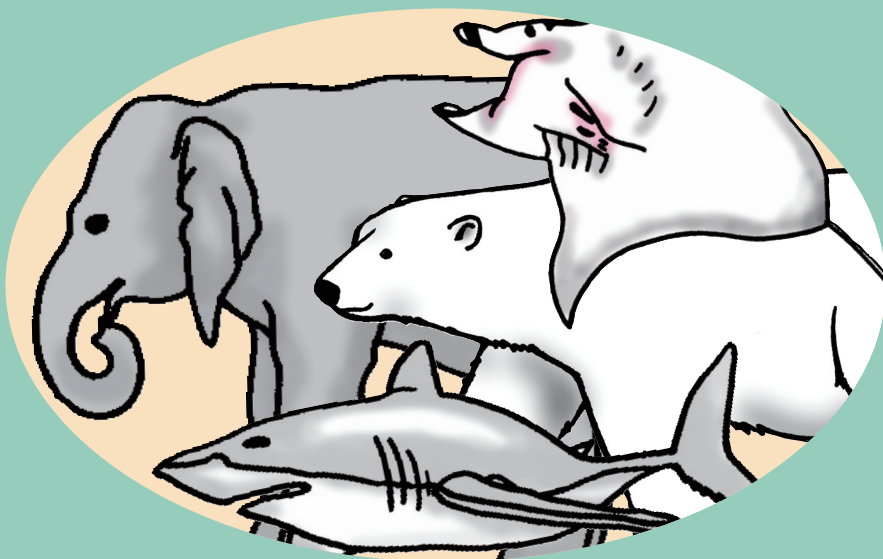


**GGT'S RECOMMENDATIONS
ON THE AMENDMENT PROPOSALS
FOR CONSIDERATION AT THE SIXTEENTH MEETING
OF THE CONFERENCE OF THE PARTIES TO CITES
(Bangkok, 2013)**



GLOBAL GUARDIAN TRUST



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SUMMARY OF THE RECOMMENDATIONS

No.	Species		Amendment	Recommendation
1	<i>Rupicapra pyrenaica ornata</i>	Abruzzo chamois	I → II	Yes
2	<i>Vicugna vicugna</i>	vicuña	I → II	Yes
3	<i>Ursus maritimus</i>	polar bear	II → I	No
4	<i>Pteropus brunneus</i>	Percy Island flying-fox	II → 0	Yes
5	<i>Thylacinus cynocephalus</i>	thylacin	I → 0	Yes
6	<i>Onychogalea lunata</i>	nailltail walabby	I → 0	Yes
7	<i>Caloprymnus campestris</i>	desert kangaroo	I → 0	Yes
8	<i>Chaeropus ecaudatus</i>	pig-footed bandicoot	I → 0	Yes
9	<i>Macrotis leucura</i>	lesser bilby	I → 0	Yes
10	<i>Ceratotherium simum s.</i>	white rhinoceros	annotation	No
11	<i>Loxodonta africana</i>	African elephant	I → II	withdrawn
12	<i>Loxodonta africana</i>	African elephant	annotation	No
13	<i>Trichechus senegalensis</i>	W. African manatee	II → I	No
14	<i>Caracara lutosa</i>	Guadalupe caracara	II → 0	Yes
15	<i>Gallus sonneratii</i>	grey junglefowl	II → 0	Yes
16	<i>Ithaginis cruentus</i>	blood pheasant	II → 0	Yes
17	<i>Lophura imperialis</i>	imperial pheasant	I → 0	Yes
18	<i>Tetraogallus caspius</i>	Caspian snowcock	I → II	Yes
19	<i>Tetraogallus tibetanus</i>	Tibetan snowcock	I → II	Yes
20	<i>Tympanuchus cupido</i>	a. greater prairie chicken	I → II	Yes

21	<i>Campephilus imperialis</i>	imperial woodpecker	I → 0	Yes
22	<i>Sceloglaux albigacies</i>	laughing owl	II → 0	Yes
23	<i>Crocodylus acutus</i>	American crocodile	I → II	Yes
24	<i>Crocodylus porosus</i>	saltwater crocodile	I → II	No
25	<i>Crocodylus siamensis</i>	Siamese crocodile	I → II	No
26	<i>Nautinus spp.</i>	geckos	0 → II	Yes
27	<i>Protobothrops mangshanensis</i>	pit viper	0 → II	Yes
28	<i>Chelodina mccordi</i>	snake-necked turtle	II → I	No
29	<i>Clemmys guttata</i>	spotted turtle	0 → II	No
30	<i>Emydoidea blandingii</i>	Blanding's turtle	0 → II	No
31	<i>Malaclemys terrapin</i>	diamondback terrapin	0 → II	No
32		ten species of turtles	0 → II, quota	No
33	<i>Cuora galbinifrons</i>	Indochinese box turtle	II → I	No
34	<i>Geoemyda japonica</i>	Ryukyu leaf turtle	0 → II	Yes
35	<i>Mauremys annamensis</i>	Annam pond turtle	II → I	No
36	<i>Platysternidae</i>	big-headed turtle	II → I	No
37	<i>Geochelone platynota</i>	Burmese star tortoises	II → I	No
38		softshell turtles	0 → II, II → I	No
39	<i>Epipedobates machalilla</i>	frog	0 → II	Yes
40	<i>Rheobatrachus silus</i>	s. gastric-brooding frog	II → 0	Yes
41	<i>Rheobatrachus vitellinus</i>	n.gast-brooding frog	II → 0	Yes
42	<i>Carcharhinus longimanus</i>	whitetip shark	0 → II	No

43	<i>Sphyma lewini, etc.</i>	hammerhead shark	0,III → II	No
44	<i>Lamna nasus</i>	porbeagle	III → II	No
45	<i>Pristis microdon</i>	freshwater sawfish	II → I	No
46	<i>Manta spp.</i>	manta rays	0 → II	No
47	<i>Paratrygon aiereba</i>	discus ray	0 → II	No
48	<i>P. motoro, P. schroederi</i>	river stingrays	0 → II	No
49	<i>Papilio hospiton</i>	Corsican swallowtail	I → II	Yes
50	<i>Yucca queretaroensis</i>	Queretaro yucca	0 → II	Yes
51	<i>Operculicarya decaryi</i>	jabihi	0 → II	No
52	<i>Hoodia spp.</i>	hoodias	annotation	Yes
53	<i>Panax ginseng and P. quinquefolius</i>	ginsengs	annotation	Yes
54	<i>Tillandsia kautskyi</i>	tillandsia	II → 0	Yes
55	<i>Tillandsia sprengeliana</i>	tillandsia	II → 0	Yes
56	<i>Tillandsia sucrei</i>	tillandsia	II → 0	Yes
57	<i>Dudleya stolonifera, D. traskiae</i>	dudleyas	II → 0	Yes
58	<i>Diospyros spp.</i>	ebonies	0 → II	No
59	<i>Aniba rosaeodora</i>	Brazilian rosewood	annotation	Yes
60	<i>Dalbergia cochinchinensis</i>	rosewood	0 → II	Yes
61	<i>Dalbergia retusa, D.granadillo</i>	rosewoods	0 → II	No
62	<i>Dalbergia stevensonii</i>	Honduras rosewood	0 → II	No
63	<i>Dalbergia spp.</i>	rosewoods	0 → II	Yes
64	<i>Senna meridionalis</i>	andapary	0 → II	No

