GGT'S RECOMMENDATIONS
ON THE AMENDMENT PROPOSALS
FOR CONSIDERATION AT THE EIGHTEENTH MEETING
OF THE CONFERENCE OF THE PARTIES TO CITES
(Geneva, 2019)



GLOBAL GUARDIAN TRUST

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SUMMARY OF THE RECOMMENDATIONS

Proposal	Species	Amendment	Recommendation
1	Capra falconeri heptneri markhor	→	Yes
2	Saiga tatarica saiga antelope	→	No
3	Vicugna vicugna vicuña	→	Yes
4	Vicugna vicugna vicuña	annotation	Yes
5	Giraffa camelopardalis giraffe	0 → II	No
6	Aonyx cinereus small-clawed otter	→	No
7	Lutogale perspicillata smooth-coated otter	→	No
8	Ceratotherium simum simum white rhino	annotation	Yes
9	Ceratotherium simum simum white rhino	→	Yes
10	Loxodonta africana African elephant	→	Yes
11	Loxodonta africana African elephant	annotation	Yes
12	Loxodonta africana African elephant	→	No
13	Mammuthus primigenius wooly mammoth	0 → II	No
14	Leporillus conditor greater stick-nest rat	→	Yes
15	Pseudomys fieldi subsp. Shark Bay mouse	→	Yes
16	Xeromys myoides false swamp rat	→	Yes
17	Zyzomys pedunculatus central rock rat	→	Yes
18	Syrmaticus reevesii Reeves's pheasant	0 → II	Yes
19	Balearica pavonina black crowned crane		No
20	Dasyornis broadbenti rufous bristlebird	→	Yes
21	Dasyornis longirostris long-billed bristlebird	→	Yes
22	Crocodylus acutus American crocodile	→	Yes
23	Calotes nigrilabris etc. garden lizards	0 → I	No
24	Ceratophora spp. horned lizards	0 → I	No
25	Cophotis ceylanica etc. pygmy lizards	0 → I	No
26	Lyriocephalus scutatus hump-nosed lizard	0 → I	No
27	Goniurosaurus spp. leopard geckos	0 → II	Yes
28	Gekko gecko tokay gecko	0 → II	No
29	Gonatodes daudini clawed gecko	0 → I	Yes
30	Paroedura androyensis ground gecko	0 → II	Yes
31	Ctenosaura spp. spiny-tailed iguanas	0 → II	Yes
32	Pseudocerastes urarachnoides viper	0 → II	Yes
33	Cuora bourreti Bourret's box turtle	→	No
34	Cuora picturata Vietnamese box turtle	→	No
35	Mauremys annamensis Annam leaf turtle	→	No
36	Geochelone elegans star tortoise	→	No
37	Malacochersus tornieri pancake tortoise	→	No

38	Hyalinobatrachium spp. etc. glass frogs	0 → II	Yes
39	Echinotriton chinhaiensis etc. spiny newts	0 → II	Yes
40	Paramesotriton spp. Asian warty newts	0 → II	Yes
41	Tylototriton spp. crocodile newts	0 → II	Yes
42	Isurus oxyrinchus etc. mako sharks	0 → II	No
43	Glaucostegus spp. guitarfishes	0 → II	No
44	Rhinidae spp. wedgefishes	0 → II	No
45	Holothuria fuscogilva etc. teatfishes	0 → II	No
46	Poecilotheria spp. ornamental spiders	0 → II	No
47	Achillides chikae hermeli swallowtail	0 → I	No
48	Parides burchellanus riverside swallowtail	0 → I	No
49	Handroanthus spp. etc. trumpet trees	0 → II	withdrawn
50	Widdringtonia whytei Mulanje cedar	0 → II	Yes
51	Dalbergia sissoo North Indian rosewood	II → 0	Yes
52	Dalbergia spp. etc. rosewoods	annotation	Yes
53	Pericopsis elata African teak	annotation	Yes
54	Pterocarpus tinctorius African padauk	0 → II	Yes
55	Aloe ferox bitter aloe	annotation	Yes
56	Adansonia grandidieri baobab	annotation	Yes
57	Cedrela spp. cedars	0 → II	No

RECOMMENDATIONS

Prop. Transfer of Tajikistan's population of the Heptner's markhor *Capra falconeri heptneri* from Appendix I to Appendix II (Tajikistan)

The species *Capra falconeri* is distributed in Tajikistan, Afghanistan, Turkmenistan, India, Pakistan and Uzbekistan. The proposal aims to transfer *C. falconeri heptneri* from Appendix I to Appendix II. The species was transferred from Appendix II to Appendix I in 1992 based on insufficient information. It is well known that in Pakistan, trophy hunting has contributed to community-based conservation. The markhor population of Tajikistan shows a steady increase thanks to the involvement of local communities. By transferring it to Appendix II, local communities will receive further incentives, thus contributing to the conservation of Tajikistan's subspecies. We strongly recommend that the proposal be **adopted**. Other range states of the species may wish to submit proposals to transfer their populations to Appendix II at future CoPs because the species as a whole does not meet the Appendix I listing criteria.

Prop. Transfer of the saiga antelope Saiga tatarica from Appendix II to Appendix I (Mongolia and USA)

The species Saiga tatarica was included in Appendix II in 1994. At that time, the proposals submitted by the US was intended to include the population of Mongolia in Appendix I and the rest of the species in Appendix II. The Conference of the Parties decided to include the species as a whole in Appendix II. The proponents, Mongolia and the US propose that the species be transferred to Appendix I. While we share the concern expressed by the proponents, a transfer to Appendix I may not have a positive effect on the species as anticipated by the proponents. Since 2015, hunting has been prohibited in all range states. In practice, there is no difference between Appendix I listing and Appendix II listing because hunting is prohibited. The saiga specimens subject to international trade are those already acquired. There are many threats ranging from local consumption for meat to habitat loss. There seems to be a large volume of saiga horn stockpile in Asian countries including China, Japan and Singapore. Saiga horn may have been utilized as substitutes for rhino horn. If this is the case, an Appendix I listing of the species would further increase the prices of these species. The global population of the species is not small. The positions of the range states other than Mongolia are not clear. Under the circumstances, the proposal should be rejected. However, split listings may be one solution with Mongolian population in Appendix I and others in Appendix II. Also, we recommend that the range states take remedial actions such as the enhancement of anti-poaching activities and strengthened border control.

