

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



Twenty-sixth meeting of the Plants Committee  
Geneva (Switzerland), 5-9 June 2023

Appendices of the Convention

Annotations

ANNOTATION OF CAPE ALOE (*ALOE FEROX*)

1. This document has been prepared by the Secretariat.
2. *Aloe ferox* is listed in Appendix II (as part of the generic listing of *Aloe* spp.) with annotation #4, which reads:

*All parts and derivatives, except:*

- a) *seeds (including seedpods of Orchidaceae), spores and pollen (including pollinia). The exemption does not apply to seeds from Cactaceae spp. exported from Mexico, and to seeds from Beccariophoenix madagascariensis and Dypsis decaryi exported from Madagascar;*
  - b) *seedling or tissue cultures obtained in vitro transported in sterile containers;*
  - c) *cut flowers of artificially propagated plants;*
  - d) *fruits, and parts and derivatives thereof, of naturalized or artificially propagated plants of the genus Vanilla (Orchidaceae) and of the family Cactaceae;*
  - e) *stems, flowers, and parts and derivatives thereof, of naturalized or artificially propagated plants of the genera Opuntia subgenus Opuntia and Selenicereus (Cactaceae);*
  - f) *finished products of Aloe ferox and Euphorbia antisiphilitica packaged and ready for retail trade; and*
  - g) *finished products derived from artificial propagation, packaged and ready for retail trade of cosmetics containing parts and derivatives of Bletilla striata, Cycnoches cooperi, Gastrodia elata, Phalaenopsis amabilis or Phalaenopsis lobbii.*
3. Paragraph f) of annotation #4 specifies the parts and derivatives of *Aloe ferox* exempted from CITES provisions.
  4. At its 19th meeting (CoP19; Panama City, 2022), the Conference of the Parties adopted Decisions 18.323 (Rev. CoP19) to 18.326 (Rev. CoP19), as follows:

***Directed to the Secretariat***

**18.323 (Rev. CoP19)** *The Secretariat shall issue a Notification to the Parties requesting the following information:*

- a) *whether, and if so how, the amended annotation #4 has impacted the international trade in Aloe ferox specimens; and*
- b) *whether, and if so how, the amended annotation #4 has affected the population size, distribution, status and harvest of Aloe ferox.*

**18.324 (Rev. CoP19)** *The Secretariat shall compile responses from the Parties as requested under Decision 18.323 (Rev. CoP19) and provide these responses to the Plants Committee.*

**Directed to the Plants Committee**

**18.325 (Rev. CoP19)** *The Plants Committee shall review the information received as requested under Decision 18.324 (Rev. CoP19) and other relevant information available regarding the status, management, and international trade in Aloe ferox, with a view to assessing whether the exemption of finished products of Aloe ferox packaged and ready for retail trade from CITES regulation have had any impacts on the natural populations of the species. Based on the outcome of this review, the Plants Committee shall formulate recommendations concerning the listing of Aloe ferox for consideration at the 20th meeting of the Conference of the Parties.*

**Directed to Parties**

**18.326 (Rev. CoP19)** *Range countries, consumer countries, and other countries involved in the management, propagation, or trade of Aloe ferox are encouraged to provide information regarding the status, management, and trade in this species as requested under Decision 18.323 (Rev. CoP19).*

Implementation of Decisions 18.323 (Rev. CoP19) and 18.324 (Rev. CoP19)

