

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES
OF WILD FAUNA AND FLORATwenty-sixth meeting of the Plants Committee
Geneva (Switzerland), 5 – 9 June 2023Regional mattersRegional reports

EUROPE

1. This document has been submitted by the regional representatives for Europe.*
2. General information
 - a) Representatives: Ms Ursula Moser and Ms Noeleen Smyth.
 - b) Alternates: Mr Daniel Wolf and Mr Hugo de Boer
 - c) Number of Parties in the region: 49
 - d) Answers were received from the following parties: Austria, Republic of Croatia, Czech Republic, Estonia, European Union, Germany, Ireland, Latvia, Norway, Portugal, Slovakia, Slovenia, Sweden, Switzerland, Türkiye, United Kingdom and Northern Ireland.
3. **Activities carried out regarding**
 - a) Significant trade

Czech Republic reported to have issued import permits for orchids (source “A”) / Equador (around 210 specimens in total), orchids (source “A”) / Thailand (around 2 000 specimens in total), cacti (source “A” and “D”) / Iran (around 400 specimens in total), *Pachypodium* and *Euphorbia* (source “A”) / Madagascar (more than 2,000 specimens in total). In all these cases they investigated the declared source of plants through communication with the applicants or with CITES Scientific Authority of the country of origin.

European Union (EU) and its Member states reported activities of the Scientific Authorities within the EU to improve standards and harmonization of NDF for timber imports of CITES-listed species. In this context a document has been submitted by the EU to PC 26

Latvia: The Latvian Nature Conservation Agency cooperates with Latvian Customs to detect and prevent illegal trade in CITES-listed plant specimens. There are very few cases of illegal trade in CITES-listed plant products in Latvia. In the last 16 years there have been 12 cases, most of them are food supplements or medicines with extracts from orchids and *Saussurea costus*.
In 2018, there was one case with a shipment without CITES documents - a wooden statue of *Dalbergia melanoxylon*.
In general there is little illegal trade in CITES-listed plant specimens in Latvia.

Turkey reported significant trade in *Galanthus spp.*, *Cyclamen spp.* and *Sternbergia lutea*

* 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.

United Kingdom of Great Britain and Northern Ireland reported to provide scientific expertise on species under review using the botanic collections at RBG Kew (approx. 8 million)

b) Review of the Appendices

Slovakia: During the CoP19 preparatory process for the proposal to list *Rhodiola* spp., the species *Rhodiola rosea*, native to Slovakia, was included in the Nature Protection Act, so that the species is now protected by national law and its social value is listed at EUR 100, allowing for better enforcement and control.

c) CITES-projects

Austria was part of the CITES Timber Task Force and supported the work on the recommendations regarding tree species. Connected to this they engaged with authorities dealing with timber trade of non-CITES species to build up synergies.

Germany was actively contributing to the CITES-NDF-Project, both financially as well as in the respective working bodies.

Norway: The Norwegian Environment Agency requested the Norwegian Scientific Committee for Food and Environment's Committee on CITES (The Norwegian Scientific Authority for CITES) to make a Scientific assessment of risk to the population of *Rhodiola rosea* listed by CITES as a result of export from Norway. This assessment was completed in March 2023.

Switzerland mentioned the following projects:

- A molecular passport for the rosewoods of Madagascar, finalized in December 2022
- Conservation status, trade and threats to the genus *Boswellia* (Frankincense), ongoing project till December 2023
- Update of CITES and Timber, A guide to CITES-listed tree species, fact sheets to be placed on the CITES homepage

United Kingdom of Great Britain and Northern Ireland highlighted the following projects

- The *Dalbergia* Checklist, Edible Orchids project
- Medicinal Plant Names Service

The **EU** funded amongst others:

- the CITES tree species programme aiming to assist Parties in taking conservation and management measures to ensure that their trade in timber, bark, extracts and other products from CITES-listed tree species is sustainable, legal and traceable;
- financial support to the CITES Secretariat to implement CoP decisions;
- Species+ and monitoring of the status of several CITES-listed species

d) Publications

Germany publishes the names of all protected species according to national law, including all CITES-listed species and has updated the database. It is online available under www.wisia.de. Together with the Thünen Institute Hamburg the German SA is currently working on an update of CITESwoodID to include the timber species listed at CoP 19 and to make it available for smartphones and on desktop PC's.