65	<i>Adenia firingalavensis</i>	bottle liana	0 → II	No
66	<i>Adenia subsessilifolia</i>	katakata	0 → II	No
67	<i>Uncarina grandidieri</i>	anakoraky	0 → II	No
68	<i>Uncarina stellulifera</i>	farehitsy	0 → II	No
69	<i>Osyris lanceolata</i>	African sandalwood	0 → II	No
70	<i>Aquilaria spp., Gyrinops spp.</i>	agarwoods	annotation	Yes
71	<i>Cyphostemma laza</i>	laza	0 → II	No

RECOMMENDATIONS

Prop. 1 Transfer of Abruzzo chamois *Rupicapra pyrenaica ornata* from Appendix I to Appendix II (Denmark)

This subspecies is endemic to Italy and was included in Appendix I at the Plenipotentiary meeting in Washington in 1973. The rest of the species are not listed in any Appendix. Although the population is small and the range is restricted, the former is increasing and the latter expanding. In this regard, Italy should be commended for their improved management. The species as a whole does not meet any of the CITES criteria. It is unlikely that the transfer of the subspecies to Appendix II will stimulate the international trade for commercial purposes. The proposal should be **adopted**.

Prop. 2 Transfer of the vicuña *Vicuña vicuña* population of Ecuador from Appendix I to Appendix II (Ecuador)

The vicuña was listed in Appendix I in 1973. Since then, the geographical populations of Argentina, Bolivia, Chile and Colombia have been transferred from Appendix I to Appendix II. The vicuña of Ecuador is the only one which remains in Appendix I. Conservation programmes have been in place by the Government in co-operation with local communities. The population has increased and is estimated 5,000 approximately. Vicuña fibre will be sheered from live animals. The transfer of its population from Appendix I to Appendix II will create further incentives to the local communities. The proposal should be **adopted**.

Prop. 3 Transfer of polar bear *Ursus maritimus* from Appendix II to Appendix I (USA)

The polar bear is distributed in Canada, Denmark (Greenland), Norway, Russian Federation and the United States. Polar bears are hunted by aboriginal people for subsistence purposes. Specimens are traded internationally as a by-product of subsistence hunting. Even if the species is transferred, hunting will continue. This is the second proposal on the polar bear made by the USA. At CoP15, the USA proposed to transfer the species from Appendix II to Appendix I but the proposal was rejected. According to the present proposal, of the five range states, Canada, Greenland and Norway are not in agreement with the USA. The USA identified loss of habitat as the main threat to the species. Deterioration of habitat, i.e., loss of sea ice, is caused by global warming. GGT was opposed to the proposal submitted at CoP15. Our position remains unchanged. The USA is the second largest country in terms of the emission of greenhouse effect gases and as such, the USA should take its own responsibility. The proposal should be **rejected**.

**Prop.
4**

Deletion of Percy Island flying-fox *Pteropus brunneus* from Appendix II (Australia)

This proposal was submitted at the request of the Animals Committee. The Percy Island flying-fox was described erroneously as a new species in 1878 and therefore, is not a valid species. If it ever existed, it is now extinct. The proposal should be **adopted**.

**Prop.
5**

Deletion of thylacine *Thylacinus cynocephalus* from Appendix I (Australia)

This proposal was submitted at the request of the Animals Committee. By 1789, the thylacine had been extirpated from the mainland Australia and Tasmania was the only place where it survived in small number. It is believed that in Tasmania, the thylacine became extinct by 1936. There is no need to keep the species listed in CITES Appendices. The proposal should be **adopted**.

**Prop.
6**

Deletion of crescent nailtail walabby *Onychogalea lunata* from Appendix I (Australia)

This proposal is of the same nature as the previous one and was submitted at the request of the Animals Committee. The crescent nailtail walabby had been extirpated by 1956 and is considered to be extinct. There is no need to list the species in CITES Appendices. The proposal should be **adopted**.

**Prop.
7**

Deletion of desert kangaroo *Caloprymnus campestris* from Appendix I (Australia)

This proposal is of the same nature as Prop. 5 and Prop. 6. It was submitted at the request of the Animals Committee. The last reliable sighting of the desert rat kangaroo was in 1935. It is considered that the species is now extinct. The proposal should be **adopted**.

**Prop.
8**

Deletion of pig-footed bandicoot *Chaeropus ecaudatus* from Appendix I (Australia)

This proposal is of the same nature as mentioned above. It was submitted at the request of the Animals Committee. It is believed that the pig-footed bandicoot had been extirpated by 1960s. The proposal should be **adopted**.

**Prop.
9**

Deletion of lesser bilby *Macrotis leucura* from Appendix I (Australia)

This proposal is of the same nature as the previous ones. It was submitted at the request of the Animals Committee. It is believed that the lesser bilby had been extirpated by 1967. The proposal should be **adopted**.

**Prop.
10**

Amendment of the annotation to southern white rhinoceros *Ceratotherium simum simum* (Kenya)

The southern white rhinoceros populations of South Africa and Swaziland are listed in Appendix II. Live animals and hunting trophies are allowed to enter international trade. The wild population of the southern white rhinoceros, including the population of Kenya, originates from a remnant population in South Africa. Almost 95 % of the total population occurs in South Africa. The fate of southern white rhinoceroses should be determined by South Africa, certainly not by Kenya nor by CoP. South Africa does not support Kenya's proposal. Depriving the aspect of international trade from trophy hunting will have a negative impact on the conservation of rhinoceroses. Even if Kenya's proposal is adopted, illegal trade in rhino horns will continue to exist because trade is not allowed under CITES. What Kenya needs to do is to abandon its trade ban policy. The proposal should be **rejected**.