Prop. Transfer of the vicuña *Vicugna vicugna* population of Salta Province from Appendix I to Appendix II (Argentina)

The species endemic to South America does not meet the Appendix I listing criteria. It is well known that local communities are involved in the sustainable management of the vicuña. Vicuña wool is sheared from live animals without killing them. The vicuña is one of the few species that CITES has worked successfully because the Conference of the Parties allowed to transfer several vicuña populations from Appendix I to Appendix II. A transfer of the population in question will create more incentives to local communities, thus having positive impacts on the conservation of the population. The proposal should be adopted.

Prop. Amendment of the name of the vicuña population of Chile already listed in Appendix II (Chile)

The proposal was submitted resulting from the name change of a geopolitical region. In adopting this proposal, the conservation status of the vicuña population remains unchanged. The proposal should be **adopted**.

Prop. Inclusion of the giraffe *Giraffa camelopardalis* in Appendix II (Central African Republic, Chad, Kenya, Mali, Niger and Senegal)

The species consists of nine subspecies, distributed in 19 range states in Africa. As is the case with other wildlife such as lions, rhinos and elephants, southern African countries have the healthy populations while other sub-regions have experienced a precipitous decline. The only exception is Niger where a conservation strategy was established. In Niger, the population of G. c. peralta has increased substantially, from 49 individuals in the 1990s to 400 in 2015. Niger's effort is commendable. As the proponents admit, exploitation for trade may not be the primary cause of decline in wild giraffe populations. The main threats are actually habitat loss, civil unrest, illegal hunting and ecological changes. We are concerned that giraffes have recently been poached for bushmeat. This threats however will not be solved by listing the species in Appendix II because CITES has no effect on internal use. Out of six co-proponents, the hunting of giraffes is prohibited in Central African Republic, Chad and Kenya. In addition, the giraffe is possibly extinct in Mali and extinct in Senegal. There is no foreseeable merit in listing the species in Appendix II. What is needed for the proponents and other range states with declining populations is to learn Niger's achievement. It is not clear if southern African countries with healthy giraffe populations are supportive of this proposal. Under the circumstances, the proposal should be rejected.

Prop. Transfer of the small-clawed otter *Aonyx cinereus* from Appendix II to Appendix I (India, Nepal and Philippines)

The small-clawed otter is distributed widely ranging from India to the Philippines.

The proponents propose to transfer the species from Appendix II to Appendix I based on the CITES listing criteria paragraph C: a marked decline in the population size in the wild. According to the IUCN Redlist, it is inferred that the global population of the small-clawed otter has declined by 30% or more over the past 30 years. Under the CITES listing criteria, a marked recent rate of decline is generally a percentage decline of 50% or more in three generations. The recent rate of decline is within this threshold and as such, the species does not meet the Appendix I listing criteria. The threats to the species include aquaculture, pollution by pesticides, habitat loss, alteration to agricultural land, garbage dumping, poaching for pelts, pets and so on, of which poaching for pelts may be a main threat. Poaching for pet trade does exist but it constitutes a small fraction of threats. According to the supporting statement, most of the range states have national legislation by which the species is protected. The range States where the species is protected include Bangladesh, Bhutan, China, India, Lao PDR, Malaysia, Myanmar, Philippines, Singapore, Taiwan, Thailand and Viet Nam. Nepal, one of the proponents, does not protect the species. Since the species is protected by most of the range States, an Appendix I listing would not make much difference. In conclusion, we recommend that the proposal be rejected. The small-clawed otter is popular among hobbyists due to its looking causing smuggling attempts. We recommend that destination countries such as Japan strengthen border controls.

Prop. Transfer of the smooth-coated otter *Lutogale perspicillata* from Appendix II to Appendix I (Bangladesh, India and Nepal)

The contents of the proposal are similar to the previous one. The smooth-coated otter is widely distributed in Asia ranging from Pakistan to Indonesia. The proponents propose to transfer the species from Appendix II to Appendix I based on the CITES listing criteria paragraph C: a marked decline in the population size in the wild. According to the IUCN Redlist, it is inferred that the global population of the smooth-coated otter has declined by 30% or more over the past 30 years. Under the CITES listing criteria, a marked recent rate of decline is generally a percentage decline of 50% or more in three generations. The recent rate of decline is within this threshold and as such, the species does not meet the Appendix I listing criteria. The threats to the species include pelt trade, dam construction, reclamation of wetlands, aquaculture, etc., all anthropogenic factors. Since the species is a fish eater, fishermen regard the species as pests resulting in illegal killing. The species is protected in most of the range States. The range States where the species is protected include Bhutan, China, India, Indonesia, Lao PDR, Malaysia, Myanmar, Nepal, Pakistan, Thailand and Viet Nam. One of the proponents, Bangladesh does not protect the species. Since the species is protected by most of the range States, an Appendix I listing would not make much difference. In conclusion, we recommend that the proposal be rejected. At the same time, we urge Bangladesh to designate the smooth coated otter as protected species under its domestic law.

Prop. Amendment of the annotation for the Eswatini population of the southern white rhinoceros *Ceratotherium simum simum* (Eswatini)

The white rhino populations of South Africa and Eswatini are listed in Appendix II with annotation. Eswatini submitted a similar proposal for CoP17 aimed at an international trade in rhino horns. The proposal was rejected. Eswatini's intention is to sell rhino horns coming from the stockpiles and horns from non-lethal harvesting. Eswatini's rhino populations occur in one national park and one game reserve. In addition, it intends to introduce rhinos to one wildlife sanctuary. These three protected areas are not financed by the Government. They need to be self-financed. At CoP17, a representative of Eswatini (Swaziland) made a plea for help but unfortunately, the Conference of the Parties rejected the proposal. By using proceeds from selling rhino horns, Eswatini wishes to enhance its effort to conserve its rhino population. Listing rhinos in Appendix I has proven to be a failure and innovative approaches need to be taken. This proposal is one of such approaches and as such, it should be adopted. The adoption of the proposal is the best interest of the conservation of the species as well as of biodiversity. Those who oppose this proposal are encouraged to provide Eswatini with financial assistances.

