

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



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ECOWAS RESPONSE TO COMMENTS OF THE SECRETARIAT ON  
DOCUMENTS COP19 DOC 36.1 AND COP19 DOC 36.2

1. This document has been submitted by Ivory Coast, Nigeria, Niger, Benin, and Senegal in relation to documents CoP19 Doc. 36.1 and 36.2.\*

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\* The geographical designations employed in this document do not imply the expression of any opinion whatsoever on the part of the CITES Secretariat (or the United Nations Environment Programme) concerning the legal status of any country, territory, or area, or concerning the delimitation of its frontiers or boundaries. The responsibility for the contents of the document rests exclusively with its author.

**ECOWAS RESPONSE TO COMMENTS OF THE SECRETARIAT ON  
COP19 DOC 36.1 AND COP19 DOC 36.2**

The CITES Secretariat has published a detailed response to CoP19 Docs 36.1 and 36.2, on *Wildlife Crime Enforcement Support in West and Central Africa*. Given the highly extensive changes proposed by the Secretariat, West African Parties wish to publish a response to the Secretariat's comments as follows:

**Regarding Proposed Decision 19.AA and 19.BB (CoP19 Doc 36.1, Annex 1) on *strengthening collaboration between source, transit and consumer countries***

1. **Secretariat comment:** The Secretariat proposes that draft decisions 19.AA and 19.BB presented in Annex 1 of document CoP19 Doc. 36.1 not be adopted. The Secretariat proposes alternative Decisions. ***These alternative Decisions do not include the establishment of a Working Group to review options for promoting enhanced collaboration between source, transit and consumer countries, as proposed in Doc 36.1.***
2. **ECOWAS response:** The Secretariat highlights a number of existing CITES provisions that recommend collaboration between source, transit and consumer countries. However, given the serious concerns about the lack of collaboration raised in Doc 36.1, these existing provisions are clearly inadequate to achieve robust collaboration between source, transit and consumer countries. West Africa Parties believe this is because collaboration between States across the enforcement chain is not the primary focus of these documents. The purpose of the draft Decisions presented in Doc 36.1 is to explore options for developing a *dedicated mechanism* for this collaboration. **West African Parties therefore support the adoption of the Decisions as originally proposed.**

ECOWAS would also like to respectfully remind the Secretariat that these draft Decisions were adopted by the Standing Committee, and as such, whilst the Secretariat's viewpoint is an important contribution to the discussion, ECOWAS does not believe that the Secretariat should suggest that CoP disregard these draft Decisions adopted and considered necessary by the Standing Committee.

**Regarding Proposed Decisions 19.AA and 19.BB (CoP19 Doc 36.1, Annex 2) on *Strengthening wildlife law enforcement in West Africa***

3. **Secretariat comment:** The Secretariat proposes that draft decisions 19.AA and 19.BB presented in Annex 2 to document CoP19 Doc. 36.1 not be adopted. The Secretariat proposes alternative Decisions. ***These alternative Decisions do not include the establishment of a Working Group to provide expert support to the WAN, as proposed in Doc 36.1***
4. **ECOWAS response:** West African Parties appreciate the Secretariat's suggestion to request support for the WAN through ICCWC, and the WAN Steering Committee will contact ICCWC in due course. However, it should be noted that development of a policy to implement the WASCWC through the WAN is being addressed directly by the ECOWAS Commission and does not require CITES support (as proposed in the Secretariat's draft Decision). The purpose of proposed Decision 19.AA (establishing an intersessional Working Group) is to provide the WAN with expertise from CITES Parties and experts within regional Wildlife Enforcement Networks, and as such **West African Parties support the adoption of the Decision as originally proposed.**

ECOWAS member States would also like to respectfully remind the Secretariat that these draft Decisions were adopted by the Standing Committee, and as such, whilst the Secretariat's viewpoint is an important contribution to the discussion, ECOWAS does not believe that the Secretariat should suggest that CoP disregard these draft Decisions adopted and considered necessary by the Standing Committee.

**Regarding proposed Decisions 19.AA and 19.BB (CoP19 Doc 36.2, Annex 1) on CITES Enforcement Fund**

5. Secretariat comment: The Secretariat proposes that the draft Decisions 19.AA and 19.BB in Annex 1 of document CoP19 Doc. 36.2 not be adopted, and instead proposes alternative language to Decision 18.91. ***This alternative language does not include reference to a CITES Enforcement Fund, as proposed in Doc 36.2***
6. ECOWAS response: The guidance provided by the Secretariat on other funding streams for CITES enforcement (including GEF-8, the Compliance Assistance Programme and ICCWC) is appreciated and ECOWAS member States will investigate those options in due course. West African Parties also welcome the proposed activities highlighted in SC74 Doc. 35.2. However, these existing funding streams are not dedicated enforcement funding and as such do not adequately reflect the rationale behind the original Decisions as presented in CoP19 Doc. 36.2.

ECOWAS member States are strongly of the opinion that a dedicated CITES Enforcement Fund will highlight the importance of CITES enforcement and will provide potential donors with a dedicated mechanism through which to direct urgently needed enforcement funding to Parties for implementation of national and regional strategies (such as the West Africa Strategy on Combating Wildlife Crime). **West African Parties therefore support the adoption of the Decision as originally proposed. However, ECOWAS countries note and accept the comment of other Parties that the Enforcement Fund should not focus on a single region only and as such welcome the amendment of the Decision accordingly.**

**Regarding proposed Decisions 19.DD and 19.EE (CoP19 Doc. 36.2, Annex 1) on Enforcement of timber listings and combatting timber crime**

7. Secretariat comment: The Secretariat proposes that the draft Decisions 19.DD and 19.EE in Annex 1 of document CoP19 Doc. 36.2 not be adopted. ***No alternative Decisions are provided.***
8. ECOWAS response: ECOWAS member States would not wish to replicate the work of the Plants Committee, as is suggested by the Secretariat. However, we note that existing efforts focus solely on tree species already listed by CITES. The purpose of the proposed West Africa Timber Response Working Group is partly to identify species that require enhanced CITES protection, including species currently not listed. Data concerning West Africa tree species and their status is currently extremely limited. Many tree species are, for example, unclassified by IUCN or were last reviewed more than 20 years ago (e.g. *Terminalia ivorensis* which is known to be exploited for timber, is not CITES listed, and which was last reviewed by IUCN in 1998).

West African countries are keen to ensure that threatened tree species are not being unsustainably exploited, and to identify species which require enhanced CITES protection. This is the rationale behind the draft Decisions and **West African Parties support the adoption of the Decision as originally proposed.**