implement domestic measures to combat corruption. We were pleased to attend the event co-hosted by the governments of Gabon, Germany and the United Kingdom during the 15th anniversary celebration of UNCAC. We urge Parties to UNCAC to think about how to implement their obligations under the treaty, and develop tools to put in place safeguards to combat corruption as it pertains to wildlife trafficking.

WCS also appreciates the increased awareness of the relationship between wildlife trafficking and money laundering and other financial crimes. We support the enacting national legislation that makes wildlife crime serious and organized according to UNTOC, ensuring that financial and other penalties are sufficient and comparable to other forms of transnational crime, conducting parallel financial investigations alongside wildlife trafficking investigations, ensuring that domestic legislation and procedures allow the use of alternative offences to pursue wildlife crimes, and enabling wildlife crime to be considered a predicate offence for money laundering so that anti-money laundering tools can be used. We appreciate the contributions of the UNODC Wildlife crime and anti-money-laundering (AML) training program to this effect, and particularly the future efforts to bring together participants along the illegal trade chain.

WCS supports the recommendations of the Secretariat in the document. We suggest however, that the Standing Committee not recommend deletion of Decision 17.85 paragraph a, as it has not yet been fully implemented (in terms of facilitation of the international movement of samples for forensic or enforcement purposes). We do agree that paragraph b is incorporated into Resolution Conf. 17.6. and can be deleted.



30. Enforcement (Continued)

30.2 International Consortium on Combating Wildlife Crime [[Doc. 30.2](#)]

WCS appreciates the submission of this document, and the efforts of all ICCWC Partners (the CITES Secretariat, INTERPOL, the United Nations Office on Drugs and Crime, the World Bank and the World Customs Organization) and the Parties whose active participation and/or generous contributions have enabled work thus far. We also appreciate the many Parties to CITES who have provided resources for implementation of the ICCWC Strategic Programme and other Decisions adopted by the CITES Parties, including the European Union, Germany, France, United Kingdom, United States and Switzerland. We recognize the value of the ICCWC Analytic Toolkit, and we are pleased to see that further contributions will allow for implementation of recommendations for countries that have been able to use the Toolkit thus far, as well as other aspects of the ICCWC Strategic Programme. We are also pleased that the ICCWC *Wildlife crime and anti-money-laundering (AML)* training program, which will help Parties address some of the concerns related to money laundering and other financial crimes associated with wildlife trafficking, has been piloted in Kenya and Tanzania. We strongly encourage Parties that have identified risks to participate in this program to ensure stronger alignment between financial and wildlife crime enforcement efforts.

Finally, we appreciate that UNODC is working to complete a second version of the World Wildlife Crime report, and we welcome the use of Parties annual reports to CITES as a key source of information. However, we note that the report should also draw on independent expert analysis, information, and intelligence, including for the recommendations.

30.3 Combatting Wildlife Cybercrime: Report of the Secretariat [[Doc. 30.3.1](#)] [[Doc. 30.3.2](#)]

WCS appreciates the submission of these documents by Kenya, as the Chair of the intersessional working group on wildlife cybercrime, and the Secretariat.

WCS has experience in monitoring online sales of wildlife products, as well as translating this into actionable intelligence that government partners have used for arrests and prosecutions. WCS is aware that some users of platforms including but not limited to Facebook and WeChat abuse these platforms as informal opportunities to offer, buy or sell illegal wildlife products. It is over such sites, rather than the 'Dark Net', that informal postings of illegal wildlife occur. We concur with the finding of the Secretariat that Parties must continue to engage with digital platforms to tackle illegal wildlife trade, and to ensure that any illegal trade through these platforms is addressed. However, we also encourage Parties to proactively conduct online investigations and for online platforms and governments to forge strong links to address illegal trade.

WCS was pleased to join the intersessional working group on wildlife cybercrime, and we appreciate the excellent chairing of the group by Kenya and the active participation of Parties and Observers. We concur with the outcome report presented in Document 30.3.1, and support the proposed amendments to Resolution Conf. 11.3 (Rev. CoP17), and recommend that the Standing Committee submit them to CoP18. While we believe other steps could be taken, including a new resolution and other initiatives, we believe that this will focus efforts on the issue and provide a platform for further engagement with private companies and enforcement authorities in key jurisdictions.



30. Enforcement (Continued)

30.4 Wildlife crime and enforcement support in West and Central Africa [\[Doc. 30.4\]](#)

WCS appreciates this document, which has been submitted by Niger, Senegal and Nigeria on behalf of the Economic Community of West African States (ECOWAS) and its member States. We congratulate the ECOWAS Member States for the workshop in Abuja, Nigeria in July 2018, and for adoption of the “Strategic Areas of Intervention and Priority Recommendations to Develop a Counter Wildlife Trafficking Response in West Africa.” We also congratulate the ECOWAS Member States on adoption of the important priorities areas and recommendations to counter wildlife trafficking in the region. We strongly support those recommendations, and encourage the Standing Committee and all Parties to take them into consideration, and to support the countries of the region in their efforts to combat wildlife trafficking. We encourage similar actions for countries of Central Africa as well. WCS works closely in country with government enforcement, management, and scientific authorities in efforts to combat poaching and wildlife trafficking, in many of the countries of West and Central Africa, and looks forward to continued collaboration.



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31. Trade in specimens bred in captivity or artificially propagated

31.3 Implementation of Resolution Conf. 17.7 on Review of trade in animal specimens reported as produced in captivity: Report of the Secretariat [[Doc. 31.3](#)]

WCS appreciates the document prepared by the Secretariat, and the hard work of the Secretariat and the Animals Committee on this vital issue. This is the first opportunity for the Standing Committee to take action on implementation of the new CITES Resolution, Conf. 17.7, that deals with specimens in trade that are reported as captive bred, but for which there are significant concerns. WCS was pleased to have been able to participate in the Working Group of the Animals Committee that dealt with this issue, and to have been able to share information from both our zoos and field programs on some of the species of concern. We support the recommendations of the Animals Committee. We note in particular that in some species/country combinations reviewed by the Animals Committee, significant compliance concerns were highlighted (dealing with origin of breeding stock as well as other issues), and we urge the Standing Committee to take appropriate action.