Prop. Transfer of the Namibian population of the southern white rhinoceros Ceratotherium simum simum from Appendix I to Appendix II (Namibia)

The white rhinoceros consists of two subspecies, *Ceratotherium simum* and *C. s. cottoni*. The latter, northern white rhinoceros, is almost extinct with only two females left. The former, southern white rhinoceros had been extirpated from most of the range States including Namibia. However, South African remaining population became subject to protection and has increased rapidly. Rhinos have been reintroduced from South Africa to Namibia, Botswana, Zimbabwe, Mozambique and Eswatini. Sixteen rhinos were reintroduced from South Africa to Namibia in 1975 and the population has since then increased up to more than 1,000. The species as a whole does not meet the Appendix I listing criteria, nor Namibia's population. The population has increased substantially, not because of CITES but because of Namibia's effort. Such efforts must be rewarded. The number of rhinos killed illegally has increased recently but it is negligible compared to the total number of animals protected. The proposal aims to export live animals and hunting trophies. Without approving this proposal, the integrity of CITES would be questioned. The proposal should be adopted.

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

Zambia's elephant population does not meet the Appendix I listing criteria. Zambia has submitted proposals to transfer its elephant population from Appendix I to Appendix II at CoP 12 (Santiago, 2002) and CoP 15 (Doha, 2010). These proposals were rejected. In relation to CoP 15 proposal, a panel of

experts was established. Its conclusion was that the acceptance of the proposal would be beneficial to the conservation of the elephant population of Zambia and long-term funding for conservation of elephants is required. Such a funding can be attained by exporting ivories annually. Adoption of the proposal would be the first step to this effect. The supporting statement is well documented and enumerates various benefits received by wildlife and local communities. The main threats are the expansion of human settlements, thus creating humanelephant conflicts. The only solution to this problem could be for local communities to receive tangible benefits from elephants with whom people compete. Zambia burned ivory in 1992 anticipating funding from outside. According to the supporting statement, Zambia has not fully benefited from previous pledges for alternative funding from other Parties and animal welfare groups. In Zambia, most of the elephant population of the country occur in the Luangwa valley, where a pioneer project known as LIRDP was developed. Community-based natural resources management programmes such as LIRDP are keys to the long-term survival of the African elephants. The adoption of the present proposal will certainly contribute to the conservation of African elephants. The proposal should be adopted.

Prop. Amendment of the annotation for the African elephant *Loxodonta africana* listed in Appendix II (Botswana, Namibia and Zimbabwe)

The African elephant was transferred from Appendix II to Appendix I at the seventh meeting of the Conference of the Parties (Lausanne, 1989) despite the general recognition that some of the southern African countries did not meet the Appendix I listing criteria. The elephant populations of Botswana, Namibia and Zimbabwe were transferred to Appendix II in 1997 and South African population in 2000. The Conference of the Parties should have supported the proposals submitted by southern African countries without any condition attached. The present proposal aims to delete some sub-paragraphs of the annotation. If this proposal is adopted, the four countries, i.e., Botswana, Namibia, South Africa and Zimbabwe will be able to export their stockpiled ivories. If this is the case, it will be the best interest of the conservation of the African elephant and will be in line with the original intent of CITES. We welcome this proposal and recommend that it be adopted. Continuing to reject their proposals is the punishment for the conservation success of southern African countries.

Prop. **12**

Transfer of the populations of the African elephant *Loxodonta africana* 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 plight now faced by African elephants started in 1989 when the Conference of the Parties adopted a transfer of the species as a whole from Appendix II to Appendix I despite the unanimous recognition that southern African populations did not meet the Appendix I listing criteria. Those who supported an Appendix I

listing need to take the responsibility because that decision brought about the present situation. The elephant populations of Botswana, Namibia and Zimbabwe were transferred back to Appendix II in 1997 and that of South Africa in 2000. Subsequently, international ivory trade took place twice, but both were 'one-off trade'. This decision exacerbated the situation because such trade precluded a possibility of establishing a long-term management strategy. According to the supporting statement, if all African elephant populations are considered as a whole, the species meets the Appendix I criteria. At the same time, the proponents admit that individual country populations may be listed separately in Appendix II. However, the proponents argue that split-listings should be avoided referring to the listing criteria: "Listing of a species in more than one Appendix should be avoided in general in view of the enforcement problems it creates". The history of CITES, however tells us that 'split-listings' was beneficial to many species including vicuna and crocodiles. The Nile crocodile population of Kenya is listed in Appendix II, creating 'split-listings' for the species. If 'split-listings' works negatively, Kenya's population should be transferred to Appendix I. Furthermore, 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 specie 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 stressed that this paragraph does not mean that in cases of uncertainty, international trade should not be permitted. On the contrary, 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. There should be clear recognition that there are two different groups of countries, the one who failed to conserve elephants and the other who succeeded. By submitting this kind of proposal repeatedly, the former's country group is asking the latter to adopt the wildlife policy that proved to have been a failure. In conclusion, there is no justification for transferring the elephant populations of Botswana, Namibia, South Africa and Zimbabwe to Appendix I. The proposal should be rejected.

Prop. Inclusion of the wooly mammoth *Mammuthus primigenius* in Appendix II (Israel)

The wooly mammoth *Mammuthus primigenius* is an extinct species. Israel proposes to include the mammoth in Appendix II for 'look-alike' reasons. According to the supporting statement, Israel consulted all CITES Parties via CITES Notification dated 8 November. This procedure seems to be against Resolution Conf. 8.21 (Rev. CoP16) "Consultation with range States on proposals to amend Appendices I and II". Under this Resolution, Israel is

required to submit the proposal to the CITES Secretariat at least 330 days in advance of CoP18. It is unclear whether the Secretariat received the draft proposal in June 2018. We share the comments made by Canada. Listing the mammoth will not have any positive impact on the African elephant and the proposal should be **rejected**. We feel that listing the mammoth is something similar to listing the domestic cat in Appendix II. All Felidae species are listed in CITES Appendices and their parts and derivatives resemble those of other Felidae species.

Prop. Transfer of the greater stick-nest rat *Leporillus conditor* from Appendix 1 to Appendix II (Australia)

This species occurred historically in the Australian mainland but became extinct in the 1930s. The remaining population was restricted to the Franklin Islands. The main threat was feral cats and introduced red foxes. Populations have been reintroduced to other islands and mainland. This proposal to transfer the species to Appendix II arises from Resolution on Periodic Review of the Appendices in accordance with the decision made by the Animals Committee. There seems no international trade in the species. Since the species does not meet the Appendix I listing criteria, the proposal should be adopted.

