



The CITES regulated legal trade in flora and fauna has an estimated worth of **US\$320 Billion pa**



CITES core budget to administer the legal trade in flora and fauna is **US\$6 Million pa**



The illegal trade is estimated to be worth **US\$91– US\$258 Billion pa** and exploits the loopholes in the legal trade system



You do the math
US\$320 Billion pa vs. US\$6 Million pa
Help us redress the balance
Because Nature Needs More

Modernising CITES

A mechanism for improving the monitoring and regulation of the legal trade in flora and fauna to help tackle the illegal trade.



CITES, No New Trade Opportunities Until Your Trading System Is Fixed!



A paper published in 2015 outlined the prevalence of documentation discrepancies in CITES trade data for Appendix I and II species exported out of 50 African nations (and 198 importing countries) between the years 2003 and 2012.

The data represented 2,750 species. Of the 90,204 original records downloaded from the database:

- **Only 7.3% were free from discrepancies**
- **Increases in discrepancy-rates between 2003 and 2012 suggests that the trade was monitored less efficiently in 2012 than it was in 2003**

There needs to be a moratorium on any additional and new trade opportunities until this system is decisively fixed.

Information is from the paper: **The prevalence of documentation discrepancies in CITES (Convention on the International Trade in Endangered Species of Wild Fauna and Flora) trade data for Appendix I and II species exported out of Africa between the years 2003 and 2012.**

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A recent paper analysing the lion bone trade found many issues in the data. One key concern relates to the interpretation of trade terms, for example:

- The CITES trade term **'bone' (BON)** is different to **'skeleton' (SKE)**.
- A **'skeleton'** is further differentiated from a **'body' (BOD)**.

During crosschecking, we found that BON, SKE and BOD were inconsistently classified on South Africa's reports, in part because:

- (1) There is no CITES trade term guideline for interpreting the description 'carcass', and
- (2) There were different interpretations of what constitutes a 'set' of lion bones.

There needs to be a moratorium on any additional and new trade opportunities until this system is decisively fixed.

Information is from the paper: **A roaring trade? The legal trade in Panthera leo bones from Africa to East-Southeast Asia**

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A paper published in 2010 on the international trade in CITES-listed live reptiles and amphibians highlighted significant discrepancies between exports and imports in the case of Thailand and Kazakhstan between 1990 and 2007:

- Thailand reports the import of >10,000 individuals (51 species) originating from Kazakhstan, but,
- Kazakhstan reported no exports of these species
- A discrepancy of >10,000 individuals



There needs to be a moratorium on any additional and new trade opportunities until this system is decisively fixed.

Information is from the paper: **The Role of Thailand in the International Trade in CITES-Listed Live Reptiles and Amphibians**

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A 2016 summary of CITES trade data for 47 species of seahorse, all listed as Appendix II, concluded:

“An evident need for greater universal compliance with CITES reporting requirements was identified. **The most glaring problem was a substantial mismatch in species and volumes between export records and import records**, indicating that neither dataset is complete nor reliable.”

There needs to be a moratorium on any additional and new trade opportunities until this system is decisively fixed.

Information is from the paper: **Opportunities and challenges for analysis of wildlife trade using CITES data – seahorses as a case study.**

CITES, No Additional Trade Opportunities Until Your Trading System Is Fixed!

Analysis of trade in Elephantidae specimens between Australia and UK from 2010 to 2016 using the CITES Trade Database:

- The number of Elephantidae 'specimens' exported from the UK to Australia amounted to 2,953 'units'
- In the same timeframe the number of Elephantidae 'specimens' recorded as imported in to Australia from the UK equalled 3 'units'
- **A discrepancy of 2,950 'units'.**

How are we supposed to reconcile and monitor trade with such flawed data? Any permit system that is this useless is counterproductive – it creates the illusion of traceability and control, whilst in reality offering nothing. **There needs to be a moratorium on any additional trade opportunities until this system is decisively fixed.**



Information extracted from For the Love of Wildlife Ltd and Nature Needs More Ltd submissions to the 2018, Australian Parliamentary Joint Committee on Law Enforcement inquiry into the trade in elephant ivory and rhino horn.

CITES, No New Trade Opportunities Until Your Trading System Is Fixed!