WCS operates the Bronx Zoo, Central Park Zoo, Prospect Park Zoo, Queens Zoo, and the New York Aquarium, and through our zoos, wildlife health program, and field programs in more than 60 countries, we have extensive expertise in the husbandry, breeding, and captive management of many animal species. Along with our partners in other zoos, we would be pleased to share any information we have with the Parties, as questions arise regarding whether or not certain species can be bred in captivity to the F2 generation, and the feasibility of the commercial quantities being exported.

31.3 Observations and recommendations regarding the first iteration of Res. Conf. 17.7 (Review of trade in animal specimens reported as produced in captivity) [[Doc. 31.4](#)]

WCS appreciates this document, and the work of the Secretariat and the Animals Committee on reviewing this first iteration of the implementation of Reso. Conf. 17.7, regarding specimens in trade that are reported as captive bred, but for which there are significant concerns (regarding founder stock, breeding stock, breeding biology of the species, ability to breed the species in captivity to the F2 in the commercial quantities indicated, etc.). WCS was pleased to have been able to participate in the Working Group of the Animals Committee that dealt with this issue, and we support the observations and recommendations of the Animals Committee and the Secretariat in this document, including the suggested draft decisions. We look forward to continuing to work with Parties and the Secretariat on this important compliance issue.



32. Disposal of confiscated specimens: Report of the working group [\[Doc. 32\]](#)

We appreciate the submission of this document by Switzerland and Israel, as well as the contributions from members of the intersessional working group on disposal of confiscated specimens. WCS supports the use of the term “Management of confiscated specimens” rather than “Disposal,” as it properly captures a wide array of options and best practices. WCS believes that zoological parks and botanical gardens can serve as good repositories of illegally traded and confiscated or seized specimens, but we strongly encourage Parties to ensure that these facilities are accredited and uphold strict standards of care and trade controls. We also strongly encourage all Parties to document the destination of all seized specimens to ensure that they do not end up back in trade circulation. We support the recommendation to the Standing Committee that would ask the Secretariat to consider *“paragraph 5a of Res. Conf. 17.8 in their existing legislative initiatives, such as the National Legislation Project, to support Parties’ efforts in the development, legal formulation and implementation of effective mechanisms to recover the costs of confiscation, custody, and disposal.”*

We appreciate that consensus was not possible in the working group on a number of issues, and would be pleased to join an in-session working group at SC70 to try to assist in bridging any gaps. We do concur that a list of rescue centers/facilities for seized/confiscated specimens would be complicated and resource-intensive to be maintained by the Secretariat, and raises confidentiality and security issues; rather, it is the obligation of each Party and its Management Authority to determine which national facilities are best suited to care for live specimens, pursuant to Article VIII paragraphs 4 and 5 of the Convention.

33. Specimens produced from synthetic or cultured DNA [\[Doc. 33\]](#) [\[Annex 6\]](#)

WCS is pleased to have been able to participate in the working group (WG) on this issue, and thanks the Secretariat and Mexico, as chair of the intersessional working group, for this document. The report of the consultant, while highly detailed, unfortunately fails to address the most critical element—it is missing an analysis of the relevant legal, regulatory, enforcement, and technical interrelated elements for CITES to consider. WCS stresses that that if a specimen cannot be easily distinguished from one from the actual animal or plant, it must be regulated as a CITES specimen. The report also suggests that marketing synthetically manufactured products produced from endangered species (such as rhino horn) would take pressure off of wild populations and always does no harm; we disagree, and are concerned that it would render enforcement of illegal trade in wild-sourced products, such as rhino horns, difficult or impossible, especially when the illegal trade is currently run by corrupt syndicates.

Biotechnology/synthetic biology can already produce certain products genetically identical to wildlife products in international commercial trade. There are potential benefits and harms that must be considered. To ensure that trade in these products is not detrimental to wild species, it is essential that they come fully under the jurisdiction of CITES. The definitions of “specimen” in the Convention and “readily recognizable” in Resolution Conf. 9.6 (Rev. CoP16) are sufficient to support regulation of these products under CITES, without three more years of discussion and analysis of the technology and processes; CITES regulates products and specimens, not processes. We therefore urge the Standing Committee to recommend that CoP18 clarify that specimens produced through biotechnology are fully covered by the Convention. WCS looks forward to continuing to work with the CITES Parties on this issue.



34. Introduction from the sea: Report of the Secretariat [[Doc. 34](#)]

WCS appreciates the initiative of the Secretariat on this issue. The Parties worked hard over many years to reach agreement in Resolution Conf. 14.6 (Rev. CoP16) on how to implement the provisions of the Convention for specimens taken beyond the jurisdiction of a State, particularly since CITES entered into force before the UN Convention on the Law of the Sea (UNCLOS) was negotiated or entered into force. WCS strongly supports the provisions of Res. Conf. 14.6 (Rev. CoP16), regarding Introduction from the Sea (IFS). We also appreciate Notification 2018/67 issued by the Secretariat inviting Parties to submit information on challenges in implementing this resolution, and we thank those Parties that responded to the questionnaire in the Notification. The Secretariat's analysis of the implementation by the Parties of this resolution, and IFS in general, is helpful. We also recall that during the Legal Acquisitions Findings workshop referred to in SC70 Doc. 27.1 (See agenda item 27.1, above), it became clear that some Parties operate open registries (sometimes called "flags of convenience") whereby vessels, including fishing vessels, can purchase a registration as a vessel of that country even if the vessel is not operated by a citizen or resident of that country. Of the top 10 open registries/flags of convenience globally, 9 are CITES Parties; the top country issues its flag to more than 8,000 vessels operating on the high seas. The Parties issuing these registrations are still obligated to ensure that vessels flying their flag have the proper CITES document(s) when landing CITES-listed species; lack of compliance with this requirement could explain some of the discrepancies in reported CITES data, and should be explored. WCS urges all Parties to be vigilant in their implementation of the Convention both within and beyond national jurisdiction.