Prop. Transfer of the Shark Bay mouse *Pseudomys fieldi praeconis* from Appendix I to Appendix II (Australia)

The species *Pseudomys fieldi* became extinct on the mainland and from two islands by the late 19th century and has survived on Bernier Island only. As is the case with the previous proposal, populations have been reintroduced to other islands and mainland. This proposal to transfer the species to Appendix II arises from Resolution on Periodic Review of the Appendices in accordance with the decision made by the Animals Committee. There seems no international trade in the species. Since the species does not meet the Appendix I listing criteria, the proposal should be **adopted**.

Prop. Transfer of the false swamp rat *Xeromys myoides* from Appendix I to Appendix II (Australia)

The species is distributed in northern Australia and Papua New Guinea. This proposal to transfer the species to Appendix II arises from Resolution on Periodic Review of the Appendices in accordance with the decision made by the Animals Committee. There seems no international trade in the species. Since the species does not meet the Appendix I listing criteria, the proposal should be **adopted**.

Prop. Transfer of the central rock rat *Zyzomys pedunculatus* from Appendix I to Appendix II (Australia)

The species is endemic to Australia occurring in restricted areas. The main

threats include feral cats and fires. There seems no international trade in the species. This proposal to transfer the species to Appendix II arises from Resolution on Periodic Review of the Appendices in accordance with the decision made by the Animals Committee. Since the species does not meet the Appendix I listing criteria, the proposal should be **adopted**.

Prop. Inclusion of the Reeves's pheasant *Syrmaticus reevesii* in Appendix II (China)

The Reeves's pheasant is endemic to China. The species is strictly protected under China's domestic legislation. The main threats are illegal hunting, habitat destruction and poison in farmland. Feathers of this pheasant have been subject to international trade. Little is known of where the specimens actually come from. By including the species in Appendix II, it would become easier for China to monitor illegal trade and as such, the proposal should be **adopted**.

Prop. Transfer of the black crowned crane *Balearica pavonina* from Appendix II to Appendix I (Burkina Faso, Côte d'Ivoire and Senegal)

The species is distributed from western Africa to eastern Africa. The population is not small and does not have a restricted area of distribution. The species does not meet the Appendix I listing criteria. The species comprises two subspecies, i.e., *Balearica pavonina pavonina* and *B. p. ceciliae*. According to the supporting statement, trend data for *B. p. ceciliae* is poorly known but may warrant transferring the species from Appendix II to Appendix I if projections depicting a worst scenario are realized. This can be interpreted that the worst scenario may not realize. The main threat is habitat loss caused by anthropogenic activities such as the use of wetlands for agriculture, extraction of water for irrigation and groundwater extraction. The species is legally protected in most of the range States. What the range states need to do is to establish comprehensive management programmes including enforcement efforts. Under the circumstances, we recommend that the proposal be **rejected**.

Prop. Transfer of the lesser rufous bristlebird *Dasyornis broadbenti litoralis* from Appendix I to Appendix II (Australia)

The subspecies *Dasyornis broadbenti litoralis* is endemic to the south-western coast of Western Australia. This proposal is similar to Props. 14, 15, 16 and 17 in its nature. The proposal was submitted by Australia in accordance with the decision made by the Animals Committee. The subspecies is considered to have become extinct. Transfer of the subspecies from Appendix I to Appendix II will not have any impact. The proposal should be **adopted**.

Prop. Transfer of the long-billed bristlebird *Dasyornis longirostris* from Appendix I to Appendix II (Australia)

The species *Dasyornis longirostris* is endemic to south-western Western Australia. The main threats to the species are habitat destruction and wildfires. As is the case with the previous proposal, Prop. 20, the proposal was submitted by Australia in accordance with the decision made by the Animals Committee. Transfer of the species from Appendix I to Appendix II will not have any impact. The proposal should be **adopted**.

Prop. Transfer of the American crocodile *Crocodylus acutus* population of Mexico from Appendix I to Appendix II (Mexico)

The American crocodile widely occurs from Florida through Caribbean islands to South America. The species was first listed in Appendix II in 1976. The population of the US was transferred to Appendix I in 1979 and the rest remained in Appendix II. In 1981, the species as a whole was listed in Appendix I and international trade in the American crocodile was prohibited. In 2004, the Cuban population was transferred back to Appendix II. In 2016, one population in Colombia was transferred to Appendix II. Other range states have Appendix I populations currently. The population of Mexico is not small and does not have a restricted area of distribution. Thus, the population does not meet the Appendix I listing criteria. This proposal submitted by Mexico aims to transfer its population from Appendix I to Appendix II. At CoP15, Mexico submitted a proposal to transfer its Morelet's crocodile population from Appendix I to Appendix II, which was successfully adopted. Since then, Mexico has developed the successful management programme, which can be applied to the American crocodile as well. By transferring its population, Mexico will be able to export the specimens from the ranching programme. Ranching is beneficial to the crocodile population, its habitat and local communities. We welcome this proposal and recommend that the proposal be adopted.

Prop. Inclusion of the garden lizards *Calotes nigrilabris* and *C. pethiyagodai* in Appendix I (Sri Lanka)

Lizards in the genus *Calotes* are distributed from South Asia to East Asia. The proposal aims to include two species endemic to Sri Lanka in Appendix I. According to the supporting statement, these two species are strictly protected under Sri Lankan legislation and no export for commercial purposes are permitted. The main threat to these species is habitat destruction/fragmentation and pesticide use by local farmers. These problems will not be solved by listing the species in Appendix I because they are of internal nature. It is difficult to understand the rationale behind the proposal. If the existing measures are considered to be insufficient, then Sri Lanka should strengthen its legislation and enhance enforcement activities. Under the circumstances, the proposal should be **rejected**. An Appendix II or III listing may be more appropriate.

Prop. Inclusion of the horned lizards *Ceratophora* spp. in Appendix I (Sri Lanka)

The genus *Ceratophora* comprises five species which are all endemic to Sri Lanka. The proponent proposes to list the five species in Appendix I. According to the supporting statement, these five species are strictly protected under Sri Lankan legislation and no export for commercial purposes are permitted. The main threat to these species is forest destruction caused by the expansion of tea plantations and timber extraction. The proponent argues that national conservation and protection measures appear to be insufficient to save these lizards. Even though these lizards are included in Appendix I, the situation would remain unchanged because the main threat is of domestic nature. If the existing measures are considered to be insufficient, then Sri Lanka should strengthen its legislation and enhance enforcement activities. Under the circumstances, the proposal should be **rejected**. An Appendix II or III listing may be more appropriate.

