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INTRODUCTION

In May this year, a landmark new report from the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) provided overwhelming evidence that nature is declining globally at rates unprecedented in human history, eroding the very foundations of our economies, livelihoods, food security, health and quality of life worldwide.

The IPBES Global Assessment Report on Biodiversity and Ecosystems Services found that around 1 million animal and plant species are now threatened with extinction and that the rate of species extinctions is accelerating. The report demonstrated that the second biggest driver of negative impacts on nature, after changes in land and sea use, is the direct exploitation of animal and plant species, including harvesting, hunting, fishing and logging. The grim picture painted by this report highlights the vital importance that multilateral environmental agreements such as CITES must play in catalysing the transformative changes needed to ensure that global goals for conserving and sustainably using nature are achieved. The 17th meeting of the Conference of the Parties to CITES (CoP17) in Johannesburg in 2016 was acclaimed by the Secretary General at that time as “a game changer for the planet’s most vulnerable wild animals and plants”. For many species – from pangolins to marine species and even including a whole genus of trees – stronger trade regulation measures were adopted through amendments to the CITES Appendices. Moreover, some key CITES Resolutions were strengthened and new Resolutions and Decisions adopted that broke new ground for several important issues, such as traceability, captive breeding, corruption, demand reduction and cybercrime.

As TRAFFIC reflected after CoP17 (see: https://www.traffic.org/site/assets/files/3014/traffic_pub_bulletin_28_2_editorial.pdf), there was indeed a unique opportunity to ensure that CITES really does change the game and deliver positive conservation outcomes. Three years later, with CITES CoP18 convening in Geneva after the tragic April 2019 bombings in Sri Lanka led to postponement and a change of venue, there is however still much to be done.
The CITES Parties and other participants at CoP18 face an enormously packed agenda. Even before this gets started, they will tackle some critical immediate issues during the 71st Meeting of the CITES Standing Committee on 16 August, including decisions on National Ivory Action Plans and national compliance measures.

For the CoP itself, the agenda includes a large volume of ongoing business related to previous decisions, often involving significant intersessional work by the Standing, Animals and Plants Committees. CoP18 will also consider a range of new topics of concern, such as the songbird trade and explore proposed new approaches to deal with intractable issues such as stockpiles and strategies to address trade in big cats. New trade regulation measures are also proposed for species such as guitarfishes, wedgefishes and mako sharks.

The agenda also includes some more strategic topics, including an item that calls for a comprehensive review of the Convention in order to enhance its impact and effectiveness. Such a review, if formulated effectively and for the right reasons, could provide a crucial opportunity for Parties to consider not only how to maximise the impact of CITES itself, but also to work out how action under CITES can be better aligned with that of other biodiversity, environment and development agreements and institutions to drive greater action to reverse the alarming trends that were highlighted by the IPBES Global Assessment.

Next year, governments will meet at the fifteenth meeting of the Conference of the Parties to the Convention on Biological Diversity (CBD) to agree on an ambitious new post-2020 global biodiversity framework and strategic plan to reverse the decline in nature. Ambitions, plans and actions of CITES and other relevant biodiversity and environmental agreements must be co-ordinated, coherent and aligned with that aim. A good starting point would be to ensure that over-exploitation of nature and related international trade is clearly flagged as targeted theme for action in the post-2020 global biodiversity framework.
TRAFFIC AT CITES COP18

This document outlines TRAFFIC’s views and advice on some priority issues and proposals on the agenda for CITES CoP18. TRAFFIC believes that policy decisions and recommendation should be informed and guided by credible evidence and impartial analysis and, for many of the issues addressed in this document, we have highlighted recent TRAFFIC reports and other research that could assist Parties in their deliberations.

We hope that this briefing document provides Parties with important insights on how their decisions about these various agenda items and proposals can help ensure that wild plants and animals are not overexploited through unsustainable trade, and that sustainable use of wildlife continues to provide benefits to conservation and human livelihoods.

Members of TRAFFIC’s team of wildlife trade specialists from our offices around the world will attend the CoP and will be available throughout the meeting to provide explanation and further advice on request. See www.traffic.org/about-us/working-with-cites/cites-cop18/ for further information and contact details.
TRAFFIC supports strengthened co-operation, collaboration and synergies between CITES’ Strategic Vision, the CBD’s Strategic Plan for Biodiversity 2011–2020, its Aichi Target and the 2030 Agenda for Sustainable Development, in particular, greater engagement with the process currently underway to adopt a post-2020 biodiversity framework to replace the Strategic Plan for Biodiversity 2011–2020.

Resolution Conf. 18.X on CITES Strategic Vision: 2021–2030, found in Annex 1 of this document, provides a good framework for realising these synergies and urges Parties to adopt this Resolution. The Aichi Targets currently do not include a specific wildlife trade target, despite illegal and unsustainable trade being a key driver of biodiversity loss, and sustainable, well-managed legal trade having the scope to provide benefits to all from biodiversity and ecosystem services.

TRAFFIC believes that establishing a wildlife trade focused target within the post-2020 Global Biodiversity Framework is essential to ensure the political commitment and levels of implementation to address this global issue. This is central to the effective implementation of CITES and would ensure connectivity to the SDGs. CITES has demonstrated its role in reducing the pressure of illegal and unsustainable trade in wild flora and fauna on biodiversity and enhancing the benefits to wildlife conservation and human well-being deriving from sustainable, legal wildlife trade. The lead up to the CBD CoP in Kunming, China, in 2020 is a golden opportunity for Parties to demonstrate the vital contribution CITES can make to the targets being set in 2020. For more on TRAFFIC’s position on the Post-2020 Global Biodiversity Framework see: https://www.traffic.org/site/assets/files/11412/post-2020_traffic_wildlife_trade_briefing.pdf

While TRAFFIC does not agree with many of the arguments and justifications in this document, we do agree that a review to improve and enhance the effectiveness of CITES will be beneficial. A review of the Convention would also be a good opportunity for Parties to consider how the work of the Convention can be aligned with that of other biodiversity, environment and development agreements and conventions to ensure the synergies and integrated approach that is needed to reverse the alarming trends that were highlighted by the IPBES Global Assessment released in May. Ambitions, plans and actions of CITES and other relevant biodiversity and environmental agreements must be co-ordinated, coherent and aligned with the objectives that will emerge from ongoing discussions on the post-2020 biodiversity framework. However, TRAFFIC recommends that such a review be conducted in a transparent and impartial manner, with clear objectives and terms of reference.
This document argues that the listings of marine species in CITES have not been properly implemented and until they can demonstrate conservation benefit, no further proposals should be made. While TRAFFIC strongly believes that decisions on listings should indeed be made on the basis of scientific information and the potential conservation benefits they would bring to the species, the document does not appear to provide sufficient evidence that the current listings of marine species have not done so. **TRAFFIC opposes the call for a moratorium on any further proposals for the listing of marine fish species in the Appendices and does not believe that any review of the implementation of CITES listings should just be restricted to listings of marine species.** We do agree that attention is needed to strengthen the effective implementation of these listings and Parties face numerous challenges, such as the development of non-detriment findings; effective compliance with, and enforcement of, CITES provisions and the making of legal acquisition findings. These challenges need to be addressed by other mechanisms, including enhanced support for the range States concerned and not through the adoption of the proposed draft resolution, which Parties should reject.

**DOCUMENT LINK:**
https://cites.org/sites/default/files/eng/prog/shark/docs/Shark%20NDF%20guidance%20incl%20Annexes.pdf
TRAFFIC supports the continued collaboration between CITES and CBD Secretariats around implementation of the Global Partnership for Plant Conservation (GSPC). TRAFFIC is concerned that issues related to trade and use of plants may receive insufficient attention during development of the post-2020 biodiversity framework. TRAFFIC encourages the Plants Committee and CITES Secretariat to engage with the CBD Secretariat and highlight the importance of Targets 11 and 12 of the GSPC and ensure these key targets are reflected in the post-2020 biodiversity framework.

**DOCUMENT LINK:**

**INTERNATIONAL CONSORTIUM ON COMBATTING WILDLIFE CRIME**

CoP18 Doc. 15.5

TRAFFIC supports the recommendations in the document calling on Parties to measure and monitor the effectiveness of their own law enforcement responses to wildlife and forest crime; draw upon the best data and case studies available to inform their decision making and development appropriate law enforcement responses; provide funding support towards the implementation of ICCWC’s Strategic Programme 2016-2020; and maintain the position of the ICCWC Support Officer.

The Secretariat reported that the Consortium, based on the outcomes of the 2nd Global Meeting of Wildlife Enforcement Networks (WENs), was exploring developing guidelines for strengthening existing and establishing new WENs. To inform

**RhODIS® (Rhino DNA Index System) Collaborative Action Planning Workshop Proceedings, 2016**
the development of such guidelines, TRAFFIC believes an independent review of the effectiveness of existing WENs is needed, to highlight best practices and identify problems and challenges in the establishment of WENs.