WCS supports the draft Decisions in the document, as submitted by the Secretariat, although we believe that it is premature to consider amendments to Reso. Conf. 14.6 (Rev. CoP16).

36. Simplified procedures for permits and certificates: Working Group Report [[Doc. 36](#)]

The Standing Committee established an intersessional working group (WG) on simplified procedures for permits and certificates, to expedite trade in samples of CITES-listed species (or samples suspected to contain CITES-listed species) for forensic, enforcement, diagnostic, or other health and disease purposes. WCS was pleased to have been able to participate in the WG. We appreciate the leadership of Australia as chair of the WG, as well as the collaboration of all WG members. We agree that Parties can use simplified procedures now, but due to some confusion, not all Parties understand how they can expedite issuance of permits for such samples.

We are aware of situations where samples taken for diagnostic purposes in the case of disease outbreaks have not been able to obtain permits in a timely fashion, putting wildlife (and sometimes humans and livestock) at risk. We also recognize that permits may need to be expedited as well for samples for forensic or enforcement purposes, or biological samples taken in the marine environment beyond national jurisdiction, for scientific purposes.

WCS therefore supports the recommended amendments to Resolution Conf. 12.3 (Rev. CoP17) on Permits and certificates, and Resolution Conf. 11.15 (Rev. CoP12) on non-commercial loan, donation, or exchange of museum and herbarium specimens. We believe these expedited processes should explicitly apply only to trade for strictly non-commercial purposes.

(Continued)



36. Simplified procedures for permits and certificates (Continued)

We also note that the title of the revised Resolution Conf. 11.15 (Rev. CoP12) (in the Annex to the document) should be changed to reflect that it is not only museum and herbarium specimens. We also note that some range States may need specific guidance on the use of the new procedure, and the greatest urgency is for the movement of samples for diagnostic and other health-related purposes. Finally, we note that these proposed amendments do not introduce any exemption to the need for CITES permits and certificates, but rather propose a system to expedite their issuance, to further forensic research, enforcement and prosecution, and responses to wildlife disease outbreaks.

WCS supports the draft Decisions in the document, as submitted by the Secretariat, although we believe that it is premature to consider amendments to Reso. Conf. 14.6 (Rev. CoP16).

38. Definition of the term ‘appropriate and acceptable destinations’

38.1 Report of the Secretariat and the Animals Committee [[Doc. 38.1](#)]

38.2 Report of the Working Group [[Doc. 38.2](#)]

WCS appreciates these documents, from the Secretariat and the Chair of the Standing Committee Intersessional Working Group on the issue, the leadership of the United States as Chair of the Working Group, and the work of the Secretariat, Parties, and observers on this issue. WCS has engaged on the issue both directly, and through the Association of Zoos and Aquariums and World Association of Zoos and Aquariums; we are a member of both organizations. We appreciate the detailed submissions by Parties and organizations in response to Notification No. 2018/33. We support the outline of non-binding guidance developed and submitted by the Animals Committee, to assist Parties with determining whether recipients of live Appendix I species are suitably equipped to house and care for them. We support the submission to CoP18 by the Standing Committee of this outline of non-binding guidance, along with the draft decisions in the documents. We also draw the attention of Parties to a side event to be presented by WAZA, AZA, WCS, and others at SC70 on the contribution of zoos and aquariums to the conservation of CITES-listed species.

38.3 Trade in live elephants [[Doc. 38.3](#)]

WCS appreciates this document from Burkina Faso and Niger, which clearly articulates the requirements in the CITES Appendices (including the Annotations) as well as [Resolution Conf. 11.20 \(Rev. CoP17\)](#), for the potential export of live African elephants from the wild to captive facilities. WCS supports the intent of the statement of the IUCN African Elephant Specialist Group, as cited in the document; however, we also recognize that there can be, or are, cases where it is in the best interest and welfare of individual elephants and the conservation of the species in the wild that they be taken into captivity outside their native range, and that decisions should be taken on a case-by-case basis. We understand the rationale behind the recommended decisions in this document, but as an alternative and to retain an element of flexibility, we suggest that the Standing Committee or CoP18 may wish to recommend the following: Before any elephants are removed from the wild with the intent of export to captive facilities, the exporting and importing countries should consult both: 1) the IUCN African Elephant Specialist Group, to ensure such trade will indeed benefit in situ conservation of the species; and 2) the World Association of Zoos and Aquariums, the European Association of Zoos and Aquariums, and/or the Association of Zoos and Aquariums (depending on the location of the facility), to assess the suitability and accreditation of the proposed facility.



41. Stocks and stockpiles of specimens of CITES-listed species: Report of the working group [[Doc. 41](#)]

WCS appreciates the submission of this document, as well as the excellent, collaborative chairing of the intersessional working group, by Israel. WCS was pleased to join this WG and participated actively. We concur with the findings of the working group report that there are several critical and outstanding issues to be addressed, and many where there is not sufficient agreement to propose decisions to CoP18. Given the importance of this topic, including aligning any new guidance with existing CITES provisions on stocks and stockpiles, we welcome the recommendation of Israel and the working group to ask CoP18 to direct the Standing Committee to continue work on this topic. We look forward to joining any further discussions.

42. Identification of Specimens in Trade

42.1 Tiger Skins: Report of the Secretariat [[Doc. 42.1](#)]

WCS strongly believes that enhanced collection and sharing of visual identification assets for tigers and other species can complement both trade control and field research. With respect to tiger skins, we work closely with range State government partners and wildlife biologists, and concur that there are few national level databases. At SC69, we encouraged Parties to direct the Secretariat to broaden the initiative and pull in alternative databases from academia, NGOs and the private sector to determine what exists and assess whether contracting a consultant makes sense. We believe that this recommendation is still valid, but understand that there is insufficient momentum to complete this task without funding.

