

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

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Thirteenth meeting of the Conference of the Parties  
Bangkok (Thailand), 2-14 October 2004

The attached document has been submitted by the United Kingdom of Great Britain and Northern Ireland.



CITES Secretariat  
 International Environment House  
 Chemin des Anémones  
 CH-1219 Châtelaine  
 Geneva  
 Switzerland

14 September 2004

Dear Secretary General,

Please can you circulate this letter to the Parties to the Convention prior to the 13<sup>th</sup> Meeting of the Conference of Parties.

**Proposals to Amend Appendices I and II at the 13<sup>th</sup> meeting of the Conference of the Parties**

Proposal	Proponent	Proposal
1	Ireland on behalf of the EU.	<p>Inclusion of a new paragraph after paragraph 4 in the Interpretation section of the Appendices which relates to:</p> <p>5. The following are not subject to the provisions of the Convention:</p> <p>b) Cells or cell lines adapted to continuous cultivation <i>in vitro</i> that theoretically at a molecular level do not contain any part of the original animal or plant from which they are derived;</p>

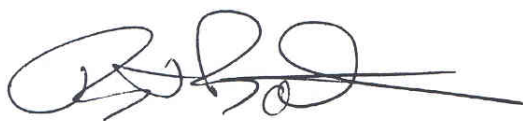
The European Collection of Cell Cultures (ECACC) was established in 1984 as not-for-profit organisation to service the world's research community and provide an International Depository and the recognised Patent depository for Europe. Over the last 20 years ECACC has expanded and diversified to become one of the premier collections of authenticated cell cultures in the world. The collections currently hold over 40,000 cell lines representing 45 different species, 50 tissue types, 300 HLA types, 450 monoclonal antibodies and at least 800 genetic disorders. ECACC currently distributes over 6000 cell cultures each year to scientists for research purposes spanning all areas of life science research e.g. cancer, genetics, biotechnology and basic science. Distribution of these cell lines outside of the UK represents almost 40% of our customer base.

European Collection of Cell Cultures, Health Protection Agency, Salisbury, Wiltshire SP4 0JG  
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We urge you to adopt Proposal 1 based on the following information.

1. Cells and cell lines which are continuously cultivated by *in-vitro* propagation have no detrimental effect on the numbers of the donor Species. One of our cell lines from a current Appendices II species has been continuously maintained since 1962 providing hundreds of cell samples for research and preventing the need to harvest new material from donor animals.
2. Complying with Permit requirements for continuously cultivated cell lines increases the costs and administration overhead for both researchers and Management Authorities. Countries affected by Permit requirements in the past include: China, Jordan, Japan, South Africa, USA, Germany, France, Czech Republic, Singapore, Belgium, Denmark, Portugal, Finland, Estonia, Italy, Norway, Cyprus, Mexico, Spain, Sweden, South Korea, Greece, Switzerland, Slovenia, Hungary, Australia, Brazil, Austria, Canada, Croatia, Egypt, Ireland, Eithiopia, Iceland, India, Israel, Netherlands, New Zealand, Federal Republic of Yugoslavia and the Russian Federation,
3. Proposal 2 does not cover *in-vitro* cell lines and does not go far enough to support the Research community. It will therefore not reduce the burden on Management Authorities to the same extend as Proposal 1 and will discourage research involving cells such as VERO, deposited by the WHO and used for viral vaccine testing. In fact it will encourage researchers to obtain cell lines from other less controlled sources such as fellow colleagues who may not operate the same levels of quality control and therefore have the potential to reduce the quality of research carried out.

Yours sincerely



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