Whole countries have been found to be exporting pythons with a CITES source code C [captive bred] when there is no evidence that python farming is currently taking place anywhere in the country. This has enabled large scale laundering of illegal python skins in to the legal marketplace.

There needs to be a moratorium on any additional trade opportunities until this system is decisively fixed.



Information is from the report: **Assessment of Python Breeding Farms Supplying the International High-end Leather Industry**

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When comparing the trade volumes in hippo teeth reported between Hong Kong and Uganda from 1995 through 2013, researchers found:

- Uganda reported exports totalling 79,000 kilograms but,
- Hong Kong reported receiving just 65,000 kilograms
- **More than 14,000 kilograms of hippo teeth were missing, representing more than 2,700 individual hippos—2% of the global population**

There needs to be a moratorium on any additional and new trade opportunities until this system is decisively fixed.

Information is from the paper: **Missing teeth: Discordances in the trade of hippo ivory between Africa and Hong Kong**

Following research on hippo teeth trade between Africa and Hong Kong, Alexandra Andersson commented:

“A quick scan of the records demonstrates that vast and consistent data discrepancies are clear in many cases, and that the true volume of many traded endangered species is simply unknown. This is alarming, considering the reason all of these species are included in Cites is because they are vulnerable to over-exploitation, and extinction.”

CITES, No New Trade Opportunities Until Your Trading System Is Fixed!



A paper published in February 2019 highlights that species identified by the IUCN Red List as being threatened from trade:

- Can wait as long as 19 years for protection under CITES or
- Have already been waiting up to 24 years to be listed after first being named.
- Can take on average about 12 years for species to be protected by CITES once identified as at risk

Therefore, the authors urge policymakers to hasten the wildlife protection process, which at present, can typically take more than two decades.

There needs to be a moratorium on any additional and new trade opportunities until this system is decisively fixed.

Information is from the paper: **Long delays in banning trade in threatened species.**

Report after report highlights the CITES permit and trade management system is not fit for purpose. The evidence also indicates that the problems have become increasingly worse over time. As a result of we have proposed a solution in the form of a reverse-listing approach and a levy of trade to help resource the CITES trade management and monitoring system.

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Information is from:

1. Information on the US\$320 Billion of the legal trade can be found via UK parliament report: <https://publications.parliament.uk/pa/cm201213/cmselect/cmenvaud/140/140.pdf>
2. Information on the estimated scale of the illegal trade can be found via the **2017 World Customs Union Illegal Trade Report**. This report highlights that the estimated profit from the illegal trade in flora and fauna to be between \$91- 258 billion USD per year, and stated, **this is an amount that is, according to the United Nations Environment Programme, growing at 2-3 times the pace of the global economy.**
3. Finally, the information on CITES core funding can be found via the link: <https://www.cites.org/eng/disc/fund.php>

Given the evidence that this trade system is not fit for purpose, we believe that there needs to be:

1. A moratorium on all new trade, e.g. rhino horn; and
2. A moratorium on all increases in quotas, e.g. lion bones

until the system is decisively fixed and resourced. This and how to do this needs to be a part of agenda at CITES CoP 18 and beyond.



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OP-ED

Cites – the trade system that doesn't know that it doesn't know

By Lynn Johnson • 17 January 2019



A picture made available Wednesday 22 September 2004 shows young black rhinoceros staring at the camera in this undated file photo. E...



Lynn Johnson

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Cites, the United Nations organisation which regulates wildlife trade, meets in Sri Lanka in May for its 18th session. First on its agenda should be its chronic inability to conserve the world's natural resources. It's a discussion the organisation has been avoiding for years. Here's why its approach is failing.

The obvious way to protect the natural world is through cautionary, conservation-based principles and conventions. Instead, Cites attempts to do this on the basis of trade.

It hasn't worked for the past 40 years of the organisation's existence, but signatory countries still believe trade is the way and refuse to be persuaded otherwise. Challenging their premise is a waste of time.

Conservation NGOs which should be highlighting Cites' failures aren't doing so. When asked why not, their response is generally "We know the system isn't great, but it is all we have".

When pushed, some admit they don't want to upset the Cites secretariat or the parties as they don't want to be uninvited to the working group meetings in Geneva or to the Conference of Parties, which would rob them of the status of "having a seat at the table". While signatories (governments) have an automatic invitation to Cites meetings and working groups, conservation NGOs are invited by the "grace and favour" of the formal stakeholders.