We strongly support the Secretariat's proposal to review the existing Resolution Conf. 11.19 (Rev. CoP16), on the Identification Manual, and to submit a new draft resolution on identification of CITES-listed species for consideration at CoP18. We believe that advances in modern forensic methods such as molecular, DNA and isotope analyses, and technological advances (web-based tools, apps, handheld tools, etc.) necessitate an updating of this resolution, elements of which are obsolete. We reiterate our recommendation from SC69--provisions should be included in this draft resolution to request input from and ensure collaboration with academia, NGOs and the private sector in collecting and disseminating to Parties the best available tools for species identification. We recommend that the mechanisms outlined in the resolution and any associated decisions be flexible enough to accommodate the different levels of information available for different taxa.





Species-Specific Matters

43. Illegal trade in cheetahs (*Acinonyx jubatus*): Report of the Secretariat [[Doc. 43](#)]

WCS appreciates this document and commends the efforts of the Secretariat, Parties, IUCN, and NGOs to address the illegal trade in live cheetahs. We would actively through the WCS-ZSL [Range Wide Conservation Program on Cheetah and African Wild Dogs](#) on the conservation of cheetahs across their range. We particularly welcome the efforts by Parties to tighten legal frameworks that facilitate the illegal trade in live cheetahs, such as new legislation in the United Arab Emirates, and to increase law enforcement efforts against illegal activities. As part of this, coordination both within country and between countries along the trade chain (including through platforms established by ICCWC Partners such as the closed coordination group) will be useful, and we encourage range, transit, and importing Parties of illegally obtained cheetahs to share intelligence and to collaborate to bring criminals to justice, and to close down the channels that allow consumers to purchase illegal cheetahs.



We note with concern that very few seizures or other evidence of illegal trade were noted in the responses to questionnaires from Parties who have cited problems with domestic demand for illegal cheetah trade in the past. We also note that some key range States did not respond. We note that general awareness raising is often not a cost-effective intervention in the short term, even if long term efforts to raise awareness of the implications of illegal trade in cheetahs is welcome. WCS stands ready to support Parties and other partners in their efforts to conserve cheetahs and prevent illegal trade. Notably, WCS would support any move to take into consideration information available from other sources beyond official records of confiscations and which could shed light on the true scale and key locations of the illegal trade in cheetah. We note that social media and other online platforms facilitate the illegal trade in cheetahs, and further enforcement cooperation as outlined under the cybercrime agenda item are relevant for combating the illegal trade in cheetahs. WCS urges social media companies to engage with CITES in combating illegal trade in cheetah, particularly in adopting strict policies against the use of social media platforms to promote illegal trade and in developing tools to identify and remove posts seeking to sell cheetahs on line.

WCS also strongly supports the efforts of the joint CITES-CMS African Carnivores Initiative to collaborate on implementation of decisions taken within both CITES and CMS on cheetahs, lions, leopards and wild dogs. We believe that concerted actions on these species will benefit the conservation of these species in the wild and we strongly encourage additional support for this Initiative. We also encourage greater collaboration between range States and the two Conventions.



45. European eels (*Anguilla anguilla*) [[Doc. 45](#)]

WCS appreciates the interest of the Parties, and the Standing Committee, in the conservation of and management of eels (*Anguilla spp.*) and trade in listed and non-listed species of eels. We note that the European eel (*Anguilla anguilla*) was included in CITES Appendix II at CoP14 (and became effective in December 2010). Offtake for trade and domestic use, combined with a number of other threats such as barriers to migration, habitat loss, turbine mortality, pollution, disease and parasites, and predators have reduced some non-CITES-listed *Anguilla* species populations to levels requiring that their trade should be regulated in order to avoid utilization incompatible with their survival. However, with only one species in the genus included in the CITES Appendices, conservation and management concerns exist, along with increasing illegal trade; furthermore, there is evidence that trade pressures (legal and illegal) have increased on other eel species since the European Union decided not to allow exports of *A. anguilla* (due to the conservation status of the species). Declines are known from other *Anguilla* species as well as *A. anguilla*.

WCS strongly supports the implementation of Decisions 17.186-17.189, including but not limited to efforts to: gather information and data on population abundance, exploitation, and trade; facilitate the legal and sustainable management of the trade in all Anguillid species; and combat trafficking in all *Anguilla* species. We urge Parties to consider inclusion of other species in the genus *Anguilla* in CITES Appendix II.

48. Sharks and rays (*Elasmobranchii spp.*) [[Doc. 48.1: Working Group Report](#)] [[Doc.48.2: Secretariat's Report](#)]

WCS appreciates the ongoing attention of the Standing Committee to the implementation of the CITES listings of species of sharks and rays, and the activities reported in Document 46. We congratulate many of the Parties, FAO, and the Secretariat for the tremendous work they have done thus far to implement those shark and ray listings adopted at CoP16 and CoP17; we encourage further collaborative efforts, including work to close legislative gaps for these species, and efforts to link CITES implementation with fisheries conservation and management measures. We also appreciate the significant progress made by the Secretariat, Parties, IGOs, and NGOs, in providing guidelines and capacity building to help ensure that CITES is effectively implemented for those sharks and rays on the CITES Appendices. We recognize the role that Regional Fisheries Management Organizations (RFMOs) and other multilateral entities such as FAO have to play in the global fishing regime, and particularly their role in data collection and management that can be used to help Parties develop NDFs for commercially exploited CITES-listed shark and ray species. WCS was pleased to attend the FAO Committee on Fisheries (COFI), and we are closely engaged in the CMS Sharks MoU.

In considering possible amendments to Resolution Conf. 12.16 (Rev. CoP17), WCS strongly recommends that:

- The report of the working group needs some technical refinement before its findings are included in any amendments to the resolution, which we suggest can be best delivered via an in-session Working Group during SC70 – one that WCS would be happy to participate in.
- Further work on the issue flagged by the Animals Committee, including a focus on overall trade volumes, possible underreporting of trade, the look-alike issues associated with small hammerheads, and ongoing efforts to better engage with RFMOs/RFBs should also be prioritized in any in-session working group discussion.



