



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Washington, D.C. 20240



In Reply Refer To:
FWS/AIA/DMA

Mr. Willem Wijnstekers, Secretary General
CITES Secretariat
15, Chemin de Anémones
Case postale 456
CH-1219 Chatelaine-Genève
Switzerland

APR 17 2008

by fax: (4122) 797-3417

Dear Mr. Wijnstekers:

We have reviewed the application for registration of Birds International, Inc. in the Philippines, as a commercial captive-breeding operation for *Cacatua sulphurea sulphurea*, *Cacatua sulphurea abboti*, *Cacatua sulphurea citrinocristata*, *Cacatua moluccensis*, *Ara ambigua*, *Ara macao*, and *Amazona barbadensis* (Notification to the Parties No. 2008/002). The United States of America opposes the registration of this operation for these species because sufficient information has not been provided to meet all the requirements set forth in Resolutions Conf. 10.16 (Rev.) and Conf. 12.10 (Rev. CoP14).

Our main concern about this operation is the lack of documentation of legal acquisition of the parental stock. None of these species were obtained from range countries. According to the applicant, all parental stock was obtained from a local pet store in the Philippines or from Singapore or Suriname. While many of the founder stock specimens were determined by the Philippines to be pre-convention, documentation is not available for any of the species to demonstrate that *all* founders are pre-convention.

The applicant also provides affidavits for six of the species that are signed by the applicant and a manager of a local pet store. However, no documentation is included to indicate the origin of the specimens from the range countries prior to their import into the Philippines. Some birds were imported from Singapore (*Cacatua moluccensis* and *Amazona barbadensis*) and Suriname (*Ara macao*), which are not range countries for these species. Indonesia is the range country for *C. moluccensis*. In a 2006 letter from the Director of Biodiversity Conservation of Indonesia to the Philippine CITES Management Authority (included with the application), Indonesia suggests the need for an independent review of *C. moluccensis* exports during the period in which the applicant acquired them because there are no known records of export from Indonesia.

Although import permits were issued by the Bureau of Animal Industry (BAI), Manila, for *C. moluccensis* and *A. barbadensis*, each permit was issued for a given number of

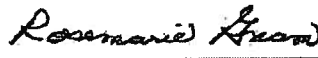
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"parrots." No species were specified. Without the species name on the permits, we cannot be sure that the permits were issued for these species. This issue is further complicated when the applicant notes that there were 60 *C. moluccensis* founders, which he supports with two BAI import permits for "30 parrots" each. However, the supplemental BAI permits provided to the Secretariat by the Philippine CITES Management Authority (included with the application) for this species are for 15 and 10 parrots.

Therefore, we are unable to support the approval of this operation for these seven species because the application does not meet the bred-in-captivity criteria of Resolution Conf. 10.16 (Rev.), specifically paragraph b)ii)A., which requires that the breeding stock must have been established "in accordance with CITES and relevant national laws" (see attached summary table). Approval of this operation in the absence of documentation of legal origin of its stock could potentially set a precedent for approving other captive-breeding operations that similarly lack such documentation. We would be willing to reconsider our position if the Philippines can provide further documentation of the legal acquisition or additional pre-Convention status of the original founder stock.

Thank you for providing us with the opportunity to comment on the proposal.

Sincerely,


 Rosemarie Gnam
 Chief, Division of Scientific Authority


 Robert R. Gabel
 Chief, Division of Management Authority

Numbers and Sources for Founder Stock Specimens

Species	Founding Stock reported in application	Pre-convention	BAI Parrots	Affidavit	Number undocumented founders if affidavit excluded	Source
<i>Cacatua sulphurea sulphurea</i>	34	26		Yes	8	Pet store
<i>C. s. abboti</i>	38	24		Yes	14	Pet store
<i>C. s. citrinocristata</i>	45	28		Yes	17	Pet store
<i>C. moluccensis</i>	60	15	60 or 25	No	?	Singapore
<i>Ara ambigua</i>	35	26		Yes	9	Pet store
<i>Ara macao</i>	57	26		Yes	31	Pet store/ Suriname
<i>Amazona barbadensis</i>	25	18	25	No	7	Singapore