DOCUMENT LINK: https://www.traffic.org/publications/reports/rhodis-collaborative-action-planning-workshop-proceedings/

RURAL COMMUNITIES
CoP18 Doc. 17.1, 17.2 & 7.3

Though disappointed that divergent views prevented meaningful inter-sessional progress on the issue of CITES and rural communities, TRAFFIC supports the recommendation for continuation of the Working Group’s efforts but urges that they focus on achieving consensus and agreement on issues of common concern. TRAFFIC encourages Parties developing listing proposals, draft resolutions and decisions, to consider the potential impacts on rural communities. It is also important that these impacts are addressed when implementing such listings. However, scientific information and the potential conservation benefits listings would bring to the species must remain the basis on which decisions on the acceptance of these listings and for amendment of Appendices I and II are made.

The proposal for the establishment of a Rural Communities Committee may involve a number of procedural, administrative and financial challenges to overcome, particularly given the ongoing concern about limited funds available for CITES’ rapidly expanding scope of work. Parties should explore other mechanisms or processes through which greater rural community engagement and participation in CITES implementation can be accomplished. For example, there can be further examination of the option discussed in the Working in seeking ways of ensuring participation of rural community representatives in all CITES meetings.


Outcomes of the RhODIS® Rhino DNA Scientific workshop held in South Africa in 2016 where the international expansion of rhino horn DNA testing was announced. Wildlife DNA forensic scientists, enforcement officers and investigators from rhino horn source, transit and consumer countries attended.

Outcomes of a project UK Government-supported Initiative aimed at improving the livelihoods of medicinal and aromatic plant collectors in Bac Kan, encouraging more sustainable wild plant collection methods.
CITES AND LIVELIHOODS
CoP18 Doc. 18.1, 18.2 & 18.3

TRAFFIC supports the draft Decisions proposed here, particularly an evaluation of using registered certification marks for products of CITES-listed species produced by rural communities, in line with CITES’ aims to enhance conservation and livelihood outcomes. In this regard, TRAFFIC would like to highlight the Information Document below on CITES and certification (see Cop18 Doc. 55).

DOCUMENT LINK:

Succeeding with CITES:
Sustainable and equitable Jatamansi trade from Nepal: Project summary

A summary of an innovative project that aims to promote legal, sustainable, and equitable international trade in medicinal and aromatic plant Nardostachys jatamansi from Nepal, through the use of FairWild Standard and certification scheme, ensuring fair working conditions and benefits for collectors and communities, and meeting management and business requirements.

DEMAND REDUCTION STRATEGIES TO COMBAT ILLEGAL TRADE IN CITES-LISTED SPECIES
CoP18 Doc. 20

The Secretariat commissioned TRAFFIC to conduct a study to assist Parties in the development and implementation of long-term demand reduction strategies or programmes to combat wildlife trafficking. To gather relevant information, the Secretariat and TRAFFIC developed a questionnaire for Parties and in November 2018, TRAFFIC supported the Secretariat’s hosting of an experts’ workshop to deepen insights and support impactful practices around influencing wildlife product consumer behaviour. The meeting report is available as an Information Document (No. 4). TRAFFIC fully supports the draft Decisions that would mandate the development of demand reduction guidelines for consideration by the Standing Committee.
Final Consultant’s Report: Review Of Demand Reduction Initiatives By CITES Parties, 2019

Outcomes from an expert workshop for Parties held to discuss the findings of a study carried out by TRAFFIC in compliance with Decision 17.48.


COMPLIANCE IN RELATION TO MALAGASY EBONIES (DIOSPYROS SPP.) AND PALISANDERS AND ROSEWOODS (DALBERGIA SPP.)

CoP18 Doc. 30.2

TRAFFIC welcomes Madagascar’s efforts to implement the CITES action plan (Doc.17.204), noting the progress being made is mostly on the scientific side of its provisions. TRAFFIC supports the draft Decisions in principle but notes that there are still key issues that Madagascar should address before any process towards the resumption of legal trade can start. These include monitoring and evaluation of the implementation of the recommendations provided by ICCWC in 2016 on wildlife law enforcement in Madagascar, as well as ensuring the robustness of the verification mechanism to sell the timber stockpile (declared stockpiles, seized stockpiles and hidden stockpiles).

The effectiveness of the Special Court for combatting illegal trade of rosewood, which although formally established, currently lacks adequate enabling financial resources and consequently is largely ineffective and must be strengthened. Madagascar’s report included court statistics on rosewood, but it is worth noting that among the notorious rosewood barons (who were made public by the former Prime Minister in 2011), few were convicted, with most of the convicted offenders being from the lower levels of the supply chain.

A strong commitment and plan of action must also be secured to ensure that any sale of stockpiles will not trigger a fresh surge of illegal harvest of these species. Although progress has

Timber Island: The Rosewood and Ebony Trade of Madagascar, 2017

This study highlights how a combination of political instability, government mismanagement, a lack of forest operation controls and a failure to impose punitive penalties on well-known traffickers contributed to what was effectively zero control...
been made with developing identification tools for Malagasy timber, these are too complex for practical use at forest level where identification, control and monitoring of the wild harvest of timber is essential for compiling non-detriment findings. Without this ability to identify species and consequently to conduct NDF’s, Madagascar will struggle to meet the requirements of current CITES Decisions.

**TRAFFIC urges support for Madagascar to build up the governance structures and processes needed.** This includes capacity building on wildlife regulations and enforcement; strengthening of information management systems; adoption of a tracking system for CITES species trade; centralisation of the CITES permit system; and capacity building on the making of NDFs.

**DOCUMENT LINK:**

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**COMBATTING WILDLIFE CYBERCRIME**

CoP18 Doc. 33.1 & 33.2

TRAFFIC has worked hard to research and document illegal wildlife trade on the internet over the past decade. In recent years, traffickers have in many cases shifted away from online retail platforms such as auction sites and onto “closed” social media platforms which are more difficult to monitor. This has created new challenges—monitoring and policing of this “underground” marketplace must become a top enforcement priority. **TRAFFIC therefore fully supports the proposed amendments to Resolution Conf. 11.3 and draft Decisions, particularly those encouraging greater engagement with relevant online and social media platforms, search engines and e-commerce platforms.**

TRAFFIC, with other partners, is providing advice and assistance to members of the Coalition to End Wildlife Trafficking Online in a pioneering collaboration between NGOs and the tech industry. The Coalition, which includes 33 global e-commerce, social media and technology companies including Baidu, Alibaba, Tencent, eBay, Google, Microsoft and Rakuten, working in partnership with TRAFFIC, WWF and IFAW, aims to reduce wildlife trafficking through web-based platforms. **TRAFFIC**

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**Wildlife Cyber Crime Trends in China: Online Monitoring Results 2017-2018**

During the period 2017–2018, the average number of new wildlife product advertisements every month on website platforms declined 73% compared to 2012–2016. However, increasingly illegal wildlife products advertisements did not use any keywords or text, favouring icons and emojis — a development which could greatly increase the difficulty of market monitoring and law enforcement.
hopes that CITES Parties similarly strengthen and enhance their engagement and cooperation with the private sector on this issue.

TRAFFIC has conducted in-depth e-commerce and social media monitoring in China and Japan, and assessed the use of social media to trade wildlife in Thailand, Malaysia, Viet Nam, the Philippines and elsewhere in Southeast Asia. TRAFFIC hopes Parties will make full use of this information to develop the relevant regulatory and enforcement responses and interventions.

DOCUMENT LINK:

TRACEABILITY

CoP18 Doc. 42

Improved systems for tracking of wildlife products through the trade chain offers great potential to boost efforts aimed at ensuring relevant national and international legislation is being respected. Such systems can also improve transparency to help consumers ensure they are not unwittingly purchasing, and therefore supporting, illegal or unsustainable trade.

While TRAFFIC notes the Standing Committee did not support the need for a CITES resolution at this time, traceability is such a fundamental component of delivering CITES implementation that TRAFFIC regards the eventual development of a resolution on traceability as essential for Parties to tackle this issue in a comprehensive and co-ordinated manner. Technology in this area is changing fast and there are great opportunities to strengthen CITES implementation and impacts through modern traceability approaches.

DOCUMENT LINK:


A review of how trade in species listed in CITES can be tracked along the supply chain. It covers shark and ray trade and case studies on trade in sturgeon caviar, crocodile skins, Queen Conch and timber.
NON-DETRIMENT FINDINGS

CoP18 Doc. 45

Non-detriment findings (NDFs) are essential to effective CITES implementation. The first International Expert meeting in Cancun on NDFs led to the development of specific NDF guidance, including the nine-step guidance for perennial plants TRAFFIC developed with BfN, Germany’s Scientific Authority for Plants, and adapted for timber, and other taxon-specific guidance for sharks, seahorses and other species. TRAFFIC fully supports the proposal to hold a second International Expert meeting and looks forward to providing input and supporting this initiative.

