

## **WCS Recommendations: CITES CoP18**

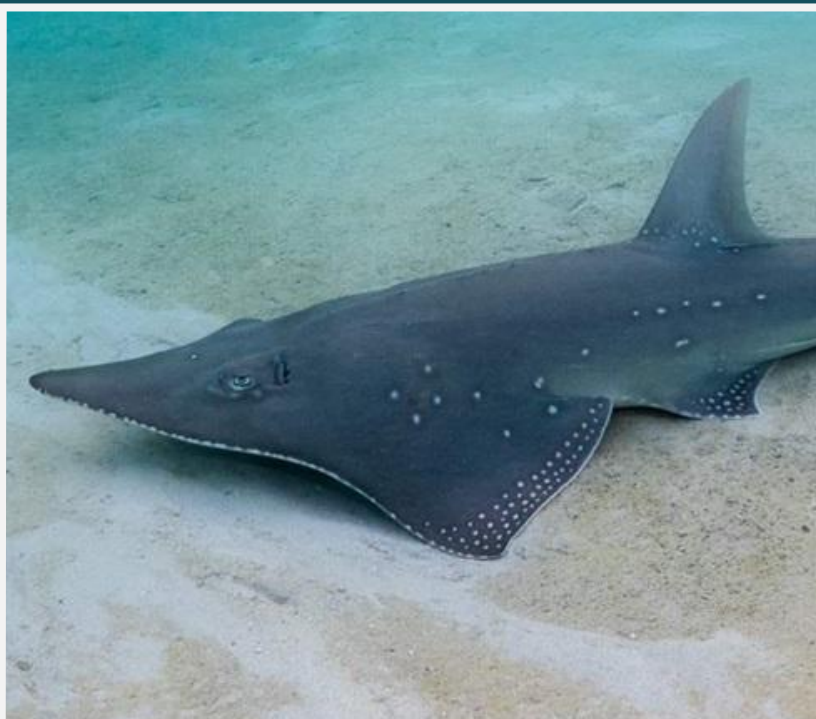
### ***Proposals to amend the appendices***

18th Meeting of the Conference of the Parties

17-28 August 2019, Geneva, Switzerland

The Wildlife Conservation Society (WCS) is a global conservation organization that takes a science-based approach to the protection of wildlife and wild places. To learn more about WCS and our work, visit [www.wcs.org](http://www.wcs.org).

Our CoP18 documents will be online at [www.wcs.org/cites](http://www.wcs.org/cites). If you have any questions, comments or concerns, please e-mail Susan Lieberman, WCS Vice President for International Policy, at [slieberman@wcs.org](mailto:slieberman@wcs.org).





## Acronyms List

AC	CITES Animals Committee
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
CMS	Convention on Migratory Species of Wild Animals
CoP	CITES Conference of the Parties
ETIS	CITES Elephant Trade Information System
EU	The European Union and its Member States
ICCWC	International Consortium on Combatting Wildlife Crime
IGO	Intergovernmental Organization
IUCN	International Union for Conservation of Nature
MA	CITES Management Authority
MIKE	CITES Monitoring the Illegal Killing of Elephants Program
MoU	Memorandum of Understanding
NDF	CITES non-detriment finding
NIAP	National Ivory Action Plan
NGO	Non-governmental Organization
PC	CITES Plants Committee
PIKE	Proportion of Illegally Killed Elephants (part of the MIKE Program)
SA	CITES Scientific Authority
SC	CITES Standing Committee
UN	United Nations
UNCAC	UN Convention Against Corruption
UNODC	UN Office on Drugs and Crime
UNTOC	UN Convention Against Transnational Organized Crime
WG	Working Group

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## WCS at the 18th meeting of the Conference of the Parties to CITES

The Wildlife Conservation Society (WCS) works to save wildlife and wild places worldwide through science, conservation action, education and inspiring people to value nature. With long-term commitments and conservation programs in dozens of landscapes and seascapes, presence in more than 60 countries, and experience helping to establish and manage more than 280 protected areas across the globe, WCS applies its biological knowledge, cultural understanding and partnerships to help ensure that wild places and wildlife thrive alongside local communities. Working with local communities and partner governments, that knowledge is applied to address threats to species, habitats and ecosystem services, and issues critical to improving the quality of life of local people whose livelihoods often depend on natural resources.

WCS's 'on-the-ground' presence across much of the globe enables us to address multiple aspects of wildlife exploitation and trade, including wildlife crime, at all points along the trade chain in source, transit and consumer countries. Our field research and related conservation efforts support the design and implementation of science-based conservation and management strategies that not only conserve and protect species, but also enhance sustainability in the exploitation of species while improving benefits to local communities and economies from sustainable use regimes, when 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 many international wildlife and policy experts at the Eighteenth meeting of the Conference of the Parties (CoP18) in Geneva, Switzerland. Our views on the proposals to amend the Appendices are based on the CITES listing criteria, the best available scientific and technical information, and information from our field and country programs around the world. WCS looks forward to working with the Parties leading up to and during CoP18.

WCS hereby submits the following recommendations to the Parties (with detailed explanations following). We have not included recommendations for species we do not work on, or are found only in countries where we do not work; we also are still analyzing some proposals and consulting our field experts, and will have updated recommendations closer to CoP18.





## Summary recommendations on proposals to amend the appendices:

#	SPECIES	COMMON NAME	PROPONENT(S)	PAGE	WCS REC.
2	<i>Saiga tatarica</i> [ <i>Saiga</i> spp. in CITES nomenclature]	Saiga Antelope	Mongolia, United States of America	6	ADOPT
5	<i>Giraffa camelopardalis</i>	Giraffe	Central African Republic, Chad, Kenya, Niger, Mali, and Senegal	8	ADOPT
6	<i>Aonyx cinereus</i>	Small-clawed Otter	India, Nepal and Philippines	9	ADOPT
7	<i>Lutrogale perspicillata</i>	Smooth-coated Otter	Bangladesh, India and Nepal	9	ADOPT
8	<i>Ceratotherium simum simum</i> (population of Eswatini)	Southern White Rhinoceros	Eswatini	9	REJECT
9	<i>Ceratotherium simum simum</i> (population of Namibia)	Southern White Rhinoceros	Namibia	11	REJECT
10	<i>Loxodonta africana</i> (population of Zambia)	African Elephant	Zambia	11	REJECT
11	<i>Loxodonta africana</i> (populations of Botswana, Namibia, South Africa and Zimbabwe)	African Elephant	Botswana, Namibia and Zimbabwe	13	REJECT
12	<i>Loxodonta africana</i> (populations of Botswana, Namibia, South Africa and Zimbabwe)	African Elephant	Burkina Faso, Côte d'Ivoire, Gabon, Kenya, Liberia, Niger, Nigeria, Sudan, Syria and Togo	14	REJECT, pending additional information
13	<i>Mammuthus primigenius</i>	Woolly Mammoth	Israel	15	ADOPT
33	<i>Cuora bourreti</i>	Bourret's Box Turtle	Viet Nam	16	ADOPT
34	<i>Cuora picturata</i>	Vietnamese Box Turtle	Viet Nam	16	ADOPT
35	<i>Mauremys annamensis</i>	Annam Leaf Turtle	Viet Nam	16	ADOPT



