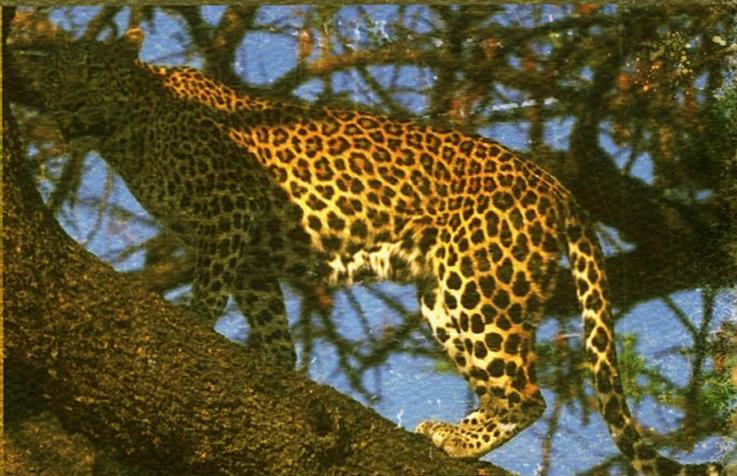




# SUSTAINABLE USE VOTING GUIDE

SAFARI CLUB INTERNATIONAL AND  
SAFARI CLUB INTERNATIONAL FOUNDATION  
POSITION STATEMENTS ON SELECT SPECIES  
PROPOSALS AND WORKING DOCUMENTS

**CITES 18th Meeting of the Conference of the Parties**  
Geneva, Switzerland 17 August - 28 August 2019



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Safari Club International and Safari Club International Foundation  
Position Statements on Select Species Proposals and Working Documents

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**Safari Club International (SCI)** is a non-governmental organization with Chapters in Europe, North and South America, Asia, and Australia. SCI has approximately 50,000 members throughout the world. SCI's missions include the conservation of wildlife, protection of the hunter, and education of the public concerning hunting and its use as a conservation tool.



**Safari Club International Foundation (SCIF)** is a non-profit organization that funds and directs worldwide programs dedicated to wildlife conservation and outdoor education and demonstrates the constructive role that hunting plays in wildlife conservation.

If you have any questions about any of the positions or other CITES-related matters, please contact Jeremy Clare at [jclare@safariclub.org](mailto:jclare@safariclub.org).

## Table of Contents

Prop. 1: Heptner’s or Bukhara markhor – <b>Support</b> .....	5
Prop. 2: Saiga antelope – <b>Qualified Reject</b> .....	6
Prop. 5: Giraffe – <b>Reject</b> .....	7
Prop. 8: Southern white rhino – <b>Support</b> .....	9
Prop. 9: Southern white rhino – <b>Support</b> .....	10
Prop. 10: African elephant – <b>Support</b> .....	11
Prop. 11: African elephant – <b>Support</b> .....	12
Prop. 12: African elephant – <b>Reject</b> .....	13
Prop. 13: Woolly mammoth – <b>Reject</b> .....	14
Prop. 22: American crocodile – <b>Support</b> .....	15
Docs. 4.1, 4.2: Rules of Procedure – <b>Support</b> .....	16
Doc. 10: CITES Strategic Vision Post-2020 – <b>Support</b> .....	16
Doc. 11: Review of the Convention – <b>Support</b> .....	16
Docs. 17.1, 17.2, 17.3: Rural Communities – <b>Support</b> .....	17
Docs. 18.1, 18.2, 18.3: CITES and Livelihoods – <b>Qualified Support</b> .....	18
Doc. 20: Demand Reduction Strategies to Combat Illegal Trade – <b>Support</b> .....	19
Doc. 31: Domestic Markets for Illegally Traded Specimens – <b>Neutral</b> .....	20
Doc. 35: Disposal of Confiscated Specimens – <b>Support</b> .....	20
Doc. 40: Due Diligence and Obligations of Importing Countries – <b>Neutral</b> .....	21
Docs. 44.1, 44.2: Definition of the term ‘Appropriate and Acceptable Destinations’ – <b>Part Support/Part Reject</b> .....	21
Doc. 45: Non-Detriment Findings – <b>Support</b> .....	22
Doc. 46: Quotas for Leopard Hunting Trophies – <b>Qualified Support</b> .....	22
Doc. 47: Enhancement of Quotas for Markhor Hunting Trophies – <b>Support</b> .....	23
Doc. 48: Black Rhino Hunting Trophies – <b>Support</b> .....	24
Doc. 49.1: Transfer of a Species to Appendix I – <b>Qualified Support</b> .....	24
Doc. 53: Purpose Codes – <b>Part Support/Part Reject</b> .....	25
Doc. 57: Captive-bred and Ranched Specimens – <b>Support</b> .....	25
Doc. 60: Illegal Trade in Cheetahs – <b>Support</b> .....	25
Doc. 69.2: Elephants–MIKE Report – <b>Note</b> .....	26
Doc. 69.4: Elephants–Ivory Stockpiles – <b>Reject</b> .....	26
Doc. 69.5: Elephants–Closure of Domestic Ivory Markets – <b>Reject</b> .....	27
Doc. 76.1: African Lion–Report of the Secretariat – <b>Qualified Support</b> .....	28
Doc. 76.2: African Lion–Conservation of and Trade in African Lions – <b>Reject</b> .....	29
Doc. 83.1: Rhino–Report of the SC and Secretariat – <b>Support</b> .....	30
Doc. 83.2: Rhino–Revisions to Res. Conf. 9.14 – <b>Reject</b> .....	31
Doc. 86: Saiga Antelope – <b>Support</b> .....	31
Doc. 92: Appendix-I Listed Species – <b>Support</b> .....	32
Doc. 96: African Carnivores Initiative – <b>Support</b> .....	32
Doc. 99: Standard Nomenclature – <b>Qualified Support</b> .....	33
Doc. 104: Review of Res. Conf. 10.9 – <b>Support</b> .....	33

## Introduction

CITES Parties need to renew their commitment to the Convention's core conservation and scientific principles. CITES aims at regulating international trade in specimens of wild animals and plants at sustainable levels to ensure that this trade does not threaten their survival. CITES is not a vehicle to pursue other ideological interests outside of its scope nor to prohibit trade in species in such pursuit. All the positions recommended below have been made with these conservation and scientific principles in mind.

CITES recognizes that peoples and States are and should be the best protectors of their own wild fauna and flora. Such people include rural communities living with wildlife and with cultural and economic interests in wildlife. These people have a particularly direct and interdependent relationship with wildlife and wildlife habitats that is unmatched in society. CITES decision-making should better incorporate the input and role of rural communities in the decisions made about wildlife trade.

At CITES CoP17 in Johannesburg, the Parties unanimously agreed that "well-managed and sustainable trophy hunting is consistent with and contributes to species conservation, as it provides both livelihood opportunities for rural communities and incentives for habitat conservation, and generates benefits which can be invested for conservation purposes." The Parties consequently recommended that countries "consider the contribution of hunting to species conservation and socio-economic benefits, and its role in providing incentives for people to conserve wildlife, when considering stricter domestic measures and making decisions relating to the import of hunting trophies." The Parties should do more than simply agree on these points. They should incorporate these analyses in their decision-making.

The following analyses and positions do not aim to be exhaustive, but rather highlight relevant information on which the CITES Parties can base their decisions with a focus on topics in the domain of international hunting and wildlife management.

## Species Proposals

**Prop. 1: Heptner's or Bukhara markhor (*Capra falconeri heptneri*)** – Transfer the population of Tajikistan from Appendix I to Appendix II.

**Summary:** Tajikistan proposes to transfer its population of markhor from Appendix I to Appendix II.

**Recommendation: SUPPORT.** Pursuant to Res. Conf. 9.24, Tajikistan's markhor no longer meet the criteria for an Appendix I listing. Tajikistan's growing markhor population substantially contributed to the positive global trend reflected in the 2015 IUCN Red List status change from "Endangered" to "Near Threatened" for all markhor. Population surveys conducted regularly since 2012 show that Tajikistan's markhor population has increased each year, with the most recent 2017 IUCN survey confirming continued growth. In some areas, markhor are approaching their ecological carrying capacity based on current habitat conditions and no major population declines have been recorded since the early 2000s. Regulated hunting has played a key role in improving the species' conservation status. Hunting programs for this subspecies in Tajikistan have been highly beneficial to active conservation and supportive of local communities. Additionally, no demand for international trade is known outside of the limited number of hunting trophies traded annually. Annual offtake since 2014 has been  $\leq 12$  individuals (all males  $\geq 8$  years old), or  $< 1\%$  of the known minimum population.

Transferring Tajikistan's markhor from Appendix I to Appendix II should not have any direct negative impact on management of markhor in Tajikistan. SCI and SCIF recognize the success of Tajikistan's community-based sustainable use model, recommend that these programs continue as currently implemented, possibly with the establishment of new hunting quotas, and fully support the local communities. SCI and SCIF are committed to assisting the government of Tajikistan, its local communities, other stakeholders and range states in continuing to implement highly successful community-based markhor hunting programs.