TRAFFIC welcomes the review aimed at strengthening and building upon existing guidance and tools. Together with BfN, TRAFFIC has held training workshops in Africa, Latin America and Asia. An e-learning tool based on the nine-step approach is under development to facilitate such capacity building. TRAFFIC will be organising a side event with BfN on this issue at CoP18 on 21st August.


STOCKS AND STOCKPILES

CoP18 Doc. 51

As outlined in SC70 Doc. 41, there has been considerable progress in the process to rationalise CITES’ approach on the issue of stocks and stockpiles. However, most results are provisional and TRAFFIC supports the proposal to extend the deliberation process to get the final results into CoP19. So far, in terms of prevailing definitions, stocks refer to live specimens and stockpiles to parts and derivatives. CITES Resolutions and Decisions currently address stock and stockpile issues associated with specimens of Asian big cats, elephants, rhinos, Saiga and Tibetan antelopes, pangolins, snakes, Malagasy ebonies (*Diospyros* spp.), palisanders and rosewoods (*Dalbergia* spp.). The issue of resale of confiscated specimens has been addressed, but practical guidance on stock and stockpile management and security has not been a major focus.
For Appendix I species subject to high levels of illegal trade, TRAFFIC believes it is imperative that countries develop competent stockpile management systems that foster transparency and accountability and maintain their security; currently leakage back into illegal trade is a serious problem in countries where stockpile management is lacking. To assist Parties with addressing this challenging issue, TRAFFIC will be producing an Information Document on effective stockpile management at this CoP.

CITES IMPLEMENTATION FOR TRADE IN MEDICINAL PLANT SPECIES

CoP18 Doc. 55

While TRAFFIC is supportive of the recommendations and overall direction of this work, we strongly urge that it be inclusive of aromatic plants. The trade in CITES-listed “medicinal” plant species has been changing rapidly in recent decades and in many examples in the document, the species are actually traded for aromatherapy, cosmetics and food (such as Nardostachys jatamansi, Aloe ferox and Aquilaria spp). TRAFFIC therefore recommends that the draft Decisions and Recommendations refer to “medicinal and aromatic plants” (MAPs).

TRAFFIC has implemented a MAP trade programme for over 20 years, and we offer our expertise and experience on this issue to CITES entities. TRAFFIC, IUCN and other partners, including Parties have developed a range of specialised tools that can support CITES implementation for MAP species, including the FairWild Standard and NDF Guidance for Perennial Plants.

Noting the draft Decision regarding a review of certification schemes, standards and guidelines, we would like to draw the attention of Parties to the Information Document drafted by TRAFFIC on this issue.

IMPLEMENTATION OF THE CONVENTION RELATING TO CAPTIVE-BRED AND RANCHED SPECIMENS
CoP18 Doc. 57

IMPLEMENTATION OF RESOLUTION CONF. 17.7 ON REVIEW OF TRADE IN ANIMAL SPECIMENS REPORTED AS PRODUCED IN CAPTIVITY
CoP18 Doc. 58

TRAFFIC welcomes the comprehensive review undertaken by the Secretariat on this critical issue that highlights the many inconsistencies and ambiguities that Parties face when trying to implement the Convention. As trade from captive-sources is already larger than trade from the wild, the need for clarity and guidance is urgent.

TRAFFIC welcomed the adoption of Resolution 17.7 at CoP17 as a critical mechanism to reduce misreporting of wild specimens as from captive sources. TRAFFIC has extensively researched this topic and regularly encounters cases of source code misuse. The proportion of trade declared as from captive sources is only likely to grow as stakeholders, including governments, encourage captive-breeding, and as more species are protected from wild harvest nationally and internationally. Ensuring there is no fraudulent use of source codes should be fundamental to the Convention, and TRAFFIC strongly supports the Standing Committee’s recommendation that implementation of this Resolution may require a budget line from core funds. TRAFFIC also supports the proposed amendments to Res. Conf. 17.7 aimed at ensuring the Animals Committee does not select species-country combinations for review if the Standing Committee is already in discussions with the country.

DOCUMENT LINK:
https://www.traffic.org/publications/reports/eastward-bound/

Eastward Bound: Analysis of CITES-listed flora and fauna exports from Africa to East and Southeast Asia, 2018

This study found that 1.3 million live animals and plants, 1.5 million skins and 2,000 tonnes of meat were exported between Africa and Asia since 2016. Captive breeding of reptiles, including Nile Crocodiles Crocodylus niloticus and Leopard Tortoise Stigmochelys pardalis, occurs throughout African nations, with exports of reptile skins occurring particularly from Zimbabwe.
**STURGEONS AND PADDLEFISH**  
(ACIPENSERIFORMES SPP.)

CoP18 Doc. 61, Doc. 54.3 Identification of Sturgeons and Paddlefish Specimens in Trade

As trade in caviar from aquaculture facilities has increased over the years, the definition of country of origin has become an issue. CoP17 adopted Decision 17.185 directing the Standing and Animals Committees to report to CoP18 on this, although they and the intersessional working group did not reach any consensus. At SC70, the Secretariat was invited to propose draft decisions to continue work on this issue. With the draft decision, the mandate of SC would be broadened to include the universal caviar labelling system, not just the definition of country of origin. TRAFFIC supports examination of this wider context. TRAFFIC also supports the recommendations in CoP18 Doc. 54.3 that aim to address issues with identification and traceability.

**DOCUMENT LINK:**  
https://www.traffic.org/publications/reports/understanding-the-global-caviar-market/

**EELS**  
(ANGUILLA SPP.)

CoP18 Doc. 63

Illegal trade in the European Eel Anguilla anguilla is serious. In the last few years, an increasing number of seizures have occurred in the EU with successful collaboration between EU range State law enforcement and CITES Management Authorities. However, a large amount of A. anguilla, especially live eel fry (glass eels) are still considered to be illegally exported from the range States and more needs to be done in order to solve the problem at its root, including the lack of an EU-wide traceability system and aquaculture over-capacity and high demand in East Asia. It is therefore essential that source, transit, farming and consumer countries/territories take collective actions to...
counter it, in particular, co-operation between range States and destination countries/territories such as China (including Hong Kong SAR). In addition, recent seizure data suggest that Southeast Asian countries such as Thailand and Viet Nam are used as transit points for *A. anguilla* live eel fry exports to East Asia for farming; co-operation with these countries also needs to be strengthened. Following the Appendix II European Eel listing and EU export ban in 2010, exploitation and trade in other eel species has increased along with significant numbers of live eel fry illegally traded from/to East Asia, Southeast Asia and the Americas. **Unless substantial progress is made in addressing illegal, unreported and unregulated (IUU) fishing, illegal trade and in establishing traceability in range States of non-CITES listed Anguilla species, TRAFFIC believes that a genus-wide listing for all Anguilla spp. might need to be considered at CoP19.**

**PRECIOUS CORALS**  
**(ORDER ANTIPATHARIA AND FAMILY CORALLIIDAE)**

CoP18 Doc. 64

The Animals Committee’s working groups on precious corals have identified various challenges including the difficulty in monitoring wild populations, a lack of research on stocks and harvest, and the difficulty of analysing international coral product trade owing to the lack of specific Customs codes. Further work is needed and it is important for Parties to ensure that the Animals and Standing Committees produce meaningful recommendations on this important issue.

**Due to the long-term nature of some of the identified challenges, TRAFFIC suggests that Parties direct the Standing Committee to consider whether a Resolution is warranted on Precious Corals (Order Antipatharia and Family Coralliidae) to support effective implementation of relevant recommendations.**

**DOCUMENT LINK:**  
https://www.traffic.org/publications/reports/seeing-red/

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**Implementation of the CITES Appendix II listing of European Eel Anguilla Anguilla (AC30 Doc 18.1 Annex 1), 2018**

**DOCUMENT LINK:**  

**Seeing Red: gaps in knowledge threatening precious coral populations, 2018**

*Inconsistent trade data and questionable harvesting practices in East Asia could threaten vulnerable species. A series of recommendations, covering sustainable management, regional co-operation, data collection, and effective implementation of CITES is proposed to help stakeholders work across supply chains towards a fully transparent and sustainable trade in these precious resources.*
SHARKS AND RAYS (ELASMOBRANCHII SPP.)

REPORT OF THE ANIMALS COMMITTEE
CoP18 Doc. 68.1

REPORT OF THE SECRETARIAT
CoP18 Doc 68.2

The document reports significant progress in implementation of the Appendix II listings for commercially-exploited sharks and rays following CoP16 and CoP17, with regional co-operation within and between CITES authorities, Customs authorities, and fisheries agencies and scientists resulting. The Animals and Standing Committees made recommendations for development into draft Decisions or revisions to Resolution Conf. 12.6 (Rev. CoP17), as appropriate, for consideration at CoP18, which TRAFFIC hopes Parties will endorse.

The Animals Committee noted some look-alike and identification issues still need to be resolved, especially for hammerhead sharks and with processed products such as shark liver oil and fish meal which may include a combination of different shark species. Parties may wish to consider the option to list the remaining hammerhead sharks in Appendix II at the next CoP or to direct the Animals and/or Standing Committee(s) to examine the benefits of the potential listing.


