WWF

BRIEFING

2019

CITES COP18

SUMMARY OF WWF'S POSITIONS ON KEY AGENDA DOCUMENTS AND PROPOSALS TO AMEND APPENDICES I AND II AT THE 18TH MEETING OF THE CONFERENCE OF THE PARTIES TO THE CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA (CITES)

Colombo, Sri Lanka, 23 May-3 June 2019

WWF'S POSITIONS ON KEY AGENDA DOCUMENTS AND PROPOSALS TO AMEND APPENDICES I AND II AT THE 18TH MEETING OF THE CONFERENCE OF THE PARTIES TO THE CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA (CITES)

Colombo, Sri Lanka, 23 May-3 June 2019

INTRODUCTION

1. In 2020, world leaders will make key decisions on the environment, climate and sustainable development, at the 15th meeting of the Conference of the Parties to the Convention on Biological Diversity, and in other key meetings regarding the Sustainable Development Goals, and the United Nations Framework Convention on Climate Change. These will shape the agenda for the next decade. The decisions they make now, and in the next few years, will profoundly affect our future. They must create a global solution that unites these issues: a New Deal for Nature and People. This new deal will require a fundamental shift in order to tackle the biggest threats to the planet together, as the systems that underpin life on Earth are interlinked. For too long we have considered them separately and searched for individual solutions. CITES can play a crucial role in such a global deal, through adoption of a new and robust strategic vision, with strong indicators and with provision for ongoing oversight by the Parties and by Civil Society.

2. In arriving at our positions on relevant individual agenda items and proposals to amend Appendices I and II to be discussed at CoP18, WWF is guided by the following considerations:

    a. The centrality of science in decision-making, especially with regard to proposals to amend Appendices I and II;

    b. Respect for the text of the Convention and for relevant CoP Resolutions.

3. WWF broadly welcomes the documents that have been tabled that address the related issues of sustainable use, livelihoods and the role of rural communities. While we differ on some of the proposed actions, we undertake to work with the Parties and with relevant stakeholders to achieve outcomes on these issues that maximise the benefits both for rural communities and for the future of endangered species of flora and fauna

4. WWF believes that one of the strengths of CITES is its strong compliance mechanisms. We welcome the increased use of Article XIII of the Convention for addressing what are often related governance, legal and enforcement issues in key countries. Among the countries whose role in both legal and illegal trade in various CITES-listed species will be discussed at the CoP, Vietnam emerges as a country of key concern. While that country has taken many commendable actions - including the tabling of a number of excellent listing proposals at this meeting - its role in the illegal trade of rhinos, elephants, tigers and many other CITES-listed species needs to be addressed, with ETIS data now clearly showing Vietnam in first place with respect to the quantity of illegal ivory in trade.

SUMMARY OF WWF'S POSITIONS ON KEY AGENDA DOCUMENTS AND PROPOSALS TO AMEND APPENDICES I AND II AT CITES COP18

5. As always, elephants are the subject of a number of agenda documents and proposals for amendment of the Appendices. WWF would like to make the following general observations, in addition to our comments and positions on individual documents.

    a. We still believe that the National Ivory Action Plan process is central to achieving a reduction in elephant poaching and illegal ivory trade. However, there is an urgent need to make the process more transparent, both for the sake of achieving better conservation outcomes and in order to provide more clarity to countries that are entered into the process. At present it relies too much on self assessment by the relevant countries. The process must also be adequately resourced, ideally through core funding in the Secretariat's budget.

    b. With regard to the agenda items relating to closure of domestic ivory markets, WWF sees the effective closure of markets in the countries neighbouring China (most of which are still National Ivory Action Plan countries) as being the most pressing priority, now that China has commendably closed its domestic ivory markets. Additional restrictions elsewhere should not be seen as an alternative to closure in key Asian markets or to other urgently required measures in key range and transit countries. We also believe that the Parties need to arrive at a better common understanding of what is meant by the term "closure" in different national contexts. Accordingly we advocate for the Standing Committee to consider this issue further and to advise on which domestic ivory markets have controls that are deemed adequate.

    c. WWF does not support any of the proposed amendments to the current listings for African elephant in the Appendices - either those that would provide for renewed ivory trade or the proposal to place the populations of Botswana, Namibia, South Africa and Zimbabwe on Appendix I. WWF calls on the respective countries to agree to mutual withdrawal of these proposals, and for the Parties to focus attention on the National Ivory Action Plan process, as outlined above.

6. WWF notes that the resources available to the Convention fall far short of the ambitions of the Parties, as reflected in decisions at CoP17 and in the long agenda at this meeting. We thank donors for their generosity in providing additional voluntary funding to work on many issues but we also note that others, including a proposed study on rosewood trade, and one on identification techniques for sturgeons, did not receive any funding. If the Parties do not budget for incremental growth at this meeting, and if donors do not dig deeper to fund non-core-funded work, then the gap between ambition and achievement will only grow. WWF stands ready to play its part in this regard.

7. Finally, WWF would like to thank the CITES Secretariat and the CITES Committees for their hard work in preparing so many of the agenda items which are tabled at CoP18.

Female saiga antelope (Saiga tatarica)
© Wild Wonders of Europe / Igor Shpilenok / WWF

WWF POSITIONS ON KEY AGENDA DOCUMENTS

ADMINISTRATIVE AND FINANCIAL MATTERS

7. Administration, finance and budget of the Secretariat and of meetings of the Conference of the Parties

7.4. Budget and work programme for 2020 to 2022

Key Points	WWF Position
Only the incremental growth budget, which would require over $3mln extra - will allow for funding work on Resolution Conf 17.7, and maintenance of the illegal trade database to be funded from core funds. Even then most of the Decisions rolled over from CoP17 - and any new ones adopted at CoP18 - that have cost implications would have to be funded out of additional contributions.	CALL FOR THE PARTIES TO ADOPT A BUDGET ALLOWING INCREMENTAL GROWTH

STRATEGIC MATTERS

10.0 CITES Strategic Vision post-2020

Key Points	WWF Position
Proposes a new Resolution on the Strategic Vision to 2030, and draft Decisions, including to Parties to take this forward into the post-2020 framework and mandating amendments to the Resolution to reflect the framework	WWF commends the Standing Committee on this document. However, we submit that the body text of the Resolution should mandate relevant Committees to monitor progress at regular meetings.

11. Review of the Convention

Key Points	WWF Position
Document recommends a review of the Convention with the aim of improving " the equitability of the Convention with regards to the role of people and States to be the best protectors of their own wild fauna and flora and the rights of rural communities and indigenous people over their own natural resources", as well as a study on the contradictions between CITES and GATT 1994, and a comprehensive review of the Appendices to be completed for CoP20	This document only focuses on cases where either CITES Decisions or stricter domestic measures are allegedly overly strict or impede sustainable use. It is silent on the possibility that some species warrant stricter regulation. Furthermore, while the compatibility of CITES and stricter domestic measures with GATT was a pertinent issue at the time of CoP10, subsequent jurisprudence does not point to any need to revisit this issue. In addition, the proposed review of existing listings would be inordinately expensive. In conclusion, while WWF is not opposed to a review of the Convention, the terms of reference for such a review warrant far more detailed and balanced consideration. If the Parties are minded to support a review, we suggest that draft Decisions mandate the Standing Committee to prepare terms of reference for consideration by CoP19. **PROVISIONALLY OPPOSE**

12. Securing better implementation of marine fish species listings in the Appendices

Key Points	WWF Position
Proposes a review of the efficacy of marine fish listings to date and urges that Parties do not submit further listing proposals for such species pending such a review	While there are some marine species listings whose implementation has required protracted discussions in the Animals and Standing Committees, the same is true of many other animal species, including Asian big cats, elephants, rhinos, pangolins, freshwater turtles and tortoises, snakes etc. Similarly, some plant listings, including orchids and some timber species, have required examination in the Plants and Standing Committees. This is an inevitable consequence of many well-merited listing decisions and there is no reason why marine listings should be singled out in this regard. And this cuts across Parties' right to submit any proposal they choose at any CoP. **OPPOSE**

Woman dehusking and seperating various grains, Mozambique, Africa.
© Green Renaissance / WWF-US

15. Securing better implementation of marine fish species listings in the Appendices

15.5. The International Consortium on Combating Wildlife Crime

Key Points	WWF Position
Proposes a draft Decision urging Parties to continue to provide funding to ICCWC	Over its lifespan, ICCWC has provided a considerable amount of capacity to CITES Parties and other stakeholders and it merits continued funding. **SUPPORT**

15.6. Cooperation between CITES and the World Heritage Convention

Key Points	WWF Position
Directs the CITES Secretariat, with the Standing Committee, to develop an MoU with the UNESCO World Heritage Centre; urges CITES Authorities of those Parties that are also WHC Parties to cooperate with their respective WHC Focal Points, encourages donors to support projects that benefit the objectives of both CITES and WHC; and urges Parties with World Heritage sites that are threatened by poaching of CITES-listed species to reach out to other range, transit and consumer countries.	WWF, in our 2017 report entitled Not for Sale: halting the illegal trade of CITES-listed species from World Heritage Sites, has already highlighted how important many natural World Heritage sites are in terms of the size of their populations of CITES-listed species, while also demonstrating how illegal harvest of such species in those sites, for the purposes of international trade, poses a threat to their Outstanding Universal Value, under the World Heritage Convention. This document sets out a suite of modest asks that would address this problem, and reflects the will of the International Community as already expressed in the World Heritage Committee, where this issue has been discussed. **SUPPORT**