5. In accordance with Decision 18.323 (Rev. CoP19), the Secretariat published [Notification No. 2023/021](#) on 2 March 2023. At the time of writing, the Secretariat had received responses from Austria, Germany, South Africa, Sweden and the United States of America.
6. In accordance with Decision 18.324 (Rev. CoP19), the Secretariat has compiled the responses to Notification No. 2023/021 in Annexes 1 to 5 to the present document (in the language and format in which they were received). To facilitate the review by the Plants Committee, the Secretariat includes a brief analysis of the responses received:
  - a) with regard to whether, and if so how, the amended annotation #4 has impacted the international trade in *Aloe ferox* specimens [paragraph a) of Decision 18.323 (Rev. CoP19)]:
    - i) importing Parties (Austria, Germany, Sweden and the United States of America) report that imports of *A. ferox* have remained comparable or decreased since 2020. However, data from before and after the adoption of the exemption is partially incomparable and does not allow for a final conclusion with regard to international trade in *A. ferox*, since trade in finished products ready for retail trade no longer requires CITES documentation and is no longer reflected in the available data; and
    - ii) South Africa as one of only two known range States of the species reports that the information is inconclusive. On the one hand, several trading companies were no longer operational as a result of the COVID-19 pandemic, and others are still in the process to rebuild their customer base. Trade in *A. ferox* has not increased to the degree that was envisioned in proposal [CoP18 Prop. 55](#), due to this interruption, since the exemption provided by annotation #4 does not cover extracts or derivatives, and also for regulatory reasons that are independent of CITES provisions. On the other hand, the business environment for swift and agile trade in *A. ferox* has reportedly improved due to the exemption, and trade seems to again increase, especially in eastern markets.
  - b) with regard to whether, and if so how, the amended annotation #4 has affected the population size, distribution, status and harvest of *Aloe ferox* [paragraph b) of Decision 18.323 (Rev. CoP19)]:

- i) South Africa, as one of the only two range States of the species, reports that due to the reduction of international trade in *A. ferox* as described above, and due to tough competition with trade in *A. vera* (which is not listed in CITES Appendices), the *A. ferox* resource base is unlikely to have changed drastically over the past three years. They add that harvest of *A. ferox* was carried out in a sustainable manner across most of the region and ongoing or increased trade was unlikely to impact the resource base;
  - ii) South Africa also reports that the species conservation was now also supported by a Biodiversity Management Plan that makes provisions for a resource monitoring plan to assess any impacts on the resource base.
- c) on a general note, responding Parties also indicated that an additional confounding factor hampering the interpretation of available information may be due to the COVID-19 pandemic, and that the time period since the exemption came into effect in 2019 may have been too short for markets and species populations to fully reflect the impacts of the new regulatory regime.

#### Recommendations

7. The Plants Committee is invited to:

- a) review the present document and its Annexes;
- b) assess whether the exemption for *Aloe ferox* as provided in paragraph f) of annotation #4 has had any impacts on the natural populations of the species; and,
- c) based on the above, formulate recommendations concerning the listing of *A. ferox* for consideration at the 20th meeting of the Conference of the Parties.

## Maria Isabel Camarena Osorno

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**Subject:** Aloe ferox - Notif. No. 2023/021 / Dec. 18.323

---

**From:** Rose Martin <[Martin.Rose@bmk.gv.at](mailto:Martin.Rose@bmk.gv.at)>  
**Sent:** Monday, March 20, 2023 2:46 PM  
**To:** Martin Otto Hitziger <[martin.hitziger@cites.org](mailto:martin.hitziger@cites.org)>  
**Cc:** Hoffmann Daniela <[Daniela.Hoffmann@bmk.gv.at](mailto:Daniela.Hoffmann@bmk.gv.at)>; Leitner Birgit <[Birgit.Leitner@bmk.gv.at](mailto:Birgit.Leitner@bmk.gv.at)>; [ENV-CITES@ec.europa.eu](mailto:ENV-CITES@ec.europa.eu)  
**Subject:** Aloe ferox - Notif. No. 2023/021 / Dec. 18.323

Sie erhalten nicht oft eine E-Mail von [martin.rose@bmk.gv.at](mailto:martin.rose@bmk.gv.at). [Erfahren Sie, warum dies wichtig ist](#)

Dear Martin,  
(EU Commission in cc)

in relation to Notification No. 2023/021 regarding Decisions 18.323 to 18.326 (Rev. CoP19) on *Annotation of Cape aloe (Aloe ferox)* Austria can provide the following information:

### Legal trade

*Aloe ferox* was the only traded CITES listed *Aloe* species in Austria in the last 10 years. Products imported from South Africa and Switzerland and concerned mainly finished products for cosmetic or homeopathic use. Since the change of the annotation, only one CITES-relevant import was realised in 2020 from Switzerland. Finished products of *Aloe ferox* packaged and ready for retail trade are still traded within Austria and are available on the market. Trade volumes are difficult to compare due to the effect of the Covid pandemic on overall trade. Nevertheless, when adjusting for that, we estimate that the trade level is comparable. Given that no other CITES-listed *Aloe* species in was in trade before the change, we have not seen a shift in trade.

