

CONVENTION SUR LE COMMERCE INTERNATIONAL DES ESPECES
DE FAUNE ET DE FLORE SAUVAGES MENACEES D'EXTINCTION



Quatorzième session de la Conférence des Parties
La Haye (Pays-Bas), 3 – 15 juin 2007

Interprétation et application de la Convention

Amendement des annexes

Propositions d'amendement à l'Annexe I et à l'Annexe II

COMMENTAIRES DES ORGANISMES INTERGOUVERNEMENTAUX

Le document ci-joint est soumis par l'Organisation internationale des bois tropicaux (OIBT). C'est un ajout au document CoP14 Doc.68, annexe 3. Il apparaît ici dans la langue dans laquelle il a été soumis.



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Date: 1 June 2007	Ref. F.07-0146	From:
To: Dr. Willem Wijnstekers Secretary-General Convention of International Trade In Endangered Species of Wild Fauna and Flora - CITES International Environment House Chemin des Anémones, CH-1219 Châtelaine Geneva, SWITZERLAND Fax: (41-22) 797.34.17		Manoel Sobral Filho Executive Director ITTO - Yokohama, Japan <i>David</i> ACTION COPY

- 1 Juni 2007

Dear Dr. Wijnstekers,

REPLY ... FILE

Thank you for your letter seeking ITTO input on the proposals to list several tropical timber species in Appendix II of CITES at COP 14. I apologize for the delay in responding, but we required time to consult with member countries. The issue was also discussed at the just completed Forty-second Session of the International Tropical Timber Council (ITTC). I hope that the following brief comments can still serve as inputs to the upcoming deliberations at COP 14.

The ITTO Secretariat is of the opinion that more detailed population studies are required for all the timber species proposed for listing to allow proper assessment of the impacts of species utilization and trade. Few (if any) range states have carried out the detailed forest inventories required to ascertain the status of individual timber species. With the exception of *Caesalpinia echinata* (proposed by Brazil, which has imposed harvest and export restrictions on this species for many years), we therefore think that the listing proposals for these species are premature. We also note that none of the listing proposals contains proposals for the listing annotation (i.e. which products of the species would be covered by the listing), meaning that the annotations would be part of the listing debate at COP 14. We would suggest that future timber listing proposals be encouraged to include a proposed annotation so that reviewers can understand the extent and potential impact of the proposed listing.

The only specific comments we have are on the proposed listing of *Cedrela odorata*. This is the only species proposed for listing for which ITTO has records of trade, as follows [2004 or 2005 data (most recent year available), all units cubic meters]:

Product	Country	Exports	Imports
Logs	Colombia	< 1,000	-
	Mexico	< 1,000	< 1,000
	Peru	< 1,000	-
Sawnwood	Bolivia	10,000	< 1,000
	Brazil	35,000	< 1,000
	Mexico	< 1,000	-
	Peru	40,000	-
	Suriname	< 1,000	-
	Venezuela	< 1,000	-

Note that Bolivia's exports were *C. fissilis*. Bolivia and Peru reported minimal exports of veneer and plywood of this species as well.

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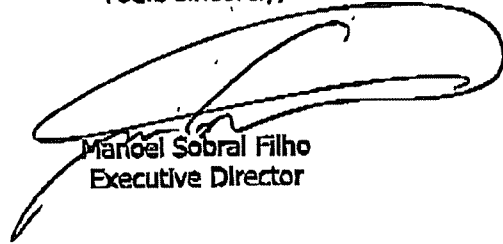
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During the discussion of the CITES listing proposals at the Forty-second Session of the ITTC, several countries (Mexico, Peru, Ghana and Cote d'Ivoire) expressed concern at the possible listing of *Cedrela odorata*. Several countries have established significant plantation areas of this species, incurring significant costs, and expressed worries that a CITES listing would make it more difficult to market the timber from these plantations.

Finally, we received written responses from Guyana and Peru regarding the listing proposal for *Cedrela odorata*, both not in favor of the proposal. These are attached for your information.

Please don't hesitate to contact ITTO if you require clarification or further information.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Manoel Sobral Filho', is written over a large, loopy scribble.

Manoel Sobral Filho
Executive Director

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-----Original Message-----

From: Pradeepa Bholanath [mailto:project.coordinator@forestry.gov.gy]
Sent: Saturday, March 31, 2007 3:04 AM
To: oshima@lto.or.jp
Cc: johnson@lto.or.jp; commissioner@forestry.gov.gy; dcof-fm@forestry.gov.gy
Subject: Guyana's comments on CITES Listing of *Cedrela odorata*

Dear Dr. Sobral,

On behalf of Mr. James Singh, Commissioner of Forests, I am attaching a file containing Guyana's comments on the proposed CITES listing of *Cedrela Odorata* (Red Cedar) on Appendix II.

It is our firm opinion that Red Cedar should not be listed in Appendix II of the CITES listing, as there is no current nor projected future threat of extinction of this species in Guyana – especially given Guyana's current low rate of harvesting and exportation of this species, coupled with our existing, rigorously enforced, forest Guidelines and Policies.