17. Rural communities

17.1. Report of the Standing Committee

Key Points	WWF Position
The Standing Committee recommended the retention of the Decisions mandating work on this issue but the Secretariat recommends as an alternative some revisions to Resolution Conf. 16.6 (Rev. CoP) on CITES and Livelihoods encouraging Parties to take account of the impact of the measures proposed on rural communities, when submitting proposals to amend the Appendices, draft Resolutions, draft decisions, and other documents for CoPs and when reviewing such documents submitted by other Parties; and to include representatives of rural communities that may be affected by the proposed measures in official national delegations to CoPs.	WWF warmly supports the recommendation that Parties include representatives of rural communities in their delegations for CITES meetings. We also support in principle the recommendation that, as far as practicable, the impacts on rural communities of Resolutions, Decisions and amendments to Appendices I and II be considered at an early stage. However, we are also mindful of the precedence of the Convention text - Article II in particular - and relevant CoP Resolutions, including Resolution Conf. 9.24 (Rev. CoP17), Resolution Conf. 11.3 (Rev. CoP17), Resolution Conf. 14.3 and Resolution Conf. 16.7 (Rev. CoP17). The important point is to consider livelihood impacts in terms of how negative impacts might be mitigated and positive impacts enhanced. Therefore, we suggest the use of the word “address the impact of the measures proposed on rural communities” rather than “take into account…”. **SUPPORT IN PRINCIPLE**

17.2. Proposed amendments to Resolution Conf. 4.6 (Rev. CoP17) and Resolution Conf. 9.24 (Rev. CoP17)

Key Points	WWF Position
Would require countries submitting listing proposals or agenda documents to the CoP to consult with rural communities and to take account of the impact on such communities.	WWF supports the principle of taking the views of rural communities into consideration. We believe that national authorities are best placed to identify and consult with rural communities within their territories. Accordingly, we submit that the proposed changes to Resolution Conf 4.6 (Rev. CoP17) and res. Conf. 9.24 (Rev. CoP17) should be strengthened to encourage range States, when they are consulted on such proposals, to consult with local communities and indigenous peoples within their territories to take account of the impact of CITES proposals and decisions on such communities. **SUPPORT IN PRINCIPLE**

17.3. Participatory mechanism for rural communities

Key Points	WWF Position
Document proposes (i) that a Resolution be prepared for CoP19 endorsing the United Nations Declaration on the Rights of Peasants and Other People Working in Rural Areas; and (ii) that a Rural Communities Committee be established.	WWF supports in principle the proposal for a Resolution on the United Nations Declaration on the Rights of Peasants and Other People Working in Rural Areas. We believe that rural communities can be best represented and have their voice heard most effectively if they participate in other CITES meetings and bodies, rather than deliberate in isolation. **SUPPORT THE PROPOSED RESOLUTION** ENCOURAGE FURTHER DISCUSSION ON HOW TO ENSURE STRONG REPRESENTATION OF THE VIEWS OF LOCAL COMMUNITIES. AS AN INTERIM MEASURE, SUPPORT THE SECRETARIAT'S RECOMMENDATION IN COP. DOC. 17.1 THAT PARTIES BE ENCOURAGED TO INCLUDE COMMUNITY REPRESENTATIVES ON THEIR CoP DELEGATIONS

18. CITES and livelihoods

18.1. Report of the Secretariat

Key Points	WWF Position
Proposes a review and a further workshop on this issue based on new case studies. Also proposes amendments to.	WWF believes that the case study approach is the best way to address livelihood issues in CITES in the long term. **SUPPORT**

18.2. Proposal by Peru

Key Points	WWF Position
Draft Decisions would mandate the re-establishment of the Standing Committee working group on livelihoods with a mandate that would include consideration of the need for a new Resolution or amendment of an existing Resolution.	WWF is open to consideration of amending Resolution Conf. 16.6 and so we support the draft Decisions in principle, although it is not apparent to us at this stage that a new Resolution is necessary. **SUPPORT**

18.3. Proposed amendments to Resolution Conf. 9.24 (Rev. CoP17)

Key Points	WWF Position
Would require Parties submitting listing proposals to indicate both positive and negative livelihood impacts and to identify how the latter might be mitigated.	WWF believes that there is merit in anticipating livelihood issues where possible when adopting listings, Resolutions or Decisions. However, any proposed mechanism for doing so must take account of the precedence of the Convention text - Article II in particular - and relevant CoP Resolutions, including Resolution Conf. 9.24 (Rev. CoP17), Resolution Conf. 11.3 (Rev. CoP17), Resolution Conf. 14.3 and Resolution Conf. 16.7 (Rev. CoP17). Accordingly, we would direct Parties to our comments on CoP8 Doc. 17.1> We would also like to see other approaches considered, including learning from previous case studies. **OPPOSE**

19. Food security and livelihoods

Key Points	WWF Position
The document suggests renewing the Decisions mandating work on this as agreement could not be found but the Secretariat suggests that this issue can be dealt with through Resolution Conf. 16.6 (Rev. CoP).	We agree with the Secretariat that, in the interests of cost and time efficiency, food security issues should be considered in the context of wider mandated discussions and initiatives on livelihood issues. **SUPPORT THE SECRETARIAT'S APPROACH**

Hardwoods (Rosewood sp.) lying on the quayside in Maroantsetra.
© naturepl.com / Nick Garbutt / WWF

20. Demand reduction strategies to combat illegal trade in CITES-listed species

Key Points	WWF Position
Draft Decisions would mandate the development of demand reduction guidelines for consideration by the Standing Committee.	Efforts at changing consumer behaviour should learn from best practice in the wildlife arena and in other spheres. **SUPPORT**

23. Youth engagement

Key Points	WWF Position
Proposes amendments to Resolution Conf. 17.5 on Youth engagement to provide for collaboration with relevant UN organizations and conventions and the Secretary-General's Envoy on Youth, encourage Parties to use the annual World Wildlife Day as an opportunity to incentivise youth awareness and to establish long term youth engagement and empowerment strategies.	These proposed measures will strengthen the engagement of youth with the Convention. **SUPPORT**

INTERPRETATION AND IMPLEMENTATION MATTERS

General compliance and enforcement

30.Compliance in relation to Malagasy ebonies (*Diospyros* spp.) and palisanders and rosewoods (*Dalbergia* spp.)

30.1. Report of Madagascar

Key Points	WWF Position
Reports on progress on technical, legal and enforcement matters and includes draft Decisions directed at transit and consumer countries, at Madagascar, at donors and at the Committees.	WWF welcomes Madagascar's report and notes the progress being made. We support the draft Decisions in principle but, as noted in our comments on Document 30.2, there are still key issues to be resolved before trade can proceed. **QUALIFIED SUPPORT**

30.2. Report of the Standing Committee

Key Points	WWF Position
Mandates the Plants and Standing Committees to continue to work on relevant issues with Madagascar but also mandates compliance actions in the event of failure by Madagascar to implement these Decisions.	WWF would like to see the stockpile sale proceed but only when we are assured that it is fully compliant with the Convention. Only audited stocks should be sold. Stocks of illegal or unknown origin cannot be legitimised by payment to their owners, as this would encourage speculative stockpiling of illegal timber. **SUPPORT CONTINUED VIGILANCE**

31. Domestic markets for frequently illegally traded specimens

Key Points	WWF Position
Proposes an amendment to resolution Conf. 10.10 (Rev. CoP17) Urging Parties that close their domestic ivory markets to enhance their border controls and collaboration with neighbouring countries trade in ivory.	While we support the proposed amendment, WWF believes that there needs to be a better common understanding of what is meant by the term "closure", and what exemptions are legitimate in any given context. Accordingly we advocate for the Standing Committee to consider this issue further and to advise on which domestic markets have controls that are deemed adequate. **CONDITIONAL SUPPORT**

32. Enforcement matters

Key Points	WWF Position
Draft Decisions call on Parties to use the new Integrity Guide for Wildlife Management Agencies.	WWF welcomes the preparation of the integrity guide and encourages its widespread use. **SUPPORT**

33. Combating wildlife cybercrime

Key Points	WWF Position
Draft Decisions encourage Parties to liaise with INTERPOL, in particular its Global Complex for Innovation in Singapore	Taken in context with Document CoP18 Doc. 33.2 this proposal is an excellent suggestion. **SUPPORT**

33.2. Report of the Standing Committee

Key Points	WWF Position
Incorporates proposed amendments to Res. Conf. 11.3 (Rev. CoP17) on compliance and enforcement to address e-commerce in CITES-listed species.	The proposed amendments would lend urgency to efforts to address illegal e-commerce in CITES-listed species. **SUPPORT**

37. Working conditions of wildlife rangers and their implications for implementation of CITES

Key Points	WWF Position
Summarises the content of the "Life on the Front Line" report and asks the CoP to consider ways in which it can contribute to the discussions at the World Ranger Congress, and to addressing the underlying problems raised.	WWF commends Nepal for tabling this document. Parties and donor bodies should reflect on the issues raised and on how best to address them. **WELCOME THE DOCUMENT**

REGULATION OF TRADE

38. Designation and roles of Management Authorities

Key Points	WWF Position
Sets out for the first time the statutory roles of Management Authorities under the Convention.	WWF congratulates the Standing Committee on this draft Resolution and urges the Parties to adopt it. **SUPPORT**

39. Guidance for making legal acquisition findings

Key Points	WWF Position
Proposes a draft Resolution with guidelines on verification of legal acquisition.	WWF welcomes these draft guidelines. However, we strongly believe that they should address the obligations of importing countries, as proposed in SC70 Doc. 27.1. We disagree with the assertion in CoP 18 Doc.40 that these are more appropriately included in Res. Conf. 11.3 (Rev CoP17). However, if the CoP opte for the latter approach then, at a minimum, to draft Resolution presented here should cross-reference that Resolution. **CONDITIONAL SUPPORT**