### Illegal trade

Seizures were dominated by *Aloe ferox* derivatives, but included other *Aloe* species (mainly live). The *Aloe ferox* derivatives were products ordered online, send to the consumers by post. Given that these were all finished products packaged and ready for retail trade, there have been no seizures of *Aloe ferox* derivatives since the change of the annotation.

Kind Regards from Vienna  
Martin

**Republic of Austria**  
**Federal Ministry for Climate Action, Environment, Energy, Mobility, Innovation and Technology**  
Dept. V/10 - National Parks, Nature Conservation & Species Protection

**Martin ROSE**  
CITES Management Authority

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## Maria Isabel Camarena Osorno

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**Subject:** FW: Antw: New Notification to the Parties to CITES  
**Attachments:** Aloe-ZA.jpg; Aloe-ferox-ZA.docx

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**From:** David Harter <[David.Harter@BfN.de](mailto:David.Harter@BfN.de)>  
**Sent:** Monday, March 20, 2023 11:06 AM  
**To:** Martin Otto Hitziger <[martin.hitziger@cites.org](mailto:martin.hitziger@cites.org)>  
**Cc:** FG-II12 <[FG-II12@BfN.de](mailto:FG-II12@BfN.de)>; Karin Hornig <[Karin.Hornig@BfN.de](mailto:Karin.Hornig@BfN.de)>; Mario Sterz <[Mario.Sterz@BfN.de](mailto:Mario.Sterz@BfN.de)>  
**Subject:** Antw: New Notification to the Parties to CITES

Hello Martin

The German CITES Authorities do not have unambiguous insight whether the amendment of annotation #4 to exclude finished products from CITES controls has impacted the international trade in *Aloe ferox* specimens. In the attached data that our MA colleagues kindly have aggregated, imports into Germany (being one of the most important import countries) are provided for the period of three years before to three years after the amendment took place.

Due to the exemption, finished products are not included in this figure anymore since the CoP19 decisions went into effect, so it is not possible to see if there has been a possible increase in trade. Please also note that for this analysis imports that were termed cosmetics on export permits but were obviously no finished products have been added/included into the appropriate commodity term extract/medicine.

Nevertheless, what could be seen from the data is that those commodities terms that are not affected by the exemption has been used less often since the CoP19 decision than in the years before.

We have no information whether the changed annotation has affected the population size, distribution, status and harvest of *Aloe ferox*.

Best wishes

David

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Dr. David Harter (Mr.)

(on behalf of)

Division of Plant Conservation

Scientific Authority to CITES Germany - Flora

**German Federal Agency for Nature Conservation**

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Email: [david.harter@bfm.de](mailto:david.harter@bfm.de)

Web: [www.bfn.de/en](http://www.bfn.de/en)

>>>

**Von:** CITES <[no\\_reply@cites.org](mailto:no_reply@cites.org)>

**An:** <[david.harter@bfm.de](mailto:david.harter@bfm.de)>

**Datum:** 02.03.2023 09:40

**Betreff:** New Notification to the Parties to CITES

The following Notification to the Parties was posted on the CITES website on 02 March 2023:

Notification to the Parties N° 2023/021:

[Decisions 18.323 to 18.326 \(Rev. CoP19\) on Annotation of Cape aloe \(Aloe ferox\)](#)

The Notification can be viewed on the page below:

<http://cites.org/eng/node/135177>

CITES Secretariat  
International Environment House  
11 Chemin des Anemones  
CH-1219 Chatelaine, Geneva  
Switzerland  
Fax: +41-22-797-34-17  
Email: [info@cites.org](mailto:info@cites.org)  
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Imports of Aloe ferox from South Africa into Germany  
Update: 17.03.2023

Description	Unit	2017	2018	2019	2020	2021	2022
Cosmetics	NO	2040	2489	1143	364 <sup>1)</sup>	0	0
Extracts/medicine	KG	32666	46181	66463	82784	24674	26930
	L	11056	13122	6522	6615	9305	2225
Powder/wax	KG	11504	17754	16437	5969	5039	2200
Leaves/dried plants	NO	6600	0	3150		120	3240
	KG				57	2011	

