

Introduction to WCS:

The Wildlife Conservation Society (WCS) is an international NGO that has been working across the globe for more than 125 years to save wildlife and wild places. We have conservation programs on the ground in about 60 countries that work in partnership with governments, Indigenous Peoples, local communities, the private sector, and other stakeholders on science-based conservation efforts.

Please contact Dr. Susan Lieberman (slieberman@wcs.org) and Alfred DeGemmis (adegemmis@wcs.org) with any questions about the contents of this document, or any related issues. Please refer to the Annex of this document for a list of acronyms used.

General remarks:

- WCS commends those Parties who have adhered to reporting obligations and responded to requests for information from the Secretariat in accordance with decisions adopted at CoP19 and associated Standing Committee meetings. The Standing Committee benefits from, and indeed requires, such information to make informed, evidence-based recommendations.
- WCS continues to believe that engagement with technically qualified third parties, including science- and evidence-based non-governmental organizations, is essential to prepare and discuss issues before the Standing Committee, and to advance the conservation of species subject to international trade and the implementation of CITES.
- WCS addresses only a subset of SC77 agenda items and documents below (on some, we are still consulting our experts). However, we would be pleased to discuss any other documents and issues with SC members and other Parties, before or during the meeting of SC77.

Recommendations regarding [SC77 agenda items](#):

17. Role of CITES in reducing risk of future zoonotic disease emergence associated with international wildlife trade

17.1. [Report of the working group](#)

17.2. [Report of the Secretariat](#)

WCS is pleased to have been a member of the WG on the “Role of CITES in reducing risk of future zoonotic disease emergence associated with international wildlife trade”, and to having been able to share our extensive [One Health work and expertise](#), and [science-based work on pandemic prevention](#) with the WG. We thank the co-Chairs (Israel and Singapore) and members of the WG for the open and collaborative dialogue. It is vital that prevention at source (particularly of pathogen spillover from wildlife) of the next outbreak, epidemic, or pandemic of zoonotic origin be addressed at the national as well as multilateral/international levels. We believe that CITES and its implementation have a role to play in this prevention, but there is also much that needs to be done that is outside the remit of CITES.

This is a matter of great urgency, and there are urgent actions that are critical for governments to take, in order to help prevent another devastating pandemic of zoonotic origin. Implementation of a true trans-sectoral One Health approach is vital in that regard. We see CITES implementation at the national level as part of such a trans-sectoral approach, which must include management and regulation of domestic wildlife use, habitat degradation and loss, animal “farming” and handling, markets for live wildlife, and multiple other factors, and by necessity must involve multiple agencies and national authorities. The extensive scientific information and data now available are clear on what is needed to prevent the next pandemic of zoonotic origin, particularly in terms of commercial breeding, handling, and trade in live

(and freshly slaughtered) wild birds and mammals. We know enough to act, and the precautionary principle necessitates action on a fast track.

We appreciate that many Parties have taken positive steps to address the risk of pathogen spillover from wildlife (farmed and from the wild), but many have not yet taken sufficient action. WHO, WOA, and UNEP have issued excellent guidance, and ongoing work of the Quadripartite (WHO, WOA, UNEP, and FAO) provides important information particularly on the risk of pathogen spillovers.

Regarding the issue of whether CITES should establish its own Advisory Body to provide guidance to Parties, in their efforts to reduce the risk of zoonotic pathogen spill-over and transmission, we do not believe that a formal, official CITES Advisory Body is the best way forward, but there are other options. This is also the view of the majority of members of the SC WG on this issue. One option is the establishment of a process whereby Parties could obtain scientific and technical advice on this issue from the Quadripartite organisations working on One Health and the Pandemic Agreement, OHHLEP, and other expert organizations.

Different factors contribute to pathogen spillovers (and spill-back) from wildlife to humans, other wildlife, and livestock. The evidence is clear that wildlife farms/captive breeding facilities, markets (particularly in live and freshly slaughtered animals, and particularly involving birds and mammals) and associated trade (domestic and international) contribute significantly to the risk of pathogen spillover. International wildlife trade is one of these factors. We are concerned that an Advisory Body dealing specifically with international trade in CITES-listed species could detract from the necessity for governments to address the risk of pathogen spillover not only from wildlife trade that crosses international borders, but for all trade and markets for live wild animals (particularly birds and mammals).

In December 2022 the Parties to the CBD adopted the [Kunming-Montreal Global Biodiversity Framework](#) (GBF), with 4 Goals and 23 Targets. Target 5 of the GBF specifically states: “Ensure that the use, harvesting and trade of wild species is sustainable, safe and legal, preventing overexploitation, minimizing impacts on non-target species and ecosystems, and *reducing the risk of pathogen spillover*, applying the ecosystem approach, while respecting and protecting customary sustainable use by indigenous peoples and local communities” (emphasis added).

In that context, all 196 CBD Parties (all but one CITES Party) are committed to taking actions involving the use and trade of wild species that serves to reduce the risk of pathogen spillover (in addition to preventing overexploitation). An integrated approach to delivery of Target 5 of the GBF should involve CITES, globally and at the national level, but must also involve all relevant government ministries, and all relevant MEAs at the intergovernmental level.

Furthermore, international movements of live animals and some products (such as fresh meat) require veterinary import/export permits. These veterinary permits should address risks associated with zoonotic-origin pathogens. It would be more beneficial to bridge the capacity gaps and increase awareness across multiple agencies (CITES authorities, environment authorities, veterinary and animal health authorities, human health authorities, etc.) than establishing another isolated unit that has no mandate for human or animal health.

Finally, we note that on 16 October, WHO released draft negotiating text of the “WHO convention, agreement or other international instrument on pandemic prevention, preparedness and response (WHO Pandemic Agreement)”. We are still analyzing the document and providing input to negotiators. The draft text is a step in the right direction, but still includes insufficient attention to wildlife/biodiversity issues, and prevention of pathogen spillovers (“prevention at source”). We strongly encourage CITES authorities (management and scientific) to engage actively with their government’s negotiators on the instrument, particularly to help governments understand wildlife conservation, use, and trade issues.