## Summary recommendations on proposals to amend the appendices:

#	SPECIES	COMMON NAME	PROPONENT(S)	PAGE	WCS REC.
36	<i>Geochelone elegans</i>	Indian Star Tortoise	Bangladesh, India, Senegal and Sri Lanka	17	ADOPT
37	<i>Malacochersus tornieri</i>	Pancake Tortoise	Kenya and the United States of America	17	ADOPT
38	<i>Hyalinobatrachium</i> spp., <i>Centrolene</i> spp., <i>Cochranella</i> spp., and <i>Sachatamia</i> spp.	Glass Frogs	Costa Rica, El Salvador and Honduras	18	ADOPT
42	<i>Isurus oxyrinchus</i> and <i>Isurus paucus</i>	Mako Sharks	27 <sup>1</sup> + EU (28)	19	ADOPT
43	<i>Glaucostegus</i> spp.	Guitarfishes	26 <sup>2</sup> + EU (28)	20	ADOPT
44	<i>Rhinidae</i> spp.	Wedgefishes	34 <sup>3</sup> + EU (28)	20	ADOPT
45	<i>Holothuria (Microthele) fuscogilva</i> , <i>H. nobilis</i> , <i>H. whitmaei</i>	Sea Cucumbers/ Teatfish	Kenya, Senegal, Seychelles, USA + EU (28)	21	ADOPT

<sup>1</sup> Bangladesh, Benin, Bhutan, Brazil, Burkina Faso, Cabo Verde, Chad, Côte d'Ivoire, Dominican Republic, Egypt, Gabon, Gambia, Jordan, Lebanon, Liberia, Maldives, Mali, Mexico, Nepal, Niger, Nigeria, Palau, Samoa, Senegal, Sri Lanka, Sudan and Togo

<sup>2</sup> Bangladesh, Benin, Bhutan, Brazil, Burkina Faso, Cabo Verde, Chad, Côte d'Ivoire, Egypt, Gabon, Gambia, Maldives, Mali, Mauritania, Monaco, Nepal, Niger, Nigeria, Palau, Senegal, Sierra Leone, Sri Lanka, Sudan, Syrian Arab Republic, Togo and Ukraine

<sup>3</sup> Bangladesh, Benin, Bhutan, Brazil, Burkina Faso, Cabo Verde, Chad, Côte d'Ivoire, Egypt, Ethiopia, Fiji, Gabon, Gambia, India, Jordan, Kenya, Lebanon, Maldives, Mali, Mexico, Monaco, Nepal, Niger, Nigeria, Palau, Philippines, Saudi Arabia, Senegal, Seychelles, Sri Lanka, Sudan, Syrian Arab Republic, Togo and Ukraine



## Proposals for amendment of Appendices I and II

### 2. Saiga Antelope (*Saiga tatarica*, or *Saiga* spp. in CITES nomenclature) -- **ADOPT**

**Proponents:** Mongolia, United States of America

**Proposal:** Transfer all *Saiga* spp. from App. II to App. I

The saiga antelope (*Saiga tatarica*, or *Saiga* spp. in the CITES Nomenclature -- see below) is a member of the Bovidae family that inhabits the open steppe/grassland habitats of Central Asia in nomadic herds, and undertakes irregular seasonal migrations (sometimes between range States).<sup>4</sup> IUCN and the Saiga Conservation Alliance recognise two subspecies of saiga: the nominate subspecies *Saiga tatarica tatarica*, which occurs in four major populations (one in Russia and three that are usually found in Kazakhstan), and the Mongolian saiga *Saiga tatarica mongolica*, which is found only in Mongolia and is separated from other saiga populations by the Altai mountain range. This nomenclature follows the best available genetic information (Kholodova et al. 2006; Mallon 2012) and is used by the IUCN Red List, the IUCN Antelope Specialist Group, and saiga scientific experts. However, the CITES-recognized nomenclature for the species is out of date, and recognizes two distinct species of saiga. The Mongolian saiga, is considered a saiga subspecies under IUCN nomenclature (*Saiga tatarica mongolica*), while it is referred to as *Saiga borealis* in CITES nomenclature.

The proposal submitted by Mongolia and the US is very clear that it refers to ALL saiga (referred to as *Saiga* spp. in CITES nomenclature). Mongolia and the U.S. used the nomenclature accepted by IUCN and saiga experts, and the proposal throughout is clear that all saiga are included in the proposal. Further to this, the US submitted clarifying comments in response to the Secretariat's Notification 2019/004. The clarification on nomenclature did not change the scope of the proposal submitted by Mongolia and the US, it only ensured that the nomenclature reflects the detailed justification provided by the proposal for listing all saiga species on Appendix I.

Formerly widespread and numbering well over 1 million individuals as recently as the 1970s, the species repeatedly experienced drastic declines in the late 20th century, reaching an all-time low of ca. 50,000 animals in the early 2000s. The species experienced an 80% decline between 1998 and 2008,<sup>5</sup> caused by a complex mix of habitat degradation, infrastructure that presents barriers to migration, changing climatic conditions that have altered food availability, and, significantly, illegal hunting of males for their horns (an ingredient in traditional Asian medicine) that has led to extremely skewed sex ratios and thus to reproductive collapse.<sup>6</sup> CMS reported that the global population was estimated in 2015 to a minimum of 100,000 individuals. Although numbers in Kazakhstan have rebounded to an estimated 344,400 in 2019, the species is highly susceptible to mass mortality events, such as diseases that killed at least 200,000 animals in the course of three weeks in 2015<sup>7</sup> and 80% of the Mongolian population in 2017, and it is currently on the IUCN Red List as Critically Endangered, pending a possible re-assessment in 2020. If it were to be re-assessed as Endangered, it would still meet the requirements of CITES Appendix I.

(Continued)

<sup>4</sup> Mallon, D.P. 2008. *Saiga tatarica*. IUCN Red List: <http://dx.doi.org/10.2305/IUCN.UK.2008.RLTS.T19832A9021682.en>.

<sup>5</sup> IUCN SSC Antelope Specialist Group 2018. *Saiga tatarica*. The IUCN Red List of Threatened Species 2018: e.T19832A50194357. <http://dx.doi.org/10.2305/IUCN.UK.2018-2.RLTS.T19832A50194357.en>

<sup>6</sup> Milner-Gulland, E. J et al. 2003. Reproductive collapse in saiga antelope harems. *Nature* 422: 135.

