

## Amend the Appendix-II listing for *Vicugna vicugna*

For the exclusive purpose of allowing international trade in wool sheared from live vicuñas and in items made thereof, the following provisions shall apply:

- In addition to obtaining the CITES permit, any person or entity making products from vicuña wool must have a licence to use the country of origin mark. There are two marks:
- For international trade in garments and cloth made from vicuña wool sheared from live animals, whether made inside or outside the country of origin, the “VICUÑA [country of origin]” mark must be used:



For cloth, the selvages must bear the words “VICUÑA [country of origin]” or products made outside the country of origin, the name of the country where the product was processed or the garment was made must also be indicated.

- For international trade in handicrafts (artisanal processing) made in the country of origin from wool sheared from live vicuñas, the “VICUÑA [country of origin] – ARTESANÍA” mark must be used.



If processing takes place outside the country of origin, the name of the country where the product was processed or the garment was made must also be indicated.

- If articles are made from vicuña wool from several countries of origin, the countries from which the wool was obtained must be indicated, along with the percentage of wool from each country contained in the product.
- All other specimens shall be deemed to be specimens of species listed in Appendix I and the trade in them shall be regulated accordingly.

### Proponent: Peru

**Summary:** The current Appending-II listing for Vicuña is annotated as follows:

*“Vicugna vicugna [Only the populations of Argentina<sup>1</sup> (the populations of the Provinces of Jujuy and Catamarca and the semi-captive populations of the Provinces of Jujuy, Salta, Catamarca, La Rioja and San Juan), Chile<sup>2</sup> (population of the Primera Región), Ecuador<sup>3</sup> (the whole population), Peru<sup>4</sup> (the whole population) and the Plurinational State of Bolivia<sup>5</sup> (the whole population); all other populations are included in Appendix I]”*

Each population has its own annotation, indicated by the numbered superscripts above, specifying the parts, purposes and labelling to be adhered to for that population. Current annotations vary marginally, allowing trade in wool sheared from live Vicuñas and items thereof under the condition that any cloth is marked with logo and indication of country of origin and that other items are labelled as artisanal products from the country of origin.

It appears that the proposed amendment is intended to replace all the current annotations 1-5 with a single annotation that would result in the following:

- For international trade in cloth or garments [from live Vicuña] processed within or outside the country of origin, the product must be marked with the logo and the indication of country of origin on the selvage (edge of woven fabric finished so as to prevent unravelling, often in a narrow tape effect, different from the body of the fabric).
- Where processing has taken place outside the country of origin, a label must indicate the country where the transformation took place or the garment was made.

- For artisanal products, where these are produced outside the country of origin, as well as the label specifying “Vicuña [country of origin] – artisanal”, a label must indicate the country where the transformation took place or the garment was made.
- Where the product is made of wool from more than one country, it should indicate all those countries and the percentage of wool from each.

Currently, exported wool does not have to be marked; once processed outside countries of origin there is no labelling requirement for cloth or garments produced. It also appears that garments made from labelled cloth do not necessarily have to be labelled with the logo and the country of origin.

**Analysis:** Under the proposal, all items processed outside the country of origin would be expected to carry the above labels. This presumably applies both to those sold in the processing country and those re-exported. It is not clear that it is possible to enforce under the Convention a requirement that products for a domestic market be labelled in a particular way. It may in theory be possible to apply a labelling restriction to re-exports, essentially as a mechanism for ensuring that wool used was legally obtained in the first place (Under Article IV of the Convention (specifically paragraph 5 a) re-export of any product from a species included in Appendix II requires a re-export certificate which the Management Authority of the re-exporting State should only grant if they are satisfied that the specimen was imported into that State in accordance with the provisions of the Convention). There is an analogy with labelling of crocodilian skins, (*Res. Conf. 11.12 (Rev. CoP15): Universal tagging system for the identification of crocodilian skins*), although the latter contains recommendations rather than prescriptions for allowing trade.

Replacing the five separate annotations would remove any differences between the current annotations.