49. Elephants (*Elephantidae* spp.)

49.1 **Elephant Conservation, Illegal Killing and Ivory Trade** [[Doc. 49.1](#)] [[A1: Data on Populations, Illegal Killing and Ivory Trade](#)] [[A2: Domestic Ivory Markets](#)]

WCS appreciates the submission of these documents, as well as the efforts of the Secretariat, Parties, IGOs, and NGOs to compile the data that underlies them for review by the Standing Committee. While the high levels of elephant poaching and illegal trade in ivory continue to receive significant global attention and funding, there is nevertheless a pressing need for this collective effort to be maintained and – critically – for a more coordinated and effective effort throughout the trade chain.

Given the dire situation for elephants reported in SC70 Doc 49.1 and its annexes, WCS calls on the Standing Committee to ensure: 1) meaningful, tangible progress with the CITES National Ivory Action Plan (NIAP) process, especially on multilateral enforcement cooperation in order to disrupt, degrade, and dismantle the organized criminal networks responsible for much of the illegal ivory trade; and 2) at the national level, efforts to combat illegal ivory processing operations. WCS also supports the calls for regular and timely reporting of ivory seizure data to ETIS, elephant poaching rate data to MIKE, and stockpile inventory data to the Secretariat, and furthermore believes that repeated failure to report should be seen as a compliance matter.

We note that it is positive that the data presented show that poaching, as recorded in a sub-regional PIKE score, is dropping in East Africa, with several countries now more vigilant and imposing stiffer penalties. Some of these Parties have been part of the NIAP process, which we believe has been successful in stimulating political will and action in some countries. However, criminal networks have been displaced to countries such as Mozambique, where there has been an increase in ivory trafficked through its ports from elephants poached elsewhere and ongoing theft from stockpiles; elephants continue to be poached at alarming rates in Central Africa, and their ivory is trafficked through Mozambique and other countries as well. We also note with concern the data presented to support claims that raw ivory is being processed in Africa and then exported as worked ivory to Asian countries. WCS urges the Standing Committee, and all Parties, to not let down their guard, and to continue with unrelenting pressure to protect vulnerable populations of elephants, close domestic ivory markets (which fuel the international illegal ivory trade), and collaborate on intelligence-sharing and enforcement actions to identify and sanction the criminal networks trafficking illegal ivory.

Closure of domestic ivory markets in consumer countries is a vital enforcement tool to end the laundering of illegal ivory through legal markets. WCS appreciates the Notification issued by the Secretariat, and the efforts of Parties to provide updates on their efforts to close their domestic ivory markets. WCS congratulates those Parties that have taken active, positive steps since CoP17 to close or further close their domestic ivory markets that contribute to poaching or illegal trade in accordance with Res. Conf. 10.10 (Rev. CoP17), including in particular China (including Hong Kong SAR), the UK, France, and the US, as well as those such as the EU, Singapore and others that are currently consulting with stakeholders and the public on the issue.



49. Elephants (*Elephantidae* spp.) (Continued)

49.1 Elephant Conservation, Illegal Killing and Ivory Trade (Continued)

We note that key Parties, such as China, Lao PDR and Viet Nam did not provide reports in response to this Notification. We urge Parties to err on the side of caution, and to recognize that any domestic trade in ivory provides opportunities for laundering of illegal ivory and therefore contributes, even if indirectly, to the poaching of wild elephants and the trafficking in their ivory. Related to this, we also urge the NIAP process to treat Parties equitably, and rely on ETIS data and other research or expert opinion to address those countries that have said that their domestic markets do not contribute to poaching or trafficking, but where seizure and other illegal trade data suggest otherwise.

It is also clear that more attention needs to be paid to Asian elephants. We commend the European Union for their additional contribution that will allow the MIKE project to capture data on Asian elephants as well. We also urge the Standing Committee to adopt the recommendations presented by the Secretariat, including the use of the AsESG Guidelines for captive Asian elephants and their management, as well as the double-marking and registration systems where possible.

49.2 Implementing aspects of Decisions 17.171-172 on *Stocks and stockpiles (elephant ivory)* [[Doc. 49.2](#)]

WCS greatly appreciates this document, submitted by the Federal Democratic Republic of Ethiopia and the Republic of Malawi, which recommends steps to help facilitate the implementation of Decisions 17.171-172 regarding ivory stockpiles and in particular the preparation of practical CITES guidance for the management of stockpiles, including their disposal. We urge the Standing Committee to adopt the recommendations in the document, and to instruct the Secretariat, as it works to implement Decisions 17.171, to fully take into account and make use of available existing material, as well as further information to be obtained from Parties and technical experts.

We note that the Standing Committee needs to make recommendations to the 18th Conference of the Parties, and, as such, we are concerned about the timeline for evaluating the implementation of the Stop Ivory Stockpile Management System in Mozambique. We strongly urge the Standing Committee to adopt the recommendations in this document, including a timetable for the completion of this work and the development of draft recommendations for the Standing Committee to consider.

WCS supports putting stockpiles of seized ivory beyond economic use and we commend, therefore, those Parties that have carried out proper inventories and destroyed their stockpiles of seized ivory. We encourage others to do the same, noting that doing so is fully consistent with all relevant CITES requirements. We call on all Parties planning to destroy their ivory stocks to conduct independently audited inventories before any destruction events and to make samples of the seized ivory available for DNA- and/or isotope-based analysis; the availability of guidance on best practices for the management of stockpiles, including their disposal, would facilitate such inventories.



51. Asian big cats (*Felidae* spp.) [[Doc. 51](#)]

WCS works to conserve all species of Asian big cats. Our field programs work directly to conserve multiple populations across the species' range, with long-term species-specific research and monitoring, and broad programs to reduce threats, from habitat protection and anti-poaching to working with local communities to reduce human-wildlife conflict. We also have programs outside of core sites to address illegal trade in big cats and their parts, including extensive work with relevant government agencies on intelligence-based law enforcement. WCS works with our partners on the conservation of Asian big cats in the following Asian big cat range States: Afghanistan, Bangladesh, Cambodia, China, India, Indonesia, Lao PDR, Malaysia, Myanmar, Pakistan, Russian Federation, and Thailand. We have shared the documents on this issue (more than 180 pages) with our country programs and experts, and time does not permit us to include a full analysis and recommendations here. We look forward to sharing our views and recommendations with Parties during the Standing Committee meeting.