<sup>7</sup> R. A. Kock, et al. 2018. Saigas on the brink: Multidisciplinary analysis of the factors influencing mass mortality events. *Sci. Adv.* 4: <http://advances.sciencemag.org/content/4/1/eaao2314.full>



## 2. Saiga Antelope (Continued)

Although trade is one of several threats, the critical state of the population means that any additional pressure from legal or illegal trade will exacerbate the current situation. The marked declines in the global population size in the wild were observed as recently as 2014-2015, with the potential to resume, demonstrate that the entire species (or genus, according to the CITES nomenclature) meets at least one of the biological criteria for inclusion in Appendix I of CITES, pursuant to Resolution Conf. 9.24 (Rev. CoP17), Annex 1.

All available data clearly demonstrate that the entire species (or genus, according to the CITES nomenclature) meets the biological criteria for inclusion in Appendix I of CITES, pursuant to Resolution Conf. 9.24 (Rev. CoP17), Annex 1 (observed declines over time and as a result of distinct mortality events; fluctuations in population size; vulnerability to climate change; demand for horns, skin and meat; and habitat fragmentation due to linear infrastructure development). Split listing should be avoided as stated in Annex 3 ("Special cases") of the CITES Criteria in Resolution Conf. 9.24 (Rev. CoP17), due to the enforcement problems it creates. It is impossible for enforcement officials to easily distinguish between horns from different saiga subspecies and a split listing would therefore pose significant enforcement challenges.

Inclusion of this species/genus on Appendix I of CITES will help ensure that international commercial trade will not contribute to further declines, and will help range States and other Parties combat any illegal trade whereby parts of newly hunted saiga are laundered through stockpiles. There is no time to waste, and it would be inconsistent with the precautionary approach to wait until CoP19 to take action. Currently all saiga range States have voluntary moratoria on international exports of saiga parts and products but this is not legally binding under CITES.

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We therefore strongly urge Parties to support the proposal by Mongolia and the US to transfer all saiga from Appendix II to I.





## 5. Giraffe (*Giraffa camelopardalis*) -- **ADOPT**

**Proponents:** Central African Republic, Chad, Kenya, Mali, Niger and Senegal

**Proposal:** Include in App. II

WCS welcomes the submission of this proposal by the Central African Republic, Chad, Kenya, Niger, Mali, and Senegal to include the giraffe (*Giraffa camelopardalis*) on CITES Appendix II. There are nine recognized subspecies of giraffe, across 19 range States, all of which are included in this proposal. WCS works in the wild and with government partners on the conservation of giraffes and their habitats in seven of the range States (habitat for 5 of the giraffe subspecies) -- Cameroon, DR Congo, South Sudan, Mozambique, Uganda, Tanzania, Rwanda. WCS is concerned about the threats to giraffes leading to declines in many of their populations, including habitat loss (largely through land conversion, deforestation, and expansion of agricultural and extractive activities), illegal killing and illegal trade, and climate change (including drought).

In 2016, the status of the giraffe on the IUCN Red List of Threatened Species was changed to Vulnerable (from Least Concern) across its range, having declined by an estimated 40% over three generations, further highlighting the increasing need to protect them. The proposal under consideration by CoP18 acknowledges that international trade is not the primary threat to giraffes, and is not responsible for their re-assessment as Vulnerable on the IUCN Red List. However, population decline data and evidence of international trade in giraffe parts and products as documented in the proposal suggests that it does meet the CITES criteria for inclusion on Appendix II (Criterion B in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17): “regulation of trade in the species is required to ensure that the harvest of specimens from the wild is not reducing the wild population to a level at which its survival might be threatened by continued harvesting or other influences.”

WCS notes that inclusion of *Giraffa camelopardalis* on Appendix II will not ban international trade in giraffe products, and will not ban the issuance of permits for hunting trophies. The listing of this species on Appendix II would require Parties to ensure that all trade is legal and sustainable, and contribute to monitoring of the international trade in giraffe specimens. WCS therefore encourages Parties to adopt the proposal to include this species on Appendix II.





## 6. Small-clawed Otter (*Aonyx cinereus*) -- **ADOPT**

**Proponents:** India, Nepal and the Philippines

**Proposal:** Transfer from App. II to App. I

WCS appreciates the submission of this proposal by India, Nepal and Philippines to transfer *Aonyx cinereus* from Appendix II to Appendix I. The species is listed as vulnerable on the IUCN Red List of Threatened Species, and fully meets the CITES criteria for transfer to Appendix I in Reso. Conf. 9.24 (Rev. CoP17), Annex 1. Small-clawed otters are declining rapidly due to habitat loss and degradation, and poaching for local and international markets, including as pets sold via the internet. The scale of the fur trade is also significant including from India, and the species has been hit hard by urban development and river pollution, among other threats. Addressing the issue of international trade is therefore critical for the species. WCS therefore urges the Parties to adopt this proposal, which would benefit the conservation of the small-clawed otter.

## 7. Smooth-coated Otter (*Lutrogale perspicillata*) -- **ADOPT**

**Proponents:** Bangladesh, India and Nepal

**Proposal:** Transfer from App. II to App. I

WCS appreciates the submission of this proposal by Bangladesh, India and Nepal to transfer *Lutrogale perspicillata* from Appendix II to Appendix I. The species is listed as vulnerable on the IUCN Red List of Threatened Species, and fully meets the CITES criteria for transfer to Appendix I in Reso. Conf. 9.24 (Rev. CoP17), Annex 1. The major threats across their range are the loss of wetland habitat, reduction in prey biomass, poaching and pollution of waterways by pesticides. Once common in the wetlands and low-lying areas of South and Southeast Asia, smooth-coated otters are now restricted to a few protected areas, and are traded on international markets for their skins and as pets. In India, there is rampant poaching of the species and a large proportion of smooth-coated otters occur outside protected areas. WCS therefore urges the Parties to adopt this proposal, which would benefit the conservation of the species.

## 8. Southern White Rhinoceros (*Ceratotherium simum simum*) -- **REJECT**

**Proponents:** Eswatini (formerly Swaziland)

**Proposal:** Amend/remove annotation to App. II listing for population of Eswatini

Eswatini (formerly Swaziland) proposes to amend the annotation to the Appendix II listing for southern white rhinos (“Only the populations of South Africa and Swaziland; all other populations are included in Appendix I. For the exclusive purpose of allowing international trade in live animals to appropriate and acceptable destinations and hunting trophies.”) to result in a “regular” Appendix II listing for their population of southern white rhino. This would permit sales of live southern white rhinos, as well as parts and derivatives such as horns, from Eswatini to “licensed retailers in the Far East.” The proposal suggests that this would be limited to existing stock of 330 kg of rhino horn in their stockpile and 20 kg per annum, however they also state that “Eswatini would reserve the right to adjust prices and amounts adaptively once sales commence.”

(Continued)



## 8. Southern White Rhinoceros (Continued)

The proposal does not provide evidence that the species has recovered. To the contrary, the proposal provides evidence of declining populations of southern white rhinos in Eswatini. The proposal claims that potential revenues from sale of horns should be considered in removing the Annotation and allowing commercial trade, but that is not a factor in the CITES listing criteria.