Shark fin and mobuild ray gill plate trade in mainland China, Hong Kong and Taiwan, 2016:

The trade in these products changes rapidly, depending on where and how profits can be made. For example, the re-exportation of shark fins from Hong Kong to mainland China, traditionally the biggest importer, significantly dropped in 2010, but was offset after Viet Nam became the largest importer of shark fins from Hong Kong. The dynamic nature of the trade highlights the need for better traceability and a global overview of the markets.
IMPLEMENTATION OF RESOLUTION CONF. 10.10 (REV. COP17) ON TRADE IN ELEPHANT SPECIMENS

CoP18 Doc. 69.1

TRAFFIC supports the Secretariat’s proposal to renew Decision 17.171 at CoP18 so that work on the important issue of ivory stocks and stockpiles can be brought to a conclusion. The Secretariat is to provide practical guidance for Parties on the management of ivory stockpiles and their disposal, while TRAFFIC is specifically noted in paragraph 8 as reviewing the Stop Ivory system as it pertained to implementation in Mozambique. TRAFFIC has recently produced a guidance document on Effective Stockpile Management that provides additional advice on this subject and which will hopefully be circulated as an Information Document for CoP18.

Two decisions focus primarily on live Asian Elephant trade, developing strategies to manage captive animals, assessing compliance of cross-border movements, and collaborating on a regional system for registering, marking and tracing animals. There has been little progress, however, mainly due to a lack of responsiveness from range States except Thailand, an issue clearly of concern. TRAFFIC supports the proposal to renew Decisions 17.217 and 17.218 with amendments to address the concerns relating elephant skin trade.

TRAFFIC’s ETIS analysis for CoP18 indicates that illegal ivory trade activity appears to be exhibiting some measure of reduction, especially in the large raw ivory weight class, but cautions that results could change as additional data for 2017 and subsequent years become available. Under the CITES-led NIAP process and major new policy interventions such as China’s landmark closure of its domestic ivory market, there is little doubt that the illegal ivory trade is experiencing more global regulatory attention and law enforcement pressure than previously.

The current period of flux and adaptation suggests that trade flows have been disrupted somewhat but whether it is sustained needs close monitoring. The raw data for 2017 indicates fewer movements of large quantities of ivory being replaced by increased processing within Africa for export of finished products to Asian markets. It is hoped that the relevant CITES Parties respond quickly to these dynamic market changes. On the other hand, recent exceptionally large ivory seizures in China, Viet Nam and possibly other countries in 2019 could presage resurgent large-scale movements of ivory from Africa to Asian destinations. The supply, regulatory and demand drivers of these apparent shifts in trade pattern need close attention. TRAFFIC commends individual actions by key Parties, but stresses that sustained positive change will only come from concerted and improved international co-operation.
IMPLEMENTING ASPECTS OF RESOLUTION CONF. 10.10 (REV. COP17) ON THE CLOSURE OF DOMESTIC IVORY MARKETS

CoP18 Doc. 69.5

TRAFFIC fully supports the efforts of countries/territories that wish to make the necessary legislative, regulatory and enforcement measures to close their domestic ivory market, where they feel it is the appropriate course of action to curtail illegal ivory trade. International efforts and co-operation, however, must continue to be focussed on those priority markets contributing to poaching or illegal trade. TRAFFIC commends the action of many Parties in their implementation of domestic ivory bans, as called for in Resolution Conf 10.10 (Rev. CoP17).

In China, for example, consumer research commissioned by TRAFFIC suggests that respondents’ claims of past purchase have reduced substantially and future intention to buy ivory products dropped by almost half to 26% compared to 2017 before the ban took effect. Support for the ban remains very high in 2018 with 9 out of 10 respondents saying they support it, although unprompted awareness of the ban was only 8%. Legal ivory shops visited by TRAFFIC have stopped selling ivory, and the magnitude of illegal ivory trade in most surveyed cities and online platforms has decreased. However, there are concerns over ivory trafficking hotspots particularly at the border with neighbouring Viet Nam, as well as a rise of activity since 2017 in China’s ivory auction market, which remains the only legitimate post-ban commercial outlet for ivory sales. In other markets, such as Japan’s, weaknesses in regulation of the domestic ivory market allows persistent illegal export of ivory.

DOCUMENT LINK:
https://www.traffic.org/publications/reports/china-ivory-ban-impacts/
HAWKBILL TURTLE (*ERETMOCHELYS IMBRICATA*) AND OTHER MARINE TURTLES (CHELONIIDAE AND DERMOCHELYIDAE)

CoP18 Doc. 70

Parties are urged to consider the findings of the report “Status, scope and trends of the legal and illegal international trade in marine turtles, its conservation impacts, management options and mitigation priorities” (CoP18 Inf. 18). Where the document provides evidence of illegal trade of marine turtles persisting in source and/or trading countries, Parties could ask the Standing Committee to consider country-level recommendations to address any emerging concerns, as well as measures to address issues such as source site management and protection, policy and legislative provisions, law enforcement, education and awareness-raising, and regional co-operation. Parties could also consider if the report is sufficiently detailed to inform decision-making or if a more comprehensive examination of trade levels and impacts on marine turtle populations is required.

TRAFFIC recommends that the CoP consider amendment of the proposed draft Decision to recommend that the Standing Committee is mandated to consider both cross-cutting and country-specific issues arising from the report.


Review of Marine Wildlife Protection Legislation in ASEAN, 2018

A compilation of legislation to conserve and manage marine species that are vulnerable to wildlife trade-related activities in ASEAN. It identifies relevant global and regional treaties and conventions and summarises the measures each country is obliged to take to uphold its international commitments. The report examines the strengths and weaknesses of the legislation and provides recommendations for improving the legislative framework.
TRAFFIC research has shown a growing proportion of tiger parts seized were suspected to be from captive breeding facilities and that many of these facilities are poorly regulated by existing laws. TRAFFIC therefore welcomes the proposed suite of Draft Decisions on tigers and other Asian big cats, including those urging countries identified as of concern to implement Decision 14.69 prohibiting the breeding of tigers for commercial trade in parts and derivatives, and strengthen their reporting of seizures and trade in other big cat species such as leopards. TRAFFIC also welcomes the draft Decision calling on the Secretariat to undertake a mission to those Parties identified in document SC70 Doc. 51 and in whose territories there are facilities which may be of concern keeping Asian big cats in captivity.

Furthermore, TRAFFIC encourages the relevant range States to reiterate and announce formally their official national policies to ban trade and transport of all tiger products, and clarify the prohibition of tiger bone usage in TCM, including from captive-bred tigers.
National laws should be revised allowing for the closure of commercial tiger “farms”, zoos, safari parks and other captive breeding facilities that have been found to operate illegally and ban the establishment of new farms. The relevant authorities are also urged to jointly review the operating status of all legal tiger farms and tiger-farming individuals, including the number of Asian big cats kept in them. Law enforcement efforts to implement bans on the marketing and sale of illegal tiger products must be strengthened, including supervision and control of online markets, which have become one of the main channels for illegal trade of tiger products. These efforts must be followed up with investigations that lead to strong convictions and the imposition of deterrent penalties. Close engagement with the private sector is also important, including with the tourism industry, to reduce demand for tiger products among Chinese visitors heading to nearby countries where tourist wildlife markets exist.

DOCUMENT LINK:
https://www.traffic.org/publications/reports/reduced-to-skin-and-bones-re-examined/

AFRICAN LION (PANTHERA LEO)
REPORT OF THE SECRETARIAT
CoP18 Doc. 76.1 (Rev. 1)
CONSERVATION OF AND TRADE IN AFRICAN LIONS
CoP18 Doc. 76.2

The Secretariat has developed a very ambitious, wide-ranging and comprehensive suite of Decisions drawn from a highly consultative process. If adopted, these Decisions will address, in a phased and targeted manner, key challenges facing the conservation of and trade in African Lions and other big cats. They also pave the way for further research to examine more deeply issues such as African Lion management, trade and the linkages between trade in African Lion and other big cats.

Given these possible linkages, TRAFFIC welcomes the establishment of a CITES Big Cats Task Force addressing enforcement and implementation issues related to illegal trade in big cat species from Africa, Asia and Latin America. A TRAFFIC report found possible linkages between markets for Lion and other large cat parts, such as the Lion bone trade strengthen laws and reduce demand are to blame for the persistent illegal trade in tiger parts. A growing proportion of tiger parts seized are suspected to be from captive breeding facilities — from just 2% in 2000–2003 to at least 30% in 2012–2015. Such seizures were most pronounced in Lao PDR, Thailand and Viet Nam, where captive breeding facilities were found to be poorly regulated.