### **References:**

Broghammer, T., Herche, C., and Lovari, S. Survey of populations of Heptner's markhor *Capra falconeri heptneri* in Tajikistan: 13th February – 6th March 2017 IUCN SSC/CSG 2017 - IUCN Species Survival Commission Caprinae Specialist Group.



**Prop. 2: Saiga antelope (*Saiga tatarica*)** – Transfer from Appendix II to Appendix I.

**Summary:** Mongolia and the United States propose to transfer Saiga antelope from Appendix II to Appendix I. The Secretariat and IUCN note issues with the nomenclature used in the proposal, although the intent appears to be to transfer all saiga populations to Appendix I.

**Recommendation: QUALIFIED REJECT.** The Parties should reject the proposal as currently worded and instead adopt the draft Decisions in Doc. 86. The Secretariat comments that the Appendix II listing adequately protects saiga antelope from trade impacts and the conservation benefits of an Appendix I listing are unclear. The populations of saiga that are primarily in Kazakhstan and Russia—*Saiga tatarica* according to CITES nomenclature—are not small nor do they have a restricted area of distribution. According to the IUCN, current levels of illegal and legal harvest are not a significant threat to *S. tatarica* populations. The major threats to saiga are massive die-offs from disease, habitat alteration, encroaching agriculture and competition with livestock grazing. The species' conservation status is improving with populations in Kazakhstan exhibiting a strong recovery since the 2015 mass die-off. Biological criteria for an Appendix I listing may be met for the population in Mongolia—*S. borealis* in CITES nomenclature. The Parties should reject the current proposal, pending resolution of the recognized nomenclature issues; however, *S. borealis* in Mongolia may qualify for an Appendix I listing. If the proposal is accordingly amended, and has range states support, Parties should consider transferring *S. borealis* to Appendix I while recognizing possible enforcement issues due to a split-listing. No legal hunting of saiga antelope has occurred since 2015; however, SCI and SCIF would support any future efforts to establish a limited, sustainable hunting program for saiga that would achieve conservation benefits for the species.



**Prop. 5: Giraffe (*Giraffa camelopardalis*)** – Include in Appendix II.

**Summary:** CAR, Chad, Kenya, Mali, Niger and Senegal propose to include giraffe in Appendix II. Proponents claim that trade has an additive effect to observed population declines when combined with major threats such as habitat loss, civil unrest and poaching for bushmeat. An Appendix II listing would not prohibit trade but would put in place monitoring and control measures.

**Recommendation: REJECT.** Globally, giraffes do not meet either criterion found in Res. Conf. 9.24, Appendix 2a for inclusion in Appendix II. According to the IUCN assessment on *Giraffa camelopardalis*, legal offtake and international trade are not among the primary threats to giraffe populations. Legal hunting of giraffes primarily takes place in Namibia, South Africa and Zimbabwe. More than 98% of giraffe trophy imports into the United States, which is the largest importer of wildlife worldwide and which keeps accurate records of giraffe imports, come from these three countries. According to the 2016 IUCN Status Report on giraffes, two giraffe subspecies inhabit Namibia, South Africa and Zimbabwe. The Angolan giraffe (*G. c. angolensis*) has increased from approximately 15,000 to over 30,000 individuals since the 1970s and 1980s, while the South African subspecies (*G.c. giraffa*) has increased from 8,000 to over 21,000 individuals in the same time frame. Recent dramatic declines have occurred in subspecies that inhabit east Africa (Kenya, Ethiopia, and Somalia) where legal hunting is not permitted. The Nubian subspecies (*G. c. camelopardalis*) has declined from over 20,000 around 1980 to less than 1,000 in 2015; Masai giraffe (*G. c. tippelskirchi*) declined from over 65,000 to 30,000; and the reticulated subspecies (*G. c. reticulata*) has declined from approximately 40,000 in 1990 to 8,600 in 2016. Giraffe populations in central and west Africa are generally small (<2,500 individuals combined).

The proposal states that “Giraffes are in decline due to habitat loss and conversion, legal and illegal offtake, and use in trade” but the data do not support the claims addressing legal offtake and trade. The IUCN status report lists major threats to giraffes as habitat loss, civil conflict, poaching, and ecological changes; it does not mention legal offtake or trade as threats. The report also notes that giraffe populations are increasing in those countries where hunting of giraffes is legal. Between 2006 and 2015, approximately 300 giraffes per year were imported into the United States, representing <0.4% of the global population at the time.

The proposal also references trade information in giraffe parts available online but does not include meaningful information about the impacts of trade in giraffes and their parts on giraffe populations. The data were not verified to ensure quality (if they are true giraffe parts), uniqueness (objects could be counted multiple times by different surveyors), or derivation (they could originate from antique specimens or captive individuals). All available data suggest that legal trade does not have an impact on giraffe populations; in fact, capacity building and habitat conservation related to legal hunting (e.g., anti-poaching efforts) likely contributed to population growth in range states with stable or increasing populations. Although some range states are proponents of the proposal, range states that have giraffe hunting programs and resulting increasing or stable giraffe populations strongly oppose the proposal.

## References:

- Deacon, F. and Tutchings, A. (2019). The South African giraffe *Giraffa Camelopardalis giraffa*: a conservation success story. *Oryx* 53(1), 45-48.
- Kiffner, C., Rheault, H., Miller, E., Scheetz, T., Enriquez, V., Swafford, R., Kioko, J. and Prins, H.H.T. (2017). Long-term population dynamics in a multi-species assemblage of large herbivores in east Africa. *Ecosphere* 8(12), e02027.
- Muller, Z., Bercovitch, F., Brand, R., Brown, D., Brown, M., Bolger, D., Carter, K., Deacon, F., Doherty, J.B., Fennessy, J., Fennessy, S., Hussein, A. A., Lee, D., Marais, A., Strauss, M., Tutchings, A. & Wube, T. (2016). *Giraffa camelopardalis*. *The IUCN Red List of Threatened Species 2016*: e.T9194A109326950. <http://dx.doi.org/10.2305/IUCN.UK.2016-3.RLTS.T9194A136266699.en>.



**Prop. 8: Southern white rhino (*Ceratotherium simum simum*)** – Remove the existing annotation for the population of Eswatini (formerly Swaziland).

**Summary:** Eswatini proposes to remove the current annotation applicable to its population of southern white rhino, which is listed on Appendix II. Removing the annotation will allow Eswatini to realize the full Appendix II status and permit regulated commercial trade in white rhino horn. Eswatini plans to sell its existing stockpile of horns with proceeds directed to a conservation endowment fund for security of rhino park areas and other anti-poaching needs.

**Recommendation: SUPPORT.** The proposal correctly argues that the CITES moratorium in rhino horn trade has made it more difficult for Eswatini to conserve the species without the full benefit of its sustainable use. Eswatini requests sovereignty in managing its white rhino population and horn stockpile. Rhino horn sales will be used to improve remuneration, equipment and conditions for anti-poaching rangers and also benefit community development in the areas surrounding rhino parks. Eswatini's stockpiles have been legally collected from natural deaths or management actions. Sales will be conducted by Big Game Parks, the CITES Management Authority of Eswatini, and will be made directly to licensed retailers. All rhino horn will be documented, certificated, recorded in a DNA database and entered into national and CITES registries to eliminate chances of illegal trade. Removal of the annotation will benefit rather than hinder rhino conservation.



**Prop. 9: Southern white rhino (*Ceratotherium simum simum*)** – Transfer of the population of Namibia from Appendix I to Appendix II with specific annotation.

**Summary:** Namibia proposes to transfer its population of southern white rhinos from Appendix I to Appendix II for the exclusive purpose of international trade in live animals and hunting trophies. The proposal includes a precautionary measure by limiting the scope of trade to these activities, which are valuable management tools for raising revenue for conservation and have beneficial impacts on population growth.

**Recommendation: SUPPORT.** Namibia's white rhino population does not meet Appendix I criteria (is not small, declining or fragmented). Namibia's population has grown from 16 animals in 1975 to 1,037 individuals currently, the world's second largest behind South Africa, with an annual growth rate of 6.7%. From 2008 to 2018, 57 white rhinos were hunted, around 0.5% of the population. Namibia is successfully monitoring its white rhino population and has demonstrated commitment, achievement and ability in conservation. The split-listing of white rhino has had an adverse effect on Appendix I populations and limited Namibia's ability to generate revenue for conservation. Namibia's population of white rhinos should have the same status as South Africa's white rhinos.

**References:**

MET (2018) White Rhinoceros Management Strategy. Ministry of Environment and Tourism, Republic of Namibia, 2018.