Prop. Inclusion of the pygmy lizards *Cophotis ceylanica* and *C. dumbara* in Appendix I (Sri Lanka)

The genus *Cophotis* comprises two species, *C. ceylanica* and *C. dumbara*. These species are endemic to Sri Lanka. The proposal aims to include these two species in Appendix I. According to the supporting statement, these two species are strictly protected under Sri Lankan legislation and no export for commercial purposes are permitted. The threats to these species include deforestation, the use of agrochemicals and effects of climate change. The main problem is deforestation caused by timber extraction and clearing of forest for tea plantations. These problems will not be solved by listing the species in Appendix I because they are of internal nature. It is difficult to understand the rationale behind the proposal. If the existing measures are considered to be insufficient, then Sri Lanka should strengthen its legislation and enhance enforcement activities. Limiting the expansion of tea plantations may be one of the solutions. Under the circumstances, the proposal should be **rejected**. An Appendix II or III listing may be more appropriate.

Prop. Inclusion of the hump-nosed lizard *Lyriocephalus scutatus* in Appendix I (Sri Lanka)

The hump-nosed lizard is endemic to Sri Lanka and is monotypic. The proposal aims to include this species in Appendix I. The species occurs in cool and shady forested areas in the southwestern part of Sri Lanka. According to the supporting statement, the species is strictly protected under Sri Lankan legislation and no export for commercial purposes are permitted. The main threat to the species is deforestation, leading to loss of habitat and habitat fragmentation. These problems will not be solved by listing the species in Appendix I because they are of internal nature. It is difficult to understand the rationale behind the proposal. If

the existing measures are considered to be insufficient, then Sri Lanka should strengthen its legislation and enhance enforcement activities. Under the circumstances, the proposal should be **rejected**. An Appendix II or III listing may be more appropriate.

Prop. Inclusion of the leopard geckos *Goniurosaurus* spp. from China and Viet Nam in Appendix II (China, EU and Viet Nam)

The genus *Goniurosaurus* consists of 19 species. These species are distributed in China, Japan and Viet Nam. The proposal aims to list 13 species in Appendix II occurring in China and Viet Nam. Six species endemic to Japan are excluded from the proposal. The main threats are habitat loss, pet trade and local use. Although little is known of the population size, it seems that the population has declined. Most of the leopard gecko species are being sold in the international pet market. An Appendix II listing will enable the range States to monitor their trade volume. We recommend that the proposal be **adopted**. We also recommend that the six species not covered by the proposal be listed in Appendix II in future because they are also subject to international pet trade.

Prop. Inclusion of the tokay gecko *Gekko gecko* in Appendix II (EU, India, Philippines and USA)

The tokay gecko is widely distributed in many countries in Asia, i.e., Bangladesh, Cambodia, China, India, Indonesia, Lao PDR, Malaysia, Myanmar, Nepal, Philippines, Singapore, Thailand and Vie Nam. The population may have declined in some range States but seems large in other States such as Bangladesh, China and Thailand. The species has historically been subject to international trade for medicinal purposes. Hunting and/or export are regulated by Bangladesh, Cambodia, China, India, Indonesia, Lao PDR, Malaysia, Nepal, Philippines, Viet Nam and Thailand. Thus, various safeguards already exist in these range States. A consultation was made by EU with all range States and oppositions were expressed by Cambodia, China, Indonesia, Nepal and Viet Nam. Under the circumstances, the proposal should be rejected.

Prop. Inclusion of the Grenadines clawed gecko *Gonatodes daudini* in Appendix I (Saint Vincent and the Grenadines)

The species is found only on Union Island of Saint Vincent and the Grenadines. Union Island is a very small island with an area of only 9 km². The species was recently described and has become targeted by collectors. The species does meet the Appendix I listing criteria. The main threat to the species is overharvesting for commercial purposes. In addition to a restricted area of distribution, the existence of illegal trade warrants an Appendix I listing of the species. We recommend that the proposal be **adopted**. We further recommend that Saint Vincent and the Grenadines take mitigative actions against other threats such as feral cats and wildfires.

Prop. Inclusion of the Grandidier's Madagascar ground gecko *Paroedura* androyensis in Appendix II (EU and Madagascar)

The species is endemic to Madagascar occurring in dry forests and its distribution is restricted to a small area of the southern tip of Madagascar. The proposal aims to list the species in Appendix II. It seems to be severely fragmented. Although no information is available on the population size, the species seems to meet the Appendix II listing criteria based on its restricted area of distribution and the threats to the species. We recommend that the proposal be **adopted**. According to the supporting statement, however, the main threats are timber extraction for charcoal production and land clearance for slash and burn agriculture. An Appendix II listing of the species will not solve the problem by itself and as such, Madagascar needs to take remedial actions.

Prop. Inclusion of the spiny-tailed iguanas *Ctenosaura* spp. in Appendix II (El Salvador and Mexico)

The genus *Ctenosaura* comprises 18 species. Four species are already included in Appendix II. The proposal aims to list other 14 species in Appendix II. By doing so, all 18 species in the genus *Ctenosaura* will be included in Appendix II. According to the supporting statement, 13 species, including already listed four species meet the Annex 2a criteria and the remaining 5 species meet the Annex 2b criteria. The supporting statement lists a variety of threats faced by these iguana species including international pet trade. Information on international trade is available for the four species. Inclusion of other species in Appendix II will provide range States with new information on quantitative data on trade volume. The proposal should be adopted.

Prop. Inclusion of the spider-tailed horned viper *Pseudocerastes urarachnoides* in Appendix II (Iran)

The species is a new species described only recently. It is found in Iran. Since the species is a newly described species, little is known of the biological and trade status. Due to its very special morphology and behaviour, the animals may have become popular among hobbyists. Despite the fact that the species is protected in Iran and export of the animals is prohibited, there are evidence of illegal trade. An Appendix II listing will help Iran to conserve the species and the proposal should be **adopted**.