Ireland mentioned the following online article/resource for Irish traders:

<https://www.npws.ie/legislation/cites> CITES CoP 19 and Implications for Irish Trade
Online article/resource on legal changes with CITES COP 19 for Irish legal practitioners
<https://www.lawsociety.ie/gazette/top-stories/2023/april/cop-on-new-species-added-to-trade-rules>

Norway mentioned the following publication:

VKM, de Boer, H.J., Gehrke, B. 2023. Scientific assessment of risk to the population of *Rhodiola rosea* listed by CITES as a result of export from Norway. Norwegian Scientific Committee for Food and Environment.
https://vkm.no/download/18.788349651876f1d23f0bf441/1682055085962/VKM%20assessment_ND_F_Rhodiola%202023.pdf

Sweden states that no publications have been made in recent years. In 2015, the Swedish EPA (CITES Scientific Authority) financially supported the publication "CITES and Timber - A guide to CITES-listed

tree species", published by the Royal Botanic Gardens, Kew, UK, and written by the authors Madeleine Groves and Catherine Rutherford. The guide gives an overview of a number of selected tree species covered by CITES and provides guidance on the main issues related to CITES implementation for these species.

United Kingdom of Great Britain and Northern Ireland make reference to the *Dalbergia* Checklist, Orchid App I and App II checklist update and mentioned a paper on the history of CITES and Agarwood

e) Others

Czech Republic: In the context of Decisions 19.249 to 19.253 on Brazil wood (*Paubrasilia echinata*) adopted at CoP19, the Czech Managing Authority has been in contact with bow producers in the Czech Republic and has developed together with them a voluntary traceability system for bows with *P. echinata* produced in the Czech Republic (start in 2023). Another important measure is the registration of stocks by bow producers and the regular updating of their stocks and verification of the legal origin of these stocks.

Estonia: In 2020, a new CITES exhibition was opened at Tallinn Airport, where, among other things, CITES plants and the related problems, as well as the rules of trade are introduced.

EU: The revised EU action plan against wildlife trafficking was adopted on 9 November 2022, providing a comprehensive set of actions aimed at addressing trafficking in wildlife.

UNEP-WCMC has been contracted to provide reports on the biological and trade data regarding a large number of species traded under CITES as well as a number of additional scientific matters relating to CITES implementation. A number of reviews carried out by UNEP-WCMC as a basis for the EU Scientific Review Group work can be accessed on the European Commission website

TRAFFIC has been contracted to monitor the implementation and enforcement of the EU Wildlife Trade Regulations, and to provide studies and assessments on particular topics. More information on the EU wildlife trade rules can be obtained via the specific webpage of the European Commission: http://ec.europa.eu/environment/cites/home_en.htm

Republic of Croatia: regarding Snowdrops (*Galanthus nivalis*) - The Institute for Environment and Nature Conservation is preparing a national monitoring programme for snowdrops. The aim of this monitoring programme is to establish long-term data collection in an unusual way to assess the conservation status of the species at national level. By implementing the national monitoring programme, the Republic of Croatia will be able to assess the population size of the species in the country and obtain more accurate information on its current distribution. Although trade in this species in Croatia is currently limited to the national level and only concerns flowering plants for ornamental purposes or intra-Community trade in bulbs, there have been some requests in the past regarding the export of wild-collected bulbs. This monitoring programme will help to establish more accurate NDFs.

Slovakia listed the CITES activities of State Nature Conservancy of the Slovak Republic as follows:

- Photography competition "Summer Memories" organised 15.09-30.09.2021
- Regular CITES Activities lectures, discussions, quiz – World Wildlife Day – every year
- Public awareness

United Kingdom of Great Britain and Northern Ireland mentioned the following activities:

- Agarwood authentication techniques tested in lab
- World Forest ID Project reference collection held at Kew
- Timber identification

4. Capacity building activities

Austria continued the exchange with the musical instrument sector and musicians, notably regarding *Paubrasilia echinata*

The Austrian CITES MA participated in a general capacity building event for Austrian Customs Officers. The segment on CITES was not restricted to plants, but timber issues played an important role.

Estonia: There are regular trainings once a year for CITES enforcement officers (customs, environmental inspectors) to learn about CITES plants and their identification.