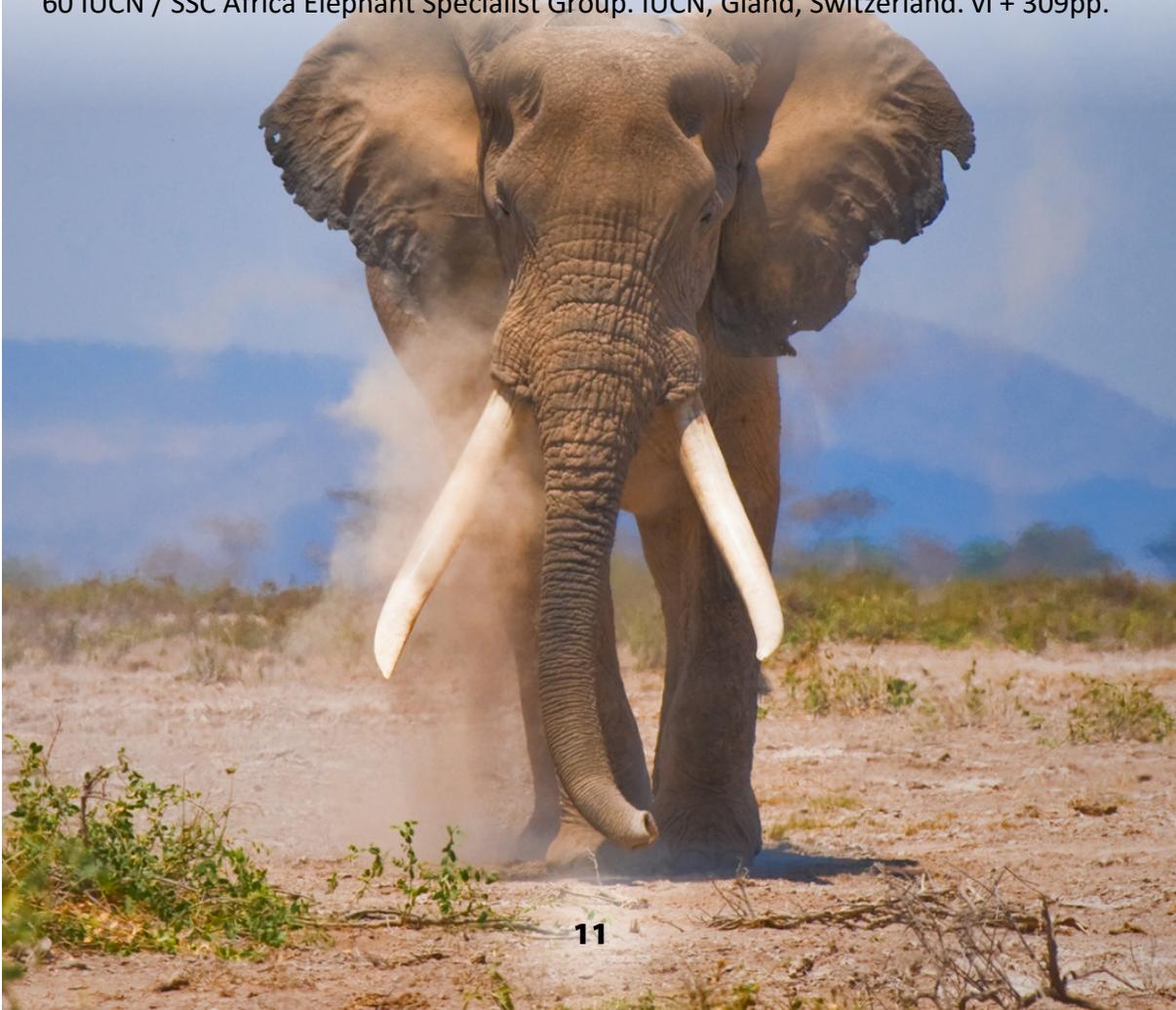
**Prop. 10: African elephant (*Loxodonta africana*)** – Transfer the population of Zambia from Appendix I to Appendix II.

**Summary:** Zambia proposes that its elephant population be transferred from Appendix I to Appendix II with trade restricted to pre-approved commercial ivory, hunting trophies for non-commercial purposes, and hides and leather goods. All other elephant specimens would be treated as Appendix I specimens.

**Recommendation: SUPPORT.** Zambia's population no longer meets the criteria for an Appendix I listing. The population is large and stable (>20,000 elephants). The transfer to Appendix II and accompanying annotation will satisfy the precautionary approach found in Res. Conf. 9.24, Annex 4. Other southern African countries with elephant populations on Appendix II have proven that sustainable use conservation is beneficial for the species. Trade in elephants is essential for economic incentive mechanisms, conservation and local community needs for co-existing with elephants. Zambia already has a successful Community-Based Natural Resources Management system, and transfer of its elephant population to Appendix II will strengthen that system.

**References:**

Thouless, C.R., H.T. Dublin, J.J. Blanc, D.P. Skinner, T.E. Daniel, R.D. Taylor, F. Maisels, H. L. Frederick and P. Bouché (2016). African Elephant Status Report 2016: an update from the African Elephant Database. Occasional Paper Series of the IUCN Species Survival Commission, No. 60 IUCN / SSC Africa Elephant Specialist Group. IUCN, Gland, Switzerland. vi + 309pp.



**Prop. 11: African elephant (*Loxodonta africana*)** – Amend annotation 2 pertaining to the elephant populations of Botswana, Namibia, South Africa and Zimbabwe.

**Summary:** Botswana, Namibia, South Africa, and Zimbabwe propose to amend the current annotation pertaining to African elephant to allow for regulated, pre-approved commercial sale of ivory.

**Recommendation:** **SUPPORT.** The Appendix II annotation should be amended as proposed. The annotation as currently written is no longer relevant or appropriate. Elephant populations in southern Africa, and specifically the four proponent countries, are secure (approximately 256,000 or 61.6% of all elephants in Africa) and, in many areas, expanding. Resources and incentives are urgently needed to support community conservation programs and mitigate human-wildlife conflict. CITES has not recognized the achievements of countries with large elephant populations and has repeatedly discounted the importance of southern Africa's conservation needs, while undermining community programs. Ivory sales should be a critical source of revenue for elephant conservation and proceeds of allowed trade will be used exclusively for elephant conservation and community development programs, as limited by the annotation.

**References:**

Thouless, C.R., H.T. Dublin, J.J. Blanc, D.P. Skinner, T.E. Daniel, R.D. Taylor, F. Maisels, H. L. Frederick and P. Bouché (2016). African Elephant Status Report 2016: an update from the African Elephant Database. Occasional Paper Series of the IUCN Species Survival Commission, No. 60 IUCN / SSC Africa Elephant Specialist Group. IUCN, Gland, Switzerland. vi + 309pp



**Prop. 12: African elephant (*Loxodonta africana*)** – Transfer the populations of Botswana, Namibia, South Africa and Zimbabwe from Appendix II to Appendix I.

**Summary:** Burkina Faso, Côte d'Ivoire, Gabon, Kenya, Liberia, Niger, Nigeria, Sudan, Syrian Arab Republic, and Togo propose to transfer the four populations of Appendix II-listed elephants to Appendix I. The proposal is allegedly justified on the basis of marked population declines, avoiding split-listings and the precautionary principle for impact of trade.

**Recommendation:** **REJECT.** The elephant populations in countries in southern Africa, including the four with Appendix II populations, are either increasing or stable. In contrast, many populations in other parts of Africa (listed under Appendix I) are either very small in size or are experiencing significant declines. Furthermore, elephant populations in portions of the Appendix II countries are close to ecological carrying capacity and limits for social tolerance. High density elephant populations can cause significant changes to vegetation cover, with negative consequences to some wildlife species and overall biodiversity. Furthermore, human-elephant conflicts are increasing in frequency and severity in the Appendix II countries. Thus, shifting elephant populations in these countries to Appendix I makes little biological sense and will undermine local community support for elephant conservation. As detailed in the proposal, the range states at issue were consulted about the proposal; they all oppose the transfer for multiple reasons.

A similar proposal has been debated and repeatedly rejected at previous CoPs. The Parties should likewise quickly reject it at CoP18 and move on to other more important and serious proposals.

**References:**

- Guldmond, R., van Aarde, R. (2008). A meta-analysis of the impact of African elephants on savanna vegetation. *Journal of Wildlife Management* 72, 892–899.
- Pozo, R.A., Coulson, T., McCulloch, G., Stronza, A.L., and Songhurst, A.C. (2017) Determining baselines for human-elephant conflict: A matter of time. *PLoS One* 12(6), e178840.
- Thouless, C.R., H.T. Dublin, J.J. Blanc, D.P. Skinner, T.E. Daniel, R.D. Taylor, F. Maisels, H. L. Frederick and P. Bouché (2016). African Elephant Status Report 2016: an update from the African Elephant Database. Occasional Paper Series of the IUCN Species Survival Commission, No. 60 IUCN / SSC Africa Elephant Specialist Group. IUCN, Gland, Switzerland. vi + 309pp.
- Valeix, M., Fritz, H., Sabatier, R., Murindagomo, F., Cumming, D. and Duncan, P. (2011). Elephant-induced structural changes in the vegetation and habitat selection by large herbivores in an African savanna. *Biological Conservation* 144, 902-912.