40. Due diligence by CITES Parties and obligations of importing countries

Key Points	WWF Position
The document (from the US) argues that the provisions regarding due diligence by importing countries belong in Res. Conf. 11.3 (Rev. CoP17) and not in the draft Resolution on verification of legal acquisition proposed under Item 39. Accordingly, they propose substantial edits to the former Resolution.	WWF's preference is to have these obligations articulated in the draft Resolution proposed in CoP18 Doc. 39. At a minimum, we would require that, if preference of the CoP is that the issue of due diligence by importing countries is addressed in Res. Conf. 11.3 (Rev. CoP17) then both Resolutions should cross-reference one another. We also note that Parties are seeing these proposed edits very late and that an in-session drafting group may be necessary to work through the substantial edits proposed. **THIS DOCUMENT IS THE LESS PREFERRED OPTION**

41. Electronic systems and information technologies

Key Points	WWF Position
Encourages Parties to use electronic systems and sets out safeguards of such systems, and mandates Standing Committee to continue work on this issue.	WWF would favour more widespread use of e-permitting where the requisite security standards are met, as this would improve security and transparency, and facilitate better reporting. **SUPPORT**

42. Traceability

Key Points	WWF Position
Presents a definition of the term "traceability" that reads *Traceability is the ability to access information on specimens and events in a CITES species supply chain *, with a footnote that reads: * This information should be carried, on a case by case basis, from as close to the point of harvest as practicable and needed to the point at which the information facilitates the verification of legal acquisition and non-detrimental findings and helps prevent laundering of illegal products.*	For WWF the key point is to establish the principle that traceability should start as close to the point of harvest as possible and continue as close as possible to the point of final sale. This has been contested but it is reflected in the text presented. **SUPPORT**

43. Specimens produced from synthetic or cultured DNA

Key Points	WWF Position
Mandates the Committees to continue work on this issue, including a direction to the Standing Committee to "discuss how to apply the term "readily recognizable part or derivative" to trade in products of biotechnology, which might potentially affect international trade in CITES-listed specimens in a way that would threaten their survival"	WWF supports the draft decisions as proposed by the Secretariat in Annex 1 of the document, as the production of wildlife products through biotechnology is an evolving field and it is critical that we understand how these processes evolve, where they are entering international trade, and where that trade involves or is impacting CITES-listed species. However, WWF finds that the discussion is focused on process, where CITES should regulate product. Where such products are readily recognizable parts and derivatives (particularly where indistinguishable from a listed species), CITES COP18 can determine that regulation under the Convention is warranted. **CONDITIONAL SUPPORT**

44. Definition of the term 'appropriate and acceptable destinations'

44.2. International trade in live African elephants: Proposed revision of Resolution Conf. 11.20 (Rev. CoP17) on Definition of the term 'appropriate and acceptable destinations'

Key Points	WWF Position
Proposes to limit the scope of the definition - in the case of African elephants - to *in situ* transfers within the elephant's natural range	While WWF agrees with the IUCN African Elephant Specialist group that live elephants should not be taken from the wild for display in zoos, the proposed amendments would only apply to elephant populations on Appendix II and would do nothing to address the discretion that range States with populations on Appendix I have, in conjunction with the importing country, to approve the export of live elephants to facilities that would not meet the conditions advocated by the proponents. We would favour addressing this issue for all elephant populations via amendments to Resolution Conf. 10.10 (Rev. CoP17). **SUPPORT DISCUSSING THIS ISSUE UNDER THE FRAMEWORK OF RESOLUTION CONF. 10.10 (REV. COP17)**

46. Quotas for leopard hunting trophies

Key Points	WWF Position
This document reports on the scrutiny by the Animals and Standing Committees, mandated by Decisions 17.114-17.117, of leopard hunting trophy quotas established under established under Resolution Conf. 10.14 (Rev. CoP16). Draft Decisions encourage further review and information sharing regarding leopard quotas, and amendments are proposed to Resolution Conf. 9.21 to ensure that the Animals Committee keep CoP-based trophy quotas under review and react to new information.	While the proposed Decisions and amendments to Resolution Conf. 9.21 are welcome they do not, in the view of WWF, go far enough. As stated elsewhere, we would call for the adoption of draft Decisions mandating the Animals Committee to review the entire approach of CoP based trophy quotas. **CALL FOR STRONGER ACTION**

47. Enhancement of quotas for markhor hunting trophies

Key Points	WWF Position
Seeks to increase the quota from 12 to 20	While we welcome the apparent success that Pakistan has demonstrated in managing its markhor population, we note some gaps in the survey data and would prefer to see the proposal being supported by more detailed information. Therefore, we are prepared to accept the proposed increased quota only on the basis that Decisions would mandate the Animals Committee to examine the population status of markhor in Pakistan on the basis of further information supplied by that country and report on this to the Standing Committee. We also believe that the CoP should reflect on the merits of establishing trophy quotas, as these quotas tend to remain in place with little oversight, and offer little incentive for adaptive management. Accordingly, we would encourage the adoption of draft Decisions mandating the Animals Committee to look at this wider issue. **CONDITIONAL SUPPORT**

48. Black rhinoceros hunting trophies: Export quota for South Africa

Key Points	WWF Position
Proposes to increase South Africa's export quota for black rhinoceros hunting trophies from five adult male black rhinoceros, as approved in Resolution Conf. 13.5 (Rev. CoP 14), to a total number of adult male black rhinoceros not exceeding 0.5% of the total black rhinoceros population in South Africa in the year of export.	The quota as proposed, given current population levels and trends, appears sustainable and South Africa has clear mechanisms in place to minimize exploitation in illegal trade and to ensure robust management. However, whilst the case has been clearly articulated as to how such quota benefits conservation of the species in South Africa, further information is required regarding the mechanisms to ensure income generated is used in service to wildlife conservation as well as the status of the central electronic permitting system. In addition, further clarity is needed on how the level of offtake would be adjusted, either by the proponent or by CITES, should the population trend change such that the agreed quota is no longer in the best interest of black rhino conservation. **CONDITIONAL SUPPORT**

49. Implications of the transfer of a species to Appendix I

49.1. Report of the Secretariat

Key Points	WWF Position
Clarifies that specimens can only be considered as pre-Convention of they were acquired before the species was included in any of the CITES Appendices. Specimens subsequently listed in Appendix I must be treated as such in trade if they were acquired after the inclusion of the species even in Appendices II or III and recommends that the Standing Committee examine whether a new Resolution or amendments to an existing Resolution are required.	We welcome the Secretariat's further reflections on this issue and we warmly support their conclusions. **SUPPORT**

49.2. Trade in 'pre-Appendix-I' specimens

Key Points	WWF Position
Takes the same interpretation as Doc. 49.1 but advocates an amendment to Resolution 13.6 (Rev. CoP16) on pre-Convention specimens.	As indicated above we agree with the interpretation, and we support amendments to Resolution Conf. 13.6 (Rev. CoP16). **SUPPORT**

52. Introduction from the sea

Key Points	WWF Position
Draft Decisions mandate the Secretariat and the Standing Committee to continue monitoring implementation of Resolution Conf. 14.6 (rev. CoP16) and on the BBNJ negotiations.	It is noted that relatively few countries have legislation in place to implement the Resolution. Accordingly, WWF calls for inclusion of wording in the draft Decisions to mandate the Standing Committee to identify those countries with high seas fisheries that do not have legislation in place and to take appropriate action. **FURTHER AMENDMENT REQUIRED**

54. Identification of specimens in trade

54.3. Identification of sturgeons and paddlefish specimens in trade

Key Points	WWF Position
Funding could not be found over two intersessionals to implement Decisions mandating work on forensic identification techniques. The document proposes renewal of these Decisions.	WWF regrets that funding could not be found for the study mandated by the current Decisions. We support their renewal and stand ready to offer assistance. **SUPPORT**

EXEMPTIONS AND SPECIAL TRADE PROVISIONS

56. Simplified procedure for permits and certificates

Key Points	WWF Position
Proposes amendments to Resolution Conf. 11.5 (Rev. CoP12) to facilitate easier transfers of samples for diagnostic and forensic research purposes.	These proposed measures can facilitate timely responses to events such as the saiga die-off in 2015 and could potentially benefit future forensic and research work. **SUPPORT**

Red Coral (Corallium Rubrum)
© WWF

58. Implementation of Resolution Conf. 17.7 on Review of trade in animal specimens reported as produced in captivity

Key Points	WWF Position
This is an overarching document reviewing the process and recommends minor revisions to the Resolution. It notes that core funding is not available for this process at present.	WWF strongly supports this Resolution and the proposed amendments and we urge Parties to fund its operation as core business. **SUPPORT AND CALL FOR CORE FUNDING**

SPECIES SPECIFIC MATTERS

60. Illegal trade in cheetahs (*Acinonyx jubatus*)

Key Points	WWF Position
Draft Decision mandates the Secretariat to make available the final version of the cheetah resource kit when available.	While WWF welcomes the resource kit, we are concerned that this issue could fall from view and that illegal trade would continue. We consider that a new Resolution is warranted encapsulating the recommendations set out in SC66 Doc. 32.5, paragraphs 17 and 18, and we call for draft Decisions mandating this, either through the relevant Committees or (preferably) via a bespoke workshop. **CALL FOR FURTHER MEASURES**

61. Sturgeons and paddlefish (*Acipenseriformes* spp.)

Key Points	WWF Position
Includes a draft Decision for the Standing Committee to consider the practical challenges in the implementation of "CITES guidelines for a universal labelling system for the trade in and identification of caviar"	WWF notes that some trading countries are not yet implementing the current labelling requirements, and that even among those that have legislated to implement it, many of the labels found in trade do not comply fully with the requirements, as outlined in a 2018 TRAFFIC report. We call on the adoption of additional draft Decisions mandating the Standing Committee to take up these concerns. **CALL FOR FURTHER MEASURES**