Africa's and Asia's rhinoceroses are facing a poaching crisis, and we believe that all efforts must be made to counter the trafficking in rhino horn that is driving the poaching, and to disrupt the organized criminal networks benefiting from it. WCS believes that legalizing rhino horn trade from Eswatini will exacerbate rather than solve the problem, by stimulating demand, undermining enforcement efforts in other range States, facilitating laundering of illegal horn through "legal" sales, and undermining enforcement and market control measures in consumer States.

Additionally, use of rhino horn is both evolving and poorly understood and now includes not only treatments for cancer and associated illnesses [e.g. fever] but also non-traditional preparations. If these preparations grow in popularity, demand could escalate if the stigma associated with illegality is removed. Furthermore, many Asian consumer States have made significant progress in reducing demand and altering consumer behavior, and in enforcement and prosecutions—those efforts would be undermined by opening up any legal international rhino horn trade.

In conclusion, even a conservative application of the precautionary principle suggests that legalizing the trade is dangerous. Demand-reduction and market control initiatives have been successful in curtailing markets for rhino horn. Such initiatives together with more effective law enforcement throughout the trade chain, efforts to disrupt the criminal networks involved, and efforts to combat the corruption driving this trade, present the best hope for ending the poaching crisis, not opening a legal trade in rhino horns.

WCS therefore recommends that the Parties reject Eswatini's proposal. However, we also recommend that the international community work to help support rhino conservation in countries such as Eswatini.





## 9. Southern White Rhinoceros (*Ceratotherium simum simum*) -- **REJECT**

**Proponents:** Namibia

**Proposal:** Transfer population of Namibia from App. I to App. II

Namibia proposes to down-list their population of southern white rhinoceros, from Appendix I to Appendix II, with an annotation that would only allow export of the species a) to “appropriate and acceptable destinations,” or b) as hunting trophies. Namibia currently exports hunting trophies (as permitted under the Convention in line with Reso. Conf. 17.9), but WCS notes that shifting this population to Appendix II with this annotation would allow Namibia to export live animals to zoos as well as other destinations that are deemed to be “appropriate and acceptable” in accordance with the ongoing debate under CITES.

In the proposal, Namibia cites increasing population numbers for this species within their borders (currently the largest population outside of South Africa, though well below the national carrying capacity), and other ecological factors which make this species less susceptible to population decline. They also note that private landowners currently providing habitat for southern white rhinos may not be able to keep this habitat against other pressures. The proposal also claims increased enforcement efforts against illegal killing, and claims a slight decline in illegal killing statistics for 2018.

WCS appreciates conservation successes in Namibia as detailed in this proposal, and commends the efforts of Namibia to increase enforcement efforts against the illegal killing of southern white rhinoceroses. However, WCS notes that, according to data presented in CoP18 Doc. 83.1 Annex 2, rhinoceros poaching levels in Namibia have been high compared to previous years, and although they declined from 2015 to 2017, they increased again in 2018. Therefore, even though WCS fully understands and is supportive of the need for private landowners to benefit from having rhinoceroses on their land, we believe that it is not appropriate for the Parties to adopt this proposal at this time. WCS believes it is important that all African governments strive to reduce rhino poaching, and by rejecting this proposal we remain consistent with this position. WCS does not believe it is appropriate to downlist this species while poaching levels are high and increasing, and by rejecting this proposal incentivizes the Namibian government to reduce its rhino poaching risk. This is an amended position, based on the new information available in Doc. 83.1.

## 10. African Elephant (*Loxodonta africana*) -- **REJECT**

**Proponents:** Zambia

**Proposal:** Transfer from App. I to App. II

Zambia, whose domestic population of African elephants is currently included in CITES Appendix I, has submitted a proposal to transfer their population to Appendix II, with an annotation that would permit: “a) trade in registered raw ivory (tusks and pieces) for commercial purposes only to CITES approved trading partners who will not re-export; b) trade in hunting trophies for non-commercial purposes; c) trade in hides and leather goods.” According to the proposed annotation, “all other specimens shall be deemed to be specimens of species in Appendix I and the trade in them shall be regulated accordingly.” WCS recommends that Parties reject this proposal.

WCS notes that Zambia should be commended for its conservation efforts. Zambia highlights the challenges associated with a large population of elephants across a mosaic of public and private lands. WCS understands, and is sympathetic to, the challenges presented by human-elephant conflict, and the very real consequences for communities living alongside wildlife.

(Continued)



## 10. African Elephant (Continued)

However, WCS considers that any re-opening of the international trade in ivory risks further endangering elephant populations across Africa, due to the widespread and significant problems of corruption and low levels of enforcement and other capacity throughout other parts of the ivory supply chain -- which facilitate the laundering of illegally-sourced ivory from multiple countries into any potential legal trade. WCS notes that the MIKE report to CoP18 documents an increase in illegal killing within South Luangwa National Park in Zambia, along with other MIKE sites in Southern Africa. There was a small number of relatively significant ivory seizures connected to Zambia from 2015-2017, suggesting that illegal killing and trade could potentially feed into any legalized international trade (despite domestic measures to counter these activities). WCS appreciates that Zambia has consulted other members of SADC, with whom they share transboundary populations; however, we note that there are many other African elephant range States that should be consulted during the development of proposals related to African elephants.

Furthermore, WCS notes that China, and many other Parties to CITES, have either already or are actively closing their domestic markets for elephant ivory in accordance with Resolution Conf. 10.10 (Rev. CoP17), and a document under consideration by CoP18, submitted by many range States of the African elephant, seeks to further mobilize Parties to close their domestic markets. There is a significant risk that any legalization of ivory trade, as proposed here, would further stimulate elephant poaching and ivory trafficking. Now is not the time to take that risk.

In its proposal, Zambia refers not only to the criteria adopted by the CITES Parties, but also to obligations under other Conventions and to socio-economic considerations. We do note, however, that these criteria are not agreed upon by the CITES CoP, and should not be used as justification for transfer of a population or species from Appendix I to II.

WCS therefore recommends that Parties reject this proposal based on the information presented. Any opening of ivory trade presents opportunities to launder illegally obtained ivory, stimulates consumer demand, and threatens African elephants in other countries. We recognize that Zambia has done an excellent job in maintaining its population of elephants and does indeed struggle with complex human-elephant conflict dynamics. It is therefore incumbent on the international community to find alternative means of helping support elephant conservation and rural development in countries such as Zambia.