**Prop. 13: Woolly mammoth (*Mammuthus primigenius*)** – Include in Appendix II.

**Summary:** Israel proposes to list Woolly mammoth, an extinct species, on Appendix II. The proponent alleges that an Appendix II listing is warranted via the “look-alike provision” and to prevent illegal trade in elephant ivory. Under an Appendix II listing, the exporting country would have to ensure ivory is correctly marked as mammoth or elephant.

**Recommendation:** **REJECT.** According to Res. Conf. 9.24, Annex 3, “[e]xtinct species should not normally be proposed for inclusion in the Appendices.” At CoP17, the CITES Secretariat submitted comments that question the legality of the proposal and whether regulation of extinct species is within the legal scope of the Convention. Although somewhat similar in appearance, mammoth ivory is usually easily distinguishable from elephant ivory. The proposal should be rejected as it is outside the scope of the Convention and otherwise unnecessary for the regulation of trade in elephant ivory.

**References:**

U.S. Fish & Wildlife Service, Forensics Laboratory. (2010). [https://www.fws.gov/lab/ivory\\_natural.php#elephant](https://www.fws.gov/lab/ivory_natural.php#elephant).

Espinoza, E.O. and Mann, M-J. (1991) *reprinted* (1999). Identification Guide for Ivory and Ivory Substitutes. World Wildlife Fund and The Conservation Fund. <https://www.cites.org/sites/default/files/eng/resources/pub/E-Ivory-guide.pdf>.

Schindler, B. (2019). Distinguishing Mammoth from Elephant Ivory. IWMC World Conservation Trust. <https://www.iwmc.org/cites-cop/cites/cites-cop18/supplementary-files/312-distinguishing-mammoth-from-elephant-ivory/file.html>.



**Prop. 22: American crocodile (*Crocodylus acutus*)** – Transfer the population of Mexico from Appendix I to Appendix II.

**Summary:** Mexico proposes to transfer to Appendix II its population of American crocodile as the species does not meet the biological criteria for Appendix I. The proposal states that the objective of the transfer is to allow ranching of wild crocodile eggs for subsequent captive breeding, the trade from which will benefit local communities and habitat conservation. No hunting or trade of specimens other than skins produced on farms will be authorized.

**Recommendation: SUPPORT.** The transfer to Appendix II will allow for increased conservation efforts and benefits to local communities through sustainable economic activities. Recent data indicate that the species' range in Mexico is not restricted and the population is not small and appears to be increasing. The Secretariat and IUCN agree that the proposed transfer still provides adequate safeguards for the species and that trade of skins could benefit conservation and local communities.



## Working Documents

### Docs. 4.1, 4.2: Rules of Procedure

**Summary:** In Doc. 4.1, the Secretariat provides the Rules of Procedure (ROPs) adopted by the Parties at CoP17. Unless amended, these rules will remain valid for each Conference of the Parties. In Doc. 4.2, the SC reports that the intersessional working group tasked with reviewing multiple rules in dispute for possible amendment was unable to agree on any proposed revisions. The SC recommends adoption of a proposed Decision that would allow continued review of Rule 25 of the ROPs, which addresses the order in which the Committees consider similar or competing proposals.

**Recommendation: SUPPORT.** The Parties should continue to use the ROPs as adopted at CoP17 and found in the Annex of Doc. 4.1. The Parties should adopt the proposed Decision in Doc. 4.2 and allow the SC to continue to review Rule 25. The ROPs have been a contentious issue for several CoP cycles. No consensus exists on several issues, and those issues likely cannot be resolved in Plenary or full Committee. Should any Party wish to engage in further debate about any of the unresolved issues, the Party should propose an amendment to the proposed Decision in Doc. 4.2 to include additional consideration of the relevant rule. Wasting valuable time discussing these issues in Plenary or Committee is not recommended.

### Doc. 10: CITES Strategic Vision Post-2020

**Summary:** The SC invites CoP18 to adopt the proposed CITES Strategic Vision: 2021-2030. Parties are also invited to adopt four Decisions that will help implement the Strategic Vision.

**Recommendation: SUPPORT.** The Parties should support and work to achieve the Goals and Objectives provided in the proposed Strategic Vision.

### Doc. 11: Review of the Convention

**Summary:** The Democratic Republic of the Congo, Namibia, South Africa, and Zimbabwe propose several recommendations that will improve implementation of the Convention:

Undertake a comprehensive review of the Convention to improve how it is equitably enforced, specifically with regards to the role and rights of rural communities;

Study the inherent contradictions between CITES and the GATT 1994 with the aim of harmonizing the underlying principles of international trade and conservation and the obligations of the Parties to the two agreements; and

Conduct an urgent and priority review of the Appendices to ensure that species and their geographically separate populations are included in the appropriate Appendices. (Note support for similar proposal in CoP18 Doc. 92.)

**Recommendation: SUPPORT.** The three different items proposed are essentially recommendations, slightly modified with the benefit of hindsight, that were initially the result of a study presented to CoP10 and adopted by the Parties as priority items. Despite their adoption, the recommendations were never completed. Doc. 11 provides sufficient and compelling justification for the recommendations. The Parties also should take particular note of the points made in paragraphs 12 through 17.

### **Docs. 17.1, 17.2, 17.3: Rural Communities**

**Summary:** CoP17 instructed the SC to establish an intersessional working group to consider how to effectively engage rural communities in the CITES processes. Sufficient progress on this issue could not be made, mainly due to differing views on the means and methods of engaging rural communities. In CoP18 Doc. 17.1, Parties are invited to consider whether to extend the mandate of the working group and report to CoP19. The Secretariat also suggests amendments to Resolution Conf. 16.6 as a way to address issues related to the participation of rural communities in CITES decision-making. The amendments would encourage Parties to take into account the impact of future proposed actions on rural communities and encourage inclusion of rural communities' representatives in national delegations to CoP meetings.

In the meantime, Namibia and Zimbabwe have proposed a concrete way forward in Doc. 17.2, which contains the following proposals:

Resolution Conf. 4.6 (Rev.CoP17) on submission of draft resolutions and other documents for meetings of the Conference of the Parties, be amended to the effect that the CoP agrees that Parties, when submitting proposals to amend the Appendices, draft resolutions, draft decisions, and other documents for consideration at meetings of the Conference of Parties and when reviewing such documents submitted by other Parties, in each case, take account of the impact of the measure proposed on rural communities that may be affected by them.

Resolution Conf. 9.24 (Rev. CoP17) on criteria for amendment of Appendices I and II, be amended so that proposals to amend the appendices should:

- provide information on any involvement of rural communities within the range of the species, in the use of, trade in and management of, the species; and
- provide details of any consultation undertaken to secure comments on the proposal from rural communities living within the range of the species or how the potential impacts of the proposal on rural communities were considered.

In addition to the two mechanisms for engaging Rural Communities, as set out in Doc. 17.2, Botswana, Congo, Namibia and Zimbabwe submitted another proposal in Doc. 17.3 for the direct involvement of rural communities in the CITES decision-making processes through a permanent CITES Rural Communities Committee being composed of Parties and Rural Communities Organizations. The latter need to qualify to participate based on a set list of criteria. The main objectives of the Committee would be to operationalize principles pertaining to wildlife trade and rural communities, livelihoods and sustainable use that are fundamental to CITES and the Convention on Biological Diversity and that are already recognized by the Parties (such as in the Convention Preamble, Resolution Conf. 8.3 (Rev. CoP13) on recognition of the benefits of trade in wildlife, and Resolution Conf. 16.6 (Rev. CoP17) on CITES and livelihoods).

**Recommendation: SUPPORT.** The proposed amendments to Resolution Conf. 4.6 (Rev. CoP17) and Annex 6 of Resolution Conf. 9.24 (Rev. CoP17) respectively, as set out in Annexes 1 and 2 to CoP18 Doc. 17.2, submitted by Namibia and Zimbabwe, should be adopted. The Secretariat, in its comments to CoP18 Doc. 18.3, recommends that the proposed amendments in Doc. 17.2 be adopted instead of those recommended in Doc. 18.3, as they would largely address similar

issues. The proposed Decisions in CoP18 Doc. 17.3, submitted by Botswana, Congo, Namibia and Zimbabwe also should be adopted. It also is important to continue the work on how to engage rural communities in CITES processes and report to the CoP19. Parties should support the Secretariat's way forward, as suggested in Doc. 17.1, as one step to address these issues; however, the mandate of the intersessional Working Group on Rural Communities should be extended. The importance of establishing and safeguarding incentive systems to achieve the coexistence of people and wildlife is generally not sufficiently appreciated within CITES. The rights of rural people over natural resources and their rights to be part of all decision-making concerning those resources are not respected. Compared to other multilateral environmental agreements, such as the Convention on Biological Diversity or the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services, rural communities' influence on policy shaping or decision-making in the CITES arena, both on the national or international level, has been extremely poor or not existent. Hence there is a need to remedy this situation.