**Prop.
11**

Transfer of the Tanzania population of African elephant *Loxodonta africana* from Appendix I to Appendix II (Tanzania)

This proposal has been **withdrawn** by Tanzania. The supporting statement is well documented and very persuasive. Tanzania is one of the seven countries which submitted proposals in 1989 to transfer the African elephant from Appendix II to Appendix I. Since then, the elephant population of Tanzania has increased from 55,000 (1989) to 110,000 (2009). Tanzania's effort and commitment to conservation are greatly commendable. Tanzania wishes to trade ivories and other products to further enhance its conservation effort. At CoP15, the Conference of the Parties rejected the proposals put forward by Tanzania and Zambia and does not allow ivory trade from the four countries whose populations are already listed in Appendix II. Since 1975, international trade in rhino horns has been prohibited. Nevertheless, the conservation status has not improved. By continuing to reject proposals on the African elephant, the Conference of the Parties is driving the elephant to the same doom as being taken by rhinos.

**Prop.
12**

Amendment of the annotation to African elephant *Loxodonta africana* (Burkina Faso, Togo, Mali, Kenya)

Again, we are appalled to see that Kenya and others have repeatedly submitted proposals to prevent ivory trade. The proposal was submitted against the spirit reached at CoP14 in The Hague. The proponents make a reference to the preambular paragraph of Resolution Conf. 9.24: "*By virtue of the precautionary approach and in cases of uncertainty regarding the status of a species or the impact of trade on the conservation of a species, the Parties shall act in the best interest of the conservation of the species concerned and, when considering proposals to amend Appendix I or II, adopt measures that are proportionate to the anticipated risks to the species*". It should be pointed out that this paragraph

does not mean that in cases of uncertainty, international trade should not be permitted. The best interest of the conservation of the African elephant will be achieved through allowing international trade in ivory with an annual export quota. By allowing ivory trade on a regular basis, exporting countries will be able to establish more pragmatic, long-term elephant conservation programmes, which is indeed in the best interest of the conservation of the African elephant. The adoption of this proposal will have extremely negative impacts on all the range states which are promoting elephant conservation through sustainable management. The proposal does not preclude a possibility of any country submitting downlisting proposals without asking for ivory trade. It is doubtful that the proponents will support such proposals. It is strongly recommended that the proposal be **rejected**.

**Prop.
13**

Transfer of West African manatees *Trichechus senegalensis* from Appendix II to Appendix I (Gabon, Gambia, Guinea, Guinea-Bissau, Mauritania, Senegal, Sierra Leone)

As admitted by the proponents, there is little information on the population size and trend of the West African manatee and as such, it is not possible to judge if the species meets the Appendix I criteria. The species is classified as a fully protected species by all range states and its trade is prohibited. Nevertheless, it seems that manatee meat is illegally sold and traded internationally. The range states should improve their enforcement activities. Without such efforts, listing in Appendix I would not change the current status of the West African manatee. Under the circumstances, the proposal should be **rejected**.

**Prop.
14**

Deletion of Guadalupe caracara *Caracara lutosa* from Appendix II (Mexico)

The Guadalupe caracara was listed in Appendix II in 1973. It is believed that the species had been extirpated by 1900. At the 26th meeting of the Animals Committee, Mexico recommended that the species be deleted from CITES Appendix and this recommendation was endorsed by the Animals Committee. Accordingly, the proposal should be **adopted**.

**Prop.
15**

Deletion of grey junglefowl *Gallus sonneratii* from Appendix II (Switzerland)

This proposal was submitted by Switzerland at the request of the Animals Committee. The species is endemic to India but is widely distributed in that country. The population size is unknown but it seems that the species is locally common. In addition, IUCN classified the species as "Least Concern". At its 26th meeting, the Animals Committee recommended that the species be deleted from Appendix II. The proposal should be **adopted**.

**Prop.
16**

Deletion of blood pheasant *Ithaginis cruentus* from Appendix II (Switzerland)

As is the case with Prop.15, the Animals Committee recommended that the blood pheasant be deleted from Appendix II. The species is distributed in South Asia. The overall population size has not been determined but the species seems common in some areas. IUCN classified the species as “Least Concern”. The proposal should be **adopted**.

**Prop.
17**

Deletion of imperial pheasant *Lophura imperialis* from Appendix I (Switzerland)

The imperial pheasant was first described in 1924 based on a pair captured in Viet Nam. However, the recent study revealed that it was not a valid species but was a natural hybrid between *Lophura edwardsi* and *Lophura nycthemera*. At its 26th meeting, the Animals Committee recommended that this ‘species’ be deleted from Appendix I. There is no need to list the imperial pheasant in CITES Appendices because it is not a valid species. It should be pointed out that *Lophura edwardsi* is listed in Appendix I and therefore, the hybrid imperial pheasant is treated as Appendix I species. The proposal should be **adopted**.

**Prop.
18**

Transfer of Caspian snowcock *Tetraogallus caspius* from Appendix I to Appendix II (Switzerland)

The snowcock is distributed in the mountains from Turkey to Turkmenistan. The species does not meet the biological criteria for listing in Appendix I because the population is not small and the range is large. The Animals Committee reviewed the status of the species and recommended that it be transferred from Appendix I to Appendix II. The proposal should be **adopted**.

**Prop.
19**

Transfer of Tibetan snowcock *Tetraogallus tibetanus* from Appendix I to Appendix II (Switzerland)

The Tibetan snowcock is widely distributed from Tajikistan to China. The species does not meet the biological criteria for listing in Appendix I because it is abundant and the range is very large. The Animals Committee reviewed the status of the species and recommended that it be transferred from Appendix I to Appendix II. The proposal should be **adopted**.

**Prop.
20**

Transfer of Attwater’s greater prairie chicken *Tympanuchus cupido attwateri* from Appendix I to Appendix II (Switzerland)

The Attwater’s greater prairie chicken is endemic to the USA. This subspecies does meet the biological criteria for Appendix I listing because the population is very small. The proposal was submitted by Switzerland but was drafted by the USA, which considers that no trade is expected as a result of the transfer of this

subspecies to Appendix II. Under the circumstances, the proposal should be **adopted**.

Prop. 21 Deletion of imperial woodpecker *Campephilus imperialis* from Appendix I (Mexico)

The imperial woodpecker is endemic to Mexico. It is considered that it had been extirpated by more than 50 years ago. At its 26th meeting, the Animals Committee endorsed this proposal. Therefore, the proposal should be **adopted**.

Prop. 22 Deletion of laughing owls *Sceloglaux albifacies* from Appendix II (New Zealand)

The laughing owl is endemic to New Zealand. The last known laughing owl was found dead in 1914. Since then, no owl has been recorded in spite of the exhaustive surveys and now the species is considered to be extinct. At its 26th meeting, the Animals Committee recommended that the species be deleted from Appendix II. The proposal should be **adopted**.