DOCUMENT LINK:
https://www.traffic.org/publications/reports/reduced-to-skin-and-bones-re-examined/

The Legal and Illegal Trade in African Lions: A study in support of Decision 17.241 e). Final Study, August 2018

SC70 Doc. 54.1 Annex
DOCUMENT LINK:
https://cites.org/sites/default/files/eng/com/sc/70/E-SC70-54-001.pdf
and farming of tigers: a Task Force would enhance greater co-operation among countries most affected by illegal big cat trade. However, the clarity and focus of any Task Force would need to be well-defined, given the complexity of issues surrounding trade in big cats, including complications where a legal trade regime exists. It is hoped that the work of the Task Force, as well as relevant future research, will help illuminate the dynamics of the legal trade in lion parts with the illegal trade in Asian big cats so that any contradictions in existing policies governing the two issues can be resolved. Discussion on the establishment of a Task Force has to date primarily involved consultation with African range States: it is important similar consultation is conducted with Asian and Latin American range States.

On the draft Resolution on conservation of and trade in African lions proposed in CoP18 Doc. 76.1, it should be noted that no consensus was reached by range States on this draft resolution at the 1st Meeting of Range States for the Joint CMS – CITES African Carnivore Initiative. The suite of Decisions proposed on African Lions, together with provisions in existing Resolutions, also appear to address sufficiently issues by the Resolution. Nevertheless, development of a Resolution is something Parties may consider at a future meeting of the CoP.

**SONGBIRD TRADE AND CONSERVATION MANAGEMENT (PASSEERIFORMES)**

CoP18 Doc. 79

The document provides a broad overview of songbird trade but acknowledges there is a lack of data on international trade specifically that may warrant further examination by CITES, as recommended by the draft Decision. Parties could consider focussing the scope of this work, at least initially. The document notes work already conducted in Asia and the Conservation Strategy for Southeast Asian Songbirds in Trade that has been developed. TRAFFIC recommends that Parties consider a focus on this Strategy for the draft Decision 18AA, to narrow down the scope for work and anticipated outputs by the Animals and Standing Committees.

Research by TRAFFIC and others shows the large and often unregulated scale of songbirds in trade, involving species that are both native and not native to a particular country. In some cases, such as with White-rumped Shama *Copsychus malabaricus*, research shows a potentially increasing trend for international trade and these species would require CITES consideration. Many Asian songbird species in trade are not yet listed in CITES although there are exceptions such as the Straw-headed Bulbul. The document helpfully includes

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*Songbird Trade and Conservation Management (Passeriformes)*

CoP18 Doc. 79

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*Caged in the City: An inventory of birds for sale in Ha Noi and Ho Chi Minh City, 2017*

Viet Nam’s sizeable trade in wild birds is going unchecked and could harm wild populations if not managed. TRAFFIC researchers
the list of 28 priority species identified in the Asian Strategy, providing a good starting point for this work although this list has recently been expanded to over 44 species.

The impact of songbird trade on local communities has not been addressed by the document. A recent TRAFFIC report showed how the banning of wild bird exports and reduced bird sales in urban markets in most of South America had eliminated incomes from bird trade to local communities, possibly leading to habitat destruction as a result of replacement economic activities such as charcoal production (Ortiz-von Halle, 2018). The Asian Strategy mentioned above considers the importance of community engagement, noting the urgent need for a multilevel approach, where top-down regulations should be conducted in tandem with bottom-up approaches which address reducing supply while sustaining local livelihoods. It is hoped that the work envisaged by these draft Decisions will take these community-related issues into serious consideration.

found 8,047 birds of 115 species offered for sale by 52 vendors in the country’s largest cities: Ha Noi and Ho Chi Minh City. Regulations governing the trade exist for only 10% of the species observed - indeed, nine of the top 10 most abundant species recorded were not subject to any national trade control legislation.

DOCUMENT LINK: https://www.traffic.org/publications/reports/caged-in-the-city/

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RHINOCEROSES (RHINOCEROTIDAE SPP.)

REPORT OF THE STANDING COMMITTEE AND SECRETARIAT

CoP18 Doc. 83.1

South Africa is home to 87% of all remaining White Rhinoceros and TRAFFIC is gravely concerned that its White Rhino populations are now suffering declines that are reversing decades of uninterrupted growth for the first time. According to the IUCN/TRAFFIC report annexed to Cop18 Doc 83.1, the Kruger National Park white rhino population, the largest in the world but continually facing the most serious poaching threat, has now declined back to 2004 numbers. The reported decrease in detected carcasses of illegally-killed rhino across Africa is
mitigated by the fact that there are fewer animals to poach in many accessible locations—as many as 20% of the poached carcasses are never detected in places like Kruger and the reported losses still indicate that three rhino have been lost every single day from 2013 to 2017 inclusive. The impact of unabating poaching of Africa’s rhino over a decade is now being seriously felt with major population reduction of the key in situ White Rhino population.

China (including Hong Kong SAR) and Viet Nam as destinations, Mozambique as an export/transit point, and South Africa as the major source country were recorded in the trade chains of over two-thirds of reported rhino horn seizures. TRAFFIC urges that these four countries remain priorities for action to curb the illegal rhino horn trade successfully and, in this regard, recommends that Parties fully support Decision 18.BB proposed in the document.

Enforcement action in Viet Nam has been far more limited than expected and its new Penal Code includes an exemption for possession of less than 50 grams of horn, meaning most consumers remain outside the scope of strengthened penalties, a very unsatisfactory omission. The retreat of illegal rhino horn trade into the deeper recesses of internet and social media trading in Asia presents a major challenge to effective law enforcement action. Discrepancies in trade data on South Africa’s rhino trophy exports are of concern and could serve to mask some degree of pseudo-hunting. For example, South Africa reports exporting 144 rhino horn trophies to Russia and 47 to Canada from 2013 through 2016, but these countries have reported no imports. Major discrepancies also characterise the data between South Africa and the United States, China and Poland. In the IUCN/TRAFFIC report to CoP17, South Africa was encouraged to take stricter domestic measures and require the prior issuance of an import permit to prevent such discrepancies, but no such action has yet been taken by the South African authorities.

A report from the IUCN Species Survival Commission (IUCN SSC) African and Asian Rhino Specialist Groups and TRAFFIC to the CITES Secretariat pursuant to Resolution Conf. 9.14 (Rev. CoP17)

CoP18 Doc. 83.1 Annex 2

Kenya proposes to amend Resolution Conf. 9.14 to mandate the closure of domestic rhino horn markets with regular reporting on actions taken; to promote the destruction of rhino horn stockpiles; and to include privately-held rhino horn stocks as part of the annual reporting requirement on rhino horn stockpiles to the CITES Secretariat. While the closure of rhino markets may lie beyond the Convention’s expressed purview of international trade, it should be noted that Parties have already agreed domestic market closure in the context of elephant ivory in paragraph 3, Resolution Conf. 10.10 (Rev CoP17) if such markets are “contributing to poaching or illegal trade”. In fact, most traditional rhino horn markets remain closed, including those in all major consuming countries. South Africa, however, has recently instigated a legal domestic trade in rhino horn. This move follows a 2017 court ruling overturning a 2008 moratorium that was imposed by the government after evidence of domestic rhino horn stocks going into illegal international trade surfaced. Rather than re-impose a moratorium that accommodated standard public participation processes, South Africa has opted to allow domestic rhino horn trade under permit, even though the country functions as a source – not a consumer – country and continues to suffer from an illegal trade problem of unparalleled dimensions. Already, in April 2019, violations of domestic trade regulations have resulted in the arrest of two men and the seizure of 167 rhino horns that were under permit for domestic trade. TRAFFIC therefore supports domestic rhino horn market closures, as Kenya proposes – they appear justified under these circumstances and are in line with CITES precedent.

Concerning the destruction of rhino horn stockpiles, it should be noted that a clear understanding of the impact of rhino horn stock destructions on illegal trade remains unclear and could result in unintended negative consequences. Demand reduction work in end-use markets has indicated that notions of rarity and acquiring something that very few people own has appeal to a certain segment of the consuming market and publicised destructions may exacerbate this form of consumption.

Finally, in terms of reporting privately-held rhino horn stockpiles, the Secretariat has proposed draft text under point R to encourage reporting, which TRAFFIC supports.
HELMETED HORNBILL (RHINOPLEAX VIGIL)

CoP18 Doc. 84

A recent TRAFFIC analysis found at least 2,878 Helmeted Hornbill casques, skulls and products were seized from at least 59 known confiscations from 2010 to 2017 and evidence of high poaching levels in Indonesian Borneo, while many Helmeted Hornbill parts were openly for sale in markets in the Special Economic Zones on Lao PDR, and online in many countries in Asia. In May 2017, a Helmeted Hornbill Conservation Strategy and Action Planning Workshop, held in Sarawak, Malaysia, developed a ten-year Conservation Strategy and Action Plan calling for unprecedented levels of international collaboration and more financial resources to scale up conservation attention aimed at targeted population recovery across the species’ range. TRAFFIC urges that the draft Decision 18.AA in the document directs Parties to report on their implementation of both Resolution Conf. 17.11 and the Action Plan, so that regulatory and enforcement gaps and weaknesses can be quickly identified, and the appropriate assistance and support provided to Parties that require it.