## **Docs. 18.1, 18.2, 18.3: CITES and Livelihoods**

**Summary:** Decisions at CoP17 called for Parties and others to continue to study CITES and livelihoods issues. Important lessons learned from the two workshops, in South Africa in November 2016 and China in November 2018, are presented in the Secretariat's report (Doc. 18.1). An important conclusion is that the engagement of rural communities in the various parts of the value chain of legal trade in CITES-listed species, including harvesting and trade, may offer economic opportunities incentivizing conservation, which helps create a positive view of rural communities towards wildlife, thereby reducing the chances of their engagement in the poaching of and trafficking in wildlife. Further, attendees of the workshops agreed that CITES must do more to educate the public regarding the benefits to rural communities, livelihoods, and species conservation that result from trade. Because several Documents submitted for consideration by CoP18 touch upon similar topics related to rural communities and livelihoods, the Secretariat attempts to bring its recommendations together under one set of proposed Decisions in Doc. 18.1.

In Doc. 18.2, Peru proposes that the SC should evaluate the possibility of using a marking system for certification of products produced by rural communities. Peru also proposes adoption of a draft Resolution that would create an International Day for Livelihoods and Rural Communities.

In Doc. 18.3, China proposes to add critical livelihoods analyses in supporting statements for listing proposals (Res. Conf. 9.24, Annex 6), which would include specification of potential beneficial and detrimental impacts of the proposed action on livelihoods along with an overall analysis and remedy measures.

**Recommendation: QUALIFIED SUPPORT.** Parties are strongly encouraged to support the relevant draft Decisions that would promote continued incorporation of livelihoods issues into CITES, highlight success stories, strengthen the exchange of experiences among countries and across regions, and develop guidelines on sustainable use of wildlife and engagement of rural communities. Trophy hunting should be highlighted as a successful model for conservation and sustainable use of CITES-listed species, as it has proven to constitute an extremely powerful management strategy, contributing to the improvement of livelihoods of indigenous and local

communities. Positive messages showing the benefits of trade in wildlife are currently insufficient, particularly in the media. It is widely recognized that habitat loss is the most significant threat to wildlife in the long term and wildlife trade can contribute to the conservation of habitat. This is recognized by Resolutions Conf. 8.3 (Rev. CoP13) and Conf. 17.9 on Trade in hunting trophies of species listed in Appendix I or II but deserves wider recognition. These discussions, among others, could continue in a re-established working group on CITES and livelihoods.

Parties should support the establishment of an “International Day for Livelihoods of Rural Communities” (as proposed in Doc. 18.2), or in the alternative, incorporate the topic into relevant existing international days that celebrate wildlife. Regarding the proposed Decisions for analysis of a marking and registration system of wildlife products, more information is needed. Such a system should not preclude trade in products without a certification mark and should not result in restrictive practices imposed on rural communities or Parties that trade in such products.

The proposal in Doc. 18.3 should be considered jointly with Doc. 17.2. Parties should support either proposal, as they both offer solutions to the current deficit of considering the impact on rural communities and livelihoods of proposed listings. Despite clear recognition in CITES and the international conservation community of the potential benefits of legal and sustainable trade to both the conservation of the species and the livelihoods of rural communities that live alongside wildlife, there is still very little evidence of livelihood being considered in CITES decision-making.

## **Doc. 20: Demand Reduction Strategies to Combat Illegal Trade in CITES-Listed Species**

**Summary:** CoP17 adopted a number of Decisions aimed at encouraging and supporting the development and implementation by Parties of demand-reduction strategies. Based on reports by Parties and the recommendation of the Secretariat, the SC agreed that guidance on demand-reduction strategies, as envisaged in Decision 17.47, is necessary and invite the Parties to adopt a Decision directing the Secretariat to develop such guidance. Importantly, the SC agreed that in line with Resolution Conf. 17.4 on demand-reduction strategies to combat illegal trade in CITES-listed species, Parties should make a clear distinction between legal and illegal wildlife products when undertaking demand reduction initiatives.

**Recommendation:** **SUPPORT.** Parties should adopt the proposed Decisions, with the amendments suggested by the Secretariat, and continue efforts to reduce demand for illegal wildlife products and combat illegal wildlife trade, while at the same time making a clear distinction between legal and illegal wildlife products when undertaking demand reduction initiatives. Legal trade is essential for effective conservation strategies and livelihoods, and demand reduction strategies should not lead to counterproductive results for sustainable use.

## Doc 31: Domestic Markets for Frequently Illegally Traded Specimens

**Summary:** CoP17 directed the Secretariat to contract independent consultant(s) to undertake a study of the domestic controls in consumer markets for specimens of CITES-listed species for which international trade is predominantly illegal as a basis for recommendations by SC70 to CoP18 to strengthen domestic controls addressing illegal trade in such specimens. Due to limited funding, the Secretariat decided to undertake the study in two phases. The first phase focuses on domestic trade controls in consumer markets for elephant ivory. For the second phase, the consultant was requested to propose a methodology for the selection of other CITES-listed species for which international trade is predominantly illegal and selection of concerned consumer markets as well as to suggest a scope of the second phase of the study. The main findings of the first phase of the study, as well as the scoping of the second phase, were made available in SC70 Inf. 18.

The Parties are invited to adopt an amendment to Resolution Conf. 10.10 (Rev. CoP17) on Trade in elephant specimens, urging Parties that close their domestic markets to enhance their border controls and collaboration with neighboring countries that have not taken similar measures; and urging such neighboring countries to closely review trends to ensure that measures are taken to immediately and effectively address illegal trade in ivory.

The Parties also are invited to direct the Secretariat to proceed with the second phase of the study and report back with recommendations to SC73, which in turn is tasked to provide recommendations to CoP19.

**Recommendation:** **NEUTRAL.** As stated in comments by the Secretariat, the scope of the proposed revised Decisions is very general, and not very well aligned with the provisions of the Convention. If adopted, the size and scope of any study should remain manageable in order to deliver useful results for the CoP. Additionally, although beyond the scope of CoP18 Doc. 31, the idea that closing legal, domestic markets for wildlife specimens prevents illegal trade of such specimens in any demonstrable amount is highly questionable and unsupported by evidence.

## Doc. 35: Disposal of Confiscated Specimens

**Summary:** The SC provides details regarding a number of issues that an intersessional working group attempted to address related to disposal of live confiscated specimens. The SC invites the Parties to agree that the relevant Decisions adopted at CoP17 have been implemented and consider adopting new proposed Decisions that would instruct the Secretariat to collect and make available to the Parties information on existing networks and resources regarding the management of confiscated live animals.

**Recommendation:** **SUPPORT.** Although the working group could not reach consensus on most of the issues, the work has concluded, and the existing Decisions from CoP17 should be deleted without need for resumption of the working group. Information on existing networks and resources for disposal of confiscated live specimens should be useful to the Parties, so adoption of the proposed Decisions is appropriate.

#### **Doc. 40: Due Diligence by CITES Parties and Obligations of Importing Countries**

**Summary:** The Parties are invited to adopt revisions to Resolution Conf. 11.3 related to importing Parties' obligation to verify CITES documents that accompany CITES-listed specimens. The United States of America proposes rearrangement of certain provisions and amendments to the Resolution to ensure that importing Parties exercise "due diligence" when verifying CITES documents from exporting countries.

**Recommendation:** **NEUTRAL.** If the Parties adopt the proposed amendments to the Resolution, importing countries are encouraged not to implement processes for verifying the validity of CITES documents that are burdensome on exporting parties and importers. Any such processes implemented by importing countries should not delay trade, and Parties should consider allocating resources to cover the costs of any new approval processes.

#### **Docs. 44.1, 44.2: Definition of the term 'appropriate and acceptable destinations'**

**Summary:** Resolution Conf. 11.20 on Definition of the term 'appropriate and acceptable destinations' and Article III of the Convention contain a requirement that the proposed recipient of a living specimen "is suitably equipped to house and care for it." In CoP18 Doc. 44.1, The SC invites CoP18 to adopt new non-binding guidance for determining this criterion, developed by the AC. The Secretariat has made minor edits to the proposed guidance. The SC also invites CoP18 to adopt Decisions aimed at facilitating the exchange of information and examples of Parties' appropriate and acceptable destination findings and suitably equipped to house and care for living specimens' findings, and other relevant information. Moreover, the SC invites CoP18 to consider continued work on species-specific guidance documents for living specimens of African elephants and southern white rhinoceros as well as non-binding best practice guidance on how to determine whether trade would promote in situ conservation.

In CoP18 Doc. 44.2, Burkina Faso, et al. propose a revision to the text in Resolution Conf. 11.20, clarifying the definition for African elephants to mean in situ conservation programs within their natural range.

**Recommendation:** **PART SUPPORT / PART REJECT.** The draft non-binding guidance document, as amended by the Secretariat, may constitute useful guidance for Parties on this topic. However, it seems unnecessary to dedicate valuable time and resources to prepare more detailed species-specific guidance for living specimens of African elephants and southern white rhinoceros. It is also unnecessary to prioritize the preparation of non-binding best practice guidance on how to determine whether "the trade would promote in situ conservation." Each Party is best placed to assess, based on its specific national and regional circumstances, how conservation efforts would be best promoted. It is also clear that the term "promote" entails a wide variety of scenarios that could lead to direct and indirect benefits to conservation. Parties should reject the proposal in CoP18 Doc. 44.2 submitted by Burkina Faso, et al.