Prop. 23 Transfer of the Bay of Cispata population of American crocodiles *Crocodylus acutus* from Appendix I to Appendix II (Colombia)

While the Cuban population of the American crocodile is listed in Appendix II, all other populations are listed in Appendix I. In Colombia, six facilities have been registered with the CITES Secretariat for breeding the American crocodile in captivity. Colombia is asking to transfer the population of the Bay of Cispata to Appendix II so that crocodiles from the Bay of Cispata can be exported in the near future. The Bay of Cispata is covered by mangrove forests and contains rich biodiversity. Conservation programmes have been in place by Colombian Government in co-operation with local communities. A key to the success of the programmes is the involvement of local communities in conservation activities. It is apparent that the population does not meet the biological criteria for listing in Appendix I. The proposal should be **adopted**. However, the supporting statement does not indicate details of future harvesting programmes. It is also recommended that Colombia submit another proposal to include all other populations in Appendix II at future meetings. As a result, split-listings within a country will be avoided.

Prop. 24 Transfer of saltwater crocodile *Crocodylus porosus* from Appendix I to Appendix II with a zero quota for wild specimens (Thailand)

The saltwater crocodile widely occurs from India through Thailand to Australia. The populations of Australia, Indonesia and Papua New Guinea are listed in Appendix II and the rest of the species is listed in Appendix I. It is evident that the species as a whole does not meet the biological criteria for listing in Appendix I. However, the wild population in Thailand is approximately 200 only

and its distribution areas are fragmented. Transferring to Appendix II with a zero quota will not change the present situation and Thai's intention is not clear from the supporting statement. There should be other reasons for this proposal. The proposal may be premature. Unless persuasive explanations are provided by Thailand, the proposal should be **rejected**.

**Prop.
25**

Transfer of Siamese crocodile *Crocodylus siamensis* from Appendix I to Appendix II with a zero quota for wild specimens (Thailand)

The status of the Siamese crocodile in Thailand is similar to that of the saltwater crocodile. The total population in Thailand is about 200 only. The Thai population consists of five fragmented populations and does meet the biological criteria for listing in Appendix I. As is the case with its saltwater crocodile population, Thai's intention is unclear from the supporting statement. For the same reason, the proposal should be **rejected**. However, we recommend that Thai consider a possibility of developing ranching programmes aiming at future transfer of the both species to Appendix II.

**Prop.
26**

Inclusion of all species of geckos in the genus *Naultinus* in Appendix II (New Zealand)

Nine gecko species in the genus *Naultinus* were included in Appendix III by New Zealand in 2003. They are endemic to the country and all the species are protected. Although Appendix II is practically identical to Appendix III, an Appendix II listing would make importing countries to pay more attention to the transaction in question. We recommend that the proposal be **adopted**. However, the main reasons for population decline are predation by invasive species and habitat loss/degradation and as such, New Zealand needs to make further effort in addressing these problems.

**Prop.
27**

Inclusion of Mangshan pit viper *Protobothrops mangshanensis* in Appendix II (China)

The Mangshan pit viper was described as a new species in 1989. The species is believed to be endemic to Mt. Mang in southern China. The population size is small and is subject to international trade. Although the species is protected, it seems that animals are illegally caught for aquarium and pet trade. We recommend that the proposal be **adopted**.

**Prop.
28**

Transfer of Roti Island snake-necked turtle *Chelodina mccordi* from Appendix II to Appendix I (USA)

The Roti Island snake-headed turtle was first described in 1994. The species is endemic to Indonesia (Roti Island only) and Timor-Leste. The species has a restricted area of distribution but little is known of the population size. The species is harvested for the international pet trade market including the USA, EU

and Japan. It seems the species meets the criteria for Appendix I listing. The proponent consulted with Indonesia and Timor-Leste but has not received any information on the species. Also, it is not clear if Indonesia and Timor-Leste support the proposal. Under the circumstances, we recommend that the proposal be **rejected**.

**Prop.
29**

Inclusion of spotted turtle *Clemmys guttata* in Appendix II (USA)

The species is distributed in Canada and the USA. In Canada, its distribution is restricted to Ontario and Quebec. In the USA, however, it is distributed widely in the eastern part of the country. According to the supporting statement, there is no population estimate for the entire USA. Live animals have been exported from the USA and the export volume has steadily increased since 1999. By allocating annual quotas to the relevant States, the USA could achieve its objective without listing in Appendix II. The proponent consulted with all States and Canada but does not mention in the supporting statement whether they support the proposal. As such, we recommend that the proposal be **rejected**.

**Prop.
30**

Inclusion of Blanding's turtle *Emydoidea blandingii* in Appendix II (USA)

The Blanding's turtle is found in Canada and the USA. There is no population estimate for the entire USA. The nature of this proposal is similar to that of the previous proposal. The proponent consulted with all States and Canada but does not mention in the supporting statement whether they support the proposal. For the same reason as the previous one, the proposal should be **rejected**.

**Prop.
31**

Inclusion of diamondback terrapin *Malaclemys terrapin* in Appendix II (USA)

The diamondback terrapin is found widely in the eastern part of the USA and inhabits brackish coastal waters. The proponent states that the US population size is presumed to exceed 100,000. The nature of this proposal is similar to those of the previous proposals. The proponent consulted with all States within the USA but does not mention in the supporting statement whether they support the proposal. For the same reason as the previous ones, the proposal should be **rejected**. What the USA needs to do is to establish management programmes for these species and introduce appropriate regulations. We do not understand why the USA proposes to list these species in Appendix II.

**Prop.
32**

Inclusion of ten species of turtles in Appendix II and establishing zero quotas for already-listed fifteen species (China, USA)

In considering the number of species (25) which are subject to this proposal, we feel the supporting statement is poorly documented. The proponent does not

provide sufficient information on several aspects including population size and population trends. Therefore, it is difficult to judge if the proposal is appropriate. Among the 25 species, Japan submitted a proposal for Ryukyu leaf turtle *Geoemyda japonica* and Viet Nam submitted proposals for Indochinese box turtle *Cuora galbinifrons* and Annam pond turtle *Mauremys annamensis*. As mentioned below, Prop. 34 should be adopted. Except for this species, the proposal should be **rejected**.