<sup>1)</sup> granted in 2019, imported in 2020

## Maria Isabel Camarena Osorno

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**Subject:** CITES Decision 18.323 to 18.326; Aloe ferox

**Importance:** High

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**From:** Michele Pfab <[M.Pfab@sanbi.org.za](mailto:M.Pfab@sanbi.org.za)>

**Sent:** Friday, March 24, 2023 3:13 PM

**To:** Martin Otto Hitziger <[martin.hitziger@cites.org](mailto:martin.hitziger@cites.org)>

**Cc:** SANBI \28010632b\29 [SANBI ORG] <[c.mbizvo@sanbi.org.za](mailto:c.mbizvo@sanbi.org.za)>; Malepo Phoshoko <[MSPhoshoko@dffe.gov.za](mailto:MSPhoshoko@dffe.gov.za)>;

Mpho Tjiane <[mtjiane@dffe.gov.za](mailto:mtjiane@dffe.gov.za)>; Tasneem Variawa <[T.Variawa@sanbi.org.za](mailto:T.Variawa@sanbi.org.za)>

**Subject:** FW: CITES Decision 18.323 to 18.326; Aloe ferox

**Importance:** High

Sie erhalten nicht oft eine E-Mail von [m.pfab@sanbi.org.za](mailto:m.pfab@sanbi.org.za). [Erfahren Sie, warum dies wichtig ist](#)

Dear Martin,

Please receive below our response to the CITES Secretariat's call for information in relation to the *Aloe ferox* annotation. Please accept my apologies for missing the deadline. We are really quite overwhelmed on this side, especially at this time of the year. I sincerely hope that you will still be able to use the information.

Regards,  
Michele

Michèle Pfab

Scientific Co-ordinator: Scientific Authority  
Biodiversity Research, Assessment and Monitoring Division  
South African National Biodiversity Institute (SANBI)

Pretoria National Botanical Garden

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Web Site address: [www.sanbi.org](http://www.sanbi.org)

<https://www.sanbi.org/biodiversity/science-into-policy-action/science-authority/>

<https://www.sanbi.org/biodiversity/building-knowledge/applied-biodiversity-research/sustainable-trade-in-wildlife-products/>



South African National Biodiversity Institute

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**From:** Tasneem Variawa <[T.Variawa@sanbi.org.za](mailto:T.Variawa@sanbi.org.za)>

**Sent:** Thursday, March 16, 2023 9:54 AM

**To:** Michele Pfab <[M.Pfab@sanbi.org.za](mailto:M.Pfab@sanbi.org.za)>

**Cc:** Mpho Tjiane <[mtjiane@dffe.gov.za](mailto:mtjiane@dffe.gov.za)>; Malepo Phoshoko <[MSPhoshoko@dffe.gov.za](mailto:MSPhoshoko@dffe.gov.za)>; Neil Crouch <[N.Crouch@sanbi.org.za](mailto:N.Crouch@sanbi.org.za)>

**Subject:** RE: CITES Decision 18.323 to 18.326; Aloe ferox

**Importance:** High

Dear Michele



I have spoken to three industry members as well as our colleagues at CapeNature and DEDEAT and have summarised the feedback as follows:

a) *On whether, and if so how, the amended annotation #4 has impacted the international trade in Aloe ferox specimens*

Essentially it is too soon to tell. Shortly after the annotation took effect at the end of 2019 (26/11/2019), countries were hit with Covid-19 restrictions which greatly impacted businesses, including the *A. ferox* industry. According to one source, several companies did not survive whilst those that did are still trying to get back to pre-covid levels and are working on re-building their customer bases. Whilst there appears to be no perceived/actual growth in the international trade of *Aloe ferox* over the past three years since the annotation came into effect, two of the companies who are involved solely in the manufacture and sale of finished products have stated that it is much easier to do business internationally. Without the hassle of needing to have inspections done and wait for CITES permits, the lead time to fulfil orders has decreased significantly and it is now convenient and more cost-effective to ship unit and bulk products out in a timely manner. It is also easier for marketing purposes as samples can be sent out more freely. One company has expanded its distribution network to several new countries and whilst this may not directly be due to the amended annotation, the exemption of finished products definitely supports the growth of this market. Suppliers of raw products remain hopeful that the exemption will get more companies (locally and internationally) interested in *A. ferox* and promote further growth in the finished product industry as was initially intended with the revised annotation. (According to one supplier there are other regulations such as the EUs [2021 regs](#) regarding botanical species containing hydroxyanthracene derivatives (e.g., aloin) that hamper Aloe business (specifically food and beverage?) expansion at this stage. Eastern markets however appear to be on the rise).