Prop. Transfer of the Bourret's box turtle *Cuora bourreti* from Appendix II to Appendix I (Viet Nam)

The species is distributed in Viet Nam and Lao PDR. It was listed in Appendix II in 2000. The proposal aims to transfer the species from Appendix II to Appendix I. Lao PDR has its national legislation banning collection. The species is protected from commercial exploitation in Viet Nam as well. The species inhabits

well developed evergreen forest. Habitat loss and degradation are threats to the species. However, the main threat is collection for trade, both for food consumption and pet. Since 2013, a zero annual export quota has been established for the species *Cuora bourreti* for specimens removed from the wild and traded for primarily commercial purposes. In practice, there is no difference between an Appendix I listing and an Appendix II listing with zero export quota. The supporting statement admits that though the species is legally protected in both range States, enforcement may be insufficient. Both countries in particular Vie Nam as a proponent are required to strengthen their enforcement activities. Under the circumstances, the proposal should be **rejected**.

Prop. Transfer of the Vietnamese box turtle *Cuora picturata* from Appendix II to Appendix I (Viet Nam)

The species is endemic to Viet Nam and found in evergreen forest. It was listed in Appendix II in 2000. The proposal aims to transfer the species from Appendix II to Appendix I. The species is legally protected from commercial exploitation in Viet Nam. Habitat loss and degradation are threats to the species. However, the main threat is collection for trade, both for food consumption and pet. Since 2013, a zero annual export quota has been established for the species *Cuora picturata* for specimens removed from the wild and traded for primarily commercial purposes. In practice, there is no difference between an Appendix I listing and an Appendix II listing with zero export quota. According to the supporting statement, domestic enforcement of existing regulations may be insufficient. The proponent clearly identifies the problem and as such enforcement activities must be strengthened. For the same reason as *Cuora bourreti*, the proposal should be **rejected**.

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

The Annam leaf turtle is endemic to Viet Nam, inhabiting floodplain wetlands. It was listed in Appendix II in 2000. The proposal aims to transfer the species from Appendix II to Appendix I. The species is legally protected in Viet Nam from any form of exploitation. Since 2013, a zero annual export quota has been established. Nevertheless, enforcement at local jurisdictions may be insufficient. In practice, there is no difference between an Appendix I listing and an Appendix II listing with zero export quota. As the proponent points out, domestic enforcement needs to be strengthened. We recommend that the proposal be rejected.

Prop. Transfer of the star tortoise *Geochelone elegans* from Appendix II to Appendix I (Bangladesh, India, Senegal and Sri Lanka)

The species is distributed in India, Pakistan and Sri Lanka occurring primarily in open dry scrublands. It was listed in Appendix II in 1973 and has been subject to

CITES from the beginning. India and Pakistan became Parties to CITES in 1976 and Sri Lanka in 1979. The species is currently protected in these three range States. Since 1980, it has been illegal to hunt the species in India. Yet, illegal trade in the species originating from India is rampant. Illegal attempts would not stop even after transferring the species to Appendix I. What is needed for India and other two range States is to enhance their enforcement activities, in particular border controls. An Appendix I listing is not a solution and as such, more comprehensive approaches must be taken. India has identified a specific location where illegal collection are being heavily made. Concentrated enforcement activities focusing on this area will also be required. Under the circumstances, the proposal should be **rejected**.

Prop. Transfer of the pancake tortoise *Malacochersus tornieri* from Appendix II to Appendix I (Kenya and USA)

The species is distributed in Kenya, Tanzania and Zambia. It inhabits semi-arid and arid thornbush and savannah landscapes. Hunting and trade in wild-caught animals have been prohibited in Kenya. The species was subject to the Significant Trade Review process. As a result, Tanzania established a zero quota for trade in wild tortoises. The species was listed in Appendix II in 1973 and has been subject to CITES treaty. According to the supporting statement, all three range States have been exporting animals from captive sources in recent years. There seems no legal trade in wild-caught tortoises from all the range States. Even though the species is transferred to Appendix I, illegal trade would continue and the present situation remains unchanged. In addition, it is not clear whether other two range States, i.e., Tanzania and Zambia support this proposal. Unless these States support the proposal, it should be **rejected**.

Prop. Inclusion of the glass frogs *Hyalinobatrachium* spp., *Centrolene* spp., *Cochranella* spp. and *Sachatamia* spp. in Appendix II (Costa Rica, El Salvador and Honduras)

The proponents propose to include in Appendix II glass frogs belonging to the genera *Hyalinobatrachium*, *Centrolene*, *Cochranella* and *Sachatamia*, comprising 104 species. These glass frogs are widely distributed in Central America and South America. Little is known of the population size of these species. However, glass frogs have become popular among hobbyists due to their unique appearance. Inclusion of the four genera will help range States to monitor trade volume of these glass frogs. We recommend that the proposal be adopted.

Prop. Inclusion of the spiny newts *Echinotriton chinhaiensis* and *E. maxiquadratus* in Appendix II (China)

The two spiny newt species, *Echinotriton chinhaiensis* and *E. maxiquadratus* are endemic to China, occurring in forested habitats in the east and southeast China.

The latter is a newly discovered species. The population size of both species seems to be small. The threats to the species include illegal collection for pet trade and habitat destruction. Inclusion of these spiny newts in Appendix II will have a positive impact on the conservation of the species. We recommend that the proposal be **adopted**. The genus *Echinotriton* comprises three species. The remaining species is *E. andersoni* occuring on Ryukyu Islands, Japan, which is not subject to this proposal. By including *E. andersoni* in Appendix II in future, all species in the genus *Echinotriton* can be covered by CITES.

Prop. Inclusion of the Asian warty newts *Paramesotriton* spp. in Appendix II (China and EU)

The genus *Paramesotriton* is distributed in China and Viet Nam. It comprises 14 species. The proposal aims to include 13 species not yet listed in Appendix II. *P. hongkongensis* is already listed in Appendix II. By including 13 species, all known species in the genus become subject to CITES. There may be many cryptic species and listing these newts as a higher taxon is necessary. Little is known of the exact population size. Since some species have a very restricted area of distribution, it is inferred that the population size of some species is very small as well. These species meet the Appendix II listing criteria and as such, the proposal should be **adopted**.