Regarding Document 17.2, the report of the Secretariat: WCS looks forward to the discussions during the SC meeting. We support the adoption of an MoU and joint programme of work between CITES and

WOAH, and will have some suggestions for improvement. For example, we believe that modifications are needed to Action track 6 (6.1.6) in the draft programme of work (or it can be deleted); development of wildlife-based economies at the national level is beyond the remit of the CITES Secretariat (or WOA). The document from the Secretariat uses the phrase, “safe, traceable and legal international trade in wildlife”. WCS believes of course that the only international trade in wildlife that should go forward is that which is legal, sustainable, and does not pose a risk of pathogen spillover. We would hope that sustainability would be added to this document. We also note that “safe”, even in the GBF, is not defined; it is clear however that it refers to the risk of pathogen spillover (and not only the safety of the animals being traded). Furthermore, we strongly recommend that the programme of work include “efforts designed to prevent pathogen spillovers”.

WCS appreciates the summary by the Secretariat of the work of CMS on these issues. We encourage the WG to further explore collaboration with CMS.

WCS also appreciates the mention by the Secretariat of the [Sustainable Wildlife Management Programme](#) (SWM). For clarification, the SWM Programme is a consortium of the following partners: FAO; French Agricultural Research Centre for International Development (CIRAD); Center for International Forestry Research (CIFOR); and WCS. The SWM Programme is funded by the EU with co-funding from the French Facility for Global Environment (FFEM) and the French Development Agency (AFD).

[19. Cooperation with the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services, including policy aspects of IPBES Assessment report on the sustainable use of wild species](#)

WCS welcomes the review of the IPBES Assessment report on the sustainable use of wild species, but recommends that the Animals and Plants Committees’ joint intersessional WG conclude their technical work prior to the establishment of an intersessional WG of the CITES SC. CITES is not mandated to make policy changes to align with the findings of the IPBES Assessment, and changes to policy should be driven by technical overlap between the Assessment’s findings and existing mandates of CITES Parties from the treaty and the CoP.

[20. World Wildlife Trade Report](#)

As we noted during CoP19, WCS does not support directing core funding from the Secretariat to regular development and publication of a “World Wildlife Trade Report” – at least not as currently presented in the pilot report. The organization and content of the pilot report does not respond to needs identified by CITES Parties through the SC or CoP and would not necessarily facilitate the implementation of CITES by Parties. Furthermore, the introduction of concepts such as traceability confuse the core mandates of CITES with specific approaches that may only be outlined in CITES resolutions.

We believe that regularly producing such a report would further burden CITES structures (Secretariat, SC), and particularly Parties on reporting with information that is not required by the treaty or resolutions. Simply demonstrating that there is economic benefit from trade is not needed – this is self-evident from the continued trade in CITES-listed specimens. Collecting and reporting valuation data for wildlife trade does not contribute to the implementation of CITES, or the legality and sustainability of trade, and presents significant additional burden for CITES Parties.

Should CITES Parties wish to mobilize the considerable scientific and technical expertise within civil society to produce a regular report on the state of CITES-listed species and their conservation, use and trade, they may wish to mandate the regular development and dissemination of a report on collective progress towards the accomplishment CITES Strategic Vision objectives and the goals and targets of the GBF, specifically using the indicators and types of data agreed to by Parties through intergovernmental consultation.

[21. CITES and forests](#)

WCS works to conserve forests, tree species, and forest-dependent wildlife in many countries around the world, and we are focused in particular on the conservation and retention of high integrity forests. The legal and illegal trade in CITES-listed timber species and other forest plant and animal species has

significant implications for their conservation and management. WCS is highly committed to the conservation of the world's forests, to benefit plant and animal species, ecosystems as a whole, and Indigenous Peoples and local communities whose livelihoods and cultural identification are closely linked with healthy, high integrity forests. While there appears to be interesting progress as outlined in this document, forests are far more than trees, and CITES is fundamentally a species-based and not an ecosystem-based treaty. We welcome discussion of implementation of CITES Article IV paragraph 3, and the role of species in their ecosystem, but that is applicable not only to forests, but also to other ecosystems (e.g. savannahs, woodlands, deserts, inland waters, coral reefs, coasts, and the ocean).

24. [Compliance Assistance Programme](#)

Improving compliance with CITES is critically important to ensure the efficacy of this Convention. We therefore welcome the Compliance Assistance Programme, which covers a variety of interlinked compliance challenges and uses innovative and context-appropriate techniques to enhance compliance with CITES. We commend the voluntary participation of Guinea, Lao PDR, Nigeria, Solomon Islands, Suriname and Togo, which entails the recognition that the CITES Secretariat and members of civil society stand ready to assist Parties with technical aspects of implementation.

However, recognizing the huge gaps in compliance represented, for example, by a high number of ongoing trade suspensions and an increasing number of countries undergoing an "Article XIII process," there is a critical need to allocate such technical resources effectively. WCS provides assistance to multiple Parties in ensuring their compliance with CITES, as do other NGOs, and we are pleased to work with the CITES Secretariat to advance these efforts in several countries. However, there should be an examination of what types of compliance assistance and capacity-building efforts have yielded material change in compliance with CITES (e.g., through an improved ranking in the CITES National Legislation Project, a lifting of trade sanctions, etc.), to ensure that any additional funds for the Programme invested by CITES Parties or other donors is used effectively.

We encourage the CITES Secretariat to create ongoing channels for communication with Parties, IGOs, and NGOs about lessons learned across the broad scope of efforts to improve compliance with CITES. A rigorous assessment of the most effective strategies is worthwhile. We also recommend that the SC engage in a broader conversation about the scale and complexity of challenges facing Parties as they seek to operate in full compliance with CITES, and Parties should consider the value of major changes to operating rhythms and meetings of CITES to enable these issues to be handled both sensitively and effectively.

28. Engagement of indigenous peoples and local communities

28.1. [Report of the working group](#)

28.2. [Report of the Secretariat](#)

WCS fully understands, respects, and supports the vital role that Indigenous Peoples and local communities play in conservation around the world. We fully acknowledge their rights as enshrined by the Universal Declaration of Human Rights and UNDRIP. Across the planet, WCS collaborates with Indigenous Peoples and local communities to achieve a shared vision for a more secure, inclusive, just, equitable, and resilient future, where wildlife remains a visible, thriving, and culturally valued part of the wild places where our partners live and we work. At WCS, we choose to work in some of the most remote and high-integrity places left on the planet. For the Indigenous Peoples and local communities that call such places home, these forests, grasslands, and coastal systems are their ancestral and traditional territories, the foundation of their cultural identities, and the source of their families' livelihoods and wellbeing.