52. Great apes (*Hominidae* spp.) [[Doc. 52](#)]

WCS appreciates the submission of this document by the Secretariat, and the efforts of the Secretariat, GRASP, members of the IUCN Primate Specialist Group, and members of the Animals Committee and other experts, to put together this comprehensive report and set of recommendations. WCS scientists have been pleased to contribute to the findings and recommendations of this report.

The report highlights threats from the wild meat trade, as well as the illegal live animal trade. We appreciate that several proposed suggestions by the AC30 in-session working group have been taken up in this version. However, we have the following CITES-related suggestions that we believe will benefit great ape conservation:

- Parties must strengthen law enforcement efforts to ensure that illegal offtake and illegal trade in great apes is stopped. The Standing Committee is well placed to make this recommendation, based on the information contained in the existing draft of this report.
- Parties must recognize that small apes (gibbons and siamangs) share similar habitats as some species of great apes, and face similar threats. Based on their conservation status, they therefore warrant consideration for listing on the CITES Appendices, particularly Appendix I.

We also suggest, although it is beyond the remit of CITES, that Parties must halt development projects that threaten critical great ape habitat. They must also ensure that, where great apes are killed and eaten as bushmeat, programs and effective law enforcement are put in place to counteract this threat.

Finally, we note that the Secretariat, in paragraph 14b of the document, recommends that the Standing Committee “consider requesting the Secretariat, in consultation with GRASP and the Chair of the Standing Committee, to review the current provisions in Resolution Conf. 13.4 (Rev. CoP16) on Conservation of and trade in great apes, and, taking account of recommendations emanating from the report, propose as appropriate amendments to the Resolution, for consideration at the 18th meeting of the Conference of the Parties.” We support this recommendation with an amendment that in addition to GRASP and the Chair of the Standing Committee, the Secretariat should consult the IUCN Primate Specialist Group, and in particular the co-authors and contributors to the report in the Annex to this document.



54. African lion (*Panthera leo*) [[Doc. 54.1: AC Report](#)] [[Doc. 54.2: WG Report](#)]

WCS appreciates the submission of this document by the CITES Secretariat. WCS works in the wild and with government partners on the conservation of lions and their habitats in at least seven countries across Africa, including Cameroon (Bouba Njida), the Democratic Republic of the Congo (Kabobo-Luama and Virunga-Hoyo), Nigeria (Yankari Game Reserve), Mozambique (Niassa National Reserve), Tanzania (Ruaha-Katavi, Tarangire National Park), Uganda (Murchison Falls National Park, Queen Elizabeth National Park, Kidepo Valley National Park), and South Sudan (Bandingalo, Boma and Southern National Parks, Sudd). WCS is concerned about the threats to African lions, including habitat loss and degradation, reduction of wild prey, human-wildlife conflict, illegal killing, unsustainable or unregulated hunting, and disease. More effort is needed to support a broader land use and management framework that addresses threats both within and outside protected areas. More research is also needed to inform the conservation of lions across their range, along with further transboundary cooperation and prioritization.

We believe that one priority for intersessional work should be examining the potential impact of sales of large numbers of lion skeletons on wild populations of both lions and other cats where there is trade in bones (i.e. tigers), as well as interactions between markets for all big cat bones. We believe that further research is needed, and that Parties should improve their information collection and sharing of information on trade in lion bone including the entities trading lion bone and other wildlife.

We are also pleased that the IUCN Cat Specialist Group will be leading the development and implementation of a African Lion Conservation Framework to implement the CITES and CMS Decisions related to African lions. The meeting of the Range States of the CMS/CITES African Carnivores Initiative to take place in Bonn, Germany in November 2018 will be an excellent opportunity to both prepare for CoP18, and take action to enhance the conservation of lions and other African carnivores.

We commend the European Union for providing generous extrabudgetary resources for implementation of existing Decisions on African lions. We welcome discussion on the nature and structure of funding, and we stress that increased domestic and international contributions to the conservation of lions will be essential to protect them from increasing threats from land-use change, human-lion conflict and unsustainable or illegal trade. As such, we strongly support the African Carnivores Initiative and other means of collaboration between CMS and CITES to ensure the most efficient use of funding for shared activities. WCS supports the recommendations of both the Animals Committee as well as the additional recommendations of the Secretariat. We would be pleased to join an intersessional working group or Task Force under CITES to continue looking at trade and conservation of the African lion.





55. Quotas for leopard hunting trophies [\[Doc. 55\]](#)

WCS appreciates the discussion of the current CITES-agreed quotas for leopard hunting trophies; we believe that it is good practice to regularly review such quotas agreed by the CoP, whether by resolution or annotation.

We recommend that the Standing Committee adopt the recommendations of the Animals Committee, particularly those that relate to ongoing monitoring of leopard populations by range States. In particular, we urge adoption of the recommendation of the Animals Committee that upcoming meetings dealing with the conservation of leopards, among other species, provide an opportunity for discussion and lessons learned on monitoring of populations of leopards (for instance, the meeting of the CMS/CITES African Carnivores Initiative, and, if held, the upcoming meeting in Africa on non-detriment findings for sport-hunted trophies).

WCS believes that it is critical that Parties implementing hunting programs obtain and analyze robust data on leopard population trends (based on a rigorous methodology, including camera trapping and spatial capture-recapture sampling), both within and outside protected areas, and that they use adaptive management. Adaptive management is critical to ensuring the sustainability of hunting programs. We also endorse the recommendation that the Standing Committee establish a process to review and if necessary revise, quotas for Appendix I species which have been established by the CoP pursuant to Resolution Conf. 9.21 (Rev. CoP13).