Conservation NGOs are also concerned that if the Cites trade permit system is seen as flawed by the general public, it would reflect very badly on them for having allowed this to go on for decades.

So if we're stuck with regulating trade as the basis of conservation for the foreseeable future, then at least the governments, agencies and organisations supporting it must demonstrate that the system administering and monitoring this trade is fit for purpose for the species it's created to protect.

This is not happening and may never have happened. People and businesses that want to maintain trade in wildlife consistently use the statement that they comply with all Cites trade permit rules. How do we know?

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Article Link: <https://www.dailymaverick.co.za/article/2019-01-17-cites-the-trade-system-that-doesnt-know-that-it-doesnt-know/?fbclid=IwAR3cmR9GXlp5B3FBuWELS7-bItaMTksQp6QJIn-RyuCW9yNhD3iUpm4TQ>

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES
OF WILD FAUNA AND FLORA

THIRD MEETING OF THE CONFERENCE OF THE PARTIES
New Delhi (India), 25 February to 8 March 1981

General Matters of Principle Relating to the Appendices

REVERSE LISTING CONCEPT FOR APPENDICES

This document was prepared by the Commonwealth of Australia.

At the XVII World Conference of the International Council for Bird Preservation, 13-18 June 1978, the following resolution was adopted:

Recognising that any exploitation of wild birds should be based on sound biological and ecological principles;

Being aware that data for evaluating the exploitation of birds on this basis are frequently lacking; and

Recalling that at the first meeting of the Conference of the Parties to the 1973 Convention on International Trade in Endangered Species (CITES), held in Berne in November 1976, a resolution was passed urging exporting countries gradually to restrict the collection of wild animals for that purpose with the object of eventually limiting the keeping of pets to those species which can be bred in captivity; and

Recognising the increasing practical problems involved in identifying the numerous species listed for varying degrees of control in the appendices to CITES:

RECOMMENDS that governments of any countries which permit trade in birds should allow trade only in listed species which are not threatened by trade and that this principle be adopted by CITES to replace the present appendices to the Convention.

This resolution identifies the problems arising from continuing additions to appendices and recommends that the principle of "reverse or clean" listing be adopted by CITES to replace the present appendices. Such lists would comprise only those species which have been proposed for commercial trade by a Party and for which there is agreement that a sufficient level of knowledge, management and control exists to ensure that the proposed trade will not threaten the species survival. The onus would be on the proponent to provide these data to the Conference of the Parties and a proposal would be dealt with in a manner similar to that presently adopted for appendix listings.

It is envisaged that there would be two or more listings to enable categorisation according to levels of restrictions on trade. Commercial trade would only be permitted in species on these lists.

Australia commends to the Conference of the Parties the principle of "reverse or clean" listing, and proposes that its adoption to replace the present appendices be examined by an expert committee which would report to the next meeting of the Conference of the Parties.

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES
OF WILD FAUNA AND FLORA

THIRD MEETING OF THE CONFERENCE OF THE PARTIES
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General Matters of Principle Relating to the Appendices

Reverse Listing Concept for Appendices

DRAFT RESOLUTION OF THE CONFERENCE OF THE PARTIES*

NOTING the increasing practical problems involved in identifying the numerous species listed for varying degrees of control on the appendices of the Convention;

HEARING at the third meeting of the Conference of the Parties the discussions indicating difficulties in identifying particular subspecies that require management and limitations in trade;

NOTING that listing species to be controlled by name has made problems with taxonomic synonyms, taxa validity, etc., and has created enforcement difficulties;

AWARE that other means of presenting the appendices might solve these problems;

THE CONFERENCE OF THE PARTIES TO THE CONVENTION

RECOMMENDS that a sub-committee of experts be appointed to examine whether other methods of classification may offer better administrative procedures and more effective management of endangered species and subspecies;

RECOMMENDS further that such a committee examine the implications of the general concept of listing on schedules species in which commercial trade is permitted (as compared to the current system, in which trade in listed species is restricted), and examine all ramifications (including legal problems, if any) in implementing any changes they might wish to put before a future meeting of the Conference of the Parties.

* This document was prepared by Australia.

Monkeys exported from Congo to Armenia. Other than saying that the monkeys are 'alive' and specifying the quantity without units (which is common), there is no information.

CITES PERMIS / CERTIFICAT N° 5078