Prop. 33 Transfer of Indochinese box turtle *Cuora galbinifrons* from Appendix II to Appendix I. (Viet Nam)

The Indochinese box turtle is known to be distributed in China, Lao and Viet Nam. Although little is known of the status, the population size seems very small. The species is protected in China and Lao but not protected in Viet Nam. According to the UNEP-WCMC CITES trade database, Hong Kong was the main exporting country. From 2007 to 2011, the number of specimens which entered international trade was 43 only with in average 8.6 per annum. However, many specimens are sold in markets and it is believed that illegal trade does exist. Without efforts to strengthen border control and internal enforcement, an Appendix I listing would not improve the situation. It is premature to transfer the species from Appendix II to Appendix I. What Viet Nam needs to do is to strengthen their efforts and as such, the proposal should be **rejected**.

Prop. 34 Inclusion of Ryukyu leaf turtle *Geoemyda japonica* in Appendix II with a zero annual export quota for primarily commercial purposes for wild-caught specimens. (Japan)

The Ryukyu leaf turtle is endemic to Japan and the distribution is restricted to Okinawa, Kume and Tokashiki Islands. The species is protected under the Law for the Protection of Cultural Properties. Nevertheless, live animals are sold in China, Hong Kong, France and the USA. Listing in Appendix II would offer an opportunity for Japan to control illegal trade in the species and send a warning to other countries that Japan does not allow the take of wild animals. As such, the proposal should be **adopted**. According to the supporting statement, however, the major threats to the species are habitat loss and degradation. This problem should seriously be addressed by Japan's authorities.

Prop. 35 Transfer of Annam pond turtle *Mauremys annamensis* from Appendix II to Appendix I. (Viet Nam)

The Annam pond turtle is endemic to Viet Nam and its distribution is restricted to central Viet Nam. No scientific information is available on the population size but it is believed that the population size is very small. Acquisition of the specimens for commercial purposes is prohibited under the regulation of Viet Nam (2006). Since 2002, 172 animals have been exported from Switzerland, China, Germany, USA and Viet Nam. During 7 surveys from August 2006 to March

2008, 11 to 50 animals were on sale in Guangzhou. Despite an Appendix II listing, it seems that illegal trade continues to occur. Listing in Appendix I would not change the present situation. Under the circumstances, the proposal should be **rejected**.

**Prop.
36**

Transfer of the family Platysternidae from Appendix II to Appendix I (USA, Viet Nam)

The big-headed turtle *Platysternon megacephalum* was, as a species, included in Appendix II at COP 12 (Santiago, 2002). The family Platysternidae is not listed in Appendix II. Even though the big-headed turtle is the only species in the family, it is procedurally incorrect to transfer a non-listed taxon from Appendix II to Appendix I. The species is distributed mainly in China and partly in northern Southeast Asia. With regard to national legal instruments, the proponent referred to the proposal submitted at CoP12 but did not include them in the present proposal, which is therefore incomplete. China, the main range state is opposed to the proposal and suggests an Appendix II listing with a zero quota. We believe China's suggestion is more appropriate and as such, the proposal should be **rejected** as it stands.

**Prop.
37**

Transfer of Burmese star tortoise *Geochelone platynota* from Appendix II to Appendix I (USA)

The Burmese star tortoise is endemic to central Myanmar and has a very restricted area of distribution. According to the supporting statement, the species is ecologically extinct in the wild. The animals have been exploited for subsistence and international pet trade. Commercial harvest is not allowed under Myanmar's law but subsistence harvest of the species is permitted. Myanmar needs to modify its regulation to include subsistence harvest. The species has been listed in Appendix II since 1975. Myanmar acceded to CITES in 1997. The proponent indicates data on legal trade from 1986 to 2011 but fails to provide detailed analysis. The proponent sent a consultation letter to Myanmar but has not received a response. Without knowing Myanmar's position, it is difficult to support the proposal. Under the circumstances, we recommend the proposal be **rejected**.

**Prop.
38**

Inclusion of eight softshell turtle species in Appendix II and transfer of two softshell turtle species from Appendix II to Appendix I (China, USA)

This proposal is very complex and even confusing. The proponents should have divided the present proposal into two separate documents, one for inclusion in Appendix II and the other for transfer to Appendix I. The proponent also sent consultation letters to the countries which are not range states of the species subject to this proposal. At a glance, it seems many range states support the proposal but this is not the case. Compared to the number of species subject to

this proposal, the supporting statement is poorly documented. The proponents admit that few population studies have been conducted on turtles in the family Trionychidae. Referring to IUCN Redlist category, the proponents mentioned that *Pelodiscus axenaria*, *P. maackii* and *P. parviformis* are for 'Data Deficient'. Nevertheless, they concluded that these three species qualify for inclusion in Appendix II. We do not understand the logic behind this conclusion. Concerning *Chitra* species, the proponents do not provide quantitative data. Overall, the supporting statement is not compelling and as such, we recommend that the proposal be **rejected**.

**Prop.
39**

Inclusion of a frog species *Epipedobates machalilla* in Appendix II (Ecuador)

This frog species was first described as *Colostethus machalilla* in 1995 but later reclassified as *Epipedobates machalilla*. All species in the genus *Epipedobates* are already listed in Appendix II. At its 25th meeting, the Animals Committee recommended that a proposal be prepared to include this species in Appendix II. There is a compelling reason for inclusion of the species in Appendix II and therefore, the proposal should be **adopted**.

**Prop.
40**

Deletion of southern gastric-brooding frog *Rheobatrachus silus* from Appendix II (Australia)

This proposal was submitted at the request of the Animals Committee. The southern gastric-brooding frog was distributed in Australia. The species had been extremely rare. Since 1981, there has been no record on sighting and the species is considered extinct. The species is listed as Extinct by both Australia and IUCN. The proposal should be **adopted**.

**Prop.
41**

Deletion of northern gastric-brooding frog *Rheobatrachus vitellinus* from Appendix II (Australia)

This proposal was submitted at the request of the Animals Committee. The northern gastric-brooding frog was distributed in Australia. The species was described in 1984 and was common across its range. Since then, it seems that the population has started declining and now the species is considered to have been extirpated. The proposal should be **adopted**.

**Prop.
42**

Inclusion of oceanic whitetip shark *Carcharhinus longimanus* in Appendix II (Brazil, Colombia, USA)

A proposal to list the oceanic whitetip shark was first submitted at CoP15 by Palau and the USA and was rejected. The species occurs in tropical and subtropical waters worldwide. According to the supporting statement, the population of this pelagic species is over-exploited in the central and western Pacific Ocean but the population size is unknown in other areas. The sharks are

caught as bycatch in high seas pelagic fisheries and the fins are retained for international trade. It is stipulated in the supporting statement that most Regional Fisheries Management Organizations (RFMOs) prohibit shark finning at sea, including the International Commission for the Conservation of Atlantic Tunas (ICCAT), the Inter-American Tropical Tuna Commission (IATTC) and the Western and Central Pacific Fisheries Commission (WCPFC). These RFMOs have already introduced strict measures. At a national level, several countries prohibited shark finning and trade in fins. Like other shark species, listing the oceanic whitetip shark in Appendix II will create unnecessary procedural burden on Management Authorities and Customs, thus depriving such CITES-related authorities of resources, which could otherwise be utilized for other species of more conservation priority. It is unlikely that an Appendix II listing of the oceanic whitetip shark will complement the measures taken by these RFMOs. The proposal should be **rejected**.