Instead, during the next cycle before CoP19, Parties should focus on:

implementing and drawing experience from the information provided on the dedicated webpage and feedback on using the guidance, and analyzing the information from the consultations by the Secretariat with Parties whose elephants are listed in Appendix II and who have exported wild caught elephants to a non-elephant range state since CoP11.

## Doc. 45: Non-Detriment Findings

**Summary:** Various actions and meetings have been conducted regarding NDFs, such as the 2008 Cancun workshop. Demand for NDFs is growing as more species are included in the Appendices and the general scope of CITES increases. The Parties are invited to adopt proposed Decisions, that among other things, will instruct the Secretariat to review existing materials for making NDFs and identify gaps, needs and priorities for improved NDF guidance. NDFs can either be supported by targeted research projects or expert meetings to increase capacity.

**Recommendation:** **SUPPORT.** Parties should support actions to develop improved NDF guidance and financially support range states through the NDF-making process. The International Expert Workshop on NDFs for hunting trophies of certain African species included in CITES Appendices I and II, hosted in Sevilla, Spain in 2018, discussed best management practices for trophy hunting and improved communications between exporting and importing Parties; however, participants of the Workshop universally agreed that broad criteria for NDFs should not be prescriptive or restrictive due to variation across regions and wildlife populations. Future NDF workshops must ensure any outputs have range state consensus and should be hosted in range states.

## Doc. 46: Quotas for Leopard Hunting Trophies

**Summary:** Pursuant to Decisions adopted at CoP17, Parties with quotas for leopard hunting trophies, established in Resolution Conf. 10.14 (Rev. CoP16), were requested to review those quotas and consider whether the quotas are at levels that are non-detrimental to the survival of the species in the wild. The AC and SC were directed to review the reports from the Parties and make recommendations as appropriate. Mozambique, Namibia, South Africa, Uganda, United Republic of Tanzania, Zambia, and Zimbabwe submitted documentation showing that the quotas are non-detrimental; Kenya and Malawi requested that their quotas be removed from the Resolution; Botswana, Central African Republic, and Ethiopia did not respond in a timely manner. The AC and SC agreed that the seven Parties that submitted documentation have quotas set at levels that are non-detrimental and propose to maintain those quotas and recommend that the three Parties who did not timely respond be allowed to respond during the next cycle. Parties are invited to agree with the AC and SC findings. The Secretariat also invites Parties to adopt additional Decisions that were developed at the first meeting of the Joint CITES-CMS African Carnivores Initiative. Finally, Parties are asked to adopt amendments to Resolution Conf. 9.21, which would instruct the AC and SC "to keep under review" the quotas for Appendix I species established by the CoP.

**Recommendation: QUALIFIED SUPPORT.** The Parties should agree to amend Res. Conf. 10.14 (Rev. CoP16) to delete the quotas for Kenya and Malawi, as requested by the two Parties, and retain the existing quotas for those countries that submitted relevant information. The Parties should agree that Botswana, CAR, and Ethiopia be allowed to continue their review during the next cycle, with support from the Secretariat. Parties should adopt all the proposed Decisions and directly fund leopard research and encourage the exchange of information on leopard science and management at relevant fora, including Safari Club International Foundation’s annual African Wildlife Consultative Forum. Regarding the proposed revisions to Res. Conf. 9.21, further clarity is necessary before the Parties decide whether to support the revisions. It is questionable whether a quota-review process for App. I listed species is needed; nevertheless, if the Parties agree such a review process is needed, the AC and SC must ensure that any review mechanisms are not overburdensome on relevant range states and a working group should be formed to develop the basic structure of the review process.

**Doc. 47: Enhancement of Quotas for Markhor Hunting Trophies**

**Summary:** Pakistan proposes that its annual export quota for markhor hunting trophies under Resolution Conf. 10.15 be increased from 12 to 20 trophies.

**Recommendation: SUPPORT.** Pakistan’s growing markhor population substantially contributed to the positive global trend reflected in the 2015 IUCN Red List status change from “Endangered” to “Near Threatened” for all markhor. 2017 population survey results indicate that Pakistan’s overall markhor population has increased by 50% in just six years from 2011 to 2017. Twenty trophies would constitute only 0.17% of the markhor population in Pakistan. The positive trend in markhor population estimates confirm that regulated trophy hunting of markhor has been highly beneficial to active conservation and supportive of local communities. Increasing the export quota will allow more communities to join this successful sustainable use model and increase the conservation benefits to the species and people.

The Secretariat recommends that the Parties approve the proposed increase in export quota, noting the enhanced conservation status and growing population of markhor in Pakistan and that the hunting programs comply with the recommendations found in Res. Conf. 17.9.

## Doc. 48: Black Rhino Hunting Trophies: Export Quota for South Africa

**Summary:** South Africa proposes to increase its export quota from 5 adult males to a total number not exceeding 0.5% of the population.

**Recommendation:** **SUPPORT.** South Africa's black rhino Biodiversity Management Plan calls for managing its surplus males. Management options are limited by available habitat and the high cost of translocation efforts and anti-poaching operations. South Africa's proposal would implement the first adaptive quota setting system under CITES. Parties should support this adaptive quota concept that is grounded in the Convention's principles of science-based decision-making. Increasing the offtake from trophy hunting from up to 5 adult males to up to 0.5% will not be detrimental to the species. Rather, increasing the number of hunting trophies will create the necessary incentives for additional communal and private land owners to expand black rhino range, a critical conservation need for the species, and revenue will be used to further fund anti-poaching efforts. Black rhino hunting in South Africa is done under best practices, strict regulations and robust monitoring. Hunting and trade in trophies, and the positive incentives they create have significantly contributed to South Africa's black rhino conservation success.

### **References:**

Informing decisions on trophy hunting: A Briefing Paper regarding issues to be taken into account when considering restriction of imports of hunting trophies (April 2016), [https://www.iucn.org/sites/dev/files/iucn\\_sept\\_briefing\\_paper\\_-\\_informingdecisionstrophy\\_hunting.pdf](https://www.iucn.org/sites/dev/files/iucn_sept_briefing_paper_-_informingdecisionstrophy_hunting.pdf).

## Doc. 49.1: Implications of the Transfer of a Species to Appendix I

**Summary:** After debate among the Parties, the Secretariat proposes that for species that are transferred from Appendix III or II to Appendix I, the relevant provisions of the Convention that apply are determined by the date of export, re-export, or import. The alternative approach would apply the relevant provisions applicable to the species at the time of acquisition. In addition, the Secretariat recommends adoption of a Decision that would instruct the SC to consider further issues.

**Recommendation:** **QUALIFIED SUPPORT.** In particular, the Parties should adopt the proposed Decision that instructs the SC to consider ancillary issues related to trade that occurs during the time that species are transferred from Appendix III or II to Appendix I. In some instances, 90 days (or even the 240 contemplated in CoP18 Doc. 49.1) is not enough time to trade previously-acquired specimens. As just one example, hunting trophies are often traded from range states to countries-of-import long after the animal is hunted because processing the trophy and taxidermy work can take months or even years. Further, trade with lengthy transportation times between country-of-export and country-of-import, coupled with processing times at a port of entry – which sometimes can result in significant delays – will give rise to issues not contemplated by the Secretariat's recommendations. Such issues should be addressed by the SC because legal certainty is needed for those trading in fauna and flora, especially considering the high costs that are sometimes associated with such trade. Should a working group be formed to address these issues, and others, Safari Club International would welcome the opportunity to participate and make appropriate recommendations.

**Doc. 53: Purpose Codes on CITES Permits and Certificates**

**Summary:** The SC invites Parties to adopt amendments to Decision 14.54 (Rev. CoP17) and Resolution Conf. 12.3. The amendments to the Decision would continue the Working Group throughout the next cycle with the primary aim of clearly defining purpose-of-transaction codes. The amendments to the Resolution explain how Parties determine which purpose codes to use for trade. The Secretariat proposes a different set of Decisions that would direct review of issues related to purpose codes.

**Recommendation:** **PART SUPPORT / PART REJECT.** The Parties should adopt the Decisions recommended by the Secretariat and approach the issues related to the use of purpose codes differently than they have for the last twelve years. The Parties should reject the amendments to the Decision and Resolution proposed by the SC. In particular, purpose codes determined by exporting and importing Parties should match each other for each transaction.

**Doc. 57: Implementation of the Convention Relating to Captive-bred and Ranched Specimens**

**Summary:** After the Secretariat submitted recommendations to address issues related to trade in captive-bred and ranched specimens, the SC considered that many of the recommendations were premature and suggests that the Committees continue the review during the next cycle.

**Recommendation:** **SUPPORT.** The Parties should support continued review and agree that a SC Working Group be formed at SC72 following CoP18.