In February 2019, relevant experts met in Sarawak, Malaysia, with discussions specifically focusing on Resolution Conf 17.11 resulting in a set of recommendations to strengthen the Resolution. TRAFFIC believes that some range States will be proposing amendments to the Resolution to incorporate these recommendations and we urge Parties to support these amendments.

DOCUMENT LINK:
SAIGA ANTELOPE (SAIGA SPP.)

CoP18 Doc. 84

Significant progress in the conservation and restoration of Saiga Antelopes and ensuring trade in their parts is well-regulated thanks to the ongoing efforts by relevant Parties. Co-operation between CITES and CMS has been excellent, particularly with regards to supporting implementation of the Medium-Term International Work Programme (MTIWP) (2016-2020) and the CMS-CITES Joint Work Programme. The draft Decisions are focussed on the continued implementation of MTIWP (2016-2020) and the development of MTIWP (2021-2025), and these should be fully supported.

However, marked population declines have been observed (although in some cases wild populations rapidly decline then rebound) and the species (combining both taxa currently recognised separately by CITES) has recently been assessed as Critically Endangered. While legal trade may be declining and seizures of illegal specimens are small, trade and use is still persistent. The presence of large stockpiles outside range States as a potential avenue for illegal trade also remains a concern.

TRAFFIC believes that the proposal not to extend Decisions 17.268, 17.269 and 17.270 because they overlap with the measures outlined in MTIWP (2016-2020) may be premature. These Decisions may indeed overlap with some measures outlined in MTIWP (2016-2020), but issues such as consumption, use of alternative products, engagement with traditional Asian medicine industries and consumers, labelling schemes, identification, stockpile management, cross-border collaboration between enforcement agencies and tackling online illegal trade channels can be addressed through CITES. Thus retention of the text in these three Decisions may be beneficial to the conservation of the species.

DOCUMENT LINK:
https://www.traffic.org/site/assets/files/12036/saiga-horn-malaysia.pdf
**TORTOISES AND FRESHWATER TURTLES**  
(*TESTUDINES SPP.*)

CoP18 Doc. 88

Much progress has been made in the implementation of the Decisions from CoP17. The draft Decisions and proposed amendments to Resolution Conf. 11.9 (Rev. CoP13) build strongly on this progress and should be supported, particularly those with regards to Madagascar, with an emphasis on greater attention to illegal trade in endemic tortoises and freshwater turtle species. Significant seizures in the tens of thousands, involving Appendix I listed Malagasy tortoises, as well as many other threatened Asian Testudines, have been taken place in recent years. Additionally, the sale of Testudines online is significant. TRAFFIC also recommends that Parties utilise the Manual for the differentiation of captive-produced and wild-caught turtles and tortoises to counter the issue of laundering of wild-caught specimens.

However, a long-standing issue is that in many transit and destination countries, non-native CITES-listed species of tortoises and freshwater turtles are not covered by the provisions of national legislation. **TRAFFIC believes that the Resolution amendments should therefore make specific reference to the need to address gaps and loopholes within national legislation, as well as a scrutiny on markets openly selling turtles and tortoises illegally.** The Resolution amendments to include text about “engaging online communities” is most welcome, but this is focused on awareness and should be expanded to ensure close collaboration and action by governments and the online sector to reduce and eliminate illegal trade taking place on these platforms.

**DOCUMENT LINK:**  
https://www.traffic.org/publications/reports/slow-and-steady-the-global-footprint-of-jakartas-tortoise- 
and-freshwater-turtle-trade/

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**Slow and Steady: The global footprint of Jakarta’s tortoise and freshwater turtle trade, 2018**

Surveys found 4,985 individuals of 65 different species of tortoise and freshwater turtles in just seven locations over a four-month period in Jakarta, Indonesia, more than in previous TRAFFIC surveys carried out in 2004 and 2010. Nearly half were IUCN Red Listed species and at least eight non-native species recorded were prohibited from international commercial trade under CITES and were likely to have been illegally imported.
PROPOSALS
TO AMEND APPENDICES I AND II
These “Recommendations” use as their foundation the IUCN/TRAFFIC Analyses, which provide background information underpinning TRAFFIC’s advice. As well as the CITES the Listing Criteria in Res. Conf 9.24 (Rev. CoP17) the IUCN/TRAFFIC Analyses also took into account “Additional considerations” that may be relevant to the decision on whether or not to adopt the proposal (for example, implementation challenges and potential risks/benefits for the conservation of the species concerned).

In TRAFFIC’s Recommendations to the Parties in terms of whether to Accept or Reject each proposal the basic question we try to answer is: “would a proposed change to the regulatory treatment of a species under CITES, on balance, be a good thing or not: or (in the words of Resolution Conf. 9.24 (Rev. CoP16)) would it be in the best interest of the conservation of the species concerned, and be a proportionate response to anticipated risks”.

IUCN/TRAFFIC ANALYSIS DOCUMENT:
https://www.traffic.org/about-us/working-with-cites/cites-cop18/
COP18 PROP. 1  
**CAPRA FALCONERI HEPTNERI**  
HEPTNER’S MARKHOR

Transfer the population of Tajikistan from Appendix I to Appendix II. **Tajikistan**

Although Tajikistan’s population does not appear to meet the Appendix I biological criteria, there are uncertainties over the extent of a recent recovery and the sustainability and legality of some trophy hunts. Furthermore, acceptance would result in split-listing for this and other subspecies in Appendix I.

COP18 PROP. 2  
**SAIGA TATARICA**  
SAIGA ANTELOPE

Transfer from Appendix II to Appendix I. **Mongolia and United States of America**

Two Saiga species (Saiga tatarica and Saiga borealis) are currently recognised under CITES taxonomy. Saiga tatarica populations have increased in recent years and have benefited from national legislation, export bans and conservation actions under the CMS MoU. Saiga borealis in Mongolia conversely does appear to meet Appendix I biological criteria for listing, but this species is apparently outside the scope of the proposal. An Appendix I listing of one of the CITES recognised species would result in a split-listing, with consequent implementation challenges.

COP18 PROP. 3  
**VICUGNA VICUGNA**  
VICUÑA

Transfer the population of the Province of Salta (Argentina) from Appendix I to Appendix II with annotation 1. **Argentina**

The population is not small, is widely distributed and increasing. Trade would be managed like that from other Appendix II Vicuña populations in Argentina.
Illegal trade has been recorded within some domestic Asian markets, though the levels and impact of international trade are little known. It is uncertain whether the clearly downward population trends for the species meet the guidelines for a marked population decline. However, a precautionary listing could spur enforcement efforts and oversight of claims of any captive breeding operations.

**COP18 PROP. 4**

*Vicugna vicugna*

**VICUÑA**

Amend the name of the population of Chile from "population of the Primera Región" to "populations of the region of Tarapacá and of the region of Arica and Parinacota". **Chile**

This simply amends the geographic name to reflect current Chilean terminology.

**COP18 PROP. 5**

*Giraffa camelopardalis*

**GIRAFFE**

Include in Appendix II. **Central African Republic, Chad, Kenya, Mali, Niger, and Senegal**

Overall populations have declined, but little evidence this is driven by illegal international trade. Populations in Namibia, South Africa and Zimbabwe, where legal trophy hunting takes place, are generally increasing.

**COP18 PROP. 6**

*Aonyx cinerea*

**SMALL-CLAWED OTTER**

Transfer from Appendix II to Appendix I. **India, Nepal, and Philippines**

Illegal trade has been recorded within some domestic Asian markets, though the levels and impact of international trade are little known. It is uncertain whether the clearly downward population trends for the species meet the guidelines for a marked population decline. However, a precautionary listing could spur enforcement efforts and oversight of claims of any captive breeding operations.
COP18 PROP. 7

**LUTROGALE PERSPICILLATA**
**SOUTH WHITE RHINOCEROS**

Transfer from Appendix II to Appendix I. **Bangladesh, India, and Nepal**

As for Prop 6, both the significance of levels of international trade and severity of clearly downward population trends are uncertain. However, a precautionary listing could spur enforcement efforts and oversight of claims of any captive breeding operations.

COP18 PROP. 8

**CERATOTHERIUM SIMUM**
**SOUTH WHITE RHINOCEROS**

Remove the existing annotation for the population of Eswatini. **Bangladesh, India, and Nepal**

This proposal does not provide adequate information on precautionary management and trade regulation measures that would replace those established in the current annotation.

COP18 PROP. 9

**CERATOTHERIUM SIMUM**
**SOUTH WHITE RHINOCEROS**

Transfer the population of Namibia from Appendix I to Appendix II. **Namibia**

The relatively small population is increasing and does not meet the Appendix I biological criteria. The proposal can be considered a special measure for transferring a taxon from Appendix I to Appendix II.
COP18 PROP. 10

**LOXODONTA AFRICANA**  
AFRICAN ELEPHANT

Transfer the population of Zambia from Appendix I to Appendix II. **Zambia**

Although the population may not meet the App. I biological criteria, the proposal gives little detail of proposed management and precautionary measures.

