



# Listing the Saiga Antelope on CITES Appendix I

Overview and FAQ in advance of CITES CoP18



**An Appendix I listing is critical to saiga conservation.** The saiga antelope (*Saiga tatarica*, or *Saiga* spp. in the CITES Nomenclature) 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. 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. 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 and 80% of the Mongolian population in 2017, and 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.

The marked declines in the global population size in the wild observed as recently as 2014-2015, with potential to resume, demonstrate that the entire species (or genus, according to the CITES nomenclature -- see below) 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. Inclusion of the saiga 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.

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

**A nomenclatural mistake should not threaten efforts to save the saiga.** 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.



### Frequently asked questions (FAQs)

**Isn't there a CITES zero quota for saiga?** No, there is no annotation in the CITES Appendices with a zero quota for any saiga. Currently all saiga range States have *voluntary* moratoria on international exports of saiga products, and strict laws against hunting and domestic trade in saiga and saiga parts and products. This is NOT an official CITES zero quota, and international trade is permitted in saiga horn with a properly issued CITES export permit (since the species is in Appendix II).

**What about Appendix II with a zero quota instead of Appendix I?** Some have suggested including a zero quota for saiga from the wild in an Annotation to the Appendices, while retaining it on Appendix II. This would make the current voluntary moratorium legally binding. However, it would suggest that saiga do not qualify for Appendix I (which is untrue). It would however be far preferable to any sort of split-listing where some saiga are in Appendix I and others in Appendix II, which would be a significant implementation and enforcement challenge.

**Aren't there CITES Decisions? Isn't that enough?** The CITES Parties adopted Decisions related to the saiga at CoP17 that require countries to collaborate to implement the CMS Saiga MoU, manage stockpiles, improve enforcement of illegal trade, and work towards reducing demand for saiga products. Decisions such as those are important, but are not legally binding on CITES Parties; listings in the Appendices are binding.

**What are the other threats to saiga? Aren't those threats more significant?** The main current threats to saiga are linear infrastructure (fences, railroads, pipelines), disease and poaching. It is correct that an Appendix I listing won't mitigate most of these threats. However, if a species is endangered or critically endangered, its conservation status is such that it cannot sustain any trade. While efforts must be made to address the primary threats, trade as an additional threat must be addressed. There is a long history of this within CITES.

**Does CITES Appendix I undermine the Convention on Migratory Species of Wild Animals (CMS) MoU?** Definitely not. The species is a priority for range States, and is covered by an MoU pursuant to both CMS and CITES, to which all relevant states and several NGOs are signatories. Nothing in the CMS Saiga MoU precludes inclusion of the species in Appendix I.

**Does Appendix I go against sustainable use?** No. Both CITES and the Saiga MoU have sustainable use as a long-term goal. When the species recovers sufficiently to transfer it back to Appendix II, then sustainable commercial use could be possible. It is not biologically feasible at this time, however. An increase in the population of saiga that has been reported for Kazakhstan is not sufficient to warrant re-opening commercial trade at this time, based on the biology and demographics of the species, the continued threat of further disease mortality events, and the threat to other saiga populations.

**What are the enforcement implications of transferring Saiga to Appendix I?** Combatting illegal trade in CITES-listed species should be a priority regardless of the Appendix the species is on; however, governments give higher priority to species included in Appendix I. Penalties, fines, and sentences for those convicted of trafficking in CITES species are often higher for Appendix I species. Thus, illegal trade in saiga products would gain far greater enforcement priority with the species on Appendix I, particularly in transit and consumer States.

