



CITES 2002

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WWF POSITION STATEMENT

12th Meeting of the Conference of the Parties to CITES, Santiago, 3-15 November 2002

Bigleaf mahogany

Prop. 50

Nicaragua and Guatemala have proposed the inclusion in Appendix II of the neotropical populations of *Swietenia macrophylla* King (*Meliaceae*), including logs, sawn timber, veneer and plywood, in accordance with Article II, paragraph 2.(a), of the Convention and Resolution Conf. 9.24, Annex 2a: “the harvesting of specimens from the wild for international trade has, or may have, a detrimental impact on the species by either: i) exceeding, over an extended period, the level that can be continued in perpetuity; or ii) reducing it to a population level at which its survival would be threatened by other influences.” Their proposal notes that, “the objective of this listing is to promote sustainable management of *S. macrophylla* in order to help ensure its further conservation and trade.”

WWF recommendation on bigleaf mahogany: Support

Summary

WWF supports the inclusion of bigleaf mahogany in Appendix II because:

- Bigleaf mahogany is subject to overharvesting, much of which is illegal and driven by demand from the international market;
- Bigleaf mahogany clearly meets the relevant criteria for listing in Appendix II;
- Appendix II listing would support range states’ ongoing efforts to achieve good management of the species;
- Despite the listing by many range states of their populations in Appendix III, bigleaf mahogany continues to face significant problems of illicit cutting and illegal trade;
- Appendix II listing would assist range states in addressing illegal logging and conservation concerns for this species;
- Appendix II listing could provide increased assurance to importers and consumers that the bigleaf mahogany they purchase is not from illegal sources.



Rationale

1. CITES Appendix II could support range states in efforts to eliminate illegal logging and ensure their mahogany populations are well managed.

The exploitation of *S. macrophylla*, bigleaf mahogany, is inconsistently and poorly controlled, leading to direct negative impacts on the biological status of this species. Exploitation is driven by continuous and high demand for this extremely valuable wood, combined with inadequate application of legislation and widespread illegality in harvest and trade. International trade is the major driver: even where there are large domestic markets, the incentive for harvest is driven by high-value export markets. Population data indicate that current national management measures and Appendix III provisions have not addressed the problem of over-harvesting, with bigleaf mahogany continuing to face significant declines.

Bigleaf mahogany was first proposed for an Appendix II listing in 1992. 10 years later:

- Protected areas are inadequate, with only 3% of the species' range within parks;
- Illicit cutting is scattered even within the protected areas. In some countries, such as Brazil, more than 80% of bigleaf mahogany cut is illicit;
- The amount of forest within the range of bigleaf mahogany in Central America is rapidly decreasing – less than one third remains;
- Bigleaf mahogany is now commercially extinct in Bolivia;
- Recent population status studies in Madre de Dios, Peru and Acre, Brazil, confirm that current harvest levels are likely to drive the species to commercial extinction in the near future;
- Experts agree that current exploitation of bigleaf mahogany is unsustainable.

These considerations clearly indicate that bigleaf mahogany meets the listing criteria for Appendix II.

Listing of bigleaf mahogany in Appendix II of CITES would promote international co-operation for management and conservation of this species. In order to export Appendix II-listed species a non-detriment finding must be made, and exports must be limited so that the species is maintained across its range at levels consistent with its role in the ecosystem. This should provide a powerful tool to ensure that export volumes of bigleaf mahogany are maintained within levels that will ensure the species' survival in the wild. Appendix II provisions should also greatly assist in combating illegal and informal harvest and trade. The improved monitoring of international trade and the tightening of import controls which should result from an Appendix II listing should also bring all logging of mahogany into the formal sector, thus reducing the illegal trade. In this way, inclusion in Appendix II would help to eliminate market distortions favouring illegal activity.

Requirements for export of Appendix II listed species are, in most cases, consistent with national control and management requirements and complementary to national management efforts. It has been suggested that the forest sector in Brazil and Peru would not be able to cope with the requirements of Appendix II listing of bigleaf mahogany. However, the requirements for issuance of an export permit are simply the two criteria of legality and non-detriment. These countries are already issuing Appendix III permits, which require a legality finding. Given that Forest Management Plans required in these countries already require forestry operations to respect relevant laws and meet sustainability criteria, issue of an Appendix II permit is unlikely to be more difficult than issue of Appendix III permits. If forestry is proceeding according to a Management Plan that has been approved by the relevant national Department, it would be expected that export permits would be issued where trade is of specimens harvested according to these Plans. Administrative requirements with regard to issuance of permits and border controls would be similar to those already in place in most range and consumer countries in accordance with Appendix III requirements.



As the listing is restricted to neotropical populations, bigleaf mahogany from plantations outside this region, such as, for instance, those in the Philippines, are excluded.

