

27 July 2022

Subject: Proposals to amend CITES Appendices I and II – timber species

Collaboration between FAO and CITES has a long history, and the Organization's work on forestry (including wildlife) supports the CITES Parties in their efforts to implement the Convention. For example, through the FAO-EU Forest Law Enforcement, Governance and Trade (FLEGT) Programme, FAO has provided technical support and resources for over a decade in support to producer countries' efforts to combat illegal timber harvesting. FAO looks forward to continuing the fruitful collaboration with the Convention and is pleased to submit its comments on the proposals to amend CITES Appendices I and II (timber species), submitted to the COP-19 to CITES (to be held on 14-25 Nov 2022 in Panama City, Panama).

General comments:

To date, over 900 tree species have been listed in the CITES Appendices. The new proposals, if endorsed, would add 149 tree species to Appendices I and II and remove one species from Appendix II. The proposals reflect concerns that the long-term survival of many more commercially valuable tree species may be threatened by unsustainable and/or illegal harvesting for international trade. These concerns are understandable due to continued deforestation and forest degradation and increasing international trade of illegally harvested wood.

However, FAO raises some concerns that these additions could potentially hinder efforts to support countries in increasing the supply of sustainable and legally harvested wood, improving the livelihoods of forest-dependent people, and promoting sustainable forest management. If a species is threatened it is justified to list it but FAO is also concerned about weakening CITES implementation if a growing number of timber species are listed without adequate capacity to implement and (possibly) monitor CITES permitting in certain countries.

In many of the proposals, the proposing Parties acknowledge that there is a lack of adequate data and information on the overall population size of the species, their subpopulations in different range states, and the volume of wood or other derivatives harvested and traded (illegally or legally). This, and the fact that many of the referred species are difficult to identify and distinguish visually from related species, probably explains why most proposals present cases for including whole genera rather than specific species in Appendix II.

This approach means that several tree species, which the IUCN Red List classifies as "least concerned", would also be listed in Appendix II. As such, it can be questioned if the long-term survival of these species is at such risk that their trade should be subject to strict regulation. Many of the "least concerned" tree species are also planted for forestry and agroforestry purposes, so the proposed CITES listing would considerably increase the countries' administrative burden for legally trading the wood of

these species. Moreover, an excessive listing of whole tree genera might weaken the Parties' capacity to continue implementing the CITES provisions.

The current proposal by India and Nepal to delete *Dalbergia sissoo* from Appendix II demonstrates the problems that are likely to emerge when commonly occurring and important forestry species are included in Appendix II.

The CITES rules allow the listing of genera if specimens of different species in the form they are traded are difficult for enforcement officers to distinguish. In the case of trees, it may not always be possible to distinguish individual species within a genus based on wood anatomy. However, with already existing and well-tested techniques based on genetic markers, it is possible to: a) identify and distinguish closely related tree species and; b) verify the geographical location in which a tree grew before it was harvested. Recently, the CITES Task Force on illegal trade in specimens of listed tree species recommended that the Parties use these and other modern techniques in enforcing the Convention's provisions, reducing the need for listing whole genera of tree species.

Specific comments on the proposals:

Include *Handroanthus* spp, *Roseodendron* spp. and *Tabebuia* spp. in Appendix II with annotation #17:

The 35 species of the genus *Handroanthus* and the 76 species of the genus *Tabebuia* include several species which are classified as "least concerned" (LC) or "nearly threatened" (NT) by the IUCN Red List. In the case of the *Roseodendron* genus, only two species are classified as LC and NT. Considering this, it is recommended to include in Appendix II only those species that are classified as "endangered" or "critically endangered".

Several species of all three genera are planted and managed for forestry across Latin America. Listing these species would increase the administrative burden to manage them sustainably and legally trade their wood and might even reduce interest in planting the species in the future.

Delete *Dalbergia sissoo* from Appendix II:

The species is classified as LC by the IUCN Red List and is widely planted and managed for forestry. Considering this and the information provided by India and Nepal in their proposal, it would be reasonable to delete the species from Appendix II.

Transfer *Paubrasilia echinata* from Appendix II to Appendix I with annotation:

This proposal is probably a necessary step to try to curb the illegal trade of the wood of this species (brazilwood).

Include all African populations of *Azelia* spp. in Appendix II with annotation #17:

Of the seven species of the genus *Afzelia* occurring naturally in Africa, three species are classified as LC and four as “vulnerable”. These species are also planted and managed for forestry across Africa. It is recommended to carefully consider if listing all species is necessary.

Include *Dipteryx* spp. in Appendix II with annotation:

Several species of this genus are classified as LC by the IUCN Red List and planted for forestry and/or agroforestry purposes. Furthermore, some species are “data deficient”. It is recommended to only include in Appendix II those species classified as “endangered” or “critically endangered”.

While it is also proposed to include the seeds of this species in the annotation, in the proposal, it is noted that the scale of international trade of *Dipteryx* seed is unknown. Extensive seed collection locally for fragrance and food industries can indeed put the natural regeneration of some tree populations in danger; however, this measure seems unnecessary for the survival of the species at the range level based on the current information. Moreover, the inclusion of the seeds would hamper the trade of the seeds as forest reproductive material internationally, which is necessary for countries in the case they cannot obtain enough seeds for planting from their own tree populations. Furthermore, including the seeds in the annotation might lead to confusion around providing permits for utilizing the seeds for research and development under the Nagoya Protocol of the CBD.

Include all African populations of *Pterocarpus* spp. in Appendix II with annotation #17:

Seven of the 12 species of the genus *Pterocarpus* in Africa are classified as LC by the IUCN Red List. Some of the species are planted and managed for forestry purposes. It is recommended to only include in Appendix II those species classified as “endangered” or “critically endangered”.

Include all African populations of *Khaya* spp. in Appendix II with annotation #17:

This proposal was not included in the email received by FAO.