The Guyana Forestry Commission hopes that this document can assist in some way.

We would very much appreciate information on any future development on this matter.

Thank you very much.

With Best Regards

Pradeepa Bholanath

Pradeepa Bholanath
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**Guyana's Response to the placement of Red Cedar
(*Cedrela odorata*) originating from Guyana, on CITES Appendix II**

Guyana is situated on the northern coast of South America, and is considered an integral part of the Guiana Shield (GFC, 2005). This area is considered to be one of the few areas in the world with pristine rainforest.

Approximately 75% of Guyana's land mass is forested. This forest houses approximately 8,000 species of plant and more than 1,000 species of terrestrial vertebrate. The forest resources in Guyana are used for many purposes, these includes harvesting for forest produce, agriculture, research, ecotourism, for culture, etc.

Guyana is known to have a good record of conservation of its forest resources. Guyana is among the countries with constant low deforestation rate. This has been the case for the past few decades. (Lanly 1982 et al) (cited in Steege, 2000).

Red Cedar (*Cedrela odorata*), also known as Spanish Cedar, is a native species of Guyana with the major clump of it being in the North Western areas of Guyana. This is a highly demanded species because of its colour, beauty and resistance to termite and rot, and excellent finishing properties. This wood is mainly used locally to make beautiful furniture.

Red Cedar is not one of the main commercially harvested trees in Guyana. According to the Forest Producers Association (FPA), Guyana, Red Cedar (*Cedrela odorata*) is not one of Guyana's main commercially viable species. This is also substantiated by GFC's production and export data for Red Cedar.

GUYANA'S COMMENTS ON THE IDENTIFIED TREATS

Excessive Exploitation:

Guyana has been harvesting timber since the 12th Century. In Guyana, logging could be considered to be done on a low impact basis. According to the FAO's global forest assessment survey result deforestation is less than 0.1%. This could be due mainly to its very low population, most of which is concentrated in the coastal area (Steege, 2000). According to Thomas et al 2003, the growth rates of commercial stocking of Guyana's forest are low, however, the timber resources of Guyana is enormous on account of the large areas of forest in Guyana.

Red Cedar harvested over the past seven (7) years reveal minimal production volumes over this period. Based on historical figures this situation was the same in previous years.

Red Cedar production of both logs and chainsawn lumber in 2004 totaled 245.13 m³. This represents only 1.0% of total production. In 2005 total Red Cedar production was 530.81 m³, representing 0.13% of total production. In 2006, total production of Red Cedar was 465.77 m³, representing 0.1% of total production.

In terms of export, a similar minimal trend is detected in export of this species from Guyana. Red cedar Logs exported is very small over the seven years examined. Most of the Red Cedar harvested was converted into sawn lumber. In terms of export, Red Cedar exports of logs and sawnwood amounted to 440.66 m³ in 2004, 757.69m³ in 2005 and 939m³ in 2006. As a percentage of total export, this is very minimal being 0.45% in 2004, 0.48% in 2005 and 0.27% in 2006. Given these production and export values, from Guyana's perspective, Red Cedar is not at risk of becoming extinct.

In addition, harvesting in Guyana's State Forest is closely monitored by the Guyana Forestry Commission, which through a series of robust sustainable forest management guidelines, monitor forest harvesting activities. Among the main documents is a Code of Practice for Harvesting operation which specifies a maximum allowable cut (based on the precautionary principle) for each hectare of forest leased to forest concessionaires.

In addition, the Food and Agriculture Organization of the United Nations (FAO) reported the deforestation rate in Guyana to be very low – below 1%. Deforestation therefore is not a threat in Guyana case for forest loss at a national or species level.

Processing:

Inefficient Processing has been reduced in Guyana especially following utilization of portable mill technology in conversion. A recent study shows that there is a significant reduction in waste from processed logs in the chainsaw processing and static mill and portable processing (GFC 2006). Further, trained forest operators record a higher percentage recovery of wood.

With the establishment of the Forestry Training Centre Incorporated (FTCI) which was established in May 2003, forest operators are much more equipped with the necessary knowledge and skills to better their processing (GFC 2007).

Kiln-dried wood has also been cited as a major constraint in processing, however, with the resuscitating of the Kiln-drying industry, this is not pose a major problem.

Logging and Trade:

Sustainable Forest Management is the core of Guyana's Forest Policies and Plans. In Guyana the Guyana Forestry Commission (GFC) is mandated to manage the forested areas legally gazetted as State Forest. The GFC's mandate is effected by a network of five divisions, one of the major departments being the Forest Monitoring Division (FMD) simply because it is responsible for the enforcement of the Forest laws and regulations, monitoring and control of environmental and social impacts of operations within the state forest estate. To effectively and efficiently fulfill its mandate the GFC/FMD has forest station country wide. These officers monitor the forests operations nationwide, these include, forest concessions, lumber yards and sawmills. The officers also conduct random sample checks on activities as cited in the Forestry Act, Policy, and Plans.