By respecting and protecting the rights of Indigenous Peoples and local communities and amplifying their voice in conservation policies, practices, and governance structures, WCS employs a human rights-based approach to give effect to this value statement that seeks to protect high-integrity terrestrial and marine ecosystems, and to more effectively mitigate and adapt to the effects of climate change. WCS believes that robust, meaningful engagement with IPs and LCs in the implementation and enforcement of CITES should be undertaken by Party governments according to their respective legal

frameworks. We greatly appreciate the work of the WG in exploring these issues. We strongly support the engagement at the national level of IPs and LCs in the implementation and enforcement of CITES, as well as in the delivery of [Target 5](#) of the Kunming-Montreal GBF. Towards that end, we strongly support national-level processes to engage IPs and LCs in the engagement in all CITES processes and meetings, to ensure their voices are well represented.

In response to the suggestion of the Secretariat on terminology in Doc. 28.2, we believe that language and terminology that are accepted and endorsed by the UN General Assembly, as well as the CBD, should also be used in CITES, for clarity and consistency. The language in UNDRIP is clear, and all CITES Parties are UN Member States; the GBF is also clear. We recommend that Parties use “Indigenous Peoples and local communities”, abbreviated as “IPs and LCs”, rather than ‘rural communities’.

29. [Livelihoods](#)

WCS looks forward to continued discussions on how to further engage IPs and LCs in wildlife management and conservation at the national level, including through implementation of CITES, and to the analysis of information on the impacts of this implementation on the livelihoods of IPs and LCs. We note that in addition to economic and other livelihood benefits that can accrue from effective implementation of CITES and national legislation, there is a significant risk of harm to livelihoods if wildlife exploitation and trade are illegal or unsustainable.

WCS was pleased to have supported and attended the joint meeting of the intersessional WG on engagement of IPs and LCs, and the intersessional WG on CITES and livelihoods, held in Cusco, Peru from 29 August-1 September 2023. We look forward to continuing to work with CITES Parties on this issue, both at the national level through our country programs and through the SC and CoP. We support production and dissemination of case studies and voluntary guidance to Parties on these issues.

30. [Demand reduction to combat illegal trade](#)

WCS strongly supports and indeed implements with government partners, targeted, evidence-based demand reduction efforts – particularly those that affect consumer behavior through legal and regulatory reform, and that use the latest behavioral science. We appreciate the adoption of *CITES guidance on demand reduction strategies to combat illegal trade in CITES-listed species* at CoP19, although we stress that this guidance, produced by TRAFFIC, is not the only guidance or tool available to influence consumer behavior. There is a great deal of work going on, in close collaboration with Parties, that is valid and scientifically exceedingly sound, but does not necessarily follow the guidance produced by TRAFFIC (useful as it can be). This work is often overlooked or under-represented. Indeed, much recent work exists by academics and practitioners with scientific grounding in changing consumer behaviors and attitudes. We believe there would be value in the SC requesting the Secretariat to develop a page on the CITES website dedicated to behavior change approaches, to highlight the CITES guidance while also providing a platform to share other approaches and tools that are available, that Parties can and do use to influence consumer behavior. We support the statement from the Secretariat in Doc. 30, highlighting the difference between public awareness campaigns and demand reduction interventions aimed at affecting behavior change. It is vital to focus on science-based, measurable behavior change in the design and implementation of demand reduction strategies and plans. WCS works with many Parties on science-based behavior change and would be pleased to provide information and updates on our work.

31. [National laws for implementation of the Convention](#)

WCS appreciates the efforts of Parties, including those with whom we work closely on CITES implementation, to provide updates on their legislative progress for CITES implementation. We commend the progress highlighted in SC77 Doc. 31 for Parties such as India, Pakistan, and the Maldives on moving to Category 1. We also welcome the progress as reported by Belize and urge the Government of Belize to identify a Scientific Authority to complete the transition to Category 1. For other Parties currently in Category 2, such as Rwanda, Mozambique, and Lao PDR where WCS has active conservation

programs, we stand ready to provide technical support that complements and responds to the review of the CITES Secretariat.

WCS believes that failure to provide updates on progress with respect to national legislation undermines the effectiveness of the Convention and detracts from the spirit of multilateral cooperation. This is true even in cases where we work actively with such Parties to update legislative and regulatory frameworks. We therefore support the recommendations in paragraph 38, although we hope that updated information can be made available by relevant Parties prior to SC77.

33. Compliance matters

33.1. [Implementation of Article XIII and Resolution Conf. 14.3 \(Rev. CoP19\) on CITES compliance procedures \[Resolution Conf. 11.3 \(Rev. CoP19\)\]](#)

WCS strongly welcomes this document, which follows on compliance issues as identified and discussed by SC74. We are not clear on why some compliance issues are addressed in stand-alone documents, while some remain in this chapeau document. Nonetheless, we are pleased to see that Viet Nam and the United Kingdom invited technical missions from the CITES Secretariat to consider potential issues of non-compliance.

WCS also welcomes the introduction of potential new issues of non-compliance regarding exports from Mexico to India.

WCS fully concurs with the Secretariat's statement in paragraph 39 that a "recommendation to suspend trade is not a 'sanction' of the Party concerned but a supportive measure adopted by all the Parties that form the CITES community to mobilize the political engagement necessary to solve an emergency situation that requires high political attention." It is through recommendations to suspend trade, and implementation of these recommendations by CITES Parties, that there is collective accountability in the CITES framework and the functionality of the Standing Committee. With that said, we understand the challenges in ambiguity, and would agree with the development of practical guidance for CITES MAs on implementing recommendations to suspend trade.

With respect to paragraphs 44 and 45(g), we would support the development of a compliance template. However, more ambitious changes may be needed to the compliance framework within CITES to ensure that there is equity in the treatment of different compliance issues, to support Parties in implementing recommendations of the Standing Committee, and so on. There is simply not enough time within the week-long Standing Committee meetings for SC members and Observers to deliberate the finer points of each potential case of non-compliance, and the fact that follow-up is subject to external funds highlights potential gaps or selective application of compliance procedures. WCS is eager to discuss these challenges with Parties and identify a sensible way forward.