Prop. Inclusion of the crocodile newts *Tylototrito*n spp. in Appendix II (China and EU)

The genus *Tylototriton* comprises 25 species currently. New species may be described in future. The proposal aims to include the genus *Tylototriton* in Appendix II. The genus is distributed in China, Viet Nam, Lao PDR, Thailand, Myanmar, India, Nepal and Bhutan. Little is known of the population size of individual species. The main threats are habitat loss and degradation. These crocodile newts are also threatened by over-exploitation for food, traditional medicine, international pet trade, etc.. Although the international trade for pet is only one of the threats, many animals seem to be exported from the range States to Europe, America and Asia. An Appendix II listing of the genus will help monitor species and trade volumes resulting in better conservation management. The proposal should be **adopted**.

Prop.

Inclusion of the make sharks *Isurus oxyrinchus* and *I. paucus* in Appendix II (Bangladesh, Benin, Bhutan, Brazil, Burkina Faso, Cabe Verde, Chad, Côte d'Ivoire, Dominican Republic, Egypt, EU, Gabon, Gambia, Jordan, Lebanon, Liberia, Maldives, Mali, Mexico, Nepal, Niger, Nigeria, Palau, Samoa, Senegal, Sri Lanka, Sudan and Togo)

The proponents propose to include the short-fin make *Isurus oxyrinchus* and long-fin make *I. paucus* in Appendix II. The latter species is proposed as a lookalike species. The short-fin make shark is distributed globally. Since CoP12

(Santiago, 2002), many commercially exploited marine species, mainly sharks, have been included in Appendix II. Listings in Appendix II of marine species have witnessed many difficulties in their implementation including on introduction from the sea and non-detriment findings. According to the operative paragraph 9 of Resolution Conf. 9.24, the Conference of the Parties resolved "that, to monitor the effectiveness of protection offered by the Convention, the status of species included in Appendices I and II should be regularly reviewed by the range States and proponents, in collaboration with the Animals Committee or the Plants Committee, subject to the availability of funding." Nonetheless, the monitoring of the effectiveness has not taken place. It is imperative to monitor the effectiveness as a matter of urgency because CITES listings may have a negative impact on the conservation of those species. FAO's expert panel met in Rome in January 2019 and assessed the proposal. It concluded that the available data do not provide evidence that the species meets the CITES Appendix II listing criteria. In addition, we are concerned that a large number of countries became co-sponsors without seeing the results of FAO's conclusion. Since there is no need to list the short-fin make in Appendix II, it is not justifiable to list the long-fin make as a look-alike species. We strongly recommend that the proposal be rejected.

Prop. 43 Inclusion of the guitarfishes *Glaucostegus* spp. in Appendix II (Bangladesh, Benin, Bhutan, Brazil, Burkina Faso, Cabo Verde, Chad, Côte d'Ivoire, Egypt, EU, Gabon, Gambia, Maldives, Mali, Mauritania, Monaco, Nepal, Niger, Nigeria, Palau, Senegal, Sierra Leone, Sri Lanka, Syrian Arab Republic, Togo and Ukraine)

The proposal aims to list all species in the genus *Glaucostegus* in Appendix II. Two species of the guitarfishes *Glaucostegus cemiculus* and *G. granulatus* are proposed in accordance with paragraph 2(a) of the Convention. The blackchin guitarfish *G. cemiculus* is distributed in the Mediterranean and Atlantic Ocean off western Africa. The sharpnose guitarfish *G. granulatus* is distributed in the north western Indian Ocean. According to the supporting statement, global population size is unknown for *G. cemiculus*, *G. granulatus* or any other *Glaucostegus* species. FAO's expert panel considers it uncertain whether these two species meet the criteria for CITES listing because sufficient evidence of declines is lacking. The same comment as Prop. 42 is applicable to Prop. 43. Under the circumstances, the proposal should be **rejected**.

Prop. 44 Inclusion of the wedgefishes Rhinidae spp. in Appendix II (Bangladesh, Benin, Bhutan, Brazil, Burkina Faso, Cabo Verde, Chad, Côte d'Ivoire, Egypt, Ethiopia, EU, 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)

As is the case with the guitarfishes, insufficient evidence of decline is available

for FAO's expert panel to make a judgment in relation to the CITES criteria. The expert panel notes that the information provided in the proposal on trends in populations across the species' range was limited, and not sufficient to allow the panel to determine whether the species qualified globally under the decline criteria for an Appendix II listing. If listed in Appendix II, exporting countries are required to ensure that export will not be detrimental to the survival of that species. It would be extremely difficult for the authorities of exporting countries to establish a non-detriment finding (NDF). Same difficulties would have happened on marine species already listed in Appendix II. Therefore, it is urgently needed to monitor the effectiveness of protection offered by CITES for those marine species. We recommend that the proposal be **rejected**.

Prop. Inclusion of the teatfishes *Holothuria fuscogilva*, *H. nobilis* and *H. whitmaei* in Appendix II (EU, Kenya, Senegal, Seychelles and USA)

These sea cucumbers are distributed in Indian and Pacific Oceans in the tropical and sub-tropical regions. The proposal aims to include three species in the genus *Holothuria* in Appendix II. FAO's expert panel concluded that while *H. fuscogilva* did not meet the Appendix II listing criteria, *H. whitmaei* met the listing criteria. On the other hand, there was insufficient evidence of declines to make a judgement in relation to CITES criteria for *H. nobilis*. Our comments on this proposal are similar to the previous ones related to marine species. For commercially exploited marine species, it is of paramount importance to monitor the effectiveness of CITES listings. Whereas some of the range States support the proposal, it is not clear whether other range States support the proposal. We recommend that the proposal be **rejected**.

Prop. Inclusion of the ornamental spiders *Poecilotheria* spp. in Appendix II (Sri Lanka and USA)

Tarantulas in the genus *Poecilotheria* are distributed in Sri Lanka and India, mainly occurring in forested areas. The genus comprises 15 species. The proposal aims to include these species in Appendix II. The threats to the species are habitat loss, habitat fragmentation and collection for pet trade. For some species, the international pet trade seems to be a major threat. While the species are not protected in India, commercial collection and export of the species is prohibited in Sri Lanka. The proponents, i.e., Sri Lanka and the US admit that though Sri Lanka has a legislative framework for the conservation of this genus, all steps of enforcement are weak due to enforcement gaps. These problems must be first addressed before listing the species in Appendix II. Under the circumstances, the proposal should be **rejected**.