Guyana also has a log tagging system which was brought into operation in 1999. This was aimed at minimizing the incidence of illegal logging practices and provides security for concessionaires. Tags are issued to concessionaires based on stock volume to be removed stated in their annual plans. Tags are issued in duplicate, one is placed on the

log or lumber and one on the stump of the tree harvested. This system provides a chain of custody for all logs harvested from Guyana's forest from the point of harvesting to the final consumer.

Land Use and Government Policy:

Guyana with 214 970 km², is a sparsely populated country with approximately 750,000 inhabitants with 90% of the people occupying the rich fertile coastal belt (Thomas et al 2003). This country is endowed with ample natural resources such as our Tropical Rain Forest. It is also one of the few countries in the world where population pressure on natural resources is virtually non-existent.

One of the constraints facing the forestry sector is the outdated laws that they are working with; however, in 2007 the new forest legislation is due to be tabled in Parliament. Once this is passed, the industry will be in a stronger position to further enhance sustainable management of the forest resources of Guyana.

CONCLUSION

Based on the major treats outlined by the Netherlands, Red Cedar in Guyana is not under any major treat. Guyana would therefore, not support the position to place Red Cedar (*Cedrela odorata*) on CITES Appendix 11.

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REFERENCES:

GFC (2007), Calendar, GFC

GFC (2005), Forestry in Guyana, 2005.

GFC (2006) (DRAFT), Forest Research Programme – Chainsaw logging Study (Guyana Component) – A conversion study.

Forest Products Association of Guyana (FPA) (2002), Analysis of the Forest Industry in Guyana, Vijay Rambrich and Associates.

Steege, Han ter, (2000), Plant Diversity in Guyana – With recommendation for a National Protected Area Strategy, Tropenbos.

Thomas, Macqueen, Hawker, DeMendonca (2003), Small and medium forest enterprise Guyana. A Discussion Paper.

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"Decenio de las Personas con Discapacidad en el Perú"

"Año del Deber Ciudadano"

Lima, 21 MAYO 2007

CARTA N° 174 -2007-INRENA-J-IFFS

Señor
Manoel Sobral Filho
 Director Ejecutivo
 ITTO - Japón
 Fax: 81-45 223-1111

ACTION COPY

- 1. Juni 2007

REPLY FILE

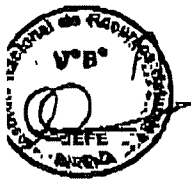
Asunto: Inclusión de *Cedrela* spp. en el Apéndice II de la CITES.

Tengo el agrado de dirigirme a usted, en relación al documento de la referencia, mediante el cual nos comunica que las especies del género *Cedrela* están propuestas para su inclusión en el Apéndice II de la CITES, así como las especies tropicales de madera de *Bulnesia sarmientoi*, *Caesalpinia echinata*, *Dalbergia retusa*, *Dalbergia granadillo* y *Dalbergia stevensonii*, las mismas que serán discutidas en la 14ª reunión de la Conferencia de las Partes CITES, que se realizará del 3 al 15 de junio del 2007. Asimismo, solicita comentarios como Estado del rango de distribución de las especies mencionadas.

Al respecto, le manifestamos como país del área de distribución de cuatro de las siete especies de *Cedrela* spp. y de las poblaciones de *Cedrela odorata*, propuestas para el Apéndice II de la CITES, presentada por Alemania en representación de la Comunidad Europea, que vemos con extrañeza propuestas de enmienda sometidas por Partes que no son Estados del área de distribución, no obstante que se encuentre conforme a lo establecido por la Convención.

Además, le comunicamos nuestra preocupación porque la propuesta incluye a todas las especies del género *Cedrela* spp., no todas presentan comercio significativo; y, no presenta una anotación de los especímenes que se encontrarían incluidos en el Apéndice II de la CITES, esto significa que las plantas, vivas, muertas, partes o derivados de *Cedrela* spp. estarían incluidos en el Apéndice II de la CITES, lo cual no es razonable ni justificable.

El Perú no apoyará la propuesta de inclusión de las poblaciones de *Cedrela odorata* y *Cedrela* spp. en el apéndice II de la CITES. Consideramos no razonable la



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inclusión de todos los especímenes del género mencionado en el Apéndice II de la CITES, más aún con vacíos de información sobre el estado de sus poblaciones.

Finalmente, quisiéramos destacar las acciones pro-activas de Perú en relación al comercio internacional de madera de cedro, debido a que el gobierno peruano a partir del año 2001 viene estableciendo esfuerzos para el control de su comercio, por tal razón incluyó sus poblaciones en el apéndice III de la CITES y viene promoviendo su manejo sostenible a través de las concesiones y permisos de aprovechamiento forestal, paralelamente se viene fortaleciendo estas acciones a través del apoyo para las certificaciones voluntarias.

Hago propicia la ocasión para expresarle mis cordiales saludos.

Atentamente,



Dr. Isaac Roberto Angeles Lazo
Jefe
Instituto Nacional de Recursos Naturales