

TRAFFIC Recommendations on the Proposals to Amend the CITES Appendices at the 15th Meeting of the Conference of the Parties

Doha, Qatar 13–25 March 2010

Downloaded from www.traffic.org/cop15



TRAFFIC Recommendations on the Proposals to Amend the CITES Appendices at CoP15

Species	Comment	Recommendation
1	<p><i>Canis lupus</i>.</p> <p>CoP15 Prop. 1 [Switzerland (as a Depositary Government, at the request of the Animals Committee)] Addition of an annotation to the species <i>Canis lupus</i> listed in Appendix I and II reading: “Exclude the domesticated form and the dingo which are referenced as <i>Canis lupus familiaris</i> and <i>Canis lupus dingo</i>”.</p> <p>This proposal to annotate the listing of the Grey Wolf <i>Canis lupus</i> in the CITES Appendices aims to clarify that the provisions of the Convention do not apply to the Domestic Dog and Dingoes, two <i>C. lupus</i> subspecies included under the more recently adopted CITES standard taxonomic reference for mammals. The suggested annotation provides necessary clarification that these subspecies are not subject to CITES provisions. However, if possible, reference should be made in the annotation to 60 plus synonyms for the two subspecies proposed for exclusion.</p>	ACCEPT
2	<p><i>Lynx rufus</i></p> <p>CoP15 Prop. 2 [United States of America] Deletion from Appendix II.</p> <p>This North American cat species is sustainably harvested in large numbers for its fur, and its populations remain well managed and are stable or increasing throughout its range. For these reasons the species would merit removal from the Appendices. However, the Bobcat <i>Lynx rufus</i> was included in the CITES Appendices because of its similarity of appearance to other Felidae species that were threatened by international trade. Readily distinguishing Bobcat fur from that of other <i>Lynx</i> species that may be threatened by trade has begun to be addressed with the creation of a <i>Lynx</i> species fur identification guide by the USA. This guide is still undergoing review and its efficacy remains uncertain at the time of writing. Also in question is identification of furs from other Felidae species. There are generally signs of a revitalized international trade in cat furs for fashion, and illegal trade problems are emerging. Therefore, it remains unclear whether removal of <i>L. rufus</i> from the CITES Appendices would cause enforcement problems by facilitating trade in <i>Lynx</i> spp. and perhaps other Felidae species, misidentified as Bobcat.</p> <p>In accordance with the listing criteria set forth in Article II (2) (b), <i>Lynx rufus</i> should be retained in CITES Appendix II until the CITES Parties endorse identification materials</p>	REJECT

TRAFFIC Recommendations on the Proposals to Amend the CITES Appendices at CoP15

Species	Comment	Recommendation
	that readily distinguish its fur products from those of potential look-alike Felidae species.	
3	<p><i>Ursus maritimus</i></p> <p>CoP15 Prop. 3 [United States of America] Transfer from Appendix II to Appendix I.</p> <p>There is an estimated global population of 20 000–25 000 Polar Bears <i>Ursus maritimus</i>, which range through Canada, Greenland, Norway, the Russian Federation and the USA. The majority of these animals—approximately 15 000— either occur entirely in Canada or are in populations shared by Canada with Greenland and Alaska. The global conservation status for Polar Bears was assessed in 2008 by IUCN as Vulnerable. While international transactions in scientific specimens of the species and some personal possessions have increased since the 1990s, commercial trade has not increased, and trends in trade are not indicative of harvest levels. Canada is the only country that currently allows commercial exports of Polar Bear parts and products—all of which result from aboriginal subsistence hunting. Since the 1990s, approximately 300 Canadian Polar Bears (about 2% of the population) have entered international trade annually. The primary threat to Polar Bears is the retreat of sea-ice habitat, driven by global climate change. The global population of Polar Bears is not small and has not undergone a marked decline in the recent past; the species' area of distribution is not restricted; and the projected rate of population decline as a result of climate change is estimated to be approximately 30% over the next 45–50 years. Therefore, the Polar Bear does not meet any of the biological criteria for inclusion in Appendix I. Trade is not a significant threat to the species.</p>	REJECT
4	<p><i>Loxodonta africana</i></p> <p>CoP15 Prop. 4 [United Republic of Tanzania] Transfer the population of the United Republic of Tanzania from Appendix I to Appendix II</p>	TRAFFIC does not wish to pre-empt the findings of the Panel of Experts and will therefore comment at a later stage.

TRAFFIC Recommendations on the Proposals to Amend the CITES Appendices at CoP15

Species	Comment	Recommendation
5	<p><i>Loxodonta africana</i></p> <p>CoP15 Prop. 5 [Zambia] Transfer the population of Zambia from Appendix I to Appendix II</p>	<p>TRAFFIC does not wish to pre-empt the findings of the Panel of Experts and will therefore comment at a later stage.</p>
6	<p><i>Loxodonta africana</i></p> <p>CoP15 Prop. 6 [Congo, Ghana, Kenya, Liberia, Mali, Rwanda, Sierra Leone]</p> <p>This proposal from seven African Elephant <i>Loxodonta africana</i> range States would introduce a 20-year moratorium on any future legal trade in raw or worked ivory under CITES by firstly, removing paragraphs h) of the current annotation which applies to the African Elephant populations of Botswana, Namibia, South Africa and Zimbabwe in Appendix II and including a new annotation that would apply to <u>all</u> populations of <i>L. africana</i> in the Appendices, and secondly, by removing paragraph f) which refers to trade in individually marked and certified ekipas incorporated in finished jewellery for non-commercial purposes for Namibia and ivory carvings for non-commercial purposes for Zimbabwe.</p> <p>With regard to paragraph h) and the proposed new annotation, Articles XV and XVI of the Convention permit any Party to propose amendments to the CITES Appendices, both at meetings of the Conferences of the Parties, or between the meetings (by postal procedure), enabling Parties to respond to changing situations through adaptive management. It is neither appropriate nor legally meaningful to limit the rights of Parties to submit such proposals. Further, the Parties have considered the use of annotations in the Appendices in <i>Resolution Conf. 11.21 (Rev. CoP14)</i> and have recognized two kinds of annotation: reference annotations (i.e. those indicating that “one or more geographically separate populations, subspecies or species are in another Appendix”; “the annotation ‘possibly extinct’”; and “annotations relating to nomenclature”) and substantive annotations (i.e. those indicating “the inclusion or</p>	<p>REJECT</p>

TRAFFIC Recommendations on the Proposals to Amend the CITES Appendices at CoP15

Species	Comment	Recommendation
	<p>exclusion of designated geographically separate populations, subspecies, species, groups of species, or higher taxa, which may include export quotas”; and those specifying “the types of specimens or export quotas”). The suggested annotation for all populations of <i>Loxodonta africana</i> in this proposal does not constitute either kind of annotation described in <i>Resolution Conf. 11.21 (Rev. CoP14)</i>.</p> <p>By advocating the removal of paragraph f) in the annotation, the proposal also seeks to curtail non-commercial trade in worked ivory products from Zimbabwe and in <i>ekipas</i>, a unique traditional ivory product from Namibia, but does not provide substantive evidence to show current problems with control of such trade in either country. Namibia suspended all trade in <i>ekipas</i> on 1 September 2008. In the case of Zimbabwe, the CITES Secretariat informed the Standing Committee, at its 58th meeting in June 2009: “the Secretariat has reason to question whether the controls are being implemented adequately, as it is aware of at least two incidents where raw ivory has been exported, accompanied by the export permits that traders are authorized to issue for trade in ivory carvings”. Zimbabwe has also suspended ivory sales, pending a regulatory review. It is encouraging to note that trade provisions have been suspended in both countries whilst regulatory measures are reviewed, strengthened and put in place.</p> <p>Finally, under the existing annotation governing such trade in these two countries, “on a proposal from the Secretariat, the Standing Committee can decide to cause this trade to cease partially or completely in the event of non-compliance”. It is worth remembering, therefore, that if, in the future, there is proper justification to curtail trade in worked ivory from either of these countries, there is a robust mechanism in place for effecting such change.</p>	
7	<p><i>Anas oustaleti</i></p> <p>CoP15 Prop. 7 [Switzerland (as a Depository Government, at the request of the Animals Committee)]. Deletion from Appendix I.</p> <p>There is considerable doubt over the validity of <i>Anas oustaleti</i> as a distinct species. Most authorities consider it a hybrid of <i>A. platyrhynchos</i> (Mallard) and <i>A. superciliosa</i> (Pacific Black Duck). The inclusion of hybrids in the Appendices is permitted under</p>	ACCEPT