There are only two years of reporting data available on the CITES trade database post 2019. Industry in the Western Cape is primarily responsible for the manufacture and export of finished product (i.e., 'Product, shipped singly or in bulk, requiring no further processing, packaged, labelled for final use or the retail trade in a state fit for being sold to or used by the general public'), with the Eastern Cape issuing permits for raw materials (i.e. extract and powder) only. According to Cape Nature, the use of the term finished product has been dropped on permits and in reports (for 2020/2021) but specimen descriptions like "cosmetics, juice, tea", which should/could fall into the definition of "finished product" as provided in the Appendices, still appears in some of the reports. This may be due to the fact that certain 'finished products' like medicines may not comply with the very narrow definition of being "fit for sale" etc. and perhaps still need to be packaged, labelled etc. for final consumer use. Exports of derivatives (which could also include such type of finished product) are also still reported. This will make it a little more complicated to determine a clear impact of the revised annotation. In general, finished products (for consumer use) are no longer being regulated and this is good for business but due to the short time frame since the annotation came into effect, and the impact of Covid, it is not possible to fully gauge any real change to the international trade in *A. ferox*. Another year or two worth of reports (i.e. 2022/23) including analysis of the volumes / quantities reflected in each report will provide a better picture in time.

b) *On whether, and if so how, the amended annotation #4 has affected the population size, distribution, status and harvest of Aloe ferox*

According to industry members, the trade in *A. ferox* parts and products is relatively stable and slowly getting back to pre-Covid levels. The CITES trade data supports this. Harvest of the resource base is therefore unlikely to have changed drastically over the past three years. The impact of Covid has hampered business expansion but the industry also remains in tough competition with *Aloe vera* (which for all intents and purposes is excluded from national and international regs.). Suppliers of *A. ferox* raw materials and value-added products to be used in the manufacture of consumer goods have reportedly not experienced a surge in demand for these goods since the annotation took effect. Producers of finished goods have also not reported a drastic increase in the demand for raw materials to manufacture finished product. The harvest of *A. ferox* is nevertheless carried out in a sustainable manner across most of the region and ongoing/increased trade, particularly in finished products is unlikely to impact the resource base. The species conservation is now also supported by a Biodiversity Management Plan (that makes provisions for a resource monitoring

plan to assess any changes to/impacts on the resource base). The harvest of *Aloe ferox* in South Africa remains sustainable but (a lot) more time is needed to assess the effect (if any) of the amended annotation on the populations.

Please let me know if there is anything you would like further clarity on. I have attached here my communication with Cape Nature and two industry members for your info.

Thank you,  
Tasneem

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**Tasneem Variawa**

**Botanist: Scientific Authority Support**

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[SANBI/scientific-authority](http://www.sanbi.org/scientific-authority)

[SANBI/sustainable-wildlife-use-and-trade](http://www.sanbi.org/sustainable-wildlife-use-and-trade)



South African National Biodiversity Institute

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**From:** Michele Pfab <[M.Pfab@sanbi.org.za](mailto:M.Pfab@sanbi.org.za)>

**Sent:** Tuesday, 07 March 2023 17:10

**To:** Tasneem Variawa <[T.Variawa@sanbi.org.za](mailto:T.Variawa@sanbi.org.za)>

**Cc:** Mpho Tjiane <[mtjiane@dffe.gov.za](mailto:mtjiane@dffe.gov.za)>; Malepo Phoshoko <[MSPhoshoko@dffe.gov.za](mailto:MSPhoshoko@dffe.gov.za)>; Neil Crouch <[N.Crouch@sanbi.org.za](mailto:N.Crouch@sanbi.org.za)>

**Subject:** FW: CITES Decision 18.323 to 18.326; Aloe ferox

Hi Tasneem,

Please see attached request from the CITES Secretariat. We have less than two weeks to respond with something. Please give this some thought and let me know tomorrow when you are ready to discuss our approach.