## 11. African Elephant (*Loxodonta africana*) -- **REJECT**

**Proponents:** Botswana, Namibia and Zimbabwe

**Proposal:** Amend App. II annotation for populations of Botswana, Namibia, South Africa and Zimbabwe

Botswana, Namibia and Zimbabwe have submitted a proposal to amend the annotation to the Appendix II listing of African elephant populations in Botswana, Namibia, South Africa and Zimbabwe. The proposed amendment would delete portions of the annotation and would, in effect, increase the number of scenarios in which ivory could be traded internationally for commercial purposes. Such amendments include a deletion of text specifying which stockpiles could be traded, thereby opening the prospect of new and additional ivory trade. The annotation would leave in place requirements that any commercial trade be sourced from stockpiles verified by the Secretariat, that trading partners be approved by the SC, and that any revenue derived from sales be channeled towards elephant conservation efforts in these proponent range States. WCS recommends that Parties reject this proposal.

This proposal is not dissimilar from two separate proposals submitted by Zimbabwe and Namibia at CITES CoP17, although those proposals sought to eliminate the entire annotation to the Appendix II listing for their respective countries. WCS opposed those proposals at CoP17, because population data were insufficient to justify an unqualified Appendix II listing. Although this proposal would leave certain restrictions in place, WCS does not support any reopening or legalization of international commercial ivory trade because: a) it cannot be sufficiently regulated to prevent laundering of illegal ivory, and b) it continues to stimulate demand. Furthermore, important steps have been taken to close domestic ivory markets in multiple countries, including China (as well as Hong Kong SAR), the United Kingdom, and the United States, and consultations are underway on closure of domestic markets in Singapore and the EU, with some further tightening of legal frameworks for trade in countries such as Japan. All of these are in compliance with Resolution Conf. 10.10 (Rev. CoP17), and it is clear that the international community is not seeking to further stimulate domestic and/or international ivory trade. Elephant populations cannot afford that risk.

The proponent countries contain the largest population of African savannah elephants, some of which are either increasing or not experiencing major declines. The proposal cites the African Elephant Specialist Group report (Thouless et al. 2016) to say that there are 256,000 elephants across these four countries, which is 61.6% of all elephants in Africa. However, they also note that ETIS data published before SC70 in August 2018 demonstrate a continued high level of seizures of illegal ivory. WCS is concerned that the MIKE report to CoP18 states that “the subregional PIKE estimate for Southern Africa increased from approximately 0.41 in 2016 to 0.48 in 2017,” and that “Several MIKE sites in the region showed an increase in PIKE levels from 2016, including Chobe National Park (Botswana), [and] Kruger National Park (South Africa)...” Furthermore, the ETIS report to CoP18 (2015-2017) states that “...considerable quantities of ivory have entered international trade from South Africa, including one large-scale shipment of 2,478 kg to Viet Nam in 2017, the fifth largest seizure in this time period... Other seizure records show that small quantities of raw ivory from Botswana, Malawi, Mozambique and Zimbabwe are entering South Africa on occasion, so there is some concern that consolidation of ivory from neighbouring countries for future illegal export is a factor.” We therefore urge extreme caution in the further loosening of any export restrictions on elephant ivory from southern Africa.

WCS therefore recommends that the Parties reject this proposal. It is important, however, for the international community to find means of helping support elephant conservation and rural development in countries such as Botswana, Namibia, South Africa and Zimbabwe, as well as all other African elephant range States.



## 12. African Elephant (*Loxodonta africana*) -- **REJECT** (pending additional information)

**Proponents:** Burkina Faso, Côte d'Ivoire, Gabon, Kenya, Liberia, Niger, Nigeria, Sudan, Syria and Togo

**Proposal:** Transfer populations of Botswana, Namibia, South Africa and Zimbabwe from Appendix II to Appendix I

Burkina Faso, Côte d'Ivoire, Gabon, Kenya, Liberia, Niger, Nigeria, Sudan, Syria and Togo have submitted a proposal to transfer the domestic populations of Botswana, Namibia, South Africa and Zimbabwe populations from Appendix II to Appendix I (thereby including all populations of this species on App. I). WCS notes that a similar proposal was put forward at CITES CoP17 by Benin, Burkina Faso, Central African Republic, Chad, Ethiopia, Kenya, Liberia, Mali, Niger, Nigeria, Senegal, Sri Lanka and Uganda. WCS held the position then that the proposal should be rejected by Parties until such time as new data were available to justify the uplisting of elephants in these countries.

In considering the proposal under consideration by CoP18, WCS looked to whether any new population data were presented to suggest that these four populations of *Loxodonta africana* meet the criteria for “a marked decline in population size in the wild.” Population data presented in the proposal do support a decline at the species level, however we note that this includes both forest and savannah elephants under CITES-approved nomenclature. With respect to population data for the domestic populations under consideration, the proposal cites the African Elephant Specialist Group report from 2016 (Thouless et al.), which says that the “four Appendix II countries have a corresponding 2015 total of 255,851 and country totals as follows: Botswana - 131,626, Namibia - 22,754, South Africa - 18,841, and Zimbabwe - 82,630.” These figures are drawn from the 2014-2015 surveys flown by the Great Elephant Census, apart from Namibia, which was flown (also in 2015) by the Government wildlife authority. The African Elephant Specialist Group’s report for CoP18 is not yet available. No evidence is provided on marked declines for these domestic populations in Southern Africa (although we note that Reso. Conf. 9.24 only addresses population declines at the species level, and we also note that the recently released (at the end of February 2019) report from Botswana shows that although there is, as yet, no decline in elephant numbers, there are signs of a year-long poaching upsurge in the north of the country (Chase et al 2018).<sup>8</sup>

The proposal correctly notes that split listings are discouraged within CITES, in accordance with Reso. Conf. 9.24 (Rev. CoP17) Annex 4, as it creates significant enforcement challenges for range States working to address illegal killing and trade in this species. WCS shares this view. However, the proposal flags that rhino horn and elephant ivory seizures connected to the southern Africa region suggest that criminal networks are still operating in these countries. Indeed the MIKE report to CoP18 suggests that the “subregional PIKE estimate for Southern Africa increased from approximately 0.41 in 2016 to 0.48 in 2017,” with several sites, including one in South Africa and one in Botswana, showing an increase in PIKE levels. We urge Southern African Parties with their elephants populations in Appendix II to recognize that illegal trade continues to be a problem across the African elephant range, and that any opening of trade (an option put forward by other proposals addressing this species) is likely to exacerbate this issue.

WCS recommends that the Parties not adopt this proposal to transfer the populations of *Loxodonta africana* of Botswana, Namibia, South Africa and Zimbabwe from Appendix II to Appendix I, based on currently available population data. We urge a full evaluation of all population and poaching data that are available, by CoP18. We urge Parties to continue to increase enforcement action and exercise vigilance against any efforts to traffic elephant ivory or other products, to increase regional and global cooperation to dismantle ivory trafficking networks that continue to endanger African elephants across the continent.

<sup>8</sup> Chase, M., Schlossberg, S., Sutcliffe, R., Seonyatseng, E., 2018. Dry season aerial survey of elephants and wildlife in northern Botswana: July – October 2018, p. 180. Elephants Without Borders and the Department of Wildlife and National Parks (Botswana).