TRAFFIC Recommendations on the Proposals to Amend the CITES Appendices at CoP15

Species	Comment	Recommendation
	<p>the Convention, but only if they form distinct and stable populations in the wild. Given <i>A. oustaleti</i> apparently occurs in differing forms, some closely resembling one or other of its parent species, this would appear to be a valid reason for deleting <i>A. oustaleti</i> from the Appendices. Furthermore, recent extensive searches for <i>A. oustaleti</i> in its former range have failed to locate any individuals, and it is considered most likely to be extinct. Even if individuals were to be found, only two specimens of <i>A. oustaleti</i> have been reported in international trade (possibly, in fact, both the same specimen). The issue of “look-alikes” may arise if <i>A. oustaleti</i> remained in the Appendices, because of its similarity to recognized <i>Anas</i> spp., and because of the hybridization of introduced <i>A. platyrhynchos</i> with the native <i>A. s. superciliosa</i> in New Zealand.</p>	
8	<p><i>Crocodylus moreletii</i></p> <p>CoP15 Prop. 8 [Mexico]. Transfer from Appendix I to Appendix II with a zero quota for wild specimens.</p> <p>The range of Morelet’s Crocodile <i>Crocodylus moreletii</i> includes Belize, Guatemala and Mexico, with almost 90% of its distribution in Mexico, and an estimated population size of 100 000 (including some 20 000 adults). The species is legally protected in all range States. Mechanisms to combat illegal trade in wild specimens and management of the habitat of the species are largely in place, as are control measures for international trade in the species (e.g. <i>Resolution Conf. 11.12 Universal tagging system for crocodylian skins</i>). If this downlisting proposal were accepted, future modification of the zero export quota for wild animals would require another proposal to be approved by the Parties.</p> <p>Based on the recent population estimates, it is clear that <i>C. moreletii</i> no longer meets the biological criteria for an Appendix-I listing. The proposed annotation for an Appendix-II listing with a zero export quota for wild animals would not allow trade in wild specimens for scientific and educational purposes and the proponent may consider modifying the proposal to apply only to wild specimens traded for commercial purposes. With very few reports of international illegal trade over the past 30 years, there is no indication that downlisting the species to Appendix II with a zero quota for specimens from the wild would impact the wild population.</p>	ACCEPT

TRAFFIC Recommendations on the Proposals to Amend the CITES Appendices at CoP15

Species	Comment	Recommendation
	<p>There is a concern raised by the IUCN/SSC Crocodile Specialist Group (CSG) related to hybridization between <i>Crocodylus moreletii</i> and <i>C. acutus</i> in captivity. It states that all captive breeding facilities producing <i>C. moreletii</i> are potentially stocked with these hybrids. Given that <i>C. acutus</i> is an Appendix-I species, trade in these hybrids would need to be in accordance with Appendix-I regulations and captive breeding operations would still need to be registered with CITES for commercial trade, clarifying that they were producing hybrids, unless there were evidence that captive-bred specimens were pure-bred <i>C. moreletii</i>.</p>	
9	<p><i>Crocodylus niloticus</i></p> <p>CoP15 Prop. 9 [Egypt] Transfer of the Egyptian population from Appendix I to Appendix II.</p> <p>The most widely distributed crocodile species in Africa, occurring in almost all sub-Saharan countries, the Nile Crocodile <i>Crocodylus niloticus</i> was included in Appendix I in 1975. It had virtually disappeared from Egypt by the 1950s, but the construction of the Aswan Dam and the subsequent creation of Lake Nasser led to a resurgence of the population, recently estimated as between 6000 and 30 000 individuals. The transfer to Appendix II is proposed to support a ranching programme based on periodic hatchling harvest, with an annual export quota of 750 skins from ranched individuals starting in 2013. Because the proposal involves ranching, it should comply with <i>Resolution Conf. 11.16 (Rev. CoP14)</i> as well as with <i>Resolution Conf. 9.24 (Rev. CoP14)</i>. Under the terms of the first of these, a ranching proposal should be submitted at least 330 days before the meeting at which it is to be considered, to allow appropriate consultation. This was not done in this case and it is possible therefore that the proposal will not be considered in its present form by the Conference of Parties at this meeting. Besides the question of submission timing, some measures required under <i>Resolution Conf. 11.16 (Rev. CoP14)</i> are in place, but other conditions are yet to be fully met, most importantly the need to address a substantial level of illegal harvest. Although trade in ranched specimens is not proposed until 2013, by which time all necessary conditions may be met, it is premature to transfer the population for the purposes of ranching at this time. Egypt</p>	REJECT

TRAFFIC Recommendations on the Proposals to Amend the CITES Appendices at CoP15

Species	Comment	Recommendation
	should be encouraged to consider submitting a proposal for the 16 th meeting of the Conference of Parties.	
10	<p><i>Uromastyx ornata</i></p> <p>CoP15 Prop. 10 [Israel]. Transfer from Appendix II to Appendix I.</p> <p><i>Uromastyx ornata</i> is one of 17 currently recognized species of spiny-tailed lizards in the genus <i>Uromastyx</i>—all listed in Appendix II of CITES. Until 2004 <i>U. ornata</i> was regarded as a subspecies of <i>U. ocellata</i>, but is now recognized in CITES taxonomy as a full species. It occurs in Egypt (Sinai Peninsula), Israel, Saudi Arabia and Yemen, but overall range and population size for the species are unknown; maximum estimates for Israel are 270 km² and 4000 individuals, respectively. <i>Uromastyx</i> species are harvested for food, use in traditional medicines and for the international pet trade, and may also be threatened by habitat loss and climate change. The extent of these threats and levels of both legal and illegal international trade in <i>U. ornata</i>, however, are uncertain, and further clarification is not provided in the supporting statement.</p> <p>Despite the fact that <i>Uromastyx ornata</i> has been listed in Appendix II since 1977, historical patterns of trade in the species are difficult to determine owing to past taxonomic uncertainties surrounding <i>U. ornata</i> and <i>U. ocellata</i> and difficulty in the identification of specimens and their associated records in the CITES trade database. Egypt banned the export of <i>U. ornata</i> in 1992 and since 1995 there have been only two recorded cases of imports of wild-taken specimens from a range State, Yemen, totalling almost 900 specimens. Since 2003, there has been a significant increase in the number of reportedly captive-bred specimens of <i>U. ornata</i> reported in global trade, however the species still does not appear to be commonly found on the international market.</p> <p>Available information on population size, area of distribution and decline for <i>Uromastyx ornata</i> is limited and mainly qualitative. However, there is no compelling case that the species meets the biological criteria for inclusion in Appendix I. Although misidentification and past taxonomic uncertainties are clearly problems for</p>	REJECT