33.3. [Application of Article XIII in Bangladesh](#)

WCS works actively to support the Government of Bangladesh to improve CITES compliance. We appreciate the thorough report in this document, prepared by the technical mission, which recognizes efforts made by the CITES MA to improve CITES compliance in the trade of birds and sharks. Overall, the recommendations for addressing identified shortcomings are appropriate and, when implemented, will likely improve national processes and capacities for enhanced compliance. WCS notes that several of the priority issues identified by the mission have also been prioritized in the annual national CITES seminars hosted by the Bangladesh CITES MA with support from WCS for senior representatives from relevant ministries and agencies. Several of the proposed steps have already been initiated, including technical trainings and species identification tools for improving detection, identification, and enforcement. WCS remains committed to continue supporting the Bangladesh CITES MA in strengthening CITES compliance and implementation of several recommendations particularly for shark trade presented in the report.

[33.5. Application of Article XIII in China](#)

WCS appreciates the report from the Secretariat regarding imports of live Asian elephants into China from Lao PDR, particularly the comprehensive analysis. We support the conclusions and recommendations of the Secretariat, in particular that the elephants in question do not meet the definition of ‘bred in captivity’ in accordance with the criteria in Resolution Conf. 10.16 (Rev. CoP19). We also support the recommendation of the Secretariat to consider this document in the context of document 33.10.

[33.6. Application of Article XIII in the Democratic Republic of the Congo](#)

WCS stands ready to continue to collaborate with the Government of DRC, including ICCN and other partners, to increase compliance with CITES and engage in efforts to combat illegal wildlife trade. We look forward to discussing the draft recommendations contained within this document during SC77.

[33.8. Application of Article XIII in European Union](#)

WCS appreciates the thoroughness and completeness of the Secretariat’s report and analysis of this situation. This is a serious issue. WCS agrees that the implementation of Articles III and VII para 4 of the Convention about registration of operations that breed Appendix I animal species in captivity for commercial purposes is highly important. Lapses in implementation and non-compliance can facilitate illegal trade, further jeopardize populations of these Appendix I species, and undermine the conservation efforts of range States. We support the findings of the Secretariat and the determination in paragraph 87 on non-compliance regarding the legality of parental stock of breeding operations, and the primarily commercial nature of operations. We believe that whether an operation is made up of individuals interested in only profit, or hobbyists with deep connections to and affection for their animals, is irrelevant from the perspective of CITES implementation and determinations of legality and commerciality. We strongly urge the EU and its Member States to register these facilities that are breeding Appendix I-listed animal species for commercial purposes, in accordance with Reso. Conf. 12.10 (Rev. CoP15). We also support the other recommendations of the Secretariat in paragraphs 88 and 89; we look forward to discussing the recommendations of the Secretariat in paragraphs 90 and 91.

[33.10. Application of Article XIII in the Lao People’s Democratic Republic](#)

WCS works closely with the Government of Lao PDR on site-based conservation work, as well as the implementation of CITES and national counter wildlife trafficking efforts. WCS welcomes the progress made by CITES Authorities in Lao PDR to address some of the recommendations of SC74; however, we concur with the findings of the Secretariat that key gaps remain in order to implement CITES effectively. This is particularly true with respect to law enforcement, with significant gaps in reporting against investigations leading to arrests and court proceedings to deter illegal trade. Gaps in other reporting, such as the National Ivory Action Plan process, suggests a need for greater transparency in this regard. WCS stands ready to work closely with the Government of Lao PDR to fully implement the recommendations adopted by the SC, to resolve any outstanding issues with implementation of CITES.

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

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 commend Nigeria for reporting on the implementation of its NIAP and submitting annual illegal trade reports amid a change in CITES Authorities. We also welcome the initial cooperation between Nigeria and the CITES Secretariat, including through the Compliance Assistance Programme as outlined in [Inf. 1](#), as well as other ongoing partnerships with ICCWC member organizations. However, it remains critical for Nigeria to deliver a report on successful implementation of the recommendations from SC75, under the Article XIII process, including updates on the Endangered Species Conservation and Protection Bill 2022 (and how it will comply with CITES), and measures related to inter-agency and federal-state coordination on permit issuance and stockpile management. We believe the updated SC recommendations, as presented in paragraph 19, are sound. We urge Nigeria to provide an oral report to SC77 and submit additional information on the implementation of SC75 recommendations well in advance of SC78.

34. [National ivory action plan process](#) (Annexes are reports from: Angola, [Cambodia](#), [Cameroon](#), [Malaysia](#), [Mozambique](#), [Nigeria](#), Qatar, and [the DRC](#))

WCS commends Angola, Cambodia, Cameroon, Malaysia Mozambique, Nigeria, Qatar, and the DRC for submitting progress reports in line with the requirements of Resolution Conf. 10.10 (Rev. CoP19). We urge those Parties who have not yet submitted progress reports – particularly those significantly impacted by illegal trade in ivory such as Viet Nam and Togo (Category A), and Gabon (Category B); and Congo and Lao PDR (Category C) – to provide written updates in advance of the SC meeting for an in-session WG to discuss. As with other processes, continued non-response, or a failure to provide the full suite of information required for assessment by the Secretariat, should be seen as a compliance issue that leads to recommendations to suspend trade from the SC.

WCS generally believes the Secretariat's analysis is sound and appreciates the Secretariat's dedication to delivering these standardized assessments. Noting that funding is not secured for such analysis, Parties may wish to consider the funding allocated for these assessments in the broader context of assessing the efficacy of the NIAP process overall (Decision 19.68).

With regards to conclusions of the Secretariat that form the draft recommendations to the SC:

- **Cambodia:** We concur that several steps have been taken to address the trafficking of ivory in Cambodia, however it remains in Category B according to the ETIS assessment to CoP19. We therefore urge the Secretariat to consult widely, including with technically qualified intergovernmental and non-governmental organizations with experience in the country, and review updated ETIS data, prior to considering whether Cambodia should exit the NIAP process or remain within the process.
- **DRC:** Given the unique circumstances, with documented high levels of illegal trade in ivory involving DRC and with other systemic issues of non-compliance with CITES as identified through the Article XIII process, we concur that urgent action is needed to combat ivory trafficking in DRC. We stand ready to support DRC in their efforts to comply with CITES and respond to this transnational crime.
- **Lao PDR:** Lao PDR did submit a report as part of the Article XIII process, according to Document 33.10, which demonstrates interest in enhancing compliance with CITES. However, we note the lack of progress across several SC recommendations highlighted in Doc. 33.10, including the lack of meeting reporting deadlines for the NIAP process. We look forward discussing this under agenda item 33.10, and to continuing our work in country with the Government of Lao PDR.
- **Viet Nam:** Viet Nam is a Category A country, like DRC, and is very significantly affected by the illegal trade in elephant ivory. We note that Viet Nam is not currently subject to a review process under Article XIII, despite compliance issues being raised under previous SC discussions (e.g., [SC75 Doc. 7.1](#)). A 60-day warning may be the appropriate course of action, but the SC should fully and closely review potential incidences of non-compliance to ensure that the implementation of CITES is robust and complemented by enforcement actions as highlighted in Viet Nam's NIRAP.