M

Michèle Pfab

Scientific Co-ordinator: Scientific Authority  
Biodiversity Research, Assessment and Monitoring Division  
South African National Biodiversity Institute (SANBI)

Pretoria National Botanical Garden

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Web Site address: [www.sanbi.org](http://www.sanbi.org)

<https://www.sanbi.org/biodiversity/science-into-policy-action/science-authority/>

<https://www.sanbi.org/biodiversity/building-knowledge/applied-biodiversity-research/sustainable-trade-in-wildlife-products/>

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**From:** Carmel Mbizvo <[C.Mbizvo@sanbi.org.za](mailto:C.Mbizvo@sanbi.org.za)>  
**Sent:** Monday, March 6, 2023 2:37 PM  
**To:** Theresa Frantz <[T.Frantz@sanbi.org.za](mailto:T.Frantz@sanbi.org.za)>; Michele Pfab <[M.Pfab@sanbi.org.za](mailto:M.Pfab@sanbi.org.za)>  
**Cc:** Gail Van Aswegen <[G.VanAswegen@sanbi.org.za](mailto:G.VanAswegen@sanbi.org.za)>  
**Subject:** FW: CITES Decision 18.323 to 18.326; Aloe ferox

Dear Theresa and Michele,

Please can we assist with the below request for information on Annotation of Cape aloe.

Kind regards,  
Carmel

---

**From:** Martin Otto Hitziger <[martin.hitziger@cites.org](mailto:martin.hitziger@cites.org)>  
**Sent:** Thursday, March 2, 2023 11:38 AM  
**To:** Carmel Mbizvo <[C.Mbizvo@sanbi.org.za](mailto:C.Mbizvo@sanbi.org.za)>; secretariat.scientificauthority <[secretariat.scientificauthority@sanbi.org.za](mailto:secretariat.scientificauthority@sanbi.org.za)>  
**Cc:** Maria Isabel Camarena Osorno <[isabel.camarena@cites.org](mailto:isabel.camarena@cites.org)>; David Morgan <[david.morgan@un.org](mailto:david.morgan@un.org)>; Thea Henriette Carroll <[thea.carroll@un.org](mailto:thea.carroll@un.org)>  
**Subject:** CITES Decision 18.323 to 18.326; Aloe ferox

Dear Ms Mbizvo,

I hope you are doing well. Please note that the Secretariat published [Notification 2023/21](#) to invite Parties to contribute information relevant to Decisions 18.323 to 18.326 (Rev. CoP19) on *Annotation of Cape aloe* (*Aloe ferox*). Considering South Africa is one of only two range States to the species, we would appreciate any information that South Africa has on this matter.

With kind regards,  
Martin Hitziger

### MARTIN HITZIGER

Associate Plant Species Officer/  
Oficial adjunto de especies de plantas/  
Administrateur associé chargé des espèces de plantes

Scientific Services/Servicios Científicos/Services Scientifiques  
CITES Secretariat/Secretaría CITES/Secrétariat CITES

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## Maria Isabel Camarena Osorno

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**Subject:** Sweden's response to notification 2023/021

**From:** [Erik.Dalarud@jordbruksverket.se](mailto:Erik.Dalarud@jordbruksverket.se) <[Erik.Dalarud@jordbruksverket.se](mailto:Erik.Dalarud@jordbruksverket.se)>

**Sent:** Friday, March 24, 2023 3:32 PM

**To:** Martin Otto Hitziger <[martin.hitziger@cites.org](mailto:martin.hitziger@cites.org)>

**Cc:** Marie Dahlström <[marie.dahlstrom@regeringskansliet.se](mailto:marie.dahlstrom@regeringskansliet.se)>; [Selam.Petersson@jordbruksverket.se](mailto:Selam.Petersson@jordbruksverket.se);  
[Negar.Aslund@jordbruksverket.se](mailto:Negar.Aslund@jordbruksverket.se)

**Subject:** Sweden's response to notification 2023/021

Sie erhalten nicht oft eine E-Mail von [erik.dalarud@jordbruksverket.se](mailto:erik.dalarud@jordbruksverket.se). [Erfahren Sie, warum dies wichtig ist](#)

Dear Secretariat,

In response to notification 2023/021, we would like to provide the following information from Sweden regarding the trade in Aloe Ferox:

Our analysis of current trade statistics reveals that Sweden predominantly imports derivatives and extracts of Aloe Ferox, with no recorded exports of the species. Trade levels have experienced natural fluctuations over the years, making it challenging to establish a causal link to the change in annotation. Notably, we have recorded import entries in 2013, 2015, 2018, 2019, and 2020.