TRAFFIC Recommendations on the Proposals to Amend the CITES Appendices at CoP15

Species	Comment	Recommendation
	determining the levels of trade in the species, evidence to demonstrate substantial legal or illegal trade in wild-taken <i>U. ornata</i> is lacking.	
11	<p><i>Ctenosaura bakeri</i>, <i>C. melanosterna</i>, <i>C. oedirhina</i></p> <p>CoP15 Prop. 11 [Honduras]. Inclusion in Appendix II.</p> <p>The three species of <i>Ctenosaura</i> have been classified by IUCN as Critically Endangered on the basis of their small ranges, presumed limited and fragmented populations, habitat loss and local exploitation for food. For the Utila Spiny-tailed Iguana <i>C. bakeri</i>, the population estimate used by the Red List is a considerable underestimate. Recent studies found high population densities, with a population of 42 000–68 000 adults, and large numbers of juveniles.</p> <p><i>Ctenosaura bakeri</i> and the Honduran Paleate Spiny-tailed Iguana <i>C. melanosterna</i> are protected by Honduran law, although enforcement is reportedly poor. All three species gain some protection through protected areas and/or research and breeding programmes. International trade in these species appears to be very limited. Small levels of trade in <i>Ctenosaura melanosterna</i> were reported in recent years, with adequate numbers of captive-bred specimens available to supply the pet trade. There is no evidence that <i>C. bakeri</i> and the Roatán Spiny-tailed Iguana <i>C. oedirhina</i> are in international trade at present, nor that harvest from the wild of <i>C. melanosterna</i> for export may reduce the population to a level at which its survival might become threatened in the near future. Therefore, it is not possible to state with confidence whether the species meets the criteria for inclusion in Appendix II set out in <i>Resolution Conf. 9.24 (Rev CoP14)</i>.</p> <p>Hatchlings or young specimens of these species may be difficult to distinguish from those of <i>Ctenosaura palearis</i>, proposed by Guatemala for inclusion in Appendix II (see CoP15 Prop. 12). In theory, the look-alike criteria of Annex 2 b of <i>Resolution Conf. 9.24 (Rev CoP14)</i> could apply, were that proposal to be accepted. However, as there is little evidence that the species that are the subject of this proposal are in trade, and as they have a different country of origin, it is unlikely that their inclusion would be necessary to assist in regulation of trade in <i>C. palearis</i>, particularly in view</p>	REJECT

TRAFFIC Recommendations on the Proposals to Amend the CITES Appendices at CoP15

Species	Comment	Recommendation
	<p>of the fact that all other <i>Ctenosaura</i> species would remain unlisted.</p> <p>The proponent could consider the inclusion of these <i>Ctenosaura</i> species in Appendix III.</p>	
12	<p><i>Ctenosaura palearis</i></p> <p>CoP15 Prop. 12 [Guatemala]. Inclusion in Appendix II.</p> <p>The Guatemalan Spiny-tailed Iguana <i>Ctenosaura palearis</i> is a Guatemalan endemic classified in 2004 by IUCN as Critically Endangered on the basis of an extent of occurrence of less than 10 000 ha, a severely fragmented population of fewer than 2500 adults, and habitat loss. However, another estimate indicates a range of over 100 000 ha and a population of 5000 adults.</p> <p>Suitable habitat for the species is undergoing degradation and conversion and only a very small proportion is included within protected areas. Other threats to the species include subsistence harvest for food and traditional medicines and export for the international pet trade. Information on international trade in this species is very limited and there are allegations of illegal international trade. In 2008, 240 individuals were imported into the USA for commercial purposes according to USFWS data, even though the species is legally protected by a number of laws. <i>Ctenosaura palearis</i> can only be used for scientific research and non-commercial breeding purposes aimed at the conservation of the species, by authorized persons under permit. Consequently, recorded commercial trade from Guatemala in the recent past has been illegal, in violation of national laws. Effective enforcement to address illegal harvest of wild specimens for commercial trade is needed.</p> <p>The population may be within the guideline figure for a small population given in Annex 5 of <i>Resolution Conf. 9.24 (Rev CoP14)</i> and collection for illegal export has been implicated in the decline or extirpation of two sub-populations. <i>Ctenosaura palearis</i> may therefore meet the criteria for inclusion in Appendix II in that regulation of trade may be necessary to prevent the species becoming eligible for inclusion in Appendix I in the near future.</p>	ACCEPT

TRAFFIC Recommendations on the Proposals to Amend the CITES Appendices at CoP15

Species	Comment	Recommendation
13	<p><i>Agalychnis</i> spp.</p> <p>CoP15 Prop. 13 [Honduras & Mexico]. Inclusion in Appendix II.</p> <p>The genus <i>Agalychnis</i> is generally taken to comprise five species. Three of the species considered in the proposal (Blue-sided Treefrog <i>A. annae</i>; <i>A. saltator</i>, sometimes known as Misfit Leaf Frog; and Gliding Treefrog <i>A. spurrelli</i>) have been included for look-alike reasons, while the other two (Red-eyed Treefrog <i>A. callidryas</i> and Morelet's Treefrog <i>A. moreletii</i>) are of conservation concern. There are, however, evident characteristics that do allow differentiation between the species in their commonly traded form (as live mature frogs and sub-adults), with distinct iris coloration being particularly striking.</p> <p>The international market for <i>Agalychnis</i> spp. is almost entirely for <i>A. callidryas</i>. This species is found in Belize, Colombia, Costa Rica, Guatemala, Honduras, Mexico, Nicaragua and Panama, and has been in international trade in large numbers for many years, with Nicaragua providing the majority of specimens for trade from captive-breeding operations. This common species is classified as of Least Concern by IUCN and even inhabits disturbed habitats. There are no indications of decline caused by international trade, although some illegal trade exists. The species is either protected or trade is regulated in Belize, Colombia, Costa Rica, Ecuador, Guatemala, with no commercial exports from the wild permitted. There is no regulation or protection in Mexico for the species.</p> <p><i>Agalychnis moreletii</i> occurs in Belize, El Salvador, Guatemala, Honduras and Mexico, and is classified as Critically Endangered by IUCN. The major concern for the species is the disease impacts of the fungus <i>Batrachochytrium dendrobatidis</i> and there have been drastic declines (more than 80%) in populations of the frog in the last 10 years. Belize, El Salvador and Guatemala do not allow trade from wild specimens. There is some trade from Guatemala in wild specimens to the USA (168 in 2007 and three in 2008), but there have been no legal exports from Guatemala over the past few years.</p> <p><i>Agalychnis moreletii</i> appears to meet criteria for inclusion in Appendix II, based on</p>	<p>ACCEPT <i>A. moreletii</i></p> <p>REJECT <i>A. annae</i>, <i>A. saltator</i>, <i>A. spurrelli</i> and <i>A. callidryas</i></p>