We continue to note with concern that many of the NIAPs currently posted to the Secretariat's website expired many years ago, and we are concerned that SC discussion of this issue is not present in Document 34. We urge the SC to recommend that Parties with significantly outdated NIAPs update their NIAPs, especially where ETIS reports are still reflecting significant illegal trade (e.g., Categories A and B), and where reporting response is weak.

Furthermore, there are Parties that are not identified in ETIS reports as a country of concern, but there remain concerns that implementation of outdated NIAPs, and controls on illegal ivory trade, may have lapsed. We strongly encourage all Parties to remain vigilant in this regard, to end the illegal ivory trade and poaching of elephants for their ivory, and to enable those African elephant populations that were hit hard by poaching for ivory trade to continue to recover.

35. Review of Significant Trade (RST) in specimens of Appendix-II species

35.1. [Overview of the Review of Significant Trade](#)

35.2. [Implementation of recommendations of the Animals Committee \(A2c: Indonesia\)](#)

WCS appreciates the document, and the summary of progress in the RST. We consider the implementation of Article IV of the Convention to be both fundamental and obligatory, to ensure the legality and sustainability of trade in CITES Appendix II-listed species; the RST, through Resolution Conf. 12.8 (Rev. CoP18) is designed to highlight problems in this implementation, and cases where species may be traded unsustainably, with possible detriment to populations in the wild.

WCS participated actively in discussions on RST in the AC. We appreciate the hard work that went into selecting the 21 species/country combinations; however, there was strong evidence that other species/country combinations were also of concern and could benefit from the RST. We recommend that the SC and Parties clarify that the number of such combinations should be based on conservation concerns, and not an arbitrary number. Furthermore, there was good science-based discussion at the meeting of the AC both in technical working groups and plenary that it would make more sense scientifically, and may be of more assistance to Parties, to look at Appendix II-listed shark species on the basis of ocean basin or stock, rather than selecting a few countries. We recommend the SC address this, with possible amendments to Reso. Conf. 12.8 (Rev. CoP18) for consideration by CoP20.

WCS appreciates the document, and the summary of progress in the Review of Significant Trade. We consider the implementation of Article IV of the Convention to be both fundamental and obligatory, to ensure the legality and sustainability of trade in CITES Appendix II-listed species; the RST is designed to highlight problems in this implementation, and cases where species may be traded unsustainably, with detriment to populations in the wild. WCS participated actively in AC discussions on RST. Finally, we note that several Party observers at the AC meeting worked very hard to prevent their country from entering the RST process; we note that the process is not punitive, but is meant to provide assistance, and we encourage Parties to look at it positively. We thank those Parties that responded positively at the AC meeting.

37. [Possession of specimens of species included in Appendix I](#)

This is a critically important issue that deserves attention from CITES Parties but will require some sensitivity. The phrase used by the Secretariat in paragraph 8 of the document that national legislation should prohibit and penalize “possession of CITES specimens that have been **obtained** contrary to the Convention” [emphasis added] is important. With this in mind, we support the draft recommendations proposed by the Secretariat for the SC to adopt, particularly as they regard national legislation.

38. [Review of Resolution Conf. 11.3 \(Rev. CoP19\) on Compliance and enforcement](#)

WCS is pleased to participate in the intersessional WG on Resolution Conf. 11.3 (Rev. CoP19), and we believe this document represents an accurate summary of its work to date. We concur with other members of the WG that critical issues to be addressed in the review include the implementation of CITES for marine species, actions to be taken for stockpiles, and the issue of timelines for response on potential issues of non-compliance (see paragraph 20). With respect to timing of responses, shortening the deadline from six months to three months, with appropriate recourse if correspondence is received, is appropriate when there could be issues of illegal trade, trade in live animals not in compliance with CITES, etc.

39. Enforcement

39.1. [Enforcement matters](#)

WCS is pleased to see domestic actions taken by CITES Parties, including Malaysia, India, Zimbabwe, and South Africa, to address wildlife trafficking offenses associated with corruption, as well as unilateral measures designed to address issues of illegal trade. Where Parties are taking unilateral measures to address countries or individuals implicated in wildlife trafficking, CITES should take note of the relation between such offenses and any progress made in existing programmes designed to improve compliance with CITES. WCS urges Parties to report, where possible, on enforcement actions associated with demonstrable impacts on the illegal trade in wildlife.

We note that external funding has not been located for the implementation of Decision 19.79, and urge Parties to mobilize such funding. Furthermore, we recommend that maintenance of the illegal trade database becomes core funding, given the role of this database in handling taxon-specific issues of illegal trade.

39.3. [CITES Big Cats Task Force](#)

WCS welcomes the progress made in convening the CITES Big Cats Task Force, and commends Uganda, the United States, and others for their leadership in this regard. WCS was pleased to have been able to attend the Task Force meeting in April 2023 and to share our expertise. We believe the outcome document from the Task Force meeting in April 2023 contains important recommendations that should be considered by Parties during their national implementation of CITES. However, WCS does not support revising Resolution Conf. 12.5 (Rev. CoP19) to be inclusive of all CITES-listed big cat species. The issues facing these species, and specifically the issues of international trade, are far too different to be folded into one resolution – it would become extremely lengthy and difficult to implement. Furthermore, processes to update or amend such a resolution would be complex undertakings, with little to no conservation benefit.

39.4. [Wildlife crime enforcement support in West and Central Africa](#)

WCS is pleased to participate in the intersessional WG on Wildlife crime enforcement support in West and Central Africa, and commend the leadership of Nigeria in their role as Chair. We support the way forward proposed in this document.