**Prop.
43**

Inclusion of scalloped hammerhead shark *Sphyma lewini* and other two species in Appendix II (Brazil, Costa Rica, Honduras)

A proposal to list hammerhead sharks was previously submitted at CoP15 by Palau and the USA and was rejected. In 2012, Costa Rica listed the scalloped hammerhead shark *Sphyma lewini* in CITES Appendix III. The scalloped hammerhead shark is distributed worldwide and occurs in warm temperate and tropical coastal waters. It seems that some populations in the Pacific Ocean meet the criteria for an Appendix II listing but the species as a whole does not meet the criteria. The proponents suggest that *Sphyma lewini* be listed in accordance with Criterion A in Annex 2a of Resolution Conf. 9.24 and other four species with Criterion A in Annex 2b. Nevertheless, the supporting statement mentions that few population assessments are available globally for *S. lewini*. Although the proponents say that estimates of trends in abundance of *S. lewini* are available for this species (Annex 2), the table shown as Annex 2 is for *Sphyma* spp. complex. According to the supporting statement, many countries have banned finning and shark fishing. Most of the RFMOs have implemented finning bans. FAO and RFMOs should be the prime organization responsible for shark fisheries. Like other shark species, listing the oceanic whitetip shark in Appendix II will create unnecessary procedural burden on Management Authorities and Customs, thus depriving such CITES-related authorities of resources, which could otherwise be utilized for other species of more conservation priority. Under the circumstances, we recommend that the proposal be **rejected**.

**Prop.
44**

Inclusion of porbeagle *Lamna nasus* in Appendix II (Denmark)

Similar proposals were rejected at CoP14 and CoP15. The porbeagle has already been listed in Appendix III since last year. To the contrary, the supporting statement mentions that in the absence of a CITES listing there is no reliable

mechanism to track trends in catch and trade of *L. nasus*. The porbeagle is distributed in the North Atlantic Ocean, the Mediterranean and the Southern Ocean. The population of the northern Atlantic has been depleted and accordingly, management measures have been introduced by many countries. The supporting statement indicates that quota management has been in place in Canada since 2002, in the US since 1999, in New Zealand since 2004 and in EU since 2008. In 2010, EU established a zero quota. In the EEZ of Canada, the population has stabilized. Thus, it is expected that porbeagle stock will recover. Regrettably, it was only 2010 when a zero quota was set by EU, which is 3 years after its first submission of the porbeagle proposal at CoP14 in 2007. With regard to marine fish species subject to large-scale commercial fisheries, there are many problems which have yet to be solved. For example, the proponent recognizes a difficulty in implementation, suggesting 18 months delay in the entry into effect. Furthermore, EU States consume this shark for its meat and a 'look-alike' problem need to be addressed. Even if EU keeps a zero fishing quota within EU waters, EU will continue importing porbeagles for internal consumption. The proposal should be **rejected**.

**Prop.
45**

Transfer of freshwater sawfishes *Pristis microdon* from Appendix II to Appendix I (Australia)

At CoP14 held in The Hague in 2007, Kenya and the USA submitted a proposal to include all *Pristis species* in Appendix I. Australia was opposed to that proposal as it stands and asked for listing *Pristis microdon* in Appendix II. Australian amendment was supported by the Conference of the Parties and as a result, all species in the family Pristidae were included in Appendix I with the exception of *Pristis microdon*. Australia is now asking to transfer the species from Appendix II to Appendix I. If adopted, the listing status will become simpler by avoiding split-listings. However, listing the species in Appendix II is annotated as "for the exclusive purpose of allowing international trade in live animals to appropriate and acceptable aquaria primarily for conservation purposes". This means that there is no practical difference between the current situation and an Appendix I listing. If Australia considers the export of the specimens is problematic, then it should choose not to issue an export permit. We do not see any reason for listing the species in Appendix I and as such, recommend the proposal be **rejected**.

**Prop.
46**

Inclusion of manta rays in the genus *Manta* in Appendix II (Brazil, Colombia, Ecuador)

Manta birostris used to be the only species belonging to the genus *Manta* but was split to two different species (*M. birostris* and *M. alfredi*) in 2009. There may be a third species. The manta rays are widely distributed in tropical, subtropical and temperate waters. Insufficient information is available on population size, population trends, trade, etc.. As a result, it is difficult to judge whether the species are qualified for Appendix II listings. Ecuador sent consultation letters to

range states but received responses from a small number of countries. We do not know how other countries consider this proposal. Under the circumstances, it is recommended that the proposal be **rejected**.

**Prop.
47**

Inclusion of discus ray *Paratrygon aiereba* in Appendix II (Colombia)

The discus ray is distributed widely in South America, occurring in freshwaters in Venezuela, Brazil, Colombia, Ecuador, Peru and Bolivia. The proponent fails to provide any scientific data on population size and population trends. No concrete data is given but it seems unlikely that the main threat to the species is international trade in ornament fishes. Indeed, the proponent admits that the information on exports does not seem to show significant over-exploitation. Therefore, listing the species in Appendix II will not improve the situation. Management programmes should be established by the range states, which is considered more important. Therefore, we recommend the proposal be **rejected**.

**Prop.
48**

Inclusion of ocellate river stingray *Potamotrygon motoro* and rosette river stingray *P. schroederi* in Appendix II (Colombia, Ecuador)

The ocellate river stingray is widely found in freshwaters in Argentina, Bolivia, Brazil, Colombia, Ecuador, French Guyana, Guyana, Paraguay, Peru, Suriname, Uruguay and Venezuela. The rosette river stingray is distributed in Brazil, Colombia and Venezuela, occurring in freshwaters. Like Prop. 47, the proponents fail to provide any scientific data on population size and population trends. No concrete data is given but it seems unlikely that the main threat to the species is international trade in ornament fishes. Indeed, the proponents admit that the information on exports does not seem to show significant over-exploitation. Therefore, listing the species in Appendix II will not benefit the conservation of the species. Management programmes should be established by the range states, which is considered more important. Therefore, we recommend the proposal be **rejected**.