TRAFFIC Recommendations on the Proposals to Amend the CITES Appendices at CoP15

Species	Comment	Recommendation
	<p>Annex 2 a A. of <i>Resolution Conf. 9.24 (Rev. CoP14)</i>. <i>A. callidryas</i> does not appear to meet the criteria for inclusion in Appendix II, however, as there is no indication of reduction of its wild populations as a result of harvest for international trade. Neither <i>A. callidryas</i> nor the three other species proposed appear to qualify for listing in Appendix II, based on Annex 2 b A. of <i>Resolution Conf. 9.24 (Rev. CoP14)</i>, as the vast majority of international trade in <i>Agalychnis</i> frogs is composed of live adult and sub-adult individuals showing the characteristics that make them recognizable as different species. Note that trade in tadpoles and very young forms will always remain an identification issue for frog species and this cannot be readily addressed, as numerous frog taxa look too similar as eggs or tadpoles to determine to species-level without sophisticated identification methods.</p>	
14	<p><i>Neurergus kaiseri</i></p> <p>CoP15 Prop. 14 [Islamic Republic of Iran]. Inclusion in Appendix I.</p> <p>The Kaiser's Spotted Newt (or Luristan Newt) is endemic to the southern Zagros Mountains of Iran. IUCN estimates that there are fewer than 1000 mature individuals in the wild and has assessed the species as Critically Endangered. The species has declined in the wild by more than 80% within recent years, largely because of illegal collection of specimens for the international pet trade. The species appears to meet the criteria for inclusion in Appendix I, in accordance with Article II, paragraph 1 of the Convention, and Annex 1 of <i>Resolution Conf. 9.24 (Rev. CoP14)</i>.</p>	ACCEPT
15	<p><i>Sphyrna lewini</i>, <i>S. mokarran</i>, <i>S. zygaena</i>, <i>Carcharhinus plumbeus</i>, <i>C. obscurus</i></p> <p>CoP15 Prop. 15 [Palau and United States of America]. Inclusion in Appendix II with the following annotation: "The entry into effect of the inclusion of these species in Appendix II of CITES will be delayed by 18 months to enable Parties to resolve the related technical and administrative issues".</p> <p>The Scalloped Hammerhead Shark <i>Sphyrna lewini</i> is proposed for inclusion in Appendix II under <i>Resolution Conf. (Rev. CoP14)</i> Annex 2 a criterion A. because of notable and continuing population declines driven by the international fin trade and the species being incidentally caught in fisheries with a primary target of other species. The Great Hammerhead <i>S. mokarran</i>, the Smooth Hammerhead <i>S.</i></p>	ACCEPT

TRAFFIC Recommendations on the Proposals to Amend the CITES Appendices at CoP15

Species	Comment	Recommendation
	<p><i>zygaena</i>, the Sandbar Shark <i>Carcharhinus plumbeus</i>, and the Dusky Shark <i>C. obscurus</i> are also proposed for listing owing to look-alike issues (Annex 2 b criterion A.).</p> <p>The Scalloped Hammerhead is the target of fisheries that are driven by the international fin trade and is also caught incidentally in other fisheries, with the products entering international trade. The species is intrinsically vulnerable to over-exploitation. Harvest has led to major declines in some stocks, such that it would appear these individual stocks already meet the criteria for inclusion in Appendix I. All subpopulations of the species have been assessed as either Vulnerable or Endangered by IUCN. It would therefore appear that the species meets the criteria for inclusion in Appendix II, in that regulation of the trade is required to ensure that the species does not become eligible for inclusion in Appendix I.</p> <p>Scalloped Hammerhead specimens in trade are primarily fins. These fins are traded in compiled non-segregated shipments with those of the other four species proposed in the supporting statement for look-alike reasons. While fin traders with expert knowledge are able to sort shark fins reliably to species level—except notably for Scalloped and Smooth Hammerheads which are often grouped together at all stages in the supply chain—such sorting typically does not occur unless the relevant Customs organization is required to identify fins to species level. DNA tests are available to confirm species identification for sharks but are not suitable for routine Customs checks. Hence, it would seem that these other species do meet criterion A. in Annex 2 b of <i>Resolution Conf. 9.24 (Rev CoP14)</i>, based on the difficulty of distinguishing their fins from those of Scalloped Hammerheads.</p>	
16	<p><i>Carcharhinus longimanus</i></p> <p>CoP15 Prop. 16 [Palau and United States of America]. Inclusion in Appendix II with the following annotation: "The entry into effect of the inclusion of <i>Carcharhinus longimanus</i> in Appendix II of CITES will be delayed by 18 months to enable Parties to resolve the related technical and administrative issues".</p> <p>The Oceanic Whitetip Shark <i>Carcharhinus longimanus</i> is widely distributed and its life</p>	ACCEPT

TRAFFIC Recommendations on the Proposals to Amend the CITES Appendices at CoP15

Species	Comment	Recommendation	
	<p>history characteristics make it highly vulnerable to over-exploitation. Oceanic Whitetip Sharks form part of the catch of many fisheries and are heavily exploited throughout their range, where removal and retention of fins is encouraged by the high value of their fins in international trade. The species is inherently vulnerable to over-exploitation and there is evidence demonstrating declines in most cases where exploited populations are monitored. Several populations of the shark appear already to meet the criteria for inclusion in Appendix I with historical declines to <10% of baseline, which for this low-productivity species is within the guidelines in <i>Resolution Conf. 9.24 (Rev. CoP14)</i> for the application of decline to commercially exploited aquatic species. Other stocks are of unknown status, but in many areas are subject to heavy fishing pressure and may be expected to show similar changes to monitored populations.</p> <p>It would appear, therefore, that the species meets the criteria for inclusion in Appendix II in that regulation of international trade is required to ensure that the species does not become eligible for inclusion in Appendix I.</p>		
17	<p><i>Lamna nasus</i></p>	<p>CoP15 Prop. 17 [Palau and Sweden]. Inclusion in Appendix II with the following annotation: "The entry into effect of the inclusion of <i>Lamna nasus</i> in Appendix II of CITES will be delayed by 18 months to enable Parties to resolve related technical and administrative issues, such as the possible designation of an additional Management Authority and adoption of Customs codes".</p> <p>This shark species, Porbeagle <i>Lamna nasus</i>, is widely distributed and its life history characteristics make it highly vulnerable to over-exploitation. This species has clearly suffered from stock declines as a direct result of a long history of harvest for international trade and still the species continues to be traded internationally. Directed fisheries for the highly valued meat have resulted in over-exploited stocks and the species continues to be taken in fisheries as incidental catch, with both meat and fins being retained for trade. There are cases of dramatic localized depletions that would meet the criteria for an Appendix-I listing. The Porbeagle is proposed for inclusion in Appendix II under the terms of <i>Resolution Conf. 9.24 (Rev. CoP14)</i> Annex</p>	ACCEPT

TRAFFIC Recommendations on the Proposals to Amend the CITES Appendices at CoP15

	Species	Comment	Recommendation
		<p>2 a criteria A. and B., because of significant and continuing population declines driven by international trade. Porbeagle stocks that do not qualify under Annex 2 a are proposed for listing under Annex 2 b criterion A. Given the observed declines, and the known role of trade in at least one fishery and its likely role in others, it would appear that the Porbeagle meets the criteria for inclusion in Appendix II in that regulation of trade is required to prevent its becoming eligible for inclusion in Appendix I in the near future. Identification tools to recognize fins at species level will be needed for implementation purposes.</p>	
18	<i>Squalus acanthias</i>	<p>CoP15 Prop. 18 [Palau and Sweden]. Inclusion in Appendix II with the following annotation: "The entry into effect of the inclusion of <i>Squalus acanthias</i> in Appendix II of CITES will be delayed by 18 months to enable Parties to resolve related technical and administrative issues, such as the development of stock assessments and collaborative management agreements for shared stocks and the possible designation of an additional Scientific or Management Authority".</p> <p>The Spiny (or Piked) Dogfish <i>Squalus acanthias</i> is widely distributed and, as with other shark species, highly vulnerable to over-exploitation because of its life history characteristics. The species is highly traded for its high-value meat and there are substantial amounts of species-specific trade information available. Where directed fisheries have occurred for the species, serious depletion of the stocks has resulted. The species aggregates according to sex and age and this has resulted in targeting of the larger females, with the result that heavily targeted stocks become male-biased with reduced pup production. International trade occurs not only in meat, but fins and other products. The Spiny Dogfish is proposed for inclusion in Appendix II under <i>Resolution Conf. 9.24 (Rev. CoP13) Annex 2 a Criteria A. and B.</i> Spiny Dogfish stocks that do not qualify under Annex 2 a are proposed for listing under Annex 2 b criterion A. The guidelines for commercially exploited aquatic species note that a species may be considered for listing in Appendix II if it is near the extent-of-decline guidelines recommended for inclusion in Appendix I. Given the extent of decline of the species as a whole, it would appear to meet the criteria for inclusion in Appendix</p>	ACCEPT