41. Asian big cats (Felidae spp.)

41.1. [Report of the Secretariat](#)

41.2. [Asian big cats in captivity](#)

WCS welcomes the reports from many Parties, including range States of Asian big cat species, as well as IGOs and NGOs. We regret that several range States did not report on measures related to *in situ* conservation or counter wildlife trafficking efforts and urge them to provide supplementary information in advance of the SC meeting.

With regards to Doc. 41.2, we are very pleased to see that technical missions were conducted to many countries identified as having facilities of concern, and that additional missions are planned at the invitation of Parties, such as the United States. We urge China to invite a similar technical mission to complete this global review. We regret, however, that in many cases where technical missions were conducted, that one or more facilities were not accessible to the CITES Secretariat and technical partners.

With respect to the proposed recommendations of the SC in Doc. 41.2, we note that there is no time-bound element to ensure that the recommendations are implemented by Parties in response to findings from the technical missions. We recommend the insertion of a recommendation from the SC to either provide a report ahead of SC78, as part of reporting on Reso. Conf. 12.5 (Rev. CoP19), or potentially ahead of SC79/CoP20.

42. [Illegal trade in African great apes \(Gorilla gorilla, Gorilla beringei, Pan troglodytes and Pan paniscus\)](#)

WCS appreciates this document and supports the recommendations of the Secretariat. We note however that in its summary of threats to populations of African great apes, in addition to the serious threats of poaching for illegal trade in live animals, meat, and body parts, and habitat loss and degradation, great apes are also threatened by the spillover of pathogens from humans (which may have originally spilled over from other animals). Vigilance, and a strong One Health approach, are necessary to protect the health of great apes and local communities that may either illegally kill great apes or find dead animals. As the numbers of researchers, ecotourists, local people, and soldiers increase in and around the lowland forests of central Africa, the likelihood of viruses, parasites, and other pathogens passing between them, and great apes rises. Research suggests that tens of thousands of great apes perished

from Ebola hemorrhagic fever virus, which is also deadly to humans. [The WCS Health Programs](#) are at the forefront of investigations into the diagnosis, management, and prevention of such diseases.

[43. Jaguars \(*Panthera onca*\)](#)

The jaguar is an emblematic species of the Americas, due to both its importance in maintaining natural landscapes and ecosystem functionality, and as an important cultural element throughout its distribution for centuries, particularly for Indigenous Peoples and Nations. We encourage Parties to support all necessary actions to benefit the conservation of this emblematic and ecologically important species.

WCS has an extensive conservation program on the jaguar, working with governments and other partners on the conservation of jaguars and their habitats in nine countries (Guatemala, Honduras, Nicaragua, Colombia, Ecuador, Peru, Bolivia, Paraguay, and Brazil). WCS is very concerned about the emerging threat of national and international trafficking in jaguar parts.

WCS welcomes this document, and appreciate the thoroughness of the discussion and analysis by the Secretariat. WCS scientists/experts working on jaguars in the region were pleased to attend the meeting of Jaguar range States held in Cuiabá, Brazil, from 18-22 September 2023.

We support all of the recommendations of the participants in the Range States meeting. In particular: We strongly support integration of the work that relates to CITES, CMS, and the 2030 Jaguar Conservation Roadmap ("Jaguar2030"). All Jaguar Range States are CBD and CITES Parties, and the delivery of Jaguar2030 will certainly deliver on multiple targets of the CBD GBF. We support the seven areas of work identified in paragraph 11, and are working now and will continue to help with the implementation of six of them, as identified. We support the establishment of a long-term system for monitoring illegal killing of jaguars, associated illegal trade in their parts and derivatives and other key aspects related to jaguar conservation, as per paragraphs 15 and 16. We recommend that this monitoring system be designed to incorporate available data spanning at least the last decade, as this will enable a more comprehensive understanding and identification of trends alongside the integration of new data. WCS has actively collaborated with government and civil society partners in the Andes, Amazon & Orinoco region to systematize this data and we would be pleased to facilitate its inclusion in this new system through our government partners. We also support the recommendations in paragraphs 21 and 22, regarding the creation of an intergovernmental platform; we recommend that this platform considers the facilitation of information exchange among law enforcement institutions across different countries, including those in transit and destination regions, extending beyond the distribution range of jaguars to expedite the sharing of critical data concerning international trafficking cases involving jaguars.

We also support the recommendations in paragraph 31, including the critical need to include jaguar population monitoring. We recognize this entails a great deal of work, and we encourage Parties to work through the Jaguar2030 Roadmap on the cooperative conservation initiatives. We also note that the Jaguar2030 Steering Committee has re-established a Sustainable Finance Sub-Committee, which could provide useful to these efforts.

[47. Introduction from the sea](#)

WCS appreciates the attention of the Parties to the implementation of their obligations relevant to specimens taken in areas beyond national jurisdiction (ABNJ). We appreciate all the hard work and consensus-building that went into the adoption of Resolution Conf. 14.6 (Rev. CoP16); unfortunately, more progress is needed on implementation of this resolution and associated CITES requirements, for specimens taken in ABNJ. We appreciate the document, and support all of the recommendations of the Secretariat. In particular, we thank the Secretariat for its proposed changes to the "10 Most Frequently Asked Questions on Introduction from the Sea" (Annex to Doc. 41), including its consideration of suggestions made by WCS. We support its finalization and posting to the CITES website, and use in both capacity building programmes, and in information to Parties if questions arise. We look forward to continuing to collaborate with Parties and the Secretariat to help ensure effective implementation of CITES for species taken in ABNJ.

50. [Stocks and stockpiles](#)

WCS has been pleased to join previous intersessional working groups on this issue, which is both complex and essential to simplify for proper implementation of CITES. Issues highlighted in SC77 Doc. 51, for example, highlights the urgency of stockpile management for elephant ivory. We concur with the Secretariat's observations contained in paragraph 15, though we believe that the reference to 'dead' specimens in the proposed definition (para 16) may require some further reflection (since some parts and derivatives may be challenging to define as "dead").

Where stockpiles have been identified as facilitating or interacting with illegal trade, for example in the case of pangolins or saiga antelope, it may be worth refining the recommendations under those agenda items or documents to request that relevant Parties report on the uptake of the guidance on stockpile management, as well as any issues identified in implementing such guidance, prior to SC78.

51. [Stocks and stockpiles \(elephant ivory\)](#)

WCS was pleased to participate in previous intersessional WGs on this topic. WCS strongly believes that legally or illegally obtained or traded stockpiles of elephant ivory should not be traded commercially and should be put beyond economic use. Parties with elephant ivory stockpiles have significant challenges with respect to managing and securing complex custodial chains of such a high-value commodity (and is indeed the reason several Parties have chosen to destroy these stockpiles when legal proceedings have been completed).