Prop. Inclusion of the Mindoro peacock swallowtail *Achillides chikae hermeli* in Appendix I (EU and Philippines)

Currently, the swallowtail Papilio chikae is listed in Appendix I. This species was

reclassified as the subspecies *Achillides chikae chikae*. It is found in northern Luzon Island in the Philippines. Another swallowtail *Papilio hermeli* is not included in Appendices. This species endemic to Mindoro was reclassified as the subspecies *Achillides chikae hermeli*. This means that *Achillides chikae* consists of two subspecies, one of which is subject to CITES but another is not covered by CITES. The proponents propose to include *Achillides chikae hermeli* in Appendix I. By doing so, the species *Achillides chikae* (*Papilio chikae + Papilio hermeli*) is included in Appendix I. According to the supporting statement, *Achillides chikae hermeli* seems to meet the Appendix II listing criteria. If this subspecies meets the Appendix II listing criteria, then *Achillides chikae* as a species would also meet the Appendix II listing criteria. We recommend that the proposal be **rejected**. The proponents may wish to submit a proposal to transfer *Achillides chikae chikae* from Appendix I to Appendix II and include *Achillides chikae hermeli* in Appendix II. This will accommodate the proponent's concern about split-listings.

Prop. Inclusion of the riverside swallowtail *Parides burchellanus* in Appendix I (Brazil)

This swallowtail butterfly is endemic to Brazil, having a restricted area of distribution. The main threats are fragmentation of its habitat, fire use, urban occupation and pollution. Illegal trade does exist but not in a significant volume. According to the supporting statement, there is no legal device in Brazil specifically designed to protect the species. Since the main threats are of internal nature, Brazil should establish the overall management programme focusing on these threats. Without such actions, the species has not much benefit resulting from CITES listing. Under the circumstances, the proposal should be rejected. An Appendix III listing may be more appropriate.

Prop. Inclusion of the trumpet trees *Handroanthus* spp., *Tabebula* spp. and *Roseodendron* spp. in Appendix II with annotation (Brazil)

Withdrawn.

Prop. Inclusion of the Mulanje cedar *Widdringtonia whytei* in Appendix II (Malawi)

This conifer species *Widdringtonia whytei* is endemic to Malawi occurring on Mount Mulanje. The population size is extremely small with a restricted area of distribution and the species is on the verge of extinction. The threats to the species are logging, changing fire regime, invasive tree species and conifer aphids. There is insufficient information on the international trade in the species. Due to its small population size, any international trade may affect the species. As such, the proposal should be **adopted**. Listing the species in Appendix II will not solve the real problem faced by the species. Enforcement should be strengthened on illegal logging and plantations need to be protected from fires

rigorously. Overall management programme should be established including ex-situ conservation.

Prop. Deletion of the north Indian rosewood *Dalbergia sissoo* from Appendix II (Bangladesh, Bhutan, India and Nepal)

The species is native to Afghanistan, Bangladesh, Bhutan, India, Iran, Iraq, Myanmar, Nepal, Pakistan, Philippines and South Africa. It has been introduced to many other countries including Israel, Australia and the US. This tree species is very popular for plantation and easy to propagate artificially. The species was included in Appendix II at CoP17 (Johannesburg, 2016) as a result of the inclusion of the genus *Dalbergia*. Deletion of the species from Appendix II will remove administrative burdens from the authorities. We welcome this initiative and recommend that the proposal be **adopted**.

Prop. Amendment of the annotation for the rosewoods *Dalbergia* spp., *Guibourtia demeusei, G. pellegriniana* and *G. tassmannii* listed in Appendix II (Canada and EU)

The proponents propose to amend the existing annotation to *Dalbergia* species. This proposal was submitted in accordance with the decision made by the Standing Committee. The proposal should be **adopted**.

Amendment of the annotation for the African teak *Pericopsis elata* listed in Appendix II (Cote d'Ivoire and EU)

The African teak *Pericopsis elata* is distributed in CAR, Nigeria, Ghana, Côte d'Ivoire, Cameroon, DRC and Congo. The proponents' intention is to include 'plywood and transformed wood' in the annotation. This amendment is proposed in accordance with the discussions in the Standing Committee Working Group on Annotations. It is not clear whether other range States than Côte d'Ivoire and Republic of Congo support this proposed amendment. On condition that most of the range states support, we recommend that the proposal be **adopted**.

Prop. Inclusion of the African padauk *Pterocarpus tinctorius* in Appendix II (Malawi)

The species is distributed in Angola, DRC, Burundi, Tanzania, Malawi, Mozambique and Zambia. Little is known of the population size. According to the supporting statement, however, the major threats to the species is overharvesting, including both legal and illegal extraction, for the international trade. It seems that many of the range States expressed their support informally. The proposal should be adopted.

Prop. Amendment of the annotation for the bitter aloe *Aloe ferox* listed in Appendix II (South Africa)

South Africa submitted this proposal to amend the annotation for *Aloe ferox* by excluding finished products of *Aloe ferox*. The species is distributed in South Africa and Lesotho. Most of the distribution area is within South Africa. The amendment will not have negative impacts on the species. On the contrary, it will contribute to the sustainable use of the species as a conservation tool. In addition, the amendment as proposed will remove administrative burdens from both exporting and importing countries. We recommend that the proposal be **adopted**.

Prop. Amendment of the annotation for the Grandidier's baobab *Adansonia grandidieri* listed in Appendix II (Switzerland)

The proponent proposes to delete 'living plants' from the annotation. This word was erroneously included in the annotation at CoP17 (Johannesburg, 2016). Since live and dead plants are always subject to the provision of the Convention, the current annotation is misleading. By keeping the current annotation, one may interpret that dead plants are excluded. To avoid these wrong interpretations, the proposal should be **adopted**.

Prop. Inclusion of the cedars *Cedrela* spp. in Appendix II (Ecuador and Brazil)

The genus *Cedrela* comprises 17 species occurring widely from Mexico to Argentina. Three species in the genus, *C. fissilis, C. lilloi* and *C. odorata*, are already listed in Appendix III. The proposal aims to list all the species in Appendix II. The main threats to these cedars are habitat loss and degradation. According to the supporting statement, the risk of extinction increases unless sustainable management and regulation of trade are established. What is needed is to address such management and regulation, and this can be dealt with by individual countries. It is unclear whether other range States support the proposal. Unless most of the range States support the proposal, it should be **rejected**.

NOTES



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

A publication of the Global Guardian Trust. 2019

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Japan