63. Eels (*Anguilla* spp.)

Key Points	WWF Position
Draft Decisions are proposed to create further reporting and implementation obligations for range States of European eel and encourage range States of other eel species to implement conservation measures and to cooperate in wide efforts directed at the genus. More work by the Standing Committee and Animals Committee is also mandated.	WWF welcomes the extensive work undertaken on this species and encourages the Parties to adopt the Decisions. **SUPPORT**

64. Precious corals (Order Antipatharia and family Coralliidae)

Key Points	WWF Position
Essentially rolls over the mandate to the Animals Committee to consider the study on precious coral trade which could not be completed in time for this CoP.	WWF regrets the slow progress on this issue. However, we have commented extensively on the draft study on coral trade and support continuation of the work. **SUPPORT**

67. Humphead wrasse (*Cheilinus undulatus*)

Key Points	WWF Position
Incorporates a draft Decision mandating the Secretariat to support exporting and importing countries.	WWF has identified a number of additional concerns that urgently need to be addressed: (i) Illegal imports to Hong Kong are continuing as noted at SC69, including imports of fish below the 1kg size limit, and these could be alleviated by simple legislative amendments; (ii) We acknowledge the potential of Indonesia's approach of growing on specimens in captivity for export but we consider that such specimens should be tagged to distinguish them clearly from wild-taken species - we also submit that these should be treated as source W and not source R. We also reiterate that they require a more robust NDF. Overall, we believe that at least some of these matters are better addressed through a Resolution rather than Decisions. We could support expanded Decisions (and can offer wording if necessary) but we would also favour a mandate to the Standing Committee to prepare a draft Resolution for CoP19. **CALL FOR FURTHER ACTION**

68. Sharks and rays (*Elasmobranchii* spp.)

68.1. Report of the Animals Committee

Key Points	WWF Position
The Animals Committee reports on progress related to NDF's, the growth in shark meat trade, etc. Concerns are raised about lookalike issues related to non-listed hammerhead species.	WWF welcomes this report but notes the concern over enforcement issues relating to non-listed hammerhead species. **We call for the drafting of a Decision directing the Animals Committee to consider this issue in more detail.**

69. Elephants (*Elephantidae* spp.)

69.1. Implementation of Resolution Conf. 10.10 (Rev. CoP17) on Trade in elephant specimens

Key Points	WWF Position
Includes updated Decisions on stockpile management and on trade in Asian elephants, a review of ETIS and on the financial sustainability of MIKE and ETIS that are not controversial. It also proposes some changes to Annex 3 of the Resolution setting out the NIAP process but they are mainly editorial.	WWF believes that the proposed amendments DO NOT go far enough. Much more needs to be done to improve transparency in the NIAP-process, both with the aim of achieving better conservation outcomes but also guiding and reassuring NIAP countries. For example, when NIAP countries are identified, the grounds for such identification should also be clearly stated, together with the criteria for a future decision on the country exiting the process. There should also be a structured mechanism for the Secretariat to consult with relevant experts, such as a technical advisory group. Finally, if the Parties wish to see this process continue they must be prepared to increase funding, ideally making it a core funded item. **CALL FOR ADDITIONAL ACTION**

69.3. Report on the Elephant Trade Information System (ETIS)

Key Points	WWF Position
There has been a continuation of the trend of a dropping number of seizures since 2015 and a slight drop in overall quantity. Compliance with the requirement for forensic testing from large-scale seizures is very poor. Malaysia, Mozambique, Nigeria and Viet Nam are rated Category A; Kenya, Tanzania, Uganda, China and Hong Kong are Category B; DRC, Congo, South Africa, Cameroon, Gabon, Zimbabwe, Angola, UAE, Ethiopia, Cambodia, Singapore, Laos, Turkey and Burundi are Category C.	Viet Nam's emergence as the largest remaining consumer market highlights the many problems that that country faces in terms of legislative loopholes, administrative integrity and political will. The IUCN-TRAFFIC report under agenda item 83.1 further underscores this. Accordingly we believe that Viet Nam should be entered into an Article XIII procedure, if necessary superseding the NIRAP process. Similarly for Mozambique, while their willingness to improve is acknowledged, they face serious capacity issues and would benefit from a broader examination of their ongoing problems through the Article XIII process. **CALL FOR ARTICLE XIII PROCESSES FOR VIET NAM AND MOZAMBIQUE**

69.4. Ivory stockpiles: proposed revision of Resolution Conf. 10.10 (Rev. CoP17) on Trade in elephant specimens

Key Points	WWF Position
Proposes that when Parties submit information to the Secretariat on the level of government-held stockpiles and significant privately held stockpiles of ivory within their territory, they are requested to include information on the quantities of any ivory stolen and/or missing from these stockpiles, to be made available to the programme Monitoring the Illegal Killing of Elephants (MIKE) and the Elephant Trade Information System (ETIS) for their analyses.	WWF believes that this proposal would improve the effectiveness of ETIS in particular. **SUPPORT**

69.5. Implementing aspects of Resolution Conf. 10.10 (Rev. CoP17) on the closure of domestic ivory markets

Key Points	WWF Position
Essentially removes the provision that confined the obligation to close markets to those that are contributing to illegal trade, and extends it to all domestic ivory markets, and stipulates that even exempted items should be subject to compulsory registration and traceability controls.	WWF supports the closure of legal domestic ivory markets that are contributing to poaching and illegal trade. As stated above under agenda item 31, WWF believes a better understanding what constitutes an effective market closure, including any narrow exemptions, would be helpful to this discussion. This document goes some way towards addressing that issue but it is effectively seeking further legislative amendments from some jurisdictions that are widely described as having closed their markets. Accordingly we advocate for the Standing Committee to consider this issue and to advise on which domestic markets have controls that are deemed adequate. **SUPPORT IN PART BUT CALL FOR FURTHER WORK**

70. Hawksbill turtle (*Eretmochelys imbricata*) and other marine turtles (*Cheloniidae* and *Dermochelyidae*)

Key Points	WWF Position
The draft Decisions proposed by the Secretariat go further than the recommendations of SC70. They mandate the Animals Committee to take up the issue as well as the Standing Committee and they mandate the Secretariat to work directly with countries that are the subject of country-specific recommendations.	WWF believes that even on the basis of the incomplete report presented to SC70 there are more prescriptive Decisions that could be adopted at this meeting. Parties where there is demand for marine turtle products should undertake or strengthen existing enforcement and demand reduction efforts; Parties in the Coral Triangle region should review and update relevant legislation and improve accountability and actionable intelligence to combat the trade; and donors should be prepared to contribute funds and capacity. **CALL FOR EXPANSION AND STRENGTHENING OF THE DRAFT DECISIONS**

71. Asian big cats (ABCs) (*Felidae* spp.)

71.1. Report of the Secretariat

Key Points	WWF Position
Proposes (i) draft Decisions for stronger enforcement and the missions to facilities keeping ABCs that may be of concern, to then inform subsequent Standing Committee recommendations; (ii) amends to Res.Conf. 12.5 (CoP17) urging adoption of comprehensive legislation; recalling Res. Conf. 17.4 on demand reduction; and aligning language on closing domestic markets to that for ivory; and (iii) retention of Decision 14.69 on captive breeding and trade of tigers.	As highlighted in the review in Annex 4 that was generously funded by the UK, there is continued and escalating poaching of ABCs. With disappointment over previous delays, including the absence of the missions to facilities keeping tigers that may be of concern, we strongly urge CITES to act decisively on the valuable and comprehensive information available in this document. The reports from China, Thailand and Viet Nam under Decision 17.226 c), and through the Article XIII process for Laos, prompt specific concerns and queries that should be addressed by the missions. We broadly support the draft Decisions, but urge specificity in 18.DD that time-bound , country-specific actions (as per Decision 17.227) are recommended from SC73. The overlap with draft Decisions proposed in Doc 71.2, should be discussed and consolidated. We support the proposed amends to the Resolution and retention of Decision 14.69. Further to Decision 17.225 (proposed to be deleted) we recommend the following is also added to the Resolution - "NOTING the Zero Poaching toolkit provides tools to aid enforcement agencies under the categories of assessment, technology, capacity, community, prosecution and cooperation." Additionally, anti-money laundering approaches, forensic analytical techniques, intelligence led enforcement and working with internet companies should be specifically included in paragraph 1c) when referring to enforcement methods. **CONDITIONAL SUPPORT**

71.2. Draft decisions on Asian big cats

Key Points	WWF Position
Proposes a suite of Draft Decisions on tigers and other Asian big cats, including urging countries identified as of concern to implement Decision 14.69 prohibiting the breeding of tigers for commercial trade in parts and derivatives, but also addressing reporting of seizures, trade in leopard etc.	WWF commends India for tabling this document. With thanks to UK and EU funding, detailed review of the illegal tiger trade, tiger farms and driving factors was provided in SC70 Doc. 51 and its annexes. However, SC70 did not provide tangible recommendations based on that valuable information. Doc 71.2 addresses comprehensively the issues identified in that review. We support this document noting that we would like to see Draft Decision 18.JJ specify reporting by SC73 as urgent action is needed. The overlap with draft Decisions and proposed amends to Res. Conf. 12.5 (CoP17) proposed in Doc 71.1, should be discussed and consolidated. **SUPPORT**

72. Seahorses (*Hippocampus* spp.) on CITES – a roadmap to success

Key Points	WWF Position
Draft Decisions mandate the Animals and Standing Committees to work on quota setting, NDF and other aspects of sustainable trade on the basis of reports from trading Parties, a proposed workshop and a proposed consultancy.	WWF believes that overall the Appendix II listing of seahorses has been a success and that much has been learned from implementing the listing that has benefitted work on other aquatic species. However, given the evolving nature of the trade we believe that CITES would benefit from the work proposed in the draft Decisions in this document. **SUPPORT**