We are pleased to see steadily increasing, if uneven reporting of elephant ivory stockpiles in line with Reso Conf. 10.10 (Rev CoP18), and recognize the value of advancing work under agenda item 50 to better define stockpiles for ivory and other CITES-listed specimens. We note the existence of potential stockpiles in Central African Republic, Cameroon, and DRC, among many other countries where ivory has been seized. We welcome the support of Switzerland in better standardizing and making use of data on stockpiles.

We concur with the recommendations in the document, including asking SC members to report on their regional outreach based on the Secretariat's findings.

52. [Transport of live specimens](#)

WCS appreciates this document from the Secretariat. We support moving forward on a global workshop on the transport of live specimens. We find the draft ToR satisfactory, but we hope that modules can be included with live or video demonstrations of handling of live animals, particularly those that may be dangerous, venomous, sick, injured, or pose a risk of pathogen spillover to other animals or human handlers. With over 125 years of zoo experience and management, in our four zoos and aquarium in NY City, WCS has extensive experience with the handling and transport of live animals. WCS has provided the Secretariat with all of the requested funding (\$15,000) for this workshop, and we look forward to working with the Secretariat and Parties to help make the workshop as practical and useful as possible.

55. [Dialogue meeting for African elephant range States \(*Loxodonta africana*\)](#)

WCS welcomes the submission of this document from Botswana, which advances Decision 19.167 adopted at CoP19, and in which Botswana kindly offers to host a Dialogue meeting of African elephant Range States. The SC is of course within its right to convene a dialogue meeting and set the agenda. We also respect the goals of a Dialogue meeting, to achieve consensus on issues that are difficult or controversial, through discussion and negotiation; we support all efforts to achieve such consensus. However, we urge SC members, Botswana, donor governments, and others, to ensure the meeting is sufficiently focused to achieve its goals. We recommend some streamlining of the agenda, to increase efficiency and productivity (as there is a lot proposed to be covered in four days).

For example, the Animals Committee has discussed the issue of nomenclature of African elephants, and how CITES will recognize the two species of *Loxodonta* spp.; the issue will also be discussed at SC77. This is more of a scientific and technical issue than a policy issue that requires debate, negotiation, and

consensus, and we recommend it not be included in the Dialogue meeting agenda (we are hopeful that a way forward can be agreed at SC77).

Regarding the ToR for the meeting, we recognize that this a meeting driven by and designed for range States. However, it would be valuable to receive some technical inputs from importing States, species experts, and other experts involved in *in-situ* conservation of elephants and combatting illegal ivory trade. We note that the existing draft ToR allows for this, but we seek clarification on how the approval of range States will be granted prior to travel to the meeting, and how observers/NGOs would be approved. Such transparency will increase the success of this important meeting.

56. [Disposal of confiscated specimens](#)

WCS notes with concern that Decision 19.171 has not been implemented by Parties, as the Secretariat has not received the information requested. We recommend that the Secretariat issue a Notification on this gap, and invite Parties to provide this information. However, this may be easier for Parties to do with some structure - such as a short survey or a workshop to discuss challenges with defining and managing confiscated specimens. The SC's recommendations may be revised accordingly. We welcome the EU's support for the implementation of Decision 19.169(b), and welcome support from other Parties or donors.

59. [Review of Resolution Conf. 12.10 \(Rev. CoP15\) on Registration of operations that breed Appendix-I animal species in captivity for commercial purposes](#)

WCS welcomes the update on the progress of the intersessional working group as prepared by the United States. We highlight two key issues. First, it is generally helpful to allow the CITES Management Authority some flexibility in domestic procedures for approving and managing registered operations breeding Appendix I species for commercial purposes. However, some agreed intergovernmental guidance – such as what constitutes a major change – would be beneficial to inform domestic procedures. Second, we note that Reso. Conf. 12.10 (Rev.) obligates Management Authorities to ensure that any approved captive-breeding operation “will make a continuing meaningful contribution according to the conservation needs of the species concerned.” This should include interactions with efforts to combat illegal trade, and such a clarification would be useful in this resolution.

63. Elephants (*Elephantidae* spp.)

63.1. [Report of the Secretariat on the implementation of Resolution Conf. 10.10 \(Rev. CoP19\) \[rev.2\]](#)

63.2. [Financial and operational sustainability of the MIKE and ETIS programmes](#)

WCS appreciates the efforts of the Secretariat to support various programs and analyses outlined in Resolution Conf. 10.10 (Rev. CoP19). We are pleased to see declining PIKE scores that could indicate reduced poaching, and we find that poaching rates have stabilized or declined in many places where WCS works with governments, communities, Indigenous Peoples, and others to combat poaching. However, in line with ETIS data that still reflect large, organized shipments, we urge continued caution and vigilance as stockpiling dynamics evidenced during the COVID-19 pandemic play out.

We appreciate the extrabudgetary funding from the UK that will allow the Secretariat to contract a consultant for a review of the NIAP process. This consultant should use transparent, evidence-based approaches to assessing the intent, guidelines, and outcomes of the NIAP process in line with the ToR identified. An open consultation for views would be welcome, noting that some Parties have said in the past that their inclusion in the NIAP process was helpful in reducing illegal trade of ivory in their country.

We note the ongoing discussions of Parties and Observers around definitions of stockpiles, as well as a potential lack of clarity regarding what constitutes a legal domestic market for ivory. We believe that further intersessional work to generate broad guidance on these matters could improve reporting into CITES, and there is a wealth of expertise and information that can underpin such broad guidance. We urge the SC to reflect on how a existing and new intersessional working groups might be able to take these issues forward.

65. [Saiga antelopes \(Saiga spp.\)](#)

WCS appreciates the efforts of the Secretariat to implement Decisions 19.213-5 and 19.217, and commends those Parties who provided current and updated information on implementation of such decisions.

As noted during AC32, WCS remains concerned about some of the reported exports of saiga specimens from Ukraine, which contain source codes and purpose codes that are either incorrectly applied or misinterpreted. While the statement of clarification from Ukraine is welcome, there are still concerns to be addressed. For instance, it is still not clear whether the specimens were wild-sourced or captive-bred. Notably, the current annotation to the Appendix II listing of the saiga antelope (adopted at CoP18) does not allow for export of wild sourced saiga for commercial trade.