COP18 PROP. 11

**LOXODONTA AFRICANA**  
AFRICAN ELEPHANT

Amend annotation 2 for the populations of Botswana, Namibia, South Africa and Zimbabwe. **Botswana, Namibia, and Zimbabwe**

The amendment would allow for exports of registered raw ivory without oversight of the previous mechanisms by the Standing Committee and CoP and there is insufficient detail to determine whether the range States have appropriate enforcement controls and compliance measures in place.

COP18 PROP. 12

**LOXODONTA AFRICANA**  
AFRICAN ELEPHANT

Transfer the populations 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**

These populations do not meet the Appendix I biological criteria.
While small carved mammoth and elephant ivory items can be difficult to differentiate and listing may indeed reduce the extent of illegal elephant ivory laundering, there is little compelling evidence of a serious laundering problem. This listing could also potentially complicate China’s existing elephant ivory market closure and Parties may wish to examine other CITES mechanisms (such as a Decision or Resolution amendment) to prompt action to address any potential problems mammoth ivory may present.

COP18 PROP. 13

**MAMMUTHUS PRIMIGENIUS**
WOOLLY MAMMOTH

Include in Appendix II. **Israel**

The outcome of a Periodic Review

COP18 PROP. 14

**LEPORILLUS CONDITOR**
GREATER STICK-NEST RAT

Transfer from Appendix I to Appendix II. **Australia**.

The outcome of a Periodic Review

COP18 PROP. 15

**PSEUDOMYS FIELDI PRAECONIS**
SHARK BAY MOUSE

Transfer from Appendix I to Appendix II. **Australia**.

The outcome of a Periodic Review

COP18 PROP. 16

**XEROMYS MYOIDES**
FALSE SWAMP RAT

Transfer from Appendix I to Appendix II. **Australia**.

The outcome of a Periodic Review
Population declines are close to or exceed Appendix I biological criteria, with trade a factor. Note the closely related (Appendix II) lookalike Grey Crowned-crane, *B. regulorum* is even more threatened.

**COP18 PROP. 17**

**ZYZOMYS PEDUNCULATUS**

CENTRAL ROCK RAT

Transfer from Appendix I to Appendix II. **Australia.**

The outcome of a Periodic Review

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**COP18 PROP. 18**

**SYRMATICUS REEVESII**

REEVES’S PHEASANT

Include in Appendix II. **China**

Although the international trade impact in the marked declines of native populations in China is unclear, an Appendix II listing may be precautionary.

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**COP18 PROP. 19**

**BALEARICA PAVONINA**

BLACK CROWNED-CRANE

Transfer from Appendix II to Appendix I. **Burkina Faso, Côte d’Ivoire, and Senegal**

Population declines are close to or exceed Appendix I biological criteria, with trade a factor. Note the closely related (Appendix II) lookalike Grey Crowned-crane, *B. regulorum* is even more threatened.

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**COP18 PROP. 20**

**DASYORNIS BROADBENTI LITORALIS**

LESSER RUFOUS BRISTLEBIRD

Transfer from Appendix I to Appendix II. **Australia.**

The outcome of a Periodic Review
COP18 PROP. 21  
**DASYORNIS LONGIROSTRIS**
LONG-BILLED BRISTLEBIRD

Transfer from Appendix I to Appendix II. **Australia**.

The outcome of a Periodic Review

COP18 PROP. 22  
**CROCODYLUS ACUTUS**
AMERICAN CROCODILE

Transfer the population of Mexico from Appendix I to Appendix II. **Mexico**

This population no longer meets the Appendix I biological criteria. Mexico has indicated it will amend the proposal to include a zero-export quota for wild specimens to allow the establishment of appropriate management systems as a precautionary measure. Any change to the zero quota would then have to be reassessed through a subsequent proposal to amend the Appendices.

COP18 PROP. 23  
**CALOTES NIGRILABRIS, CALOTES PETHIYAGODAI**
GARDEN LIZARDS

Include in Appendix I. **Sri Lanka**

Both species apparently meet Appendix I biological criteria and have appeared in International trade despite an export ban since 1993. Sri Lanka could consider listing six other native *Calotes* species in Appendix III with a zero export quota.
COP18 PROP. 24

**LYRIOCEPHALUS SCUTATUS**
HUMP-NOSED LIZARD

Although somewhat unclear whether it meets Appendix I biological criteria, a precautionary listing appears warranted. Alternatively, Sri Lanka could consider listing this species in Appendix III with a zero export quota.

COP18 PROP. 25

**COPHOTIS CEYLANICA, COPHOTIS DUMBARA**
PYGMY LIZARDS

Both species have been offered for sale despite a Sri Lanka export ban since 1993 and *Cophotis ceylanica*, and possibly *C. dumbara* too, meet Appendix I biological criteria.

COP18 PROP. 26

**CERATOPHORA SPP.**
HORNED LIZARDS

Include in Appendix I. Sri Lanka

All species have been offered for sale despite a Sri Lanka export ban since 1993, and all except *Ceratophora aspera* apparently meet Appendix I biological criteria. Trade in the latter is apparently in readily identified adults: if excluded from the listing, Sri Lanka could consider listing this species in Appendix III with a zero export quota.
COP18 PROP. 27

**GONIUROSAURUS SPP.**
LEOPARD GECKOS

Include the populations of China and Viet Nam in Appendix II. **China, European Union, and Viet Nam**

Thirteen *Goniurosaurus* species are impacted by trade and meet Appendix II criteria. Other *Goniurosaurus* species in China and Viet Nam should be listed as look-alikes. Non-experts may struggle to recognise six endemic Japanese species of the same genus that are outside the scope of this proposal, so Japan might consider listing these in Appendix III to monitor any trade impacts should the proposal be accepted.

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COP18 PROP. 28

**GEKKO GECKO**
TOKAY GECKO

Include in Appendix II. **European Union, India, Philippines, and United States of America**

There is widespread international trade in this species and although common in much of its range, there are concerns about some national population declines. Given the large magnitude of the trade, a precautionary Appendix II listing appears warranted.

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COP18 PROP. 29

**GONATODES DAUDINI**
GRENADINES CLAWED GECKO

Include in Appendix I. **Saint Vincent and the Grenadines**

There are reports of this species with a small population and very restricted area for sale online despite no issuance of trade permits.
Four Ctenosaura species are already listed in Appendix II and the species are apparently difficult to differentiate (lookalike), particularly as juveniles. One species appears to meet the Annex 2a criteria and two may meet the Appendix I biological criteria.

**COP18 PROP. 30**

**PAROEDURA ANDROYENSIS**
GRANDIDIER’S MADAGASCAR GROUND GECKO

Include in Appendix II. **European Union and Madagascar**

Madagascar exports around 1,200 specimens a year although it is unclear what impact this has on populations: a precautionary listing appears warranted.

**COP18 PROP. 31**

**CTENOSAURA SPP**
SPINY-TAILED IGUANAS

Include in Appendix II. **El Salvador and Mexico**

Four Ctenosaura species are already listed in Appendix II and the species are apparently difficult to differentiate (lookalike), particularly as juveniles. One species appears to meet the Annex 2a criteria and two may meet the Appendix I biological criteria.

**COP18 PROP. 32**

**PSEUDOCERASTES URARACHNOIDES**
SPIDER-TAILED HORNED VIPER

Include in Appendix II. **Iran, Islamic Republic of**

This recently described species from Iran is believed to be of interest to hobbyists but trade appears to be limited and is illegal. The conservation benefit of Appendix II inclusion is unclear. Iran could consider an Appendix III listing with a zero export quota.
COP18 PROP. 33

**CUORA BOURRETI**

BOURRET’S BOX TURTLE

Transfer from Appendix II to Appendix I. **Viet Nam**

The outcome of a Periodic Review. A zero-quota is already in place; benefits of an Appendix I listing are not likely to be realised unless enforcement efforts are increased.

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COP18 PROP. 34

**CUORA PICTURATA**

VIETNAMESE BOX TURTLE

Transfer from Appendix II to Appendix I. **Viet Nam**

The outcome of a Periodic Review. A zero-quota is already in place; benefits of an Appendix I listing are not likely to be realised unless enforcement efforts are increased.

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COP18 PROP. 35

**MAUREMYS ANNAMENSIS**

ANNAM LEAF TURTLE

Transfer from Appendix II to Appendix I. **Viet Nam**

The outcome of a Periodic Review. A zero-quota is already in place; benefits of an Appendix I listing are not likely to be realised unless enforcement efforts are increased.

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COP18 PROP. 36

**GEOCHELONE ELEGANS**

STAR TORTOISE

Transfer from Appendix II to Appendix I. **Bangladesh, India, Senegal, and Sri Lanka**

Although not definitively meeting relevant biological criteria, there is undoubtedly a high level of illegal trade in this species despite the Appendix II-listing. An Appendix I listing appears warranted and might spur increased enforcement efforts and oversight of captive breeding operations.
Both Chinese endemic Echinotriton species likely meet Appendix II criteria. Although export is already prohibited, China may wish to reflect this by stipulating a zero quota for wild specimens. If this proposal is accepted, Japan may wish to list E. andersoni, in Appendix III, so as to monitor any trade impacts.