## 12. African Elephant (Continued)

The proposal correctly notes that split listings are discouraged within CITES, in accordance with Reso. Conf. 9.24 (Rev. CoP17) Annex 4, as it creates significant enforcement challenges for range States working to address illegal killing and trade in this species. WCS shares this view. However, the proposal flags that rhino horn and elephant ivory seizures connected to the southern Africa region suggest that criminal networks are still operating in these countries. Indeed the MIKE report to CoP18 suggests that the “subregional PIKE estimate for Southern Africa increased from approximately 0.41 in 2016 to 0.48 in 2017,” with several sites, including one in South Africa and one in Botswana, showing an increase in PIKE levels. We urge Southern African Parties with their elephants populations in Appendix II to recognize that illegal trade continues to be a problem across the African elephant range, and that any opening of trade (an option put forward by other proposals addressing this species) is likely to exacerbate this issue.

WCS recommends that the Parties not adopt this proposal to transfer the populations of *Loxodonta africana* of Botswana, Namibia, South Africa and Zimbabwe from Appendix II to Appendix I, based on currently available population data. We urge a full evaluation of all population and poaching data that are available, by CoP18. We urge Parties to continue to increase enforcement action and exercise vigilance against any efforts to traffic elephant ivory or other products, to increase regional and global cooperation to dismantle ivory trafficking networks that continue to endanger African elephants across the continent.

## 13. Woolly Mammoth (*Mammuthus primigenius*) -- ADOPT

**Proponents:** Israel

**Proposal:** Include in App. II

As highlighted in CoP18 Docs. 69.2 and 69.3, in recent years, extant species of elephants have suffered from a major poaching crisis that has caused dramatic reductions in populations and shrinkage of elephant range. The primary driver of such declines has been demand for ivory from Asian markets. As many countries have taken laudable measures to address this trade, including legislative and regulatory changes to close their domestic markets for elephant ivory, a market for ivory from extinct woolly mammoths has emerged. Facilitated by climate change reducing permafrost, mammoth skeletons are increasingly becoming more accessible, and are being excavated at increasing rates, especially in the Russian Federation, from where their ivory is exported to markets in Asia. At present, the trade is largely unmonitored and unregulated. Its impact on the trade of ivory from extant elephant species is not clear, but the presence of large quantities of legal mammoth ivory in markets potentially allows for laundering of illegally obtained elephant ivory into such markets, and for confusion among potential consumers on the origin and legality of ivory. WCS recommends that Parties adopt the proposal from Israel to list the woolly mammoth on Appendix II, in accordance with Article II, paragraph 2 (b), of the Convention and pursuant to Annex 2b paragraph A of Resolution Conf. 9.24 (Rev. CoP17). Clearly, the species qualifies in that mammoth ivory is difficult to differentiate from elephant ivory for untrained officers. This will allow for monitoring and, where necessary, regulation of the trade. It would also facilitate study of the impacts of trade in mammoth ivory on the trade in ivory from extant species of elephants.



**33. Bourret's Box Turtle (*Cuora bourreti*) -- ADOPT**

**34. Vietnamese Box Turtle (*Cuora picturata*) -- ADOPT**

**35. Annam Leaf Turtle (*Mauremys annamensis*) -- ADOPT**

**Proponents:** Viet Nam

**Proposal:** Transfer from App. II to App. I

WCS appreciates the submission by Viet Nam of proposals to transfer *Cuora picturata*, *Cuora bourreti*, and *Mauremys annamensis* from Appendix II to Appendix I. All three species are Critically Endangered on the IUCN Red List of Threatened Species, and fully meet the CITES criteria for transfer to Appendix I in Reso. Conf. 9.24 (Rev. CoP17), particularly Annex 1. WCS strongly urges the Parties to adopt all three of these proposals.

*Cuora picturata* and *Cuora bourreti* were traditionally considered as subspecies of *Cuora galbinifrons*; however, the nomenclature standard reference for the *Cuora galbinifrons* group adopted by the Parties at CoP17 recognizes *Cuora picturata* and *Cuora bourreti* as full valid species for CITES purposes, and all three appear as separate species on the IUCN Red List of Threatened Species.



At the request of Viet Nam, *Cuora galbinifrons* and *Mauremys annamensis* were included in the Periodic Review of Animal Species in the Appendices, conducted by the AC prior to CoP17. The AC agreed with the recommendation in the Periodic Review to transfer *Cuora galbinifrons* including the taxa/subspecies *bourreti* and *picturata* and *Mauremys annamensis* to Appendix I ([AC28 Sum. 2 \(Rev. 1\)](#); [CoP17 Doc. 73](#), para. 11). Therefore, the AC has already agreed with all three of these proposals.

The primary threat to these species is collection for trade, both as pets and as food. *C. picturata* and *Mauremys annamensis* are endemic to Viet Nam, and *C. bourreti* is native to Viet Nam and Lao PDR. The conservation of these critically endangered species will benefit from transfer to Appendix I, particularly through resulting enhanced enforcement measures.



## 36. Indian Star Tortoise (*Geochelone elegans*) -- ADOPT

**Proponents:** Bangladesh, India, Senegal and Sri Lanka

**Proposal:** Transfer from App. II to App. I

WCS welcomes the submission of this proposal by India and Sri Lanka to transfer *Geochelone elegans* from Appendix II to Appendix I in accordance with Article II, paragraph 1, of the Convention and Reso. Conf. 9.24 (Rev. CoP17), Annex 1. WCS concurs with the proposal's assessment of the available evidence for population decline for this understudied species (currently listed as Vulnerable on the IUCN Red List of Threatened Species). The data cited on seizures of this species in illegal trade are especially worrying, in both the frequency and size of seizures, which suggests ongoing, organized, commercial trafficking in *Geochelone elegans*. Indeed, the figure that this species represents 11% of seizures involving tortoises or freshwater turtles, a massive illegal trade, suggests that this species is of high value by consumer markets. Coupled with extrinsic threats such as habitat degradation and decline, there is a very strong case that this species meets the criteria established in Res. Conf. 9.24 (Rev. CoP17).

WCS therefore strongly urges Parties to adopt the proposal to transfer *Geochelone elegans* to Appendix I, and to increase attention to the conservation of this species and enforcement to combat illegal trade.

## 37. Pancake Tortoise (*Malacochersus tornieri*) -- ADOPT

**Proponents:** Kenya, United States of America

**Proposal:** Transfer from App. II to App. I

WCS appreciates the submission of this proposal by Kenya and the US. The pancake tortoise is found in isolated rock outcroppings in Kenya and Tanzania, with a single isolated, small population in Zambia. In 1996, IUCN assessed the pancake tortoise on its Red List of Threatened Species as "Vulnerable"; however, the 2018 Draft IUCN Red List Assessment considers the species "Critically Endangered" due to an 80 percent decline observed and estimated over the past two generations (30 years) and predicted in the next 15 years. The species has a long lifespan (35 years), is highly vulnerable to overexploitation due to its late maturity, low fecundity, and very rigid microhabitat requirements. Populations are severely fragmented, and the species' habitat is rapidly deteriorating in both extent and quality.