60. Rhinoceroses (*Rhinocerotidae* spp.) [\[Doc. 56\]](#)

WCS appreciates the submission of this report by the United Kingdom as the Chair of the intersessional working group on rhinoceroses. WCS works to combat the illegal trade in rhinoceros horn, particularly from southern and eastern Africa to Asia. We work closely with government partners in Mozambique, Viet Nam and China to combat the illegal trade in rhinoceros horn and to increase compliance with CITES, and were pleased to have been able to join the working group.

We welcome the responses from all 20 Parties to the intersessional working group's questionnaire on implementation of Res. Conf. 9.14 (Rev. CoP17), however we note with concern the United Kingdom's observation that several key countries, particularly Asian range States, did not submit responses. We strongly encourage the Standing Committee to consider standardizing guidelines for developing NIRAPs and a methodology to determine whether international efforts on implementation of Res. Conf. 9.14 (Rev. CoP17) is having an impact on the rate of illegal killing of rhinoceroses in range States.

WCS recommends that the Standing Committee adopt recommendations and provide clear guidance to the current and suggested Priority Countries for Attention (China, Mozambique, Namibia, South Africa, Viet Nam, and Zimbabwe), and request that they all provide reports to SC71 that include the following:

- Arrests, prosecutions, convictions, and penalties for violations/crimes involving rhino horn from 2016 to date that enable an analysis of conversion of arrests to convictions; and
- Details of rhino horn stockpiles and protocols in place to ensure they are securely managed.

(Continued)



60. Rhinoceroses (*Rhinocerotidae* spp.) (Continued)

With respect to the country-specific recommendations, we have the following comments:

- **Mozambique:** We recognize that the capacity for law enforcement in Mozambique has increased, and we welcome increased dialogue both within the country and between the Government of Mozambique and other governments on enforcement cooperation. We encourage the Government of Mozambique to dedicate additional resources to CITES implementation and continue open dialogue with civil society partners in this regard, and we encourage donors to support this effort. We commend the Government of Mozambique for adopting a revised Conservation Law in 2017, but we note that the potential for high sentences under this law has not yet been realized in the courts (including for convictions related to poaching or illegal trade in elephant ivory and rhinoceros horn). We also note that stockpile management continues to be a challenge from a resources and capacity standpoint, and we also encourage donors to support this effort.
- **Viet Nam:** WCS commends the adoption by Viet Nam of a revised Penal Code and efforts undertaken on illegal wildlife trade. We are pleased to see that Viet Nam convened an internal, inter-sectoral workshop in June 2018 on enforcement cooperation; however we note that additional information related to intelligence-led enforcement actions would have been welcome in this report (as encouraged by SC69). We note that Viet Nam is requested to submit a report in advance of SC71, and we urge the Standing Committee to request that this report contain documentation on arrests, prosecutions and sentences handed out for offenses tried under the new Penal Code. We also urge Viet Nam to clarify its policy regarding seized stockpiles of rhino horn and to report on this stockpile to the Secretariat in advance of SC71.
- **China:** We note the working group's finding that, "China did not provide details on prosecutions, and is encouraged to clarify its enforcement policy for rhinoceros horn souvenirs illegally brought into the country." China is a critical country in combating trafficking in rhinoceros horn. Several recent seizures have been documented in open-access sources, but do not seem to be reflected in the response to this questionnaire. We welcome the working group's recommendation that China clarify enforcement measures regarding rhinoceros horn. Further increased effort to report on illegal trade of rhinoceros horn will be critical in international collaboration to effectively dismantle networks engaging in illegal killing and trafficking of rhinos.

We look forward to further discussion at SC70, and would be pleased to participate in any in-session or intersessional working group on the subject.





57. Illegal trade in the helmeted hornbill (*Rhinoplax vigil*) [[Doc. 57](#)]

WCS greatly appreciates the attention of the Standing Committee and the Parties to the crisis facing the helmeted hornbill (*Rhinoplax vigil*), due to poaching and trafficking in its casques, including the adoption of [Resolution Conf. 17.11](#) and relevant Decisions, at CoP17.

The helmeted hornbill is listed in CITES Appendix I and is Critically Endangered on the IUCN Red List of Threatened Species; urgent action must be taken. The species is native to lowland forests in Brunei Darussalam, Indonesia, Malaysia, Myanmar, Singapore and Thailand (though it is now extinct in Singapore). Resolution Conf. 17.11 contains a number of critical measures that relate to: enhanced law enforcement efforts to interrupt criminal networks involved in this illegal trade; transboundary law enforcement collaboration; collaboration between range and consumer countries; and stockpile management to avoid laundering. WCS strongly urges the Standing Committee and all Parties to treat this with the utmost seriousness, and take action as a matter of urgency—and to do more than push the issue to after CoP18.

We appreciate the actions by Parties to date, but also stress that much more needs to be done to disrupt this trade. We also appreciate the “Helmeted hornbill (*Rhinoplax vigil*) Status Review, Range-side Conservation Strategy and Action Plan (2018-2027)” included as the Annex to Document 57, which was developed by the Helmeted Hornbill Working Group, and the efforts of all members of the working group. This working group is now formally a part of the recently established IUCN SSC Hornbill Specialist Group which endorses the need for further conservation measures for this Critically Endangered species.

We recommend that the Standing Committee convene an in-session Working Group, to propose actions that could be taken to implement paragraphs 1a-1g in Resolution Conf. 17.11, as the situation facing this species is a conservation emergency. We urge action on elements that relate not only to range States, but also to consumer States, as agreed by CoP17.





58. Saiga antelope (*Saiga* spp.) [[Doc. 58](#)]

WCS appreciates this report on implementation of several CoP17 Decisions regarding the Saiga antelope, as well as on implementation of the CMS-CITES Joint Work Programme, which includes the Saiga. The Saiga is on both CITES and CMS Appendix II, and is subject to both the MoU Concerning Conservation, Restoration, and Sustainable Use of the Saiga Antelope (Saiga MoU) and the Central Asian Mammals Initiative (CAMI). WCS is pleased to be a signatory to the Saiga MoU as a cooperating organization, and to be actively engaged with CAMI.