TRAFFIC Recommendations on the Proposals to Amend the CITES Appendices at CoP15

Species	Comment	Recommendation
	<p>II. For implementation purposes, there is a need to identify fins at species level when traded.</p>	
19	<p><i>Thunnus thynnus</i></p> <p>CoP15 Prop. 19 [Monaco]. Inclusion in Appendix I.</p> <p>Atlantic Bluefin Tuna <i>Thunnus thynnus</i> is found throughout the North Atlantic and its adjacent seas, particularly the Mediterranean. The species is generally regarded as comprising two stocks, one spawning in the Gulf of Mexico and the Straits of Florida (the West stock), and the other in the Mediterranean (the East stock).</p> <p>The species has been extensively fished for centuries with current demand for high value sushi and sashimi, largely in Japan. The majority of global fishery production is for export.</p> <p>The International Commission for the Conservation of Atlantic Tunas (ICCAT), which came into force in 1969, is responsible for the management of the Atlantic Bluefin Tuna.</p> <p>The footnote on the “Application of decline for commercially exploited aquatic species” states the historical extent of decline should be the primary criterion of consideration in Appendix I, that it should extend as far back into the past as possible, and that it can be estimated or inferred using indirect or direct methods. Guidelines in the footnote suggest that historical declines for species with low productivity should be to within 15–20% of the historical baseline and, for species with medium productivity, declines to within 10–15% of the historical baseline are appropriate for listing in Appendix I. The species is considered by ICCAT’s SCRS (Standing Committee of Research and Statistics) to be of low-to-medium productivity. On the basis of estimated historical extent of decline from un-fished stock, the SCRS considered that there was a greater than 90% probability that both East and West stocks had declined to less than 15% of their unexploited population sizes and therefore it appeared that <i>Thunnus thynnus</i> met the biological criteria for Appendix I. The species is clearly affected by trade.</p>	ACCEPT

TRAFFIC Recommendations on the Proposals to Amend the CITES Appendices at CoP15

Species	Comment	Recommendation
	<p>While a reduction in catch for the East stock was agreed by ICCAT in 2009 and, if implemented effectively, could potentially lead to some stock recovery, ICCAT's SCRS recognizes a history of catch in excess of the agreed Total Allowable Catch (TAC) of the order of 60% above the TAC per year (for 1998–2007). Its 2009 summary report for Atlantic Bluefin Tuna recognizes the TAC was ineffective in controlling overall catch. There is no reason to assume that this situation will change in the immediate future. Despite low quotas imposed for the West stock, recovery has not occurred.</p> <p>The resolution (document CoP15 Doc. 52) proposed to accompany the listing would appear not to be consistent with <i>Resolution Conf. 9.24 (Rev. CoP14)</i> Annex 4 A.1 which directs that “no species listed in Appendix I shall be removed from the Appendices unless it has been first transferred to Appendix II, with monitoring of any impact of trade on the species for at least two intervals between meetings of the Conference of the Parties”.</p>	
20	<p><i>Dynastes satanas</i></p> <p>CoP15 Prop. 20 [Plurinational State of Bolivia]. Inclusion in Appendix II.</p> <p><i>Dynastes satanas</i> is a large rhinoceros beetle confined to the moist green forests of the districts of La Paz and Cochabamba in Bolivia. Little is known of its biology and there are no published estimates of population numbers or trends for this species. However, locals harvesting <i>D. satanas</i> from the wild have reported a decline in the number of individuals being captured over the last eight years, despite an increase in collecting effort. Furthermore, the loss of <i>D. satanas</i> habitat, the result of settlement, deforestation and agricultural development, is known to be continuing.</p> <p><i>Dynastes satanas</i> beetles are sought after in Europe, the USA and parts of Asia (particularly Japan) for the pet trade, as fighting animals and for display. Wild-taken and captive-bred specimens (and those of unknown origin) are being sold on the Internet and individuals can fetch prices of up to USD220. Local communities in</p>	REJECT

TRAFFIC Recommendations on the Proposals to Amend the CITES Appendices at CoP15

Species	Comment	Recommendation
	<p>Bolivia collect specimens of this species and the closely related <i>D. hercules</i> for export, despite national laws prohibiting their harvest from the wild. In recent years, there have been a number of seizures of live and dead <i>D. satanas</i>, in Bolivia, Ecuador and the USA, in addition to two requests to export specimens from Bolivia (both denied)—providing further evidence that wild-taken specimens of this species are being traded on an international level.</p> <p>Although there is evidence of local declines in areas subject to harvest, it is not clear that there is any significant impact to the species population. Overall, evidence that <i>D. satanas</i> meets the criteria for Appendix II listing is not strong.</p> <p>The proponent could consider the inclusion of this species in Appendix III.</p>	
21	<p>Coralliidae spp. (<i>Corallium</i> spp. and <i>Paracorallium</i> spp.)</p> <p>CoP15 Prop. 21 [Sweden and the USA] Inclusion of all species in the family in Appendix II.</p> <p>There are more than 30 species in the family Coralliidae found throughout the world in tropical, subtropical and temperate oceans. Several species of the genera <i>Corallium</i> and <i>Paracorallium</i> are harvested in the Mediterranean and the Western Pacific, primarily for the manufacture of jewellery and objets d'art. Four of these species are listed in CITES Appendix III (China). The products made from Coralliidae command high prices and near-global market demand. As a result, the trade in these corals is extensive and profitable and provides ample incentive for their harvest. Many Mediterranean populations of Coralliidae spp. have declined as a result of over-harvesting and overall the average size of Coralliidae colonies in the Mediterranean has been significantly reduced with a correlated reduction of reproductive capability. In the Pacific, discovery of commercially viable beds has at times led to rapid exploitation and subsequent exhaustion of the resource. Identification of Coralliidae to species level is difficult, especially when manufactured into finished products.</p> <p>There are challenges in applying the criteria for inclusion in Appendix II provided by <i>Resolution Conf. 9.24 (Rev. CoP14)</i> to Coralliidae in a straightforward way, largely</p>	ACCEPT

TRAFFIC Recommendations on the Proposals to Amend the CITES Appendices at CoP15

Species	Comment	Recommendation
	<p>because the criteria were clearly not established with widely distributed, colonial marine organisms in mind. However, it can be argued that <i>Corallium rubrum</i>, the only species found in the Mediterranean, may meet the criteria for inclusion in Appendix II by virtue of regulation of trade being necessary to prevent the species becoming eligible for inclusion in Appendix I in the near future, as described in Annex 2 a A. of <i>Resolution Conf. 9.24 (Rev. CoP14)</i>, applying the decline criterion for Appendix-I listing.</p> <p>The other species of the family would then qualify for listing in Appendix II as “look-alikes” in accordance with criterion A. in Annex 2 b of <i>Resolution Conf. 9.24 (Rev. CoP14)</i>, because of the difficulty in identifying Coralliidae products to species level; and because inclusion of some and not all species in the Appendices would add to the enforcement problems that already exist owing to the listing of four species in CITES Appendix III.</p> <p>Despite confusion about how to apply the listing criteria for these species, there is a clear case that regulation of trade in Coralliidae spp. under CITES would provide important safeguards in support of better management of these valuable species.</p>	
22	<p><i>Operculicarya decaryi</i></p> <p>CoP15 Prop. 22 [Madagascar]. Inclusion in Appendix II.</p> <p>This plant species, sometimes known as jabily, is locally very abundant in Madagascar with populations estimated to be in the millions. Recorded trade levels are reportedly not having a deleterious impact on wild populations. In addition, this species is easily propagated from cuttings. Based on available information this species does not meet the criteria for listing in CITES Appendix II.</p>	REJECT
23	<p><i>Operculicarya hyphaenoides</i></p> <p>CoP15 Prop. 23 [Madagascar]. Inclusion in Appendix II.</p> <p>This small tree-like plant is a locally abundant species with at least one extrapolated population estimate running to millions of plants. Even adopting a precautionary approach to population size, it is clear that the species is locally common and not threatened by the reportedly low levels of trade. At least part of this population occurs</p>	REJECT