**Doc. 60: Illegal Trade in Cheetahs (*Acinonyx jubatus*)**

**Summary:** The Secretariat commissioned a CITES cheetah trade resource kit with information and tools to assist in implementing the Convention, mostly related to live animals. The tool kit will be reviewed by an intersessional working group and at SC71. The Secretariat also posted a new webpage on cheetahs with relevant CITES documents and species information. Cheetahs are recommended to be included in the CITES Big Cat Task Force, should one be established. The Task Force would discuss enforcement issues related to illegal trade, exchange information and develop strategies and make recommendations to improve international cooperation. The Task Force is further addressed in CoP18 Doc. 76.1 below.

**Recommendation:** **SUPPORT.** Subject to the SC's review, the Parties should adopt the draft Decision that directs the Secretariat to make available the cheetah trade resource kit, subject to funding and further instructions from the SC.

## Doc. 69.2: Elephants (Elephantidae spp.) – Report on Monitoring the Illegal Killing of Elephants (MIKE)

**Summary:** The Secretariat provided an extensive report on the MIKE program and is investigating the use of dynamic population modelling, among other actions under review, to improve the methodology and scientific robustness of the Proportion of Illegally Killed Elephants (PIKE) analysis. The Secretariat will report on this progress at SC73.

**Recommendation:** **NOTE.** Parties are simply asked to note the report. Relevant to the MIKE program, Parties should support actions taken to improve the methodology and scientific robustness of the MIKE program. PIKE may be affected by data quality, carcass detection and natural mortality, tending to overestimate poaching. Recent data indicate an overall decrease in poaching in Africa. Parties should be commended for their efforts and successes in reducing poaching.

## Doc. 69.4: Elephants (Elephantidae spp.) – Ivory Stockpiles: Implementation of Resolution Conf. 10.10 (Rev. CoP17) on *Trade in elephant specimens*

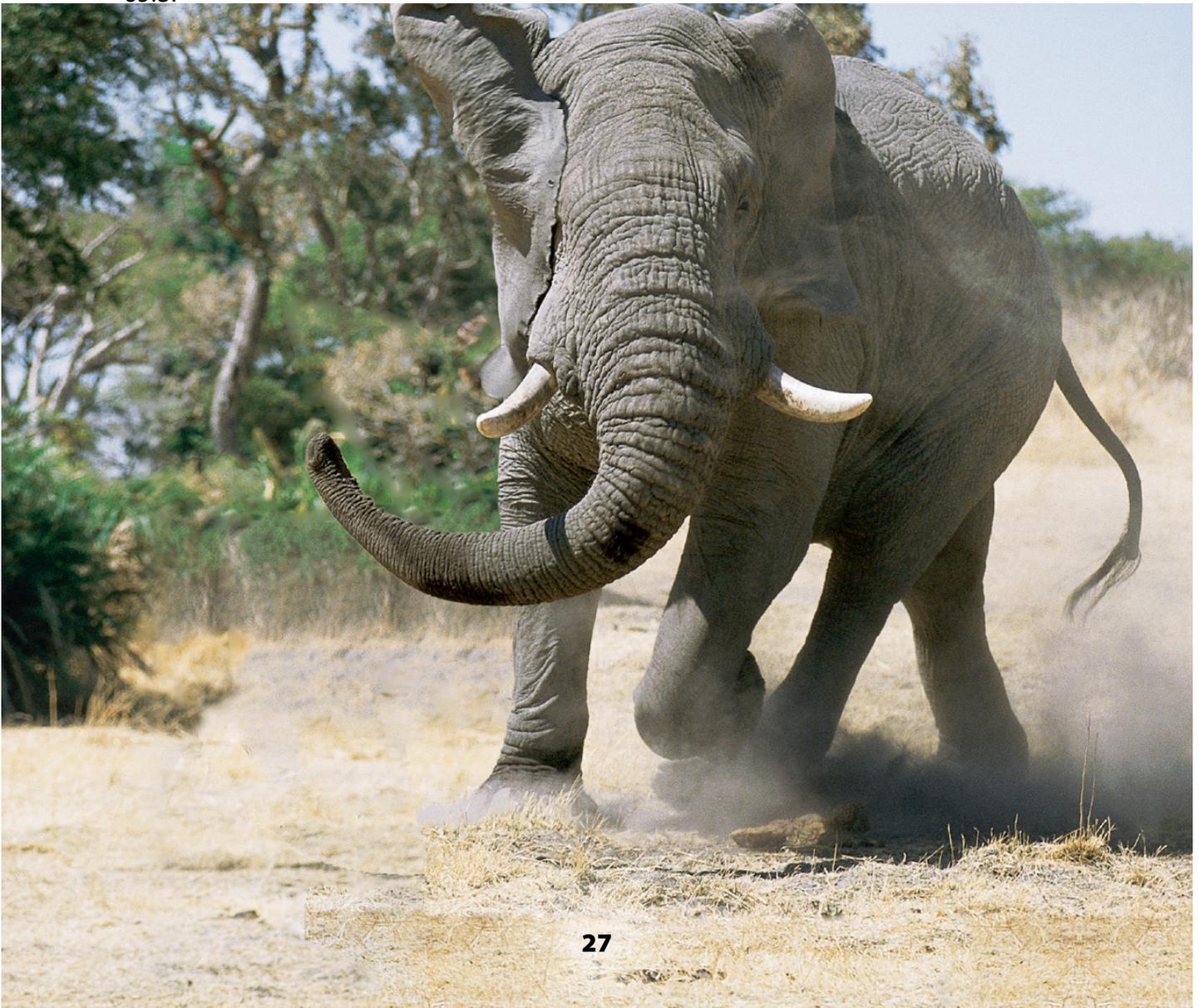
**Summary:** A number of African Parties claim that maintaining and securing ivory stockpiles outweigh any potential benefits of keeping the ivory. A previous Decision directed the Secretariat to develop practical guidance for the management of ivory stockpiles, including their disposal, based on an analysis of best practices. The guidance prepared by the Secretariat will be ready for review by SC71, and the SC will make appropriate recommendations for consideration at CoP19. The proponents of Doc. 69.4 propose an in-session working group be established to finalize the guidance on stockpile management, if the SC is not able to do so at SC71. The proponents also propose Decisions related to stockpile management reporting requirements.

**Recommendation:** **REJECT.** Although the alleged benefits of destroying ivory stockpiles are highly questionable, CITES guidance on the matter should be used to avoid corruption and ensure specimens are fully used as forensic evidence. As the Secretariat recommends, the Parties should reject the recommendation to establish an in-session working group at CoP18 because such groups are not well suited for technical reviews and reject the proposed Decisions because they are largely unnecessary.

**Doc. 69.5: Elephants (Elephantidae spp.) – Implementing Aspects of Resolution Conf. 10.10 (Rev. CoP17) on the Closure of Domestic Ivory Markets**

**Summary:** The proponents of CoP18 Doc. 69.5—many of which are proponents of CoP18 Doc. 69.4—recommend amendments to Res. Conf. 10.10 that would call for the closure of all remaining domestic ivory markets, regardless of whether those markets are contributing to elephant poaching or illegal trade in ivory.

**Recommendation: REJECT.** As the Secretariat concludes, CITES does not have authority to regulate national laws regarding domestic markets for legally acquired ivory; such action falls outside the scope of the Convention. CoP17 addressed the closure of domestic ivory markets that contribute to poaching and illegal trade, and the proponents have provided no evidence to support their claim that all domestic ivory markets contribute to poaching or illegal trade. Finally, the Secretariat notes that the proposed changes may prevent the trade in hunting trophies, which has been recognized as a form of sustainable use and beneficial to elephant conservation. The Parties should reject all of the proposed amendments and proposed Decisions in CoP18 Doc. 69.5.



## Doc. 76.1: African Lion (*Panthera leo*) – Report of the Secretariat

**Summary:** CoP17 directed, subject to external funding and in collaboration with CMS and IUCN, various actions regarding lion, including to implement joint conservation plans; develop an inventory of lion populations across its range and other relevant databases; develop strategies to reinforce international cooperation; study legal and illegal trade with TRAFFIC, population trends, and management practices, such as lion hunting and the role of trade; support capacity building and making NDFs; increase public awareness; promote fundraising; establish a CITES Task Force and create a website portal for information. The Secretariat could not implement the full range of activities directed by CoP17 due to limited time and resources, but the Parties are invited to adopt new Decisions to direct the Secretariat to complete much of the previously directed work. Some of the draft Decisions arose from recommendations from the AC; others arose from recommendations from the range states, who met and discussed relevant issues at the first meeting of the Joint CITES-CMS African Carnivores Initiative (ACI1). At ACI1, the range states drafted the “Guidelines for the Conservation of Lions in Africa” (GCLA). The work outlined in the proposed Decisions in Annex 1 of CoP18 Doc. 76.1 will be informed and partially directed by the continued development of the GCLA.

**Recommendation: QUALIFIED SUPPORT.** Parties should support the various actions proposed, some of which were agreed upon at CoP17, and continue to support African lion conservation efforts with the devotion of significant resources. Parties should also support the continued development of the GCLA, but the current draft was not developed with inclusive consultation or sufficient time for review. In the future, the ACI should strive for consensus before adopting the Guidelines. If the AC reviews the GCLA, the review should be comprehensive and inclusive and led by the range states.