**Prop.
49**

Transfer of Corsican swallowtail *Papilio hospiton* from Appendix I to Appendix II (Denmark)

This proposal was submitted arising from the periodic review process of Appendices and was endorsed by the Animals Committee. The Corsican swallowtail is endemic to Corsica and Sardinia. The species is widespread and locally abundant on the two islands. It has been reported that the population is stable. IUCN classified the species as 'Least Concern'. The species is protected both in Italy and France. Transferring to Appendix II will therefore not have a negative impact on the species. The proposal should be **adopted**.

**Prop.
50**

Inclusion of Queretaro yucca *Yucca queretaroensis* in Appendix II (Mexico)

The Queretaro yucca is endemic to central Mexico. The species is protected in Mexico. According to the supporting statement, its use and exportation are supposed to be regulated but the official record shows the specimens have been exported. In this regard, internal co-ordination is required. Considering the size and morphology of the plant, it should be easy to exercise a border control. The problem could be solved by Mexico itself. However, it seems that there has been increased international demand as pointed out by Switzerland. It is recommended that the proposal be **adopted**.

**Prop.
51**

Inclusion of jabihy *Operculicarya decaryi* in Appendix II (Madagascar)

The jabihy *Operculicarya decaryi* is endemic to Madagascar. At CoP15, Madagascar submitted a proposal to list the species in Appendix II but it was withdrawn. The present proposal is poorly documented. Little quantitative data are provided on population. The species is not protected nor managed. The number of the specimens exported has recently increased. However, it seems that export of the species is subject to the authorization of the Management Authority. If Madagascar is concerned about the export volume, it should establish an export quota. The proposal should be **rejected**.

**Prop.
52**

Amendment of the annotation to hoodias *Hoodia* spp. (Botswana, Namibia, South Africa)

At CoP 13, *Hoodia* spp. was listed in Appendix II with annotation. According to the supporting statement, the annotation in question has caused difficulties in particular in importing countries. The intent of the proponents was not reflected precisely in the annotation. The present proposal was submitted to make their intention clearer. The proposal should be **adopted**.

**Prop.
53**

Amendment of the annotation to ginsengs *Panax ginseng* and *P. quinquefolius* (USA)

Panax quinquefolius was included in Appendix II in 1973. The Russian population of *P. ginseng* was listed in Appendix II at CoP10 in 2000. The annotations for ginsengs have been subject to amendment and hence confusion. This confusion was caused by deleting the exclusionary languages. The proponent is seeking to add the wording "excluding manufactured parts or derivatives such as powders, pills, extracts, tonics, teas and confectionery". The proposal should be **adopted**.

**Prop.
54**

Deletion of tillandsia *Tillandsia kautskyi* from Appendix II (Brazil)

Tillandsia kautskyi was listed in Appendix II in 1992. The species is a rare species occurring in some parts of Brazil but it seems unlikely that international trade is a factor affecting the species. No information is provided on the status and trends. However, since listing the species in 1992, no wild-taken specimen has been traded. There is no justification to continue listing the species in Appendix II. The proposal should be **adopted**.

**Prop.
55**

Deletion of tillandsia *Tillandsia sprengeliana* from Appendix II (Brazil)

Tillandsia sprengeliana was listed in Appendix II in 1992. The species is a rare species occurring in some parts of Brazil. No information is provided on the status and trends. It seems unlikely that international trade is a factor affecting the species. The proposal should be **adopted**.

**Prop.
56**

Deletion of tillandsia *Tillandsia sucrei* from Appendix II (Brazil)

Tillandsia sucrei was listed in Appendix II in 1992. The species is a rare species occurring in some parts of Brazil. No information is provided on the status and trends. It seems unlikely that international trade is a factor affecting the species. The proposal should be **adopted**.

**Prop.
57**

Deletion of dudleyas *Dudleya stolonifera* and *Dudleya traskiae* from Appendix II (USA)

The two dudleya species were listed in Appendix I at CoP4 in 1983. *Dudleya stolonifera* was transferred to Appendix II at CoP11 in 2000 and *D. traskiae* at CoP 12 in 2002. These two species are endemic to the USA. They have a restricted area of distribution and their populations are small. When listed in Appendix I, trade in the plants was considered a significant threat. According to the supporting statement, since the species were listed in 1983, there has been only one export reported for 2,461 artificially propagated specimens from France to Switzerland in 1985. Deletion of these species from Appendix II will not have a negative impact on the conservation of the species. The proposal should be **adopted**.

**Prop.
58**

Inclusion of ebonies in the genus *Diospyros* in Appendix II (Madagascar)

According to the proposal, 550 species belong to the genus *Diospyros*. The present proposal is asking to list 240 species, of which *Diospyros ferrea* is the only species that is not endemic to Madagascar. In Annex 1 of the supporting

statement, only 84 species are listed. In 2011, Madagascar listed 104 *Diospyros* species in Appendix III. The proponent should mention the scientific names of all species subject to the proposal. The supporting statement is confusing and if listed in Appendix II, it will be difficult for importing countries to know which species are subject to CITES. Already, 104 species are listed in Appendix III but the effects of Appendix III listing are not clear from the proposal. We consider that listing in Appendix II is premature and as such, the proposal should be **rejected**.

**Prop.
59**

Amendment of the annotation to Brazilian rosewood *Aniba rosaeodora* (Brazil)

The current annotation reads “Logs, sawn wood, veneer sheets, plywood and essential oil”. Brazil is asking to replace the term “essential oil” by “extracts”. This proposal was submitted as a result of the deliberation held at the twentieth meeting of the Plants Committee. The proposal should be **adopted**.

**Prop.
60**

Inclusion of Siamese rosewoods *Dalbergia cochinchinensis* in Appendix II (Thailand, Viet Nam)

The Siamese rosewood is distributed in Cambodia, Lao, Thailand and Viet Nam. The population has recently been depleted. Logging of the species is prohibited in all range states but still illegal logging and trade are rampant. Thailand has sent consultation letters to other range states. The position of Cambodia and Lao is unclear but based on its protection status, both countries should be supportive of this proposal. We recommend that the proposal be **adopted**.

**Prop.
61**

Inclusion of black rosewoods *Dalbergia retusa* and *Dalbergia granadillo* in Appendix II (Belize)

Whereas *Dalbergia retusa* is distributed from Mexico to Panama, *Dalbergia granadillo* is found in Mexico and El Salvador. The proponent is asking to list *Dalbergia retusa* in accordance with Resolution Conf. 9.24 (Rev. CoP15) Annex 2 (a) and *Dalbergia granadillo* for a look-alike reason. Very little is known of trade data on *D. retusa*. According to the proposal, the species is so rare that very little of it reaches the world market. In addition, it is mentioned that most internationally traded timber now comes from plantations. It seems that a threat caused by international trade is negligible. We do not understand what Belize wishes to accomplish by listing the species in Appendix II. Consultation letters were sent to the range states but it is not clear if they are supportive of the proposal. Under the circumstances, we recommend that the proposal be **rejected**.