TRAFFIC Recommendations on the Proposals to Amend the CITES Appendices at CoP15

Species	Comment	Recommendation
	within a protected area. The species is reportedly easy to propagate. The species does not appear to meet the criteria for listing in CITES Appendix II.	
24	<p><i>Operculicarya pachypus</i></p> <p>CoP15 Prop. 24 [Madagascar]. Inclusion in Appendix II.</p> <p>This short, thick-stemmed shrub species has a highly localized distribution, but is reportedly locally abundant and not under pressure from wild collection of plants for trade. Trade levels at a local and international level and harvest for medicinal purposes are currently estimated not to represent a threat to the wild population. Under these circumstances, it appears that the species does not meet the criteria for listing in CITES Appendix II. However, as for any species with a restricted distribution, finite population, and subject to multiple forms of trade (e.g. horticultural and medicinal), any moderate escalation in harvest can result in damage to the wild population. Madagascar is therefore urged to conduct a non-detriment finding for this species and to report back to the next meeting of the CITES Plants Committee.</p>	REJECT
25	<p>CACTACEAE spp. and all taxa with annotation #1</p> <p>CoP15 Prop. 25 [Mexico and the United States on behalf of the Plants Committee]. Delete annotations #1 and #4 and replace them both with the following new annotation for plant taxa listed in Appendix II:</p> <p>"All parts and derivatives, except:</p> <ul style="list-style-type: none"> a) seeds (including seedpods of Orchidaceae), spores and pollen (including pollinia) except those seeds from Cactaceae spp. exported from Mexico; b) seedlings or tissue cultures obtained <i>in vitro</i>, in solid or liquid media, transported in sterile containers; c) cut flowers of artificially propagated plants; d) fruits and parts and derivatives thereof of naturalized or artificially propagated plants of the genera <i>Vanilla</i> (Orchidaceae), <i>Opuntia</i> subgenus <i>Opuntia</i> (Cactaceae), <i>Hylocereus</i> and <i>Selenicereus</i> (Cactaceae); e) stems, flowers, and parts and derivatives thereof of naturalized or artificially propagated plants of the genera <i>Opuntia</i> subgenus <i>Opuntia</i> and <i>Selenicereus</i> (Cactaceae); and 	<p>a) ACCEPT, on condition that the results of proposals for <i>Beccariophoenix madagascariensis</i> (Prop. 32) and/or <i>Neodypsis decaryi</i> (Prop. 33) seeds are included in the redrafted annotation to ensure that they are covered by the provisions of</p>

TRAFFIC Recommendations on the Proposals to Amend the CITES Appendices at CoP15

Species	Comment	Recommendation
	<p>f) finished products of <i>Euphorbia antisiphilitica</i> packaged and ready for retail trade."</p> <p>Amend footnote 6 as follows (delete struck-through text): Artificially propagated specimens of the following hybrids and/or cultivars are not subject to the provisions of the Convention:</p> <ul style="list-style-type: none"> – <i>Hatiora x graeseri</i> – <i>Schlumbergera x buckleyi</i> – <i>Schlumbergera russelliana x Schlumbergera truncate</i> – <i>Schlumbergera orssichiana x Schlumbergera truncate</i> – <i>Schlumbergera opuntioides x Schlumbergera truncate</i> – <i>Schlumbergera truncata</i> (cultivars) – Cactaceae spp. colour mutants lacking chlorophyll, grafted on the following grafting stocks: <i>Harrisia 'Jusbertii'</i>, <i>Hylocereus trigonus</i> or <i>Hylocereus undatus</i> – <i>Opuntia microdasys</i> (cultivars) <p>With regard to the seeds, this proposal will simplify implementation both in Mexico and elsewhere and will have no adverse conservation impacts. With regard to fruits, flowers and stems, exempting them from the provisions of the Convention under the terms of the proposed annotations is extremely unlikely to have any adverse conservation impact. The proposed exemption for fruits will no longer cover fruits of artificially propagated <i>Cereus peruvianus</i>, which will then theoretically be subject to regulation under CITES. This will increase the burden of implementation and have no conservation benefit. Reversion to the original wording of annotation #4 would solve this problem.</p> <p>There is an extensive trade in grafted colour forms of various cacti, particularly <i>Gymnocalycium mihanovicii</i>. This trade has nothing to do with wild plants and has no conservation impact. Although most of the forms do indeed lack chlorophyll, some contain small quantities and are therefore in theory not covered by the existing exemption, although there is no reason for them not to be covered. The proposed amendment rectifies this, so that all such forms would be covered by the</p>	<p>CITES.</p> <p>b) ACCEPT</p> <p>c) ACCEPT</p> <p>d) REJECT and retain wording of current annotation #4, so as to allow fruits of artificially propagated species such as <i>Cereus peruviana</i></p> <p>e) ACCEPT</p> <p>f) ACCEPT</p>

TRAFFIC Recommendations on the Proposals to Amend the CITES Appendices at CoP15

Species	Comment	Recommendation
	<p>exemption.</p> <p>With regard to <i>Euphorbia antisyphilitica</i>, the proposed amendment is extremely unlikely to have adverse conservation impacts, but should help reduce implementation burdens.</p>	
26	<p><i>Zygosicyos pubescens</i></p> <p>CoP15 Prop. 26 [Madagascar]. Inclusion in Appendix II.</p> <p>Although this succulent species appears to be uncommon, this is mainly because of the paucity of available information on population distribution and density. However, reported trade is also very limited and if maintained at this level would not appear to be detrimental to wild populations. From a precautionary stance, the combination of human-induced habitat alteration and limited trade may well represent a threat to this species and its associated habitat. However, improved management of the ecosystem by Malagasy authorities is likely to have a greater conservation impact than a CITES Appendix-II listing. Madagascar may want to approach the CITES Plants Committee for guidance in conducting a non-detriment finding as part of a broader species management plan.</p>	REJECT
27	<p><i>Zygosicyos tripartitus</i></p> <p>CoP15 Prop. 27 [Madagascar]. Inclusion in Appendix II.</p> <p>Although this succulent species is more common than <i>Zygosicyos pubescens</i> (proposal CoP15 Prop. 26), recorded trade volumes are higher and habitat destruction is problematic in its habitat. It is possible that a substantial increase in trade from wild populations and continuing habitat destruction could in future place targeted populations under pressure. However, at current levels trade does not appear to be detrimental to wild populations. In addition, improved management of the ecosystem by Madagascar authorities is likely to have a greater conservation impact than a CITES Appendix-II listing. Madagascar may want to approach the CITES Plants Committee for guidance in conducting a non-detriment finding as part of a broader species management plan.</p>	REJECT