We welcome the Secretariat's report on the seizures of saiga specimens as contained in Parties' annual illegal trade reports. Noting some positive trends, such as the decline in number of seizures, we note that the size of such seizures is critically important. As with pangolins or elephants, large seizures indicate organization, stockpiling, and continued commercial transactions on a more industrial scale. We recommend that the SC request the Secretariat to analyze the illegal trade database again with this in mind ahead of SC78.

67. Sharks and rays (Elasmobranchii spp.)

67.1. [Evidence of continued non-compliant trade of Appendix-II listed shark species \(Carcharhinus longimanus\)](#)

WCS welcomes this document from the Maldives, which brings to the SC an analysis submitted to AC32 concerning continued unreported and under-reported trade in this Critically Endangered species (*Carcharhinus longimanus*, Oceanic whitetip shark). The analysis concludes that based on extensive genetic surveys of East Asian shark fin markets, cross referenced with the CITES trade database, that widescale illegal trade in the species continues.

The document includes a set of recommendations (paragraph 10) to allow Parties to better understand how to address, and to respond to, this lack of compliance with CITES requirements. WCS supports all of these recommendations, and calls particular attention to the recommendations contained in paragraph 10, subparagraph 2a of the document, which we feel should be prioritized when the document is discussed at SC77.

67.2. [Report of the Animals Committee](#)

67.3. [Report of the Secretariat \[A3\]](#)

WCS appreciates the efforts of the Secretariat and Parties to continue to successfully implement the shark and ray listings adopted at the previous four CITES CoPs. These documents showcase the ongoing progress in effectively managing the global trade in shark and ray parts and products, but highlight that continued efforts are needed to ensure that CITES Appendix II listings are resulting in sustainable, traceable, legal trade in CITES listed shark species.

WCS believes that the delivery of the full study first described in decision 18.221, and rolled over into Decision 19.223 on the mismatch between catch and trade levels of CITES listed sharks and rays should remain a top priority. Trade data continue to indicate underreporting by CITES Parties, when compared to country level catch data, and studies of the shark fin and meat trade at its hubs. We note that in point 11 of Document 67.3 that the Secretariat plans to provide an update on plans to better investigate the issue of 'missing sharks' via full implementation of Decision 19.223, and we call on Parties and the Secretariat to prioritize this issue when these documents are discussed at SC77.

74. [Taxonomy and nomenclature of African elephants \(Loxodonta spp.\)](#) [Inf. 5]

WCS appreciates the detailed summary by the Secretariat on this issue, and on comments received. We also appreciate SC77 Information Document 5, which includes all comments received in response to Notification to the Parties No. 2023/078 on this issue (the comments from WCS are on pages 37-39).

Regarding paragraph 46 of Doc. 74, the upcoming IUCN African Elephant Status Reports (one volume for forest elephants and another for savannah elephants) is under development that will clarify the full range of both elephant species (our scientists who are members of the IUCN African Elephant Specialist Group will co-author). Corrections will likely need to be made regarding the presence of pure savanna elephants (*Loxodonta africana*) in Benin, Burkina Faso, Central African Republic, and Togo (though hybrids may be present).

WCS fully recognizes that the science is clear that there are two species of African elephant: the African savanna elephant (*Loxodonta africana*), and the African forest elephant (*Loxodonta cyclotis*). WCS recommends a nomenclatural change in the CITES Appendices, to now list *Loxodonta* spp. (replacing *Loxodonta africana* with *Loxodonta* spp.). We support the conclusion of the Secretariat that such a change is purely taxonomic and would not require a proposal to amend the Appendices, as it would not change the Appendix listing of any population of African elephant.

Those populations of *Loxodonta africana* and *Loxodonta cyclotis* [currently in Appendix I](#) would all still be in Appendix I, and those populations of *Loxodonta africana* included in Appendix II (those in Botswana, Namibia, South Africa, and Zimbabwe) would remain in Appendix II, and would remain subject to the [Annotations](#) adopted by the CoP and found in Annotation A10. We believe that this is the best and most practical option, and the option most consistent with the CITES treaty, Resolutions of the CoP, and precedent, for the reasons summarized by the Secretariat and shared by Parties and NGOs.

WCS recommends therefore that the SC agree to: move forward to change the nomenclature of the African elephant in the CITES Appendices, to replace *Loxodonta africana* with *Loxodonta* spp., by: 1) requesting the AC to propose this change to CoP20 and to propose a suitable Nomenclatural reference for this change; 2) and to request the Secretariat to prepare proposals for amendments to relevant Resolutions and CITES guidelines to address this recognition of the two species of African elephants, and submit them for consideration to SC78. We believe that this recommendation is fully consistent with all available science and CITES practice and precedent.

Annex: Acronyms used

ABNJ	Areas Beyond National Jurisdiction
AC	CITES Animals Committee
CBD	Convention on Biological Diversity
CMS	Convention on the Conservation of Migratory Species of Wild Animals
CoP	meeting of the Conference of the Parties
CoP19	19 th meeting of the Conference of the Parties (November 2022)
CoP20	20 th meeting of the Conference of the Parties
ETIS	CITES Elephant Trade Information System
EU	European Union
FAO	Food and Agriculture Organization of the United Nations
GBF	Kunming-Montreal Global Biodiversity Framework
IFS	Introduction from the Sea
IGO	Intergovernmental organization
IPs	Indigenous Peoples
IUCN	International Union for the Conservation of Nature
LCs	Local communities
MEA	Multilateral environmental agreement
MIKE	CITES Monitoring Illegal Killing of Elephants
MoU	Memorandum of Understanding
NIAP	National Ivory Action Plan
NIRAP	National Ivory and Rhinoceros Action Plan
NGO	Non-governmental organization
OHHLEP	The One Health High Level Expert Panel
PIKE	Proportion of Illegally Killed Elephants
RST	CITES Review of Significant Trade
SC	CITES Standing Committee
SC77	The 77 th meeting of the CITES Standing Committee
SC78	The 78 th meeting of the CITES Standing Committee
ToR	Terms of Reference
UNDRIP	United Nations Declaration on the Rights of Indigenous Peoples
UNEP	United Nations Environment Programme
WG	Working Group
WHO	World Health Organization
WOAH	World Organisation for Animal Health

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