**Prop.
62**

Inclusion of Honduras rosewood *Dalbergia stevensonii* in Appendix II (Belize)

The Honduras rosewood occurs in Mexico, Belize and Guatemala. Unlike *Dalbergia retusa*, this species is not available from plantations. Little is known of the population size and trends. However, it seems that international trade from Mexico and Guatemala is non-existent. In addition, Belize has established a moratorium on cutting and export of Honduras rosewoods. For the same reason as Prop.61 for *Delbergia retusa* and *D. granadillo*, we recommend that the proposal be **rejected**.

**Prop.
63**

Inclusion of rosewoods in the genus *Dalbergia* in Appendix II (Madagascar)

According to the proposal, 250 species belong to the genus *Dalbergia*. The present proposal is asking to list 48 species, all of which are endemic to Madagascar. Insufficient information is available on the population size and trends. However, it seems that a large quantity of *Delbergia* logs have been shipped from Madagascar. We recommend that the proposal be **adopted**. However, it should be pointed out that listing in Appendix II is not a goal. It seems likely that illegal trade will continue even after 48 species in the genus *Dalbergia* are included in Appendix II. A CITES listing is not a panacea. What Madagascar should do is to strengthen its enforcement activities.

**Prop.
64**

Inclusion of andapary *Senna meridionalis* in Appendix II (Madagascar)

The andapary is endemic to the south-west of Madagascar with a fragmented distribution. According to the supporting statement, no illegal trade in this species has been recorded. Furthermore, it is mentioned that since the species is not covered by CITES, harvesting and export are not subject to any form of regulation. It is quite difficult to understand this statement. If Madagascar recognizes a necessity to regulate the harvest and export of the species, then it should introduce such regulations. This can be done without listing the species in Appendix II. Indeed, it is mentioned in the supporting statement that collecting and exporting are regulated by the authorization procedures at national level. Under the circumstances, the proposal should be **rejected**.

**Prop.
65**

Inclusion of bottle liana *Adenia firingalavensis* in Appendix II (Madagascar)

A proposal on the same species was submitted at CoP15 but was withdrawn. The bottle liana is endemic to Madagascar. Contrary to what the proponent claims, it seems unlikely that international trade is a main threat to the species considering the number of specimens exported recently. Some of the habitats are protected in nature reserves. But in others, the species is not protected nor

managed. It seems that export of the species is subject to the authorization of the Management Authority. If Madagascar is concerned about the export volume, it should establish a specific export quota without listing in Appendix II. The proposal should be **rejected**.

**Prop.
66**

Inclusion of katakata *Adenia subsessilifolia* in Appendix II (Madagascar)

A similar proposal was submitted at CoP15 in 2010 but was withdrawn. The katakata is endemic to south-western Madagascar with a restricted distribution. Contrary to what the proponent claims, it seems unlikely that international trade is a main threat to the species considering the number of specimens exported recently. Some of the habitats are protected in nature reserves. But in others, the species is not protected nor managed. It seems that export of the species is subject to the authorization of the Management Authority. If Madagascar is concerned about the export volume, it should establish a specific export quota without listing in Appendix II. The proposal should be **rejected**.

**Prop.
67**

Inclusion of anakoraky *Uncarina grandidieri* in Appendix II (Madagascar)

The genus *Uncarina* is endemic to Madagascar, comprising 9 species. This species occurs only in the southern tip of Madagascar. Contrary to what the proponent claims, it seems unlikely that international trade is a main threat to the species. No illegal trade has been recorded. It seems that export of the species is subject to the authorization of the Management Authority. If Madagascar is concerned about the export volume, it should establish a specific export quota without listing in Appendix II. According to the proposal, propagation of *Uncarina* species from cuttings is very successful and propagation from seed is also possible. These activities should be encouraged. Under the circumstances, we recommend that the proposal be **rejected**.

**Prop.
68**

Inclusion of farehitsy *Uncarina stellulifera* in Appendix II (Madagascar)

This species is endemic to the southwestern part of Madagascar. Contrary to what the proponent claims, it seems unlikely that international trade is a main threat to the species. No illegal trade has been recorded. It seems that export of the species is subject to the authorization of the Management Authority. If Madagascar is concerned about the export volume, it should establish a specific export quota without listing in Appendix II. According to the supporting statement, propagation of *Uncarina* species from cuttings is very successful and propagation from seed is also possible. These activities should be encouraged. Under the circumstances, we recommend that the proposal be **rejected**.

**Prop.
69**

Inclusion of African sandalwood *Osyris lanceolata* in Appendix II (Kenya, Tanzania)

This species is widely distributed ranging from Africa through Europe to Asia. Insufficient information is available on the population size and trends. The proposal is referring to the situation of Kenya only and still superficial. As a distinguished delegate of Kenya stressed at the 62nd meeting of the Standing Committee, any CITES decision should be made based on 'pure science'. It is mentioned in the proposal that various consultations were initiated within the range states. Nevertheless, the proposal refers to Tanzania, Uganda, South Sudan and Ethiopia only. A vast majority of the range states is not covered by consultations. As such, the proposal should be **rejected**.

**Prop.
70**

Amendment of the annotation to agarwoods *Aquilaria* spp. and *Gyrinops* spp. (China, Kuwait, Indonesia)

This proposal is seeking to replace the current annotation with a new annotation. For plant species, there have been difficulties in implementing provisions set by the annotation. This proposal arose from the decisions adopted at CoP14 and Cop15 as well as discussions held at two working groups established by the Plants Committee. Adoption of this proposal will simplify CITES enforcement activities. We recommend that the proposal be **adopted**.

**Prop.
71**

Inclusion of laza *Cyphostemma laza* in Appendix II (Madagascar)

This species is endemic to the southwestern part of Madagascar. Insufficient information is available on the population size and trends. Although the number of specimens exported in 2005 and 2007 was high, it seems unlikely that international trade is a main threat to the species. No illegal trade has been recorded. It is mentioned in the proposal that the collection and export are regulated by the authorization procedures at national level. Therefore, it seems that export of the species is subject to the authorization of the Management Authority. If Madagascar is concerned about the export volume, it should establish an appropriate export quota. Under the circumstances, we recommend that the proposal be **rejected**.

NOTES

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NOTES

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.



For the benefit of species and people
(GGT's motto)

A publication of the Global Guardian Trust. 2013

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