2. Mahogany and CITES Appendix III

Proposals to include bigleaf mahogany in Appendix II were considered by the CITES Parties at CoP 8 (1992), CoP 9 (1994) and CoP 10 (1997); the CoP 10 proposal cosponsored by Bolivia and the USA. The 1992 and 1994 proposals were supported by the CITES Plants Committee and the 1997 proposal by the CITES Secretariat and numerous range States. Although they received the majority of votes of the Parties, none of these proposals reached the two-thirds majority required for acceptance. However, the accompanying debate prompted listing by various range states of bigleaf mahogany in Appendix III. In a landmark move, Costa Rica included the neotropical populations of bigleaf mahogany in CITES Appendix III with effect from November 1995. This required Costa Rica to issue a CITES export permit on the basis of a finding that specimens were legally acquired, and other producer countries to provide a CITES Certificate of Origin confirming the origin of shipments in trade, and all importing countries to verify such documentation. The listing covers logs, sawn wood and veneer only. Since that time, five more countries have listed bigleaf mahogany populations in CITES Appendix III: Bolivia, Brazil, Colombia, Mexico and Peru.

A key benefit of Appendix III listing is that it stipulates that imports and exports of bigleaf mahogany must be monitored, increasing our knowledge about international trade. Other benefits of the Appendix III listings include:

- Allowing comparisons by exporting countries of their export volume data with import volume data of consumer countries;
- Complementarity with other existing government controls, such as chain of custody mechanisms, including export documentation requirements;
- Complementarity with national measures to control exports, including the interdiction of illegal shipments.

The requirements and benefits of the current Appendix III listings should make the proposed Appendix II listing easier to implement.

However, as well as these benefits, a report submitted by TRAFFIC to the CITES Mahogany Working Group in October 2001, concluded the Appendix III listing does have several weaknesses:

- Issuance of export permits does not require a non-detriment finding. Only the legal acquisition finding is required. Although most range countries have domestic legislation requiring determinations of sustainability, only CITES Appendix II would ensure a multilateral non-detriment standard;
- Implementation is often incomplete;
- Enforcement measures for Appendix III are much weaker in range, re-exporting and consuming countries, reducing the incentive for compliance. Many countries have no penalties at all for Appendix III violations;
- Some recent evidence indicates that the documentation of legality produced to fulfil Appendix III requirements is sometimes unreliable, falsified, or non-existent. In these cases, the objectives of Appendix III listings are not achieved, and the documentation gives exporters and importers false credit.

There is no evidence that Appendix III listings have significantly reduced this unsustainable and illicit cutting and trade. The greater power and impact of Appendix II listing is urgently needed to promote conservation and sustainable management of this species.

3. CITES Appendix II will provide stronger assurance for importers that mahogany is not from illegal sources

Illegal cutting and trade of mahogany is currently the focus of environmental activism and international scrutiny. Disclosure of illegal trade has led to disruption of supply, market confusion, and import restrictions in some cases. This has potentially extremely negative repercussions for retailers of timber sourced from illicit traders, as well as the tropical timber market more generally. At the consumer level, concern about the origin of tropical woods is increasing. Listing in Appendix II will allow more effective international scrutiny of the trade and provide greater assurance on the importing side that wood products are from legal sources, as well as promoting better management over the longer term.

It is important to note that CITES and voluntary, market based measures such as certification through the Forest Stewardship Council (FSC) appear to be complementary. Measures implemented by CITES are very different to those of the FSC, not least because the former is regulatory while the latter is voluntary. However, Appendix II measures could complement and support FSC certification, and for parties engaged in the FSC process, directly assist in the implementation of full certification. With respect to the “sustainability” requirements of each system, there is substantial complementarity between the two. Under FSC, certification bodies must be satisfied that forest management operations are fulfilling the Principles and Criteria, which include conserving biological diversity, and maintaining the ecological functions and integrity of the forest. Under CITES Appendix II listing, the Scientific Authority must be satisfied that the trade will not be detrimental to the wild population, and must limit trade so that species are maintained throughout their range at levels consistent with their role in their ecosystems. An Appendix II listing is more limited in scope than FSC certification, but provides a globally applicable and immediate regulatory framework to assist in combating illegal logging, an issue of concern to all those involved in the trade of this species. While further consultation through CITES will be required to determine the feasibility of various harmonisation scenarios of the two systems, both mechanisms may be necessary if species conservation, continued supplies of mahogany and consumer confidence are to be secured for the long term.



WWF's mission is to stop the degradation of the planet's natural environment and to build a future in which humans live in harmony with nature, by:

- conserving the world's biological diversity
- ensuring that the use of renewable resources is sustainable
- promoting the reduction of pollution and wasteful consumption.

WWF International

Species Programme
Panda House, Weyside Park
Godalming, Surrey GU7 1XR
United Kingdom
E-mail: information@wwf-species.org
www.panda.org/species