Previously known subpopulations of *M. tornieri* in Tanzania and Kenya have been depleted and locally extirpated by ongoing offtake to supply both the legal and illegal international commercial trade. Low population densities in otherwise seemingly suitable habitat are reported to result from removal and offtake by commercial collectors. By far the greatest threat to the species is collection for the pet trade. A large portion of declared exports of the species are claimed to be captive bred, although some concerns exist as to the origin of specimens or founder stock.

The species clearly meets the criteria for inclusion in CITES Appendix I in Resolution Conf. 9.24 (Rev. CoP17), Annex 1, paragraphs B and C. Therefore, WCS strongly urges the Parties to adopt this proposal.





## 38. Glass Frogs (*Hyalinobatrachium* spp., *Centrolene* spp., *Cochranella* spp., and *Sachatamia* spp.) -- **ADOPT**

**Proponents:** Costa Rica, El Salvador and Honduras

**Proposal:** Include all species in App. II

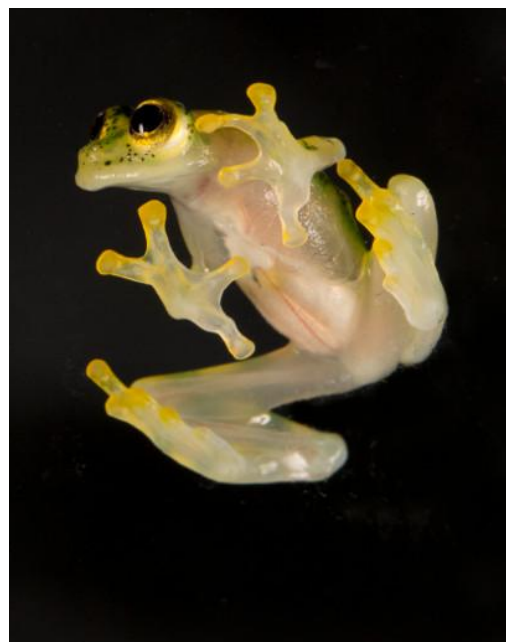
WCS welcomes the proposal of Costa Rica, El Salvador (and possibly Honduras and Perú, as indicated in the proposal) to include 105 species in the genera *Hyalinobatrachium*, *Centrolene*, *Cochranella* y *Sachatamia*, part of the family Centrolenidae that is commonly referred to as “glass frogs” or “ranas de cristal,” in CITES Appendix II. We are also pleased to see that other range States and civil society organizations have been consulted in the development of this proposal, including Brazil, Colombia, Ecuador, Guatemala, México, Nicaragua, Panamá, and Venezuela.

We note that the primary threats to these species are habitat degradation and destruction, acute threats to species that rely on specific hydrological conditions and other habitat features to survive. We note with concern the information presented in the proposal of decreasing habitat availability for most of the species covered by this proposal, including in part as a result of expansion of commercial agriculture across Central and South America, and other land use changes -- and that a relatively small proportion of known habitat for these species is under any form of legal protection. We also note that climate change will continue to alter the habitat that these species (particularly *Centrolene lynchi*, *C. peristictum*, *C. ballux*, *C. heloderma*, *C. balionota*, *C. scirtetes* and *C. geckoideum*) rely on, and there may be an increasing threat from chytridiomycosis.

On the threats posed by trade, this proposal documents trade between range States and countries with active demand for these specimens for the pet trade, including the United States and EU Member States such as Germany, the Netherlands, and others. The proposal notes that international trade is the primary trade-related threat to these species, as there is no local use of these species. These species sell for significant prices in consumer countries, suggesting that demand is high.

The proponents propose that 17 species across the four genera be included in accordance with Annex 2a (paragraph A) of Resolution Conf. 9.24 (Rev. CoP17). These species range from Critically Endangered to Vulnerable on the most recent IUCN Red List assessments (cited in Annex B of the proposal); 11 additional species are proposed for Appendix II in accordance with Annex 2a paragraph B, for those that may become threatened with extinction in the near future, as a result of their documented presence in international trade; a further 77 species are proposed for Appendix II in accordance with the provisions of Reso. Conf. 9.24 Annex 2b, due to their resemblance to species addressed by paragraph 2(a), and the inability for customs and enforcement officials to easily differentiate between them.

WCS strongly concurs that available data on population size and trends; threats posed by habitat loss, disease, and international trade; and enforcement challenges for identification of species within these genera strongly warrant the listing of all species in all four genera on CITES Appendix II.





## 42. Mako Sharks (*Isurus oxyrinchus* and *Isurus paucus*) -- **ADOPT**

**Proponents:** Bangladesh, Benin, Bhutan, Brazil, Burkina Faso, Cabo Verde, Chad, Côte d'Ivoire, Dominican Republic, Egypt, EU, Gabon, Gambia, Jordan, Lebanon, Liberia, Maldives, Mali, Mexico, Nepal, Niger, Nigeria, Palau, Samoa, Senegal, Sri Lanka, Sudan and Togo

**Proposal:** Include both species in App. II

**Visit** [www.citessharks.org](http://www.citessharks.org) **for more information.**

WCS welcomes this proposal to list these depleted and heavily traded sharks on CITES Appendix II. CITES has taken excellent steps since 2013, with between 11.8% and 15.5% of the global shark fin trade representing species listed on CITES Appendix II. Following six years of dedicated implementation efforts for sharks and rays by CITES Parties, the Secretariat, IGOs and NGOs, effective management of shark species and their trade has indeed become a global priority.

Despite these excellent steps, WCS remains concerned that the majority of the global trade in both shark fins, and other products such as meat, remains unregulated, pushing many species towards extinction. Recent research, published in 2017,<sup>9</sup> shows the true scale of the global shark fin trade for the first time, with at least 76 species in trade, and 1/3 of those species threatened with extinction. The research, conducted in the global trade hub of Hong Kong SAR, shows that around 30 widely distributed species account for the majority of the fin trade. WCS feels that any species that plays a prominent role in this trade, and lacks adequate management, should be considered for inclusion on CITES Appendix II, to prevent the species from continued declines that could threaten their survival.

The shortfin mako shark (*Isurus oxyrinchus*) is regularly traded for its fins and meat, and is caught in large numbers in commercial and recreational fisheries. It has declined rapidly in the North Atlantic, and is poorly understood throughout the rest of the world. The actions of International or Regional Fisheries Bodies to manage the species are inadequate, or totally lacking throughout much of the species' range. We believe this species fully qualifies for inclusion in CITES Appendix II pursuant to Reso. Conf. 9.24 (Rev. CoP17), Annex 2a.

A new guide to visual identification of mako shark fins (the primary traded product), genetic identification tools to identify meat in trade, a new electronic NDF tool designed for sharks, and a host other implementation tools are available to assist Parties in implementing this listing, and will be showcased at CoP18.