73. Great apes (*Hominidae* spp.)

Key Points	WWF Position
Proposes amendments to Resolution Conf. 13.4 on conservation of and trade in great apes, the most significant being that trade in wild-sourced apes is not to be encouraged, except for the movement of animals seized from illegal trade into long-term care facilities.	WWF warmly supports the proposed amendments and welcomes the recognition that trade in wild-sourced apes is not to be encouraged, except for the movement of animals seized from illegal trade into long-term care facilities. **SUPPORT**

74. Rosewood timber species [Leguminosae (Fabaceae)]

Key Points	WWF Position
Funding could not be found for a study on these species in the last intersessional and the new draft Decisions mandate a study with revised ToR.	WWF supports these draft Decisions that retain and expand the mandate for a study on trade in these species. We believe that such a study is crucial, inter alia, to test the validity of the revised annotation proposed in the listing proposal on *Dalbergia* and *Gibourtia* spp. **SUPPORT**

75. Pangolins (*Manis* spp.)

Key Points	WWF Position
Proposes draft Decisions requiring range countries to report on in situ conservation measures, and mandating continued work by the Animals and Standing Committees, as well as deleting the reference to NDFs for trade in the species as such trade should not normally arise in the context of Appendix I species.	WWF welcomes the recognition that further work is required on these species to render the Appendix I for these heavily trafficked mammals listing effective. We support the allocation of further work to the Animals and Standing Committees and the deletion of the reference in Resolution Conf. 17.10 to the making of NDFs for these species. **SUPPORT**

76. African lion (*Panthera leo*)

76.1. Report of the Secretariat

Key Points	WWF Position
Draft Decisions mandate the Secretariat to collaborate with CMS and to establish a big cats task force. Further draft Decisions encourage Parties to scale up enforcement and cooperation, and mandate the Secretariat to undertake further research.	WWF believes that the Decisions directed at Parties and donors could form the basis for consideration of a draft Resolution on lions, as advocated in Document CoP18 Doc. 76.2 and we prefer that approach. We also note that draft Decision 18.BB implies that the final say on membership of the Big Cats Task Force rests with the Secretariat whereas we believe it should rest with the Standing Committee. **SUPPORT A RESOLUTION ON LIONS AND MODIFICATION OF THE PROPOSED DECISIONS ACCORDINGLY**

76.2. Conservation of and trade in African lions

Key Points	WWF Position
Proposes a draft Resolution on lions that would: (i) prioritise enforcement on lions; (ii) address the risk of trade in captive lion parts stimulating demand for wild sourced lion parts [needs a reference to tiger here]; (iii) ensure registration of captive breeding facilities and traceability of products: (iv) undertake demand reduction efforts; (v) establish trophy quotas; and (vi) review NDFs.	WWF opposes trade in lion parts and derivatives even from captive breeding facilities as this complicates enforcement efforts against illegal trade in Asian big cats. We also recognise the need for more rigour in the making of NDFs and the establishment of trophy quotes. Accordingly, while noting the Secretariat's comments and agreeing that some of the proposed text may require modification, we broadly support this draft Resolution. **SUPPORT**

Jaguar (Panthera onca).
© Staffan Widstrand / WWF

77. Jaguar (*Panthera onca*)

77.1. Jaguar trade

Key Points	WWF Position
Draft Decisions mandate a consultancy with input from Parties and other relevant stakeholders for consideration by the Animals and Standing Committees.	WWF welcomes the two documents from Costa Rica & Mexico, and from Peru, respectively given the emergence of trade in jaguar parts as an issue of conservation concern. WWF supports the decisions as drafted by the Secretariat and encourages funding support for the proposed study, which should provide a solid basis off which to build future effective CITES interventions. **SUPPORT**

77.2. Illegal trade in jaguar

Key Points	WWF Position
Proposes a draft Resolution urging Parties to treat the matter as urgent concern, strengthen legislation, enhance cooperation etc.	As stated above with regard to Item 77.1, WWF welcomes the two documents from Costa Rica & Mexico, and from Peru, respectively, given the emergence of trade in jaguar parts as an issue of conservation concern, and supports the decisions as drafted by the Secretariat, calling for funding support for the proposed study, as a solid basis off which to build future effective interventions. **SUPPORT**

78. Illegal trade in Tibetan antelope (*Pantholops hodgsonii*)

Key Points	WWF Position
Secretariat suggests that in the light of the improved status of the species that there is no longer a need for regular reporting to the Standing Committee.	WWF commends China for its achievement in increasing the population of the Tibetan antelope and curtailing illegal trade, and we agree that the Standing Committee no longer requires ongoing oversight of the issue. **SUPPORT**

79. Songbird trade and conservation management (*Passeriformes*)

Key Points	WWF Position
Draft Decisions mandate the Animals Committee to prepare a report on trade, conservation priorities, management needs and enforcement priorities for consideration by the Standing Committee, and mandate the development of guidance on NFFs for songbirds.	WWF considers that this document does an excellent job of addressing what is a complex and multifaceted issue, and that the proposed Decisions are an excellent way forward. **SUPPORT**

83. Rhinoceroses (*Rhinocerotidae* spp.)

83.1. Report of the Standing Committee and the Secretariat

Key Points	WWF Position
Draft Decisions are directed to Viet Nam, China, Namibia, South Africa and Mozambique urging them to continue their efforts to address the poaching crisis, and to Zimbabwe urging it to follow up on outstanding court cases. The Standing Committee is mandated to continue to monitor implementation of these Decisions.	While progress continues to be made in some countries, it is evident that the scale of rhino poaching and trafficking of rhino horn continues to pose a serious threat and that Parties must sustain and increase efforts to deter poaching, trafficking and demand for rhino horn. In particular, Viet Nam and Mozambique continue to stand out. It is not evident that there has been a fundamental shift in political will in the former country, while there are concerns that serious capacity problems remain in the latter. Noting that both countries are also Category A countries in the ETIS analysis, WWF, in its comments on Document CoP18 Doc. 69.3, recommends that both be entered into an Article XIII procedure. How this aligns with the NIRAP process, and how CITES ensures increasingly meaningful gains are realized via that process, is a matter for discussion, noting that some other Article XIII countries are also NIAP countries. Overall, WWF broadly supports the decisions as proposed by the Secretariat, but would note (i) that Draft Decision 18.AA should retain the reference originally included in Decision 17.133 to Resolution Conf. 9.14 (Rev. CoP17), which includes language on specific measures useful to addressing poaching, trafficking and demand: (ii) SC73 should review Viet Nam and Mozambique under Article XIII, taking into account also progress with NIRAP implementation, given the slow progress demonstrated in addressing the roles played by each in the illegal rhino horn trade to date; and (iii) WWF would urge the COP to include a decision directed the Standing Committee to consider recommendations to suspend trade with Viet Nam, in particular, but also in Mozambique if necessary, if progress in addressing their role in illegal rhino horn trade continues to be deemed insufficient. **CONDITIONAL SUPPORT**

83.2. Revisions to Resolution Conf. 9.14 (Rev. CoP17) on Conservation of and trade in African and Asian rhinoceroses, and associated decisions

Key Points	WWF Position
Proposed amendments include: (i) urging closure of all domestic markets; (ii) collation of and reporting to the Secretariat of information on privately held stockpiles; (iii) stockpile destruction; (iv) a direction to IUCN/ TRAFFIC to address domestic markets as an additional issue in their report to each CoP; and (v) reporting to each Standing Committee meeting (via the Secretariat and including IUCN and TRAFFIC) on the status of domestic markets and efforts to close them.	WWF supports the closure of domestic markets for products illegal in international trade, recognizing the role that such markets can play in complicating enforcement efforts and potentially undermining demand reduction; this principle includes rhino horn, and other rhino parts and derivative. WWF supports closure of domestic markets for both wild and captive sourced specimens and would suggest clarifying language be added to the suggested amendments to Res. Conf. 9.14. However, WWF is concerned by the potential market impacts of public destruction events for limited high value products and does not support destruction of rhino horn stockpiles without further research into potential impacts and without strong management and audit procedures. **CONDITIONAL SUPPORT**

84. Helmeted hornbill (*Rhinoplax vigil*)

Key Points	WWF Position
Essentially rolls over the work mandated by CoP17.	WWF believes that there is an urgent need for more substantive Decisions at this meeting. We note that the hornbill range States have convened a workshop prior to the CoP and we would urge Parties to take the outcomes of this workshop into account. **CALL FOR MORE SUBSTANTIVE ACTIONS**

86. Saiga antelope (*Saiga* spp.)

Key Points	WWF Position
Draft Decisions mandate work on the Medium Term International Work programme for the Saiga Antelope 2021-2025 by range and consumer countries, the Secretariat (in collaboration with CMS) and the Standing Committee.	The urgency of the situation concerning saiga antelope is underlined by our support for the Appendix I listing proposal. In the hope that sustainable trade can resume at some point in the future, we encourage the Secretariats of CITES and CMS, together with range and consumer countries, to engage on the proposed medium term programme of work. **SUPPORT**

88. Tortoises and freshwater turtles (*Testudines* spp.)

Key Points	WWF Position
Concerns about trade in ploughshare tortoise from Madagascar have led to a draft Decision requiring that country to report to the Standing Committee. Other draft Decisions mandate the development of a guide to parts and derivative in trade.	The growing demand for ploughshare tortoises, especially in Asia, is well document, and WWF supports the Decision requiring reporting by Madagascar. We also support the other draft Decisions proposed. **SUPPORT**