Although there has been a slight decrease in import volumes since 2018, it remains difficult to determine if this is part of the natural fluctuation or directly linked to the change in annotation.

Over the past decade, a few seizures have been made, including 180 capsules by customs in August 2016 and 30 capsules from the US in 2015. The majority of imports originate from South Africa, with a smaller quantity from Switzerland. These imports are mainly for commercial purposes and are of wild origin. Aloe Ferox is likely imported as a preparation for the health food trade.

In summary, based on the available data, we cannot provide conclusive information on how the change in annotation impacts the population size, distribution, status, or harvest of Aloe Ferox

Kind regards,

Erik Dalarud

Swedish CITES Management Authority  
Swedish Board of Agriculture



# United States Department of the Interior



FISH AND WILDLIFE SERVICE  
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IN REPLY REFER TO:  
FWS/DMA/ PLA 7-01

March 28, 2023

Martin Otto Hitziger  
Associate Scientific Support Officer, Science Unit  
CITES Secretariat  
International Environment House  
11 Chemin des Anémones  
CH-1219 Châtelaine, Geneva  
Switzerland

VIA EMAIL: [martin.hitziger@un.org](mailto:martin.hitziger@un.org)

Dear Martin:

This letter provides the U.S. response to Notification to the Parties No. 2023/021 - Decisions 18.323 to 18.326 (Rev. CoP19) on Annotation of Cape aloe (*Aloe ferox*), which requests information on the experience of Parties in implementing Annotation #4 following its amendment at the 18th meeting of the Conference of the Parties (CoP18; Geneva, August 2019) to exclude finished products packaged and ready for retail trade from the Appendix-II listing of Cape aloe (*Aloe ferox*).

Because finished products packaged and ready for retail trade are no longer covered under the CITES listing and therefore do not require CITES documents in international trade, the United States does not have trade data for import of such commodities. However, we are aware that there are several United States-based distributors of *A. ferox* finished products. The CITES Trade Database reports U.S. imports of wild-sourced extracts, leaves, and powder directly from South Africa; and a small quantity of artificially propagated live plants (UNEP-WCMC CITES Trade Database 2023). Additionally, the United States is not a major exporter of specimens of *A. ferox*. For the period 2015 to 2019, South Africa reported exports to the United States of derivatives of *A. ferox* totaling 72,637 g, 12,442.89 kg, and 216,690 ml. For 2020 and 2021, South Africa reported 45 and 1,000 unreported units of derivatives, respectively, compared to 1,625 unreported units of derivatives for 2016-2019 (UNEP-WCMC CITES Trade Database 2023).

We note that the revised Annotation #4, and the resulting exclusion of finished products of *A. ferox* packaged and ready for retail trade from the listing, has been in effect for little more than

three years (since November 26, 2019), most of which was during a worldwide pandemic. We suggest contacting the IUCN SSC Cactus and Succulent Plant Specialist Group to determine if they are able to provide additional information on the population size, distribution, status, and harvest of *A. ferox*. Additionally, we are hopeful that the range States of *A. ferox* can provide more useful information for the species, including concerning the implementation of the Biodiversity Management Plan and a monitoring plan for *A. ferox*, to help inform discussions on the effect of the amended annotation on the conservation of the species.

Please let us know if you have any questions regarding the above information and we look forward to discussing this issue more at the upcoming 26th meeting of the Plants Committee.

Sincerely,

Rosemarie Gnam, Head  
Division of Scientific Authority  
U.S. Fish and Wildlife Service

Sincerely,

NAIMAH  
AZIZ

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NAIMAH AZIZ  
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Naimah Aziz, Head  
Division of Management Authority  
U.S. Fish and Wildlife Service