In summary, mako sharks have long been highlighted as species in need of better management. However, despite being listed on the CMS Appendices a decade ago and heavily caught in RFMO fisheries, there has still been no meaningful management progress for these species. CITES action is needed now, to incentivize sustainable trade, underpinned by well-managed, legal fisheries - before the demand for mako fins and meat pushes the species closer to qualifying for Appendix I. We also look forward to the new IUCN Red List assessments for mako sharks, which we believe may be released prior to CoP18.

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<sup>9</sup> Fields et al. 2017. "Species composition of the international shark fintrade assessed through a retail-market survey in Hong Kong" *Conservation Biology*, Volume 32, No. 2, 376–389.



## 43. Guitarfish (Glaucostegidae spp.) -- ADOPT

**Proponents:** Bangladesh, Benin, Bhutan, Brazil, Burkina Faso, Cabo Verde, Chad, Côte d'Ivoire, Egypt, EU, Gabon, Gambia, Maldives, Mali, Mauritania, Monaco, Nepal, Niger, Nigeria, Palau, Senegal, Sierra Leone, Sri Lanka, Sudan, Syrian Arab Republic, Togo and Ukraine

**Proposal:** Include *Glaucostegidae* spp. in App. II

**Visit** [www.citessharks.org](http://www.citessharks.org) **for more information.**

WCS strongly supports the inclusion of shark and ray species on the CITES Appendices when they qualify pursuant to Resolution Conf. 9.24 (Rev. CoP17), including shark-like batoid species such as giant guitarfish. We support and urge the Parties to adopt the proposal submitted by Senegal, and co-sponsored by numerous other Parties, to include two species of giant guitarfish -- blackchin guitarfish (*Glaucostegus cemiculus*) and sharpnose guitarfish (*Glaucostegus granulatus*) -- on CITES Appendix II in accordance with Reso. Conf. 9.24 (Rev. CoP17), Annex 2a, and all other giant guitarfish species (family Glaucostegidae) on CITES Appendix II in accordance with Reso. Conf. 9.24 (Rev. CoP17), Annex 2b.

A new visual identification guide for all giant guitarfish and wedgefish (whole animals for fisheries monitoring, and fins for trade monitoring) has been prepared by WCS, in partnership with leading experts in these species. It will be available online and in hard copy at the CoP, to aid Parties in implementing this listing.

Based on all available information, we strongly concur that these species qualify for inclusion in Appendix II. Such a listing would help ensure that international trade is legal and sustainable, and where they are already severely depleted protections are put in place, and would help enable giant guitarfish populations to recover (thereby avoiding the need for their inclusion in Appendix I in the future). We urge Parties to help ensure that the giant guitarfish does not suffer the same fate as iconic species with similar morphology, such as sawfish, due to high demand from international trade.

## 44. Wedgefish (Rhinidae spp.) -- ADOPT

**Proponents:** Bangladesh, Benin, Bhutan, Brazil, Burkina Faso, Cabo Verde, Chad, Côte d'Ivoire, Egypt, Ethiopia, EU, Fiji, Gabon, Gambia, India, Jordan, Kenya, Lebanon, Maldives, Mali, Mexico, Monaco, Nepal, Niger, Nigeria, Palau, Philippines, Saudi Arabia, Senegal, Seychelles, Sri Lanka, Sudan, Syrian Arab Republic, Togo, Ukraine

**Proposal:** Include *Rhinidae* spp. on App. II

**Visit** [www.citessharks.org](http://www.citessharks.org) **for more information.**

WCS is very pleased to see the timely proposal from Sri Lanka (and co-sponsored by numerous other Parties) to include two species commonly referred to as white-spotted wedgefish (*Rhynchobatus australiae* and *Rhynchobatus djiddensis*) on CITES Appendix II in accordance with Reso. Conf. 9.24 (Rev. CoP17), Annex 2a, and all other wedgefish species (family Rhinidae) on CITES Appendix II in accordance with Resolution Conf. 9.24 (Rev. CoP17), Annex 2b.

WCS remains concerned that the majority of the global trade in shark fins, as well as other shark products such as meat, remains unregulated and is pushing many species such as wedgefish towards extinction. We welcome this proposal, as we believe inclusion of these species on Appendix II will help ensure sustainable trade, promote sound fisheries management, and break the cycle of inaction that has seen sharks and rays nearly unmanaged globally.

(Continued)



## 44. Wedgefish (Continued)

Newly published market studies using genetic analysis specific to shark-like batoids, have found that not only are they a common commodity in the Hong Kong SAR and mainland China shark fin trade, but also that a dedicated, high value category of the shark fin trade ‘Qun chi’ is made up of wedgefish and guitarfish (or ‘shark-like batoids’) species. These fins are known as the ‘king of shark fins’ and command the highest price of all fins in the Hong Kong SAR shark fin market.

It is well known that wedgefish and guitarfish are two of the most vulnerable families of sharks and are noted to be the ‘new sawfish.’ However, until this study was released, it was unclear if they were traded in major quantities. We now know that they are, and given that population levels in these species have dropped approximately 86% over a five-year period, inclusion on CITES Appendix II is urgently needed to control unsustainable trade before these families head the same way as their Appendix I-listed relatives, the sawfish.

A new visual identification guide for all giant guitarfish and wedgefish (whole animals for fisheries monitoring, fins for trade monitoring) has been prepared by WCS, in partnership with leading experts in these species. It will be available online, and in hard copy at CoP18, to aid Parties in implementing this Appendix II listing.

## 45. Sea Cucumbers/Teatfish (*Holothuria (Microthele) fuscogilva*, *Holothuria (Microthele) nobilis*, *Holothuria (Microthele) whitmaei* -- **ADOPT**)

**Proponents:** European Union, Kenya, Senegal, Seychelles, United States of America

**Action:** Include in App. II

Exploitation of sea cucumbers has risen for the past decades and is filling growing international markets seeking luxury seafood products. Some of the proposed species are some of the most expensive in international markets, and therefore are the first to be harvested unsustainably and traded illegally. In some regions where WCS works, such as the Western Indian Ocean, these three species have been fished to very low levels across shallow coastal environments, and they continue to be in high demand for export; these three species are also heavily overfished in Melanesia.

Management of sea cucumber species in the wild is often poor, due to several factors including insufficient knowledge of their biology and poor monitoring of species populations and catch levels. There is evidence that sea cucumbers are often found in illegal trade with other marine species (such as sharks and rays) or terrestrial species such as rhinoceroses. Although taxonomic knowledge of sea cucumbers among wildlife trade enforcement authorities is limited, species in the sub-genus *Holothuria (Microthele)* are some of the easiest to identify, either fresh or dried, due to distinct morphological traits.

WCS therefore recommends that Parties adopt this proposal, as implementation of an Appendix II listing will greatly enhance the conservation and management of the species concerned.