TRAFFIC Recommendations on the Proposals to Amend the CITES Appendices at CoP15

	Species	Comment	Recommendation
28	<i>Euphorbia misera</i>	<p>CoP15 Prop. 28 [Mexico and United States of America]. Deletion from Appendix II.</p> <p>This slow-growing perennial succulent occurs in coastal areas of north-western Mexico and southern California, USA. About half of its known occurrences in the USA and Mexico are within protected areas, and it is covered by general regulations requiring permits for collection and commercialization of non-woody plants (Mexico) or succulents (California). While there is domestic demand for artificially propagated plants, there is no evidence of a threat to wild specimens from domestic or international trade. Minimal trade in the species is reported in CITES trade data (nine specimens in total, the most recent in 1997, all reported as from the USA and as artificially propagated), and there have been no reports of illegal collection or international trade in this species. There is thus no indication that trade in <i>Euphorbia misera</i> needs to be regulated to prevent its becoming eligible for inclusion in Appendix I in the near future, or to ensure that harvest from the wild is not reducing the population to a level at which its survival might be threatened by continued harvesting or other influences.</p>	ACCEPT
29	<i>Aniba rosaeodora</i>	<p>CoP15 Prop. 29 [Brazil]. Inclusion in Appendix II with the following annotation: "#11 Designates logs, sawn wood, veneer sheets, plywood and essential oil".</p> <p>Brazilian Rosewood <i>Aniba roseadora</i> is a slow-growing hardwood tree and occurs in primary wet tropical rainforest in a wide-ranging habitat in the mid-northern Amazon and the Guyana Shield (Brazil, Colombia, Ecuador, French Guyana, Guyana, Peru, Suriname and Venezuela). Colombia and Suriname have listed the species as "threatened". IUCN has assessed it, in 1998, as Endangered. More recent information is not available.</p> <p>Historically, the species has been harvested for the international and national trade of timber and more recently for extracting the linalool-rich oil used for fragrances, which has high commercial value. The best oils are derived from wood of adult specimens, resulting in the complete local destruction of seed-bearing specimens. Producers also target juvenile specimens now.</p>	ACCEPT

TRAFFIC Recommendations on the Proposals to Amend the CITES Appendices at CoP15

Species	Comment	Recommendation
	<p>Oil from other parts of the tree (leaves and branches), or other sources, such as plantations, might have future, but uncertain, potential to meet demand. Synthetic linalool oil and other natural essential oils are substitutes, but <i>Aniba roseaodora</i> oil is still much in demand because of its superior aroma. The only remaining producer of oil is Brazil, but output has decreased and since 2000 export has been less than 39 t and has reportedly failed to meet demand, in spite of increasing prices. Most oil is exported: only 15% is sold on the domestic market.</p> <p>Accessible stocks are believed to have been largely exhausted though over-exploitation in French Guyana, Guyana and Peru, as well as in Amapá, Pará and a significant area of Amazonas in Brazil. Remaining stands are reportedly in remote forest areas where access is difficult. Natural regeneration takes place slowly, irregularly and infrequently.</p> <p>Application of the listing criteria for this species is inconclusive, owing to the significant uncertainty over the levels and significance of decline. Nevertheless, listing in Appendix II may provide a useful tool in support of better management of this valuable resource.</p>	
30	<p><i>Senna meridionalis</i></p> <p>CoP15 Prop. 30 [Madagascar]. Inclusion in Appendix II.</p> <p>This deciduous shrub species is reported to occur in fragmented and locally common populations and is represented in at least one protected area. In addition, these populations occur over a wide area in southern and western Madagascar. Trade as a horticultural subject, including for cultivation into bonsai specimens, is reported to include specimens harvested from the wild, although specimens are reportedly easily propagated from seeds and cuttings. The low levels of recorded trade, even if assumed to be all in wild-collected plants, is not likely to represent a threat to the survival of the species in the wild, unless future harvest from the wild were to increase dramatically. It is not clear from the proposal what the impact of habitat destruction is on this species.</p>	REJECT

TRAFFIC Recommendations on the Proposals to Amend the CITES Appendices at CoP15

Species	Comment	Recommendation	
31	<p>ORCHIDACEAE spp. included in Appendix I</p>	<p>CoP15 Prop. 31 [United States of America] Amend the annotation to the listing of Orchidaceae included in Appendix I, as follows: Delete the current annotation, which states: <i>For all of the following Appendix-I species, seedling or tissue cultures obtained in vitro, in solid or liquid media, transported in sterile containers are not subject to the provisions of the Convention.</i></p> <p>Replace with the following new annotation: "For all of the following Appendix-I species, seedling or tissue cultures obtained <i>in vitro</i>, in solid or liquid media, and transported in sterile containers are not subject to the provisions of the Convention only if the specimens meet the definition of 'artificially propagated' agreed by the Conference of the Parties".</p> <p>The intent of this proposal is to clarify that plant material propagated <i>in vitro</i> and transported in sterile containers must comply with the definition of artificially propagated (<i>Resolution Conf. 11.11 Rev. CoP14</i>) if it is to qualify for exemption from CITES provisions in terms of various species annotations. Although this clarification is consistent with the aforementioned Resolution, it should be recognized that it may not be possible under all circumstances to ensure that <i>in vitro</i> material meets this definition. A flasks specimen is distinguishable from any other kind of specimen and is clearly not a wild-collected species, but assessing whether such specimens meet the definition of 'artificially propagated' as set out in the aforementioned Resolution is not straightforward and cannot be done merely by inspecting a specimen or shipment. Strict implementation may therefore be an enforcement challenge. However, it is advisable for the sake of consistency and clarity that this proposal be adopted.</p>	ACCEPT
32	<p><i>Beccariophoenix madagascariensis</i></p>	<p>CoP15 Prop. 32 [Madagascar]. Inclusion of the seeds of the species in Appendix II.</p> <p><i>Beccariophoenix madagascariensis</i> is a very rare palm endemic to a few sites in eastern Madagascar. The species was included in Appendix II in 2002, and without an annotation, meaning it covered all parts and derivatives, so that all readily recognizable parts and derivatives were included in the listing. At CoP14 in 2007 a proposal (no 27) was put forward to amend, amongst other things, annotation #1. <i>B.</i></p>	ACCEPT

TRAFFIC Recommendations on the Proposals to Amend the CITES Appendices at CoP15

Species	Comment	Recommendation
	<p><i>madagascariensis</i> was erroneously included in a list of species that already had this annotation.</p> <p>This proposal attempts to restore what appears to have been the original intent of the listing of <i>B. madagascariensis</i>, namely to include seeds as the primary part and derivative in trade. Madagascar is encouraged to seek assistance in producing identification materials to help Parties with identification of the seed.</p>	
33	<p><i>Dypsis decaryi</i> [According to the standard nomenclatural reference adopted by the Conference of the Parties, this species is named <i>Neodypsis decaryi</i>]</p> <p>CoP15 Prop. 33 [Madagascar]. Inclusion of the seeds of the species in Appendix II</p> <p><i>Dypsis decaryi</i> is a palm species endemic to Madagascar. The species was included in Appendix II in 1975, and without an annotation, meaning it covered all parts and derivatives. In 1985, it was annotated with the general annotation applied to Appendix II-listed plants at that time, which amongst other things, excluded seeds.</p> <p>However, seeds were, and have always been, the only wild specimens regularly in trade and this proposal aims to include seeds of this palm species, as the primary part and derivative in trade, within the scope of the Convention. The proposal seeks to alter the scope of the Appendix II listing in terms of the parts and derivatives to which it applies but does not alter the species listing itself, so that the criteria in Resolution Conf, 9.24 (Rev. CoP14) are not relevant. As seeds are the primary commodity in international trade from the wild population, harvesting of seed could have an impact on the population.</p> <p>Given the difficulties of identifying palm seeds, Madagascar is encouraged to produce identification materials to assist Parties with identification.</p>	ACCEPT
34	<p><i>Adenia firingalavensis</i></p> <p>CoP15 Prop. 34 [Madagascar]. Inclusion in Appendix II.</p> <p>This widespread and locally common succulent plant species in Madagascar is traded in volumes that do not appear to represent a significant threat to its survival in the wild</p>	REJECT