COP18 PROP. 37

MALACOCHERSUS TORNIERI
PANCAKE TORTOISE

Transfer from Appendix II to Appendix I. Kenya and United States of America

The population may be small and have declined by more than 50% in the last two generations. Most exports are reported as captive-bred but it appears wild harvest is continuing.

COP18 PROP. 38

HYALINOBATRACHIUM SPP., CENTROLENE SPP., COCHRANELLA SPP., SACHATAMIA SPP.
GLASS FROGS

Include in Appendix II. Costa Rica, El Salvador, and Honduras

Based on available information, these genera apparently do not meet the Appendix-II listing criteria.

COP18 PROP. 39

ECHINOTRITON CHINHAIENSIS, ECHINOTRITON MAXIQUADRATUS
SPINY NEWTS

Include in Appendix II. China

Both Chinese endemic Echinotriton species likely meet Appendix II criteria. Although export is already prohibited, China may wish to reflect this by stipulating a zero quota for wild specimens. If this proposal is accepted, Japan may wish to list E. andersoni, in Appendix III, so as to monitor any trade impacts.
COP18 PROP. 40

**PARAMESOTRITON SPP.**
ASIAN WARTY NEWTS

Include in Appendix II. China and European Union

One *Paramesotriton* species (*P. hongkongensis*) is already listed in Appendix II, and with species identification difficult—particularly dried specimens traded for traditional medicine—all other species could be included as look-alikes under Annex 2bA. Although the proposal is to list all *Paramesotriton* species endemic to China and Viet Nam, as all known species are, it would seem logical to list the genus as a whole. A zero quota could be specified for species that are nationally protected.

COP18 PROP. 41

**TYLOTOTRITON SPP.**
CROCODILE NEWTS

Include in Appendix II. China and European Union

Some species of *Tylototriton* have shown population declines, likely caused by over-harvesting, although it is unclear whether this is driven by domestic or international trade. Species are hard to separate, and taxonomy of this genus is in flux. An Appendix II listing is therefore warranted on look-alike grounds. A zero quota could be specified for species that are nationally protected.
There are historical and recent population decreases across the majority of *Isurus oxyrinchus*'s range and it appears to meet the Annex 2aB criterion. *Isurus paucus* is likely similarly to have declined, while fins and meat of both species are often mixed, hampering their specific identification. A CITES listing would reinforce the implementation of any existing legislation and management measures.

**COP18 PROP. 42**

**ISURUS OXYRINCHUS, ISURUS PAUCUS**

MAKO SHARKS

Include in Appendix II. Bangladesh, Benin, Bhutan, Brazil, Burkina Faso, Cabo Verde, Chad, Côte d’Ivoire, Dominican Republic, Egypt, European Union, Gabon, Gambia, Jordan, Lebanon, Liberia, Maldives, Mali, Mexico, Nepal, Niger, Nigeria, Palau, Samoa, Senegal, Sri Lanka, Sudan, and Togo

Populations of all six *Glaucostegus* species have declined, driven mainly by over-harvest. Fins of guitarfish and wedgefish (see Proposal 44) are difficult to differentiate and therefore all species should be listed as look-alikes under Annex 2bA.
COP18 PROP. 44

**RHINIDAE SPP. WEDGEFISHES**

Include in Appendix II. Bangladesh, Benin, Bhutan, Brazil, Burkina Faso, Cabo Verde, Chad, Côte d’Ivoire, Egypt, Ethiopia, European Union, 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

Two species of wedgefish with population declines of greater than 80% are known to be affected by trade. Fins of guitarfish (see Proposal 43) and wedgefish are difficult to differentiate and therefore all species should be listed as look-alikes under Annex 2bA.

COP18 PROP. 45

**HOLOTHURIA (MICROTHELE) FUSCOGILVA, HOLOTHURIA (MICROTHELE) NOBILIS, HOLOTHURIA (MICROTHELE) WHITMAEI** SEA CUCUMBERS

Include in Appendix II. European Union, Kenya, Senegal, Seychelles, and United States of America

Although data are scarce, those available indicate significant population declines in these three species, apparently as a result of targeted fisheries likely driven by international trade.
Although most reported trade is stated as captive-sourced, of the 15 recognised Poecilotheria species from India and Sri Lanka, two—P. hanumavilasumica and P. metalica—have restricted ranges and declining habitat and may meet the Appendix II criteria. Other species closely resemble P. hanumavilasumica and would qualify as look-alikes. The taxonomy is in flux, therefore listing the genus would facilitate future implementation. Sri Lanka could consider registering a zero-export quota to reflect that export from there is illegal.

**COP18 PROP. 46**

**POECILOOTHERIA SPP. ORNAMENTAL SPIDERS**

Include in Appendix II. Sri Lanka and United States of America

This sub-species may already meet the biological criteria for Appendix I in its own right. Accepting this proposal and adoption of the new standard reference proposed for Philippines swallowtail butterflies would result in Achillides chikae being included as a species in Appendix I.

**COP18 PROP. 47**

**ACHILLIDES CHIKAE HERMELI MINDORO PEACOCK SWALLOWTAIL**

Include in Appendix I. European Union and Philippines

This species has restricted and fragmented subpopulations and there is evidence of illegal international trade.

**COP18 PROP. 48**

**PARIDES BURCHELLANUS RIVERSIDE SWALLOWTAIL**

Include in Appendix I. Brazil

This species has restricted and fragmented subpopulations and there is evidence of illegal international trade.
COP18 PROP. 49

**HANDROANTHUS SPP., TABEBUIA SPP., ROSEODENDRON SPP**

TRUMPET TREES

Include in Appendix II with annotation #6. Brazil

COP18 PROP. 50

**WIDDRINGTONIA WHYTEI**

MULANJE CEDAR

Include in Appendix II. Malawi

This species has been exploited to the point where no mature trees exist in the wild. While this appears to negate the need for CITES controls, the existence of in-situ plantations of the species that have potential for timber production in the short to medium term may warrant ongoing monitoring and management of trade until such time that Malawi re-establishes the species in the wild and timber extraction is resumed.

COP18 PROP. 51

**DALBERGIA SISSOO**

NORTH INDIAN ROSEWOOD

Delete from Appendix II. Bangladesh, Bhutan, India, and Nepal

Included under the Dalbergia genus listing at CoP17, the expertise and technology to differentiate this species from others are still not widely available
A precautionary listing may be beneficial and this species is very similar to other *Pterocarpus* species including the Appendix II listed *P. erinaceus*. In addition, the wood of *P. tinctorious* is difficult to distinguish from the Appendix-II listed *P. erinaceus* and from similar un-listed species such as *P. angolensis*.

**COP18 PROP. 52**  
**DALBERGIA SPP., GUIBOURTIA DEMEUSEI, GUIBOURTIA PELLEGRINIANA, GUIBOURTIA TESSMANNII**  
ROSEWOODS, PALISANDERS AND BUBINGAS

Amend annotation #15. **Canada and European Union**

This proposal reflects the consensus reached by the Standing Committee Working Group on Annotations.

**COP18 PROP. 53**  
**PERICOPSIS ELATA**  
AFRICAN ROSEWOOD

Amend annotation #5 for *Pericopsis elata*. **Côte d’Ivoire and European Union**

This proposal would close the #5 loophole. The “transformed wood” definition warrants inclusion in Res. Conf. 10.13.

**COP18 PROP. 54**  
**PTEROCARPUS TINCTORIUS**  
AFRICAN PADAUK

Include in Appendix II. **Malawi**

A precautionary listing may be beneficial and this species is very similar to other *Pterocarpus* species including the Appendix II listed *P. erinaceus*. In addition, the wood of *P. tinctorious* is difficult to distinguish from the Appendix-II listed *P. erinaceus* and from similar un-listed species such as *P. angolensis*. 
COP18 PROP. 55
**ALOE FEROX**
BITTER ALOE

Amend annotation #4 for Aloe ferox. **South Africa**

Without more detailed information on the concentration of primary and secondary Aloe ferox extracts in the products exported it is not possible to assess whether the exemption proposed would be in line with Res. Conf 11.21 (Rev. CoP17), which directs that trade controls should concentrate on those commodities that first appear in international trade as exports from the range State and include only those commodities that dominate the trade and the demand for the wild resource.

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COP18 PROP. 56
**ADANSONIA GRANDIDIERI**
GRANDIDIER’S BAOBAB

Amend annotation #16 for Adansonia grandidieri. **Switzerland**

According to Article I of the Convention live plants are automatically part of a listing, so this term in the annotation is redundant.

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COP18 PROP. 57
**CEDRELA SPP.**
CEDARS

Include in Appendix II. **Ecuador**

Cedrela odorata populations have substantially declined through exploitation while some look-alike listings are probably warranted.
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