WCS notes that the Saiga antelope (*Saiga tatarica*) has experienced marked population declines throughout its range, which includes areas of Mongolia, Kazakhstan, Uzbekistan, Turkmenistan and the Russian Federation. The Saiga is Critically Endangered on the IUCN Red List of Threatened Species. Significant threats to Saiga include poaching, habitat loss, competition with livestock, climate change, fragmentation, disease, and barriers to migration. In addition, recent mass mortality events, killing up to 60% of a subpopulation in less than a month, caused by disease and certain climatic conditions, are projected to increase throughout Saiga range in the future.



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WCS congratulates range States on their efforts to enhance the conservation of the species in the wild, to stem the poaching of Saiga and illegal trade in their parts and derivatives, and to combat other threats to the species. In its report, the Secretariat appears to conclude that international trade in Saiga parts and derivatives has declined. WCS is concerned that illegal trade continues, and that stockpiles of Saiga horns in some consumer States are fueling both consumption and continuing illegal trade.

We support some of the recommendations of the Secretariat in the document, including proposed new Decisions; however, we are concerned that the Secretariat is proposing a significant reduction in what is asked of Parties. All of the problems have not been solved. The Secretariat proposes elimination of the text of Decisions 17.268-17.270, directed to “important consumer and trading countries of saiga parts and derivatives”, including encouraging them to carefully manage trade and consumption, promote alternatives, ensure stockpile management, and promote cross-border enforcement collaboration. WCS recommends retention of the text of those Decisions. We recognize that some of these Decisions are not time-limited, and aspects could be converted into a draft Resolution. However, we do not see that now is the time to reduce attention to the plight of this critically endangered species.



61. Tortoises and freshwater turtles (*Testudines* spp.): Secretariat's Report [[Doc. 61](#)]

WCS undertakes work in many countries to conserve tortoises and freshwater turtles. Our staff in Africa, Asia, Latin America, and North America have all seen significant increases in trafficking in tortoises and freshwater turtles, particularly for the pet trade and collectors' markets. As we have noted at CoP17, as well as the Animals and Standing Committees, WCS is also particularly concerned about ongoing and rampant illegal trade in *Astrochelys yniphora* (Ploughshare tortoise) in Madagascar (CITES Appendix I and IUCN Critically Endangered) which is now driving this species to the brink of extinction in the wild. We urge Madagascar, other Parties, member organizations of ICCWC, and the Secretariat to take urgent action in relation to the trafficking in this species, including listing additional species that meet relevant criteria.

We look forward to continuing our collaboration with Parties, the Secretariat, and others, on the conservation of these species and on enforcement efforts to stop illegal trade. There is growing evidence of the involvement of well organized criminal networks in turtle and tortoise trafficking, including of collectors, traders, exporters and importers, particularly in Appendix I tortoises and freshwater turtles, and we urge the Parties to implement strong measures to deter and disrupt these networks. We appreciate the opportunity to have joined the April 2017 meeting of the CITES Tortoises and Freshwater Turtles Task Force, and we believe that such a task force can be useful in providing a regular opportunity to share learning and provide guidance to Parties. In support of this goal, we urge Parties to make use of other tools that have been developed for international cooperation, such as the WCO Closed User Group, and to report in advance of SC71 to ensure that inter-Party communications result in an exchange of intelligence to guide enforcement action, as well as the uptake of best practices for enforcement.

WCS commends the work of the IUCN Species Survival Commission Tortoise and Freshwater Turtle Specialist Group for their *pro bono* work with the Secretariat to deliver the products requested by Decisions adopted at CoP17 and subsequent recommendations of the Task Force. This includes draft guidance on how to photograph specimens for identification and the ongoing preparation of a list of rescue facilities for confiscated living specimens. We strongly support the efforts to create a contact group that could assist with identification of tortoise and freshwater turtle species, and WCS would be pleased to provide our expertise through these channels, as we have many experts in these species in our conservation, zoo, and wildlife health teams.

WCS supports the proposed amendments to Resolution Conf. 11.9 (Rev. CoP13) on *Conservation of and trade in tortoises and freshwater turtles* in order to reflect the recommendations of the Task Force and further stimulate actions to enhance the conservation of these species.





Maintenance of the Appendices

65. Guidance on the application of Resolution Conf. 9.24 (Rev. CoP17) when preparing to list commercially exploited aquatic species [[Doc. 65](#)]

WCS greatly appreciates the submission of this document by Israel, one of the Standing Committee members for Europe. It provides an excellent analysis and very useful practical guidance for Parties that are developing proposals to include commercially-exploited aquatic species in the CITES Appendices. The document suggests that Parties pay careful attention to FAO's recommendations for evaluating the status of commercially-exploited aquatic species in a CITES context, and to the similarities and differences between the CITES criteria, the IUCN Red List criteria, and the FAO criteria. WCS believes that the analysis and practical guidance in this document will be useful not only for proponent Parties, but will also assist all Parties in evaluating proposals to amend the Appendices for commercially exploited aquatic species.

WCS recommends that the Standing Committee not only note the document, but submit it to CoP18 as practical guidance. We also recommend that the Standing Committee adopt the two draft decisions in the document, and consider forwarding them to CoP18 as well.



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68. Review of Resolution Conf. 10.9 on Consideration of Proposals for the Transfer of African Elephant Populations from Appendix I to Appendix II: Report of the Working Group [[Doc. 68](#)]

WCS was pleased to have been able to actively participate in the intersessional Working Group (WG) on this issue. We wish to thank Germany for its excellent and fair chairing, and all WG members for the collegial and transparent discussions. We recognize that African elephants are the only species with a “special” process to evaluate proposal to transfer some populations from Appendix I to II, and that Resolution 9.24 (Rev. CoP17) provides sufficient and adequate guidance and precautionary measures, such that Resolution Conf. 10.9 is no longer necessary. This was the overwhelming view of the WG as well, among other factors. We urge the Standing Committee to endorse the recommendation of the WG to repeal Resolution Conf. 10.9, and to report this recommendation to CoP18. We also suggest that Decision 16.160 (Rev. CoP17) has been fulfilled and can be deleted at CoP18.