89. Totoaba (*Totoaba macdonaldi*)

Key Points	WWF Position
Draft Decisions mandate continued oversight of this issue by the Standing Committee.	According to CIRVA, no more than 22 vaquitas remained during 2018. We are beyond the 11th hour in addressing the illegal totoaba trade driving declines of both of these species, and this issue must be given the utmost priority before another species is lost. WWF supports the draft recommendations in CoP18 Doc. 89, with the following amendments: - WWF recommends specific inclusion of Mexico, the U.S. and China in 18.AA as the key source, transit and consumer states for totoaba. ("18. AA Parties, in particular Mexico, the U.S. and China, in collaboration with relevant stakeholders, are encouraged to:") - WWF recommends inclusion of draft decision 18.AA e) as follows: support Mexico, as a matter of urgency, in implementation of recommendations from the Report of the 11th Meeting of CIRVA. In particular to 1) fully fund and expand net removal efforts to maintain the area as a net-free zone; 2) provide 24-hour surveillance and monitoring; 3) take all necessary measures to protect net removal teams; 4) arrest and prosecute illegal fishermen. **SUPPORT**

91. Conservation of vicuña (*Vicugna vicugna*) and trade in its fibre and products

Key Points	WWF Position
A draft Resolution calls for greater vigilance by range countries and others in combating illegal trade in this species.	WWF supports the efforts that have been made in recent decades to bring about sustainable trade in this species through shearing and labelling regimes in range countries and would not want to see these undermined by illegal trade that is indeed being reported from various sources. **SUPPORT**

96. African Carnivore Initiative

Key Points	WWF Position
Draft Decisions mandate the Secretariat to include this initiative in its programme of work and to report as necessary to the Animals and Standing Committees.	WWF welcomes this initiative. However we do believe that there will be a continued need for the Committees to monitor implementation of relevant Articles of the Convention and Conference Resolutions by range and consumer countries. **SUPPORT**

MAINTENANCE OF THE APPENDICES

98. Reservations with respect to amendments to Appendices I and II

Key Points	WWF Position
Makes the 90-day deadline for entry of reservations to Appendices I and II absolute with no discretion to the Depositary Government.	The 90-day deadline for entry of reservations to amendments to Appendices I and II is inscribed in the text of the Convention and there should be no discretion to vary it. **SUPPORT**

104. Review of Resolution Conf. 10.9 on Consideration of proposals for the transfer of African elephant populations from Appendix I to Appendix II

Key Points	WWF Position
Recommends repeal of the Resolution	WWF notes the near unanimous support for appeal of this Resolution, and we consider that proper application of the criteria in Resolution Conf. 9.24 (Rev. CoP17), including assessment of relevant precautionary measures, are an adequate basis for assessing future proposals for the transfer of African elephant populations from Appendix I to Appendix II . **SUPPORT**

African elephant (Loxodonta africana).
© Staffan Widstrand / WWF

WWF POSITIONS ON KEY PROPOSALS TO AMEND APPENDICES I AND II

(Note: For those proposals not addressed here WWF urges Parties to follow the advice in the analyses provided jointly by IUCN and TRAFFIC)

Proposal number	Taxon	Species Common name	Proposal	Proponent(s)	WWF Position
CoP18 Prop. 1	*Capra falconeri heptneri*	Heptner's Markhor	Transfer of the population of Tajikistan from App. I to App. II	Tajikistan	WWF notes that problems with enforcement of the current trophy quota system have been identified, including the hunting of young males below the legal trophy age. Given these problems, the high level of poaching in neighbouring Afghanistan and other enforcement difficulties, we consider that neither the precautionary conditions for downlisting or for a split listing have been met. **OPPOSE**
CoP18 Prop. 2	*Saiga tatarica*	Saiga	Transfer from App. II to App. I	Mongolia and United States of America	Although we recognise that an error was made with the nomenclature, and that on the basis of a strict interpretation of the criteria, Saiga tatarica might not qualify, we consider that it would be regrettable if the proposal was rejected on these grounds. The reality is that the nomenclature will be updated in due course and saiga will revert to being considered as one species. It would be unfortunate, therefore, if the Parties did not avail of this opportunity at CoP18 to recognise that overall saiga antelope does meet the Appendix I criteria. Addressing the issue of the CMS Saiga MoU, which endorses the principle of sustainable use, this MoU was adopted in 2006, long before the major die-off that put the population in a critical state. WWF looks forward to resumption of sustainable use of saiga in the future but for now we consider that the species merits listing on Appendix I. **SUPPORT**
CoP18 Prop. 8	*Ceratotherium simum simum (population of Eswatini)*	Southern White Rhinoceros	Remove the existing annotation for the population of Eswatini	Eswatini	WWF acknowledges Eswatini's contributions to the conservation of southern white rhinos as well as the rising costs of protecting them, but we are concerned about the broader impacts that allowing legal trade in rhino horn to meet these costs would have. It is not likely that any consumer countries can effectively manage a regulated horn trade; in fact, it is not clear from the proposal how any such consumer countries, or "licensed retailers," would be vetted or approved. On balance, we do not believe the potential benefits for Eswatini outweigh the broader threats to global rhino populations. **OPPOSE**

Proposal number	Taxon	Species Common name	Proposal	Proponent(s)	WWF Position
CoP18 Prop. 9	*Ceratotherium simum simum* (population of Namibia)	Southern White Rhinoceros	Transfer of the population of Ceratotherium simum simum of Namibia from Appendix I to Appendix II with the following annotation: "For the exclusive purpose of allowing international trade in: live animals to appropriate and acceptable destinations; and hunting trophies. All other specimens shall be deemed to be specimens of species included in Appendix I and the trade in them shall be regulated accordingly."	Namibia	Namibia has a strong track record on rhino conservation and with this proposal seeks alignment on the listing of its southern white rhino population with neighboring Swaziland and South Africa (down listing from App I to App II). WWF is in principle supportive of this amendment. However, WWF recognizes the need to be pre-emptive regarding possible exploitation that could occur under the annotations for trophy hunting and trade in live specimens. Neighboring countries have been subjected to pseudo hunting as a mechanism to obtain rhino horns for illegal trade and, indeed, the IUCN SSC-TRAFFIC report to the Secretariat (COP18 Doc 83.1 Annex 2) highlights discrepancies between Namibia's trophy export data and that of other Parties that may warrant further scrutiny. Additionally, WWF has concerns around rhinos exported from other range states used to stock Asian farms with plans for commercial harvest of their horns and seeks clarity from the proponents as to how they will eliminate the risk of similar exploitation. **CONDITIONAL SUPPORT**
CoP18 Prop. 10	*Loxodonta africana* (population of Zambia)	African Elephant	Transfer the population of Zambia from App. I to App. II subject to: Trade in registered raw ivory (tusks and pieces) for commercial purposes only to CITES approved trading partners who will not re-export. Trade in hunting trophies for non-commercial purposes; Trade in hides and leather goods. All other specimens shall be deemed to be specimens of species in Appendix I and the trade in them shall be regulated accordingly	Zambia	It is noted that Zambia's elephant population statistics have improved in recent years. Nevertheless, the supporting statement does not offer sufficient assurance regarding anti-poaching impacts, stockpile management and other key criteria included in Resolution Conf. 10.9. Furthermore, the concerns set out in the comments on Proposal 38 with regard to commercial international trade in ivory also apply in this case. **OPPOSE**

Proposal number	Taxon	Species Common name	Proposal	Proponent(s)	WWF Position
CoP18 Prop. 11	*Loxodonta africana* (populations of Botswana, Namibia, South Africa and Zimbabwe)	African Elephant	* Please see details below	Namibia	To date, countries with Appendix II populations have demonstrated their commitment and capacity to manage and protect their important elephant populations and on the whole indicated an ability to manage their ivory stockpiles adequately. The fact that the 2008 one-off sale of ivory was not a causal factor in the poaching crisis of the last 15 years is not disputed. However, the outcome of the 2008 sale also refuted the thesis that provision of legal supply under controlled international trade would reduce poaching and trafficking, by meeting market demand. Hence, even though a sale might raise funds for elephant conservation in the vendor countries, there is no evidence that it would have wider positive benefits for elephants that would justify the potential risks. Regardless of conditions in the proponent range states, legislative and enforcement gaps, and / or weak governance remain in other range States and especially in consumer countries. Such lack of controls undermines the potential for the proposal to meet its stated goals. Whilst the proposal provides for prior approval of any trading countries by the Standing Committee, the likelihood of credible trading partners emerging is negligible. Furthermore, such partners would be approved for ongoing trade, not a one-off sale, posing the risk that even if a trading partner demonstrated adequate control measures to gain approval, these could subsequently lapse without recourse to address. **OPPOSE**

* Amend annotation 2 as follows:

"For the exclusive purpose of allowing:
trade in hunting trophies for non-commercial purposes trade in live animals to appropriate and acceptable destinations, as defined in Resolution Conf. 11.20 (Rev. CoP17), for Botswana and Zimbabwe and for in situ conservation programmes for Namibia and South Africa; trade in hides; trade in hair; trade in leather goods for commercial or non-commercial purposes for Botswana, Namibia and South Africa and for non-commercial purposes for Zimbabwe; trade in individually marked and certified ekipas incorporated in finished jewellery for non-commercial purposes for Namibia and ivory carvings for non-commercial purposes for Zimbabwe; trade in registered raw ivory (for Botswana, Namibia, South Africa and Zimbabwe, whole tusks and pieces) subject to the following: only registered government-owned stocks, originating in the State (excluding seized ivory and ivory of unknown origin); only to trading partners that have been verified by the Secretariat, in consultation with the Standing Committee, to have sufficient national legislation and domestic trade controls to ensure that the imported ivory will not be re-exported and will be managed in accordance with all requirements of Resolution Conf. 10.10 (Rev. CoP17) concerning domestic manufacturing and trade; not before the Secretariat has verified the prospective importing countries and the registered government-owned stocks; raw ivory pursuant to the conditional sale of registered government-owned ivory stocks agreed at CoP12, which are 20,000 kg (Botswana), 10,000 kg (Namibia) and 30,000 kg (South Africa); in addition to the quantities agreed at CoP12, government-owned ivory from Botswana, Namibia, South Africa and Zimbabwe registered by 31 January 2007 and verified by the Secretariat may be traded and despatched, with the ivory in paragraph (g) iv) above, in a single sale per destination under strict supervision of the Secretariat; the proceeds of the trade are used exclusively for elephant conservation and community conservation and development programmes within or adjacent to the elephant range; and the additional quantities specified in paragraph g) v) above shall be traded only after the Standing Committee has agreed that the above conditions have been met; and no further proposals to allow trade in elephant ivory from populations already in Appendix II shall be submitted to the Conference of the Parties for the period from CoP14 and ending nine years from the date of the single sale of ivory that is to take place in accordance with provisions in paragraphs g) i), g) ii), g) iii), g) vi) and g) vii). In addition such further proposals shall be dealt with in accordance with Decisions 16.55 and 14.78 (Rev. CoP16).On a proposal from the Secretariat, the Standing Committee can decide to cause this trade to cease partially or completely in the event of non-compliance by exporting or importing countries, or in the case of proven detrimental impacts of the trade on other elephant populations.