TRAFFIC Recommendations on the Proposals to Amend the CITES Appendices at CoP15

Species	Comment	Recommendation
	<p>and hence it does not meet the criteria for listing in CITES Appendix II.</p> <p>Although the species regenerates from seeds and cuttings, growth and recovery of the plants after harvest of vegetative material is slow. Consequently, it is possible that even a modest increase in harvest of this species could compromise populations. It is recommended that the trade in this species be regularly monitored to ensure that trade remains at the current low levels.</p>	
35	<p><i>Adenia olaboensis</i></p> <p>CoP15 Prop. 35 [Madagascar]. Inclusion in Appendix II.</p> <p>This Madagascan vine is a relatively widespread and locally common species. In part of its range it enjoys protection within a protected area. Apart from its reportedly healthy population, the species appears to be easily propagated, its large adult size limits wild collection, and the export trade is limited to small volumes. Overall, it appears that historical and current trade volumes are causing negligible damage to wild populations. It is not clear from the proposal what the impact of habitat destruction is on this species. This species does not meet the criteria for listing in CITES Appendix II.</p>	REJECT
36	<p><i>Adenia subsessifolia</i> [According to the standard nomenclatural reference adopted by the Conference of the Parties, this species is named <i>Adenia subsessilifolia</i>]</p> <p>CoP15 Prop. 36 [Madagascar]. Inclusion in Appendix II.</p> <p>This succulent plant is reportedly widespread in the southern and south-western parts of Madagascar and appears to grow in rocky areas where habitat destruction by agriculture is unlikely. The low historical and current trade reported for this species is unlikely to have a negative impact on the population as a whole. However, as some local populations have been negatively impacted by trade, it is clear that the species is susceptible to large-scale harvest. Any substantial increase in trade would need to be monitored by the Malagasy authorities. This species does not meet the criteria for listing in CITES Appendix II.</p>	REJECT
37	<p><i>Orothamnus zeyheri</i></p> <p>CoP15 Prop. 37 [South Africa]. Deletion from Appendix II.</p>	ACCEPT

TRAFFIC Recommendations on the Proposals to Amend the CITES Appendices at CoP15

Species	Comment	Recommendation
	<p>The Marsh Rose <i>Orothamnus zeyheri</i> is an extremely rare endemic species, restricted to two populations in the south-western Cape, Western Cape Province, South Africa. Although traded in the past, the main current threats are reported to be from the root pathogen <i>Phytophthora cinnamomi</i> and, to a lesser extent, unplanned fires and alien species. It appears that current management regimes in place to protect this species limit these threats and consequently the species' population is stable. Current legal and illegal trade is not thought to represent any form of threat to this species. Given these circumstances, this species does not appear to meet the requirements for maintenance in CITES Appendix II.</p>	
38	<p><i>Protea odorata</i></p> <p>CoP15 Prop. 38 [South Africa]. Deletion from Appendix II.</p> <p>The Swartland Sugarbush <i>Protea odorata</i> is an extremely rare species. It has been reduced in number in recent years, primarily by habitat destruction, to a single population of about 27 plants in the Western Cape Province of South Africa. Having small, unscented flowers, this species has not been sought after and hence trade has not contributed to the gradual demise of the species to its current very small population. For this reason, the species does not satisfy the requirements for continued listing in the CITES Appendices.</p>	ACCEPT
39	<p><i>Cyphostemma elephantopus</i></p> <p>CoP15 Prop. 39 [Madagascar]. Inclusion in Appendix II.</p> <p><i>Cyphostemma elephantopus</i>, a succulent of the grapevine family, has a restricted range in southern Madagascar, where at least some populations are under pressure from habitat loss: populations are estimated to be in the order of several hundred thousand. Although trade in wild-collected plants occurs, its current impact on wild populations is estimated to be negligible and not a cause for concern. This species is propagated for the horticultural trade from seeds and cuttings. Considering these factors, and providing that future trade in wild plants does not increase substantially, an event that would almost certainly threaten targeted populations, it appears that the species does not meet the criteria for listing in CITES Appendix II.</p>	REJECT

TRAFFIC Recommendations on the Proposals to Amend the CITES Appendices at CoP15

Species	Comment	Recommendation
40	<p><i>Cyphostemma laza</i></p> <p>CoP15 Prop. 40 [Madagascar]. Inclusion in Appendix II.</p> <p>The succulent plant species <i>Cyphostemma laza</i> is widely distributed with a large estimated population that may comprise millions of plants. Although some local populations are reported to be declining, the main detrimental impacts are thought to be related to habitat destruction, not trade. The main trade pressures have been as a result of the export of about 12 000, presumably wild-collected, plants over a four-year period. There is little evidence of intensive or extensive local use in Madagascar. The species is represented in at least four protected areas within Madagascar. Taking these impacts and factors into account, it appears that the species is not under imminent threat from trade and therefore does not meet the requirements for listing in CITES Appendix II.</p>	REJECT
41	<p><i>Cyphostemma montagnacii</i></p> <p>CoP15 Prop. 41 [Madagascar]. Inclusion in Appendix II.</p> <p><i>Cyphostemma montagnacii</i>, a succulent plant species, has a restricted range in south-western Madagascar, where at least some populations are under pressure from habitat loss. It is not possible with available information to estimate the population but, from reference to available density data, the population is thought to be sufficiently large to withstand current levels of trade and habitat destruction. Considering these factors, and providing that trade in wild plants does not increase substantially, an event that would almost certainly threaten targeted populations, it appears that the species does not meet the criteria for listing in CITES Appendix II. In addition, improved management of the ecosystem by Malagasy authorities is likely to have a greater conservation impact than a CITES Appendix-II listing.</p>	REJECT
42	<p><i>Bulnesia sarmientoi</i></p> <p>CoP15 Prop. 42 [Argentina] Inclusion in Appendix II, with the following annotation: "#11 Designates logs, sawn wood, veneer sheets, plywood, powder and extracts."</p> <p>Palo santo <i>Bulnesia sarmientoi</i> is a slow growing hardwood tree, endemic to a limited region at the junction of Argentina, Bolivia, Paraguay and Brazil, the Gran Chaco. It grows in isolated or continuous stands. There is no artificial propagation of the</p>	ACCEPT

TRAFFIC Recommendations on the Proposals to Amend the CITES Appendices at CoP15

Species	Comment	Recommendation
	<p>species. The timber is hard, durable and of high commercial value. The extracted oil and resin are traded for the cosmetic and paint industries.</p> <p><i>Bulnesia sarmientoi</i> is impacted by two factors: destruction of habitat as a result of deforestation of the Gran Chaco and land-use change, and selective logging, especially for export markets, as reported from Paraguay and Argentina. Although there has been a sharp increase in timber exports in recent years, it seems unlikely that regulation of trade is necessary to ensure that the harvest of specimens from the wild is not reducing the wild population to a level at which its survival might be threatened by continued harvesting. Land conversion, on the other hand, is clearly reducing the habitat and population of <i>B. sarmientoi</i>. Argentina listed the species in Appendix III in 2008 and, while this has produced positive effects in terms of trade control, there are continuing concerns over illicit trans-boundary trade and listing the species in Appendix II could assist in controlling this. The benefits observed for Argentina's population of the species, following its listing under CITES, may accrue to all range States if the whole species is listed in Appendix II. Despite significant harvesting pressure, there is no clear evidence that the Appendix-II listing criteria are satisfied. However, there would appear to be clear conservation and management benefits from trade regulation under CITES for this valuable resource. Attention should be paid to potential identification difficulties between this species and <i>B. arborea</i>.</p>	