Amendment of the listing of *Bulnesia sarmientoi* in Appendix II

Amend Annotation #11 with underlined text: Logs, sawn wood, veneer sheets, plywood, powder and extracts. *Finished products containing such extracts as ingredients, including fragrances, are not considered to be covered by this annotation*

Proponent: United States of America

**Summary:** *Bulnesia sarmientoi* is a tree species occurring in the Plurinational State of Bolivia, Paraguay, Argentina and a small part of Brazil. It was included in Appendix II in 2010. The wood of *B. sarmientoi* is heavy, very strong and decay-resistant, even underground, because of its resin content, which also gives it aromatic properties. It has a wide range of uses including furniture, flooring, lathe work, manufacture of propeller shaft bearings for ships, and fence poles. The essential oil derived from *B. sarmientoi* wood, known as “Guayacol”, “Guajol” or “Guayaco”, is used in the perfume cosmetics industry and in mosquito repellents. Palo santo resin, derived from the residue of the distillation process can be used to produce dark varnishes and paints. The tree is also used for charcoal production and the leaves have been used for medicinal purposes.

The listing currently has annotation #11 covering “Logs, sawn wood, veneer sheets, plywood, powder and extracts”.

A working group set up at CoP16 to review annotations concluded that finished products containing extracts of *B. sarmientoi* could be excluded from the listing with minimal impact on the conservation of the species. The proposed new annotation would ensure that extract, which is routinely exported, continues to be covered by the listing but that finished products containing extract are not. The wording does not specify that, in order to be exempted from CITES controls, finished products should be “ready for retail trade”. This reflects the findings of the Annotations Working Group, based on consultation with the personal care products industry, that there are many different commodities along the production chain that are not yet packaged and ready for retail trade but whose trade has minimal conservation impact¹.

The CITES Trade Database shows that, along with timber, extract (including oil) is a key commodity of *B. sarmientoi* exported by range States – some 1000mt is reported as having been exported in the period 2010-2014. It is not clear to what extent “finished products” are exported from range States as these have not been reported as a separate term.

**Analysis:** According to *Res. Conf. 11.21 (Rev. CoP16)* annotations should concentrate on those commodities that first appear in international trade as exports from range States and include only those commodities that dominate the trade and the demand for the wild resource. Extracts (including oil) are clearly significant commodities in trade from range States. Although information is sparse, there is little indication that finished products are a major commodity exported by them.

The proposed amendment would closely align the annotation for this species to that for *Aniba rosaeodora* (annotation #12), which is similar in trade. The only difference is a reference to powders in the annotation for *Bulnesia*. This reference appears technically redundant, as powders are covered by the current definition of extracts (as solid – fine or coarse particles)².

**References:**
Information not referenced in the Summary section is from the Supporting Statement.