**Doc. 76.2: African Lion (*Panthera leo*) – Conservation of and Trade in African Lions**

**Summary:** Nigeria and Togo's proposed resolution recommends increased limitations on and requirements for trade in African lions.

**Recommendation:** **REJECT.** The Parties are strongly encouraged to reject the proposed Resolution. The range states are far from consensus on this issue. While increased enforcement efforts to combat illegal trade in lion parts are desirable, the proposal does nothing to address the main threats to lions including human-wildlife conflict, habitat loss and prey depletion. The proposal's focus on legal trade, which has no negative impact on lion conservation, is misplaced and many of the provisions in the proposal are already found in existing Resolutions. There is no evidence that legal trade in lion hunting trophies stimulates or covers up illegal trade, and in fact, well-regulated lion hunting programs conserve critical habitat and fund anti-poaching efforts. There is no need to address hunting trophies, already subject to necessary checks and controls, in a Resolution regarding illegal trade and enforcement issues. Additional and unnecessary reporting requirements could be burdensome for range states that may lack the resources to conduct such reviews. The proposed Resolution would have the Parties, in many respects, treat African lion as though the species is listed on Appendix I. A proposal to transfer African lion to Appendix I was rejected by the Parties at CoP17; this Resolution should not be used to circumvent the Parties' previous decision. Additionally, a number of Decisions related to African lion were adopted at CoP17, and in CoP18 Doc. 76.1, the Parties are invited to adopt Decisions to largely continue that work beyond CoP18. Nigeria and Togo's proposal attempts to preempt the conclusions of that work.

For some of the same reasons stated above, the Secretariat recommends that the Parties not adopt the proposed resolution. Rather, the Parties should focus on the proposed Decisions in CoP18 Doc. 76.1.



## Doc. 83.1: Rhinoceroses (Rhinocerotidae spp.) – Report of the Standing Committee and Secretariat

**Summary:** The Secretariat and SC provide an extensive report on the implementation of a number of Decisions related to rhinoceros adopted by CoP17. The report addresses the status of rhino species, trade, stock management, poaching, enforcement, conservation actions, management strategies and developments since CoP17. The Parties are invited to adopt new Decisions to continue efforts to conserve rhino and combat rhino poaching.

**Recommendation:** **SUPPORT.** Parties should support the draft Decisions to continue rhino conservation efforts. While many interested parties, both within and outside CITES prefer to focus on the ongoing challenges of African rhino conservation and illegal rhino horn trade, the report in Doc. 83.1 shows that a number of African range states have made significant progress addressing those challenges:

The total number of rhinoceros, across all species, has increased 28% since 2007. White rhino outside South Africa increased 64% from 2012 to 2017.

In South Africa and Namibia, the countries with the largest populations of both black and white rhino species, rhino numbers have increased considerably since sport hunting resumed in 1968 and 2005, respectively.

Poaching levels have declined since the 2015 peak, and 2018 is likely the first time in six years that the total rhino poaching numbers dropped below 1,000.

Trends in illegal trade flow likely indicate increased enforcement effectiveness.

South Africa has made significant progress in clamping down on “pseudo-hunting”, which was previously estimated as the source of as much as 18% of illegal horn trade. It is now down to 0.7% of such trade.

Regulated hunting continues to play an important role in rhino conservation through the revenue it generates. Measures to restrict trophy hunting, such as import bans or airline transport refusals, have the potential to negatively impact conservation.

Live sales of rhinos to maintain productive population densities continues to be key to biological management and raises additional revenue for conservation efforts.

Safari Club International and Safari Club International Foundation commend those Parties that are increasing rhino populations and combating rhino poaching and illegal trade.

**Doc. 83.2: Rhinoceroses (*Rhinocerotidae* spp.) – Revisions to Resolution Conf. 9.14 (Rev. CoP17) on Conservation of and trade in African and Asian rhinoceroses, and Associated Decisions**

**Summary:** Among other things, Kenya claims that domestic rhino horn markets contribute to poaching and illegal trade, undermine demand reduction programs, obfuscate enforcement efforts and provide potential for laundering of illegally-sourced rhino horn. Parties are invited to adopt proposed amendments to Resolution Conf. 9.14 that would, among other things, urge all Parties to close domestic rhino horn markets and consider destruction of rhino horn stockpiles. Parties are also invited to adopt related proposed Decisions.

**Recommendation: REJECT.** As recommended by the Secretariat, the Parties should not adopt the proposed amendments to Resolution Conf. 9.14 or proposed Decisions. Much of the proposed amendments and Decisions lack justification, are unnecessary, or are outside the scope of the Convention.

**Doc. 86: Saiga Antelope (*Saiga* spp.)**

**Summary:** CoP17 directed range states and important consumer and trading countries to implement the “Medium-Term International Work Programme for the Saiga Antelope (2016-2020)” and other conservation efforts. None of the range and consumer states reported problems or challenges regulating trade of saiga antelope. Based on recommendations from the Secretariat, the SC invites the Parties to adopt draft Decisions that direct continued saiga antelope conservation efforts.

**Recommendation: SUPPORT.** Range states support the international collaboration and actions outlined in the document and proposed in the draft Decisions. CoP18 should adopt the draft Decisions, including the amendments recommended by the Secretariat.



## Doc. 92: Appendix-I Listed Species

**Summary:** At CoP17, Parties adopted Decisions to hire consultants to conduct a rapid assessment of the conservation status and trade levels of all species included in Appendix I and to indicate conservation priorities based on threat levels and resources available to address the threats. Due to lack of funding (and proposed high costs), this work was never commissioned. Doc. 92 recommends a less comprehensive review be commissioned for all Appendix I species and consultation between range states and the Secretariat occur related to those species most at risk.

**Recommendation:** **SUPPORT.** The recommended Decisions will attempt to keep the costs down while still accomplishing most of the work approved at CoP17. The review is important and should be completed. This work is also subject to funding. Parties are encouraged to fund the work.

## Doc. 96: African Carnivores Initiative

**Summary:** Big cats were identified as target species for joint CMS-CITES actions. The African Carnivore Initiative (ACI) was established at the CMS CoP12, working closely with the IUCN and its specialist groups to jointly and coherently implement Resolutions and Decisions relating to African lion, leopard, cheetah, and African wild dog. The first range state meeting (ACI1) was held in Bonn, Germany in 2018. At CMS CoP12, CMS Parties adopted Decisions specifically regarding the ACI, but CITES Parties have not yet done so. At ACI1, the range states agreed to a number of recommendations, including to invite CoP18 to adopt Decisions related to the Joint CITES-CMS African Carnivores Initiative and the development of a Joint Programme of Work.

**Recommendation:** **SUPPORT.** Parties should support the joint actions for conservation of the four African carnivore species and the outcomes of ACI1 by adopting the draft Decisions. Parties and relevant stakeholders are also encouraged to support financially the work of the ACI, including by dedicating funds equitably to work on the four relevant carnivore species. Future ACI meetings should be held in African range states with sufficient resources dedicated to support attendance and participation by all relevant stakeholders. Future meetings are welcomed to be held in conjunction with Safari Club International Foundation's annual African Wildlife Consultative Forum.

**Doc. 99: Standard Nomenclature**

**Summary:** Doc. 99 recommends a number of nomenclature-related changes. This recommendation addresses only the recommendations for *Panthera leo* and the genus *Ovis*. The nomenclature specialist and AC recommends recognizing two subspecies for lions: *Panthera leo leo* (India and central and western Africa) and *Panthera leo melanochita* (eastern and southern Africa). Populations of *P. leo leo* in India remain on Appendix I. They also recommend a new standard reference (Valdez and Weinberg 2011) for the genus *Ovis*. The most significant change is that subspecies of *Ovis aries* (mouflon, urial, and domestic sheep) and *Ovis ammon* (argali) are elevated to full species status based on geographic origin, with a couple of exceptions.

**Recommendation: QUALIFIED SUPPORT.** First, regarding *Panthera leo*, Parties should fully support the proposed recognition of two subspecies. This will align CITES with the nomenclature used by some Parties, such as the United States in its African lion listing under the U.S. Endangered Species Act. Second, despite some concerns about implementation of the changes in *Ovis*, the recommended changes will provide more clarity in designations for the taxonomic groups referenced. Although the older nomenclature that has fewer full species is preferable because it seems more biologically defensible and will keep regulatory compliance simpler, the recommended changes should not functionally change much. The Working Group also expressed some concerns about customs officers being able to recognize the various species.

**Doc. 104: Review of Resolution Conf. 10.9**

**Summary:** The SC recommends that Resolution Conf. 10.9 on Consideration of proposals for the transfer of African elephant populations from Appendix I to Appendix II be repealed.

**Recommendation: SUPPORT.** The SC's recommendation has broad support from Parties and Observers. As noted in SC70 Doc. 68, Res. Conf. 9.24 provides sufficient and adequate guidance for dealing with proposals to amend CITES Appendices I and II. African elephants should not be treated differently under this process from any other species. Thus, Res. Conf. 10.9 is unnecessary and should be repealed.