All other specimens shall be deemed to be specimens of species included in Appendix I and the trade in them shall be regulated accordingly."

Proposal number	Taxon	Species Common name	Proposal	Proponent(s)	WWF Position
CoP18 Prop. 12	*Loxodonta africana* (populations of Botswana, Namibia, South Africa and Zimbabwe)	African Elephant	Transfer the 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, Syrian Arab Republic and Togo	The overall decline in elephant population numbers has largely been driven by losses in countries whose populations are already on Appendix I. For the purpose of this analysis, only those populations on Appendix II should be assessed according to Annex 1 of Resolution Conf. 9.24 (Rev. CoP17) and these populations have shown no or minimal declines. In this regard, the proposal argues that there is transboundary movement between Appendix II and Appendix I countries but provides no evidence of such movement having resulted in a decline in the former. Existing annotations to the Appendix II listing already unequivocally prohibit commercial trade in ivory. As such, Appendix I listing would not confer any additional protection on these populations. Many other Appendix I species continue to be traded illegally despite having been so listed for a long time; Appendix I listing does not reduce illegal trade except where supported by improved controls in range, transit and market countries. The proposal argues that the 1989 Appendix I listing of certain countries was followed by a sharp drop in elephant poaching but this occurred under different patterns of demand and enforcement and there is no reason to predict the same outcome today. Poaching and illegal trade of elephants – nearly all of which comes from Appendix I populations – occur as a result of legislative and enforcement gaps, and/ or weak governance in range, transit and consumer countries, including some of the proponents of this proposal. The proposal also argues that the current provisions encourage laundering. However, most documented instances of illegal ivory trade do not involve laundering through legal channels. Proposing Appendix I listing as a solution merely deflects attention from the urgency of addressing the real issues. Finally, any amendment to the current provisions opens up the possibility of any range and/ or consumer country entering a reservation against the new listing, which would allow legal trade to take place where this was previously prohibited. **OPPOSE**
CoP18 Prop. 19	*Balearica pavonina*	Black crowned crane	Transfer from Appendix II to Appendix I	Burkina Faso, Côte d'Ivoire and Senegal	The data presented in the proposal show a decline that all but reached the Appendix I "recent decline" threshold. Given the gaps in the data, and the obligation in Resolution Conf. 9.24 (Rev. CoP17) to act in the best interests of the conservation of the species, this proposal should be adopted. **SUPPORT**

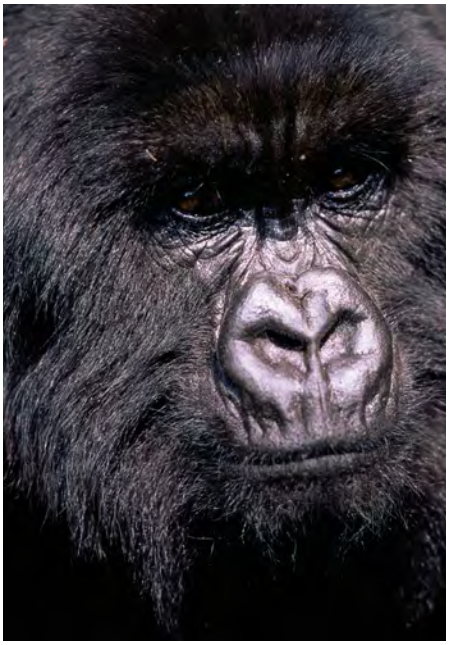
Proposal number	Taxon	Species Common name	Proposal	Proponent(s)	WWF Position
CoP18 Prop. 28	*Gekko gecko*	Tokay gecko	Include in Appendix II	European Union, India, Philippines and the United States of America	The species is common and resilient. However, given the large volumes in trade Appendix II listing is a reasonable precautionary measure **SUPPORT**
CoP18 Prop. 32	*Pseudocerastes urarachnoides*	Spider-tailed horned viper	Include in Appendix II	Iran	The attention that this species has attracted in the media in recent years, together with its limited range, have made it extremely vulnerable to over-collection. Accordingly, WWF considers that the criteria in Annex 2 a A and 2 a B of Resolution Conf. 9.24 (Rev. CoP17) are met. **SUPPORT**
CoP18 Prop. 33	*Cuora bourreti*	Bourret's box turtle	Transfer from Appendix II to Appendix I	Vietnam	WWF supported Appendix I for *C. galbifrons* (now split to *C. bourreti* and *C. picturata*) at CoP16 but the proponents narrowed the proposal to Appendix II with a zero quota. We believe that the Appendix I criteria are met and that Appendix I listing would provide better legal protection. **SUPPORT**
CoP18 Prop. 34	*Cuora picturata*	Southern Vietnamese box turtle	Transfer from App. II to App. I	Vietnam	WWF supported Appendix I for *C. galbifrons* (now split to *C. bourreti* and *C. picturata*) at CoP16 but the proponents narrowed the proposal to Appendix II with a zero quota. We believe that the Appendix I criteria are met and that Appendix I listing would provide better legal protection. **SUPPORT**
CoP18 Prop. 35	*Mauremys annamensis*	Vietnamese pond turtle	Transfer from App. II to App. I	Vietnam	Noting that we supported an Appendix I listing at CoP16, and that such a listing was endorsed by a subsequent periodic review, WWF urges the transfer of this species to Appendix I. **SUPPORT**
CoP18 Prop. 37	*Malacochersus tornieri*	Pancake tortoise	Transfer from App. II to App. I	Kenya and United States of America	Although the geographical range is broad, the very specific habitat preferences of the species result in a very limited distribution. Demand in international trade is high and declines are catastrophic. **SUPPORT**

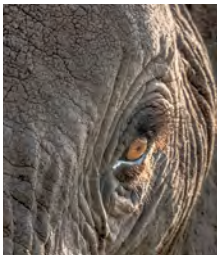
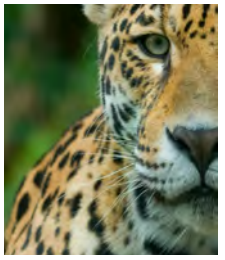
A Shortfin mako shark (Isurus oxyrinchus) off the coast of California, United States.
© Brian J. Skerry / National Geographic Stock / WWF

Proposal number	Taxon	Species Common name	Proposal	Proponent(s)	WWF Position
CoP18 Prop. 42	*Isurus oxyrinchus and Isurus paucus*	Shortfin mako shark; Longfin mako shark	Include in App. II	Bangladesh, Benin, Bhutan, Brazil, Burkina Faso, Cabo Verde, Chad, Côte d'Ivoire, Dominican Republic, Egypt, European Union, Gabon, Gambia, Jordan, Lebanon, Liberia, Maldives, Mali, Mexico, Nepal, Niger, Nigeria, Palau, Samoa, Senegal, Sri Lanka, Sudan and Togo	All the available data point towards a decline for *I. oxyrinchus* and there are no information sources that counter that trend, so WWF believes that the Appendix II criteria are met, and the addition of I paucus is justified on lookalike grounds. **SUPPORT**
CoP18 Prop. 43	*Glaucostegus* spp.	Guitarfishes	Include in Appendix II	Bangladesh, Benin, Bhutan, Brazil, Burkina Faso, Cabo Verde, Chad, Côte d'Ivoire, Egypt, European Union, Gabon, Gambia, Maldives, Mali, Mauritania, Monaco, Nepal, Niger, Nigeria, Palau, Senegal, Sierra Leone, Sri Lanka, Sudan, Syrian Arab Republic, Togo and Ukraine	While the analogy with the history of decline in sawfish may not be entirely valid, the proposal references decline statistics across the ranges of *G. cemiculis* and *G. granulatus* that fulfil the decline criteria, and listing the remainder of the genus is justified on lookalike grounds. **SUPPORT**

Proposal number	Taxon	Species Common name	Proposal	Proponent(s)	WWF Position
CoP18 Prop. 44	*Rhinidae* spp.	Wedgefishes	Include in App. II	Bangladesh, Benin, Bhutan, Brazil, Burkina Faso, Cabo Verde, Chad, Côte d'Ivoire, Egypt, Ethiopia, European Union, 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	The decline data presented are less complete than for the other elasmobranch proposals but none of them contradict the overall narrative of decline. R. *australiae* and R. *djiddensis* are the two most traded species at present but listing of the entire family is warranted on lookalike grounds, especially as some of the other species are even more endangered. **SUPPORT**
CoP18 Prop. 45	*Holothuria (Microthele) fuscogilva, Holothuria (Microthele) nobilis, Holothuria (Microthele) whitmaei*	Teatfish (sea cucumbers)	Include in Appendix II	European Union, Kenya, Senegal, Seychelles and United States of America	The proposal presents data and references from most fisheries showing extensive decline. The exclusion of other sea cucumbers from the scope is not a critical weakness as the species proposed are among those of highest value. **SUPPORT**
CoP18 Prop. 51	*Dalbergia sissoo*	North Indian rosewood	Delete from Appendix II	Bangladesh, Bhutan, India and Nepal	It is acknowledged that *D. sissoo* would not meet the Annex 2a criteria in Resolution Conf. 9.24 (Rev. CoP17). However, WWF considers that it does meet the Annex 2b criteria when traded as timber, and the proposal does not present any information to the contrary. Moreover, adoption of this proposal could lead to a cascade of future exclusion proposals that would undermine the genus-wide listing. **OPPOSE**
CoP18 Prop. 52	*Dalbergia* spp., *Guibourtia demeusei, Guibourtia pellegriniana, Guibourtia tessmannii*	Rosewood (Genus)	Amend annotation #15 as follows: "All parts and derivatives, except: leaves, flowers, pollen, fruits, and seeds; finished products to a maximum weight of wood of the listed species of 500g per item; finished musical instruments, finished musical instrument parts and finished musical instrument accessories; parts and derivatives of *Dalbergia cochinchinensis*, which are covered by annotation #4; parts and derivatives of *Dalbergia* spp. originating and exported from Mexico, which are covered by annotation #6.	Canada and European Union	WWF recognises that the current annotation is ambiguous and challenging and we welcome a consensus outcome on this issue. However, our support for this proposal is in part because of the agreement of the Plants Committee to forward draft Decisions to the CoP recommending that a future study look at the conservation implications. If these Decisions are not adopted, or if the study does not go ahead, we will press for a future CoP to revisit this issue. **CONDITIONAL SUPPORT**

Proposal number	Taxon	Species Common name	Proposal	Proponent(s)	WWF Position
CoP18 Prop. 53	*Pericopsis elata*	African teak	Expand the scope of the annotation for *Pericopsis elata* (currently #5) to include plywood and transformed wood as follows: "Logs, sawn wood, veneer sheets, plywood, and transformed wood[1]." [1] Whereby transformed wood is defined by HS code 44.09: Wood (including strips, friezes for parquet flooring, not assembled), continuously shaped (tongued, grooved, v-jointed, beaded or the like) along any edges, ends or faces, whether or not planed, sanded or end-jointed.	Côte d'Ivoire and European Union	There is growing evidence of basic transformation of sawn timber in range countries with a view to evading the provisions of the present listing. **SUPPORT**
CoP18 Prop. 54	*Pterocarpus tinctorius*	Tacula	Include in App. II	Malawi	As with *Pterocarpus erinaceus* and *Dalbergia* spp., whose Appendix II listings we supported at CoP17, in this case demand in China is driving overexploitation, much of it illegal under range State legislation. **SUPPORT**
CoP18 Prop. 55	*Aloe ferox*	Bitter Aloe	Amend annotation #4 for *Aloe ferox* as follows: "All parts and derivatives, except: a) seeds (including seedpods of Orchidaceae), spores and pollen (including pollinia). The exemption does not apply to seeds from *Cactaceae* spp. exported from Mexico, and to seeds from *Beccariophoenix madagascariensis* and *Dypsis decaryi* exported from Madagascar; b) seedling or tissue cultures obtained in vitro, in solid or liquid media, transported in sterile containers; c) cut flowers of artificially propagated plants; d) fruits, and parts and derivatives thereof, of naturalized or artificially propagated plants of the genus *Vanilla* (Orchidaceae) and of the family Cactaceae; e) stems, flowers, and parts and derivatives thereof, of naturalized or artificially propagated plants of the genera *Opuntia subgenus Opuntia* and *Selenicereus(*Cactaceae*)*; and f) finished products[2] of *Aloe ferox* and *Euphorbia antisyphilitica* packaged and ready for retail trade. [2] This term, as used in the CITES Appendices refers to product, shipped singly or in bulk, requiring no further processing, packaged, labelled for final use or the retail trade in a state fit for being sold to or used by the general public.	South Africa	WWF believes that this proposal does not represent best practice in the use of annotations as it would result in failure to regulate trade in a listed species at the point of first export. It could result in large volumes of material being exported under an exemption without any scrutiny as to legality of origin or conservation detriment. **OPPOSE**
CoP18 Prop. 57	*Cedrela* spp.	Spanish cedars	Include in Appendix II	Ecuador	The listing of this genus on Appendix II was already warranted when it was last proposed at CoP14 in 2007. Since then its conservation status has only worsened. **SUPPORT**



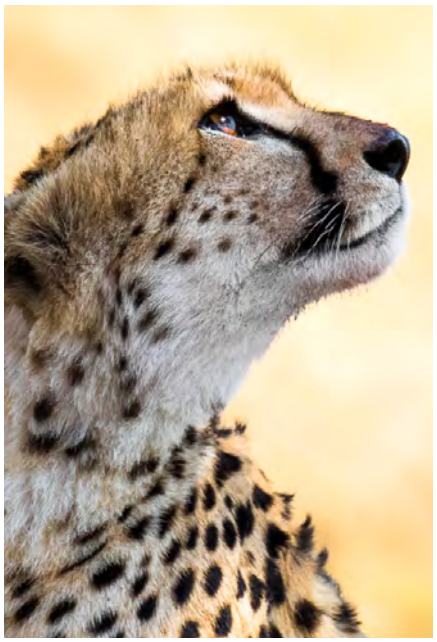
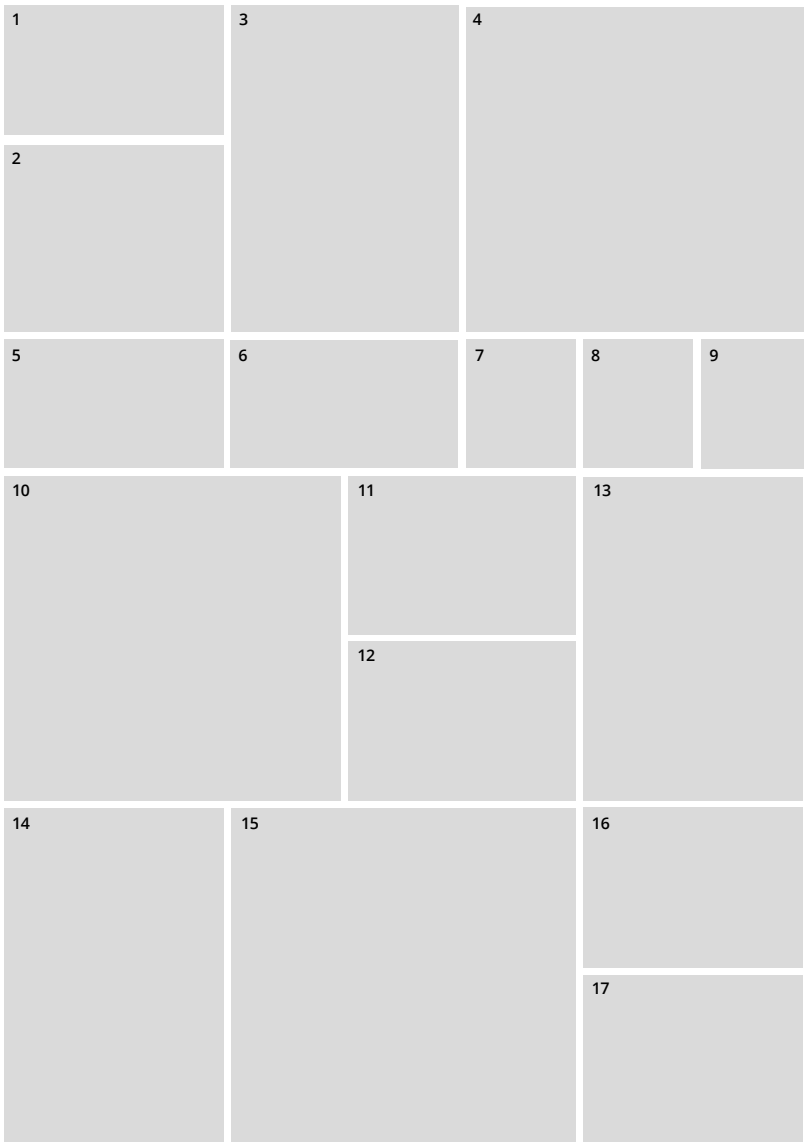


IMAGE CREDITS



1. © Andrey Nekrasov / WWF
2. © Georgina Goodwin / Shoot The Earth / WWF-UK
3. © naturepl.com / Anup Shah / WWF
4. © naturepl.com / George Chan / WWF
5. © Photoshot License Ltd / Alamy Stock Photo
6. © James Morgan / WWF-US
7. © Staffan Widstrand / WWF
8. © naturepl.com / Edwin Giesbers / WWF
9. © naturepl.com / Ingo Arndt / WWF
10. © Wild Wonders of Europe / Igor Shpilenok / WWF
11. © Alex Covelli
12. © Jeff Goldberg
13. © Trina Pate
14. © Simon Lorenz / WWF-Hong Kong
15. © Jürgen Freund / WWF
16. © Juan Pratginestos / WWF
17. © Wild Wonders of Europe / Zankl / WWF

CITES COP 18 IN NUMBERS

18

CITES 18th Conference of the Parties

160

Proposals to amend Appendices I &II

182

Parties to CITES including 181 State Parties and the EU

35,800

Species of plants and animals are currently protected under CITES

Why we are here

To stop the degradation of the planet's natural environment and to build a future in which humans live in harmony with nature.

panda.org

© 1986 Panda symbol WWF – World Wide Fund For Nature (Formerly World Wildlife Fund)
® "WWF" is a WWF Registered Trademark. WWF, Avenue du Mont-Blanc, 1196 Gland, Switzerland. Tel. +41 22 364 9111 Fax +41 22 364 0332. For contact details and further information, please visit our international website at www.panda.org