Germany: Together with Traffic Germany is currently funding a project to review the 9-Steps NDF-Guidances for Perennial Plants and for Timber, including the respective e-learning tools and decision trees and will conduct a workshop on NDF in an exporting country in the near future. For more information please visit: <https://www.9steps-cites-ndf.org/>

Together with the Thünen Institute Hamburg the German SA has invited enforcement colleagues to a workshop on timber ID and on the application of CITESwoodID in September this year.

Latvia: Regarding plants, the nature conservation authority has held meetings with the EU TWIX team to learn how to contact institutes for plant species identification. The Latvian authorities also regularly organise expert seminars and field trips to protected areas for administrative staff to increase knowledge about protected species, including CITES-listed species.

Ireland: CITES Authorities in Ireland involved with lectures and talks to build awareness and capacity within Irish Government departments and agencies, engaging with traders and incorporating information on CITES for World Wildlife Day 2023 and CITES listed species in relevant modules the students at University College Dublin, Belfield, Dublin 4.

Portugal reported that their CITES Authorities regularly organise capacity building activities directed to the different law enforcement agencies involved in CITES. These activities are not specific for plants issues but more or less generalist.

Among other issues, training involved sessions on CITES regulations, smuggling ways, products in trade, etc. It should be noted that needs were identified as a result of the training session, such as need for further trainings in identification of species.

Enforcement officers participated in capacity building activities on timber identification in Brazil, under the scope of Interpol organised operations.

Slovakia highlighted the Strategy for development of network of education centers in the Bratislava county 2018-2025 and the Project Ecoregion SKAT – strengthening of cooperation in ecotourism in cross border region of Slovakia and Austria 01.01.2020-31.12.2022 – There will be special CITES room, educational CITES program for the public, etc.

Project SWIPE LIFE19 GIE/BG/000846 SWIPE Project Successful Wildlife Crime Prosecution in Europe 01.09.2020-31.08.2023.

Custom officers were trained by MA/SA CITES during the year 2022.

The Ministry of the Environment organised two workshops for CITES and Enforcement Authorities, colleagues from CZ were invited as well (09/2021, 09/2022).

Sweden reported that nothing happened in recent years specifically targeting trade in plants. In 2016, the Swedish EPA organized a course on CITES-listed cacti together with the Swedish Board of Agriculture (Management Authority) for the regulatory and enforcement authorities. The course included presentations on how CITES-listed cacti species are regulated, including the many exemptions that exist, with a focus on how to make controls in e.g., shops selling cacti and how to identify wild specimens from artificially propagated specimens. A study visit to the Botanical Gardens in Uppsala was also organized.

Switzerland mentioned that regular training for enforcement and scientific officers in CITES topics are organised twice a year at least.

United Kingdom of Great Britain and Northern Ireland mentioned CITES training (General), AI web scraping training for CITES listed plants online.

5. Difficulties of implementation encountering in your country

a) Conservation issues

Austria reported with regard to native CITES plant species, no conservation issues with connection to international trade were encountered, that the continued illegal import of some cacti would be a conservation concern for those species and also the illegal trade with medicinal supplements (mostly *Prunus africana*) would be in most cases a technical issue. They also stress that it can be difficult to assess whether this trade is of conservation concern or not.

Czech Republic emphasized that there have been problems in the past with exports of certain CITES Appendix II cacti consignments accompanied by phytosanitary certificates and that this has also resulted in illegal exports of CITES Appendix I specimens. It should be noted that under Czech Republic legislation, the export permit can be replaced by a phytosanitary certificate for CITES Appendix II species with an "A" origin, but not for Appendix I species. These cases were investigated by the enforcement authority and now it seems that this practice no longer occurs.

Ireland stressed that in CITES management, scientific expertise and enforcement of rules surrounding CITES listed species is dependent on very few people.

Latvia: noted that CITES plant species native to Latvia would not be used for international trade. Now and then there would be cases of people collecting wild orchid species and selling them at the local farmers' market; in these cases there are infringement procedures and fines.

Slovakia reported “Barcoding Slovakia 2016-2023” as a tool for nature conservation and protection, run by Slovak National Museum – Natural History Museum in Bratislava. Building a barcode library of native orchid species and populations, threatened by illegal harvesting for commercial purposes. The aim of the project is to create a database of voucher DNA sequences of most of the orchid species in Slovakia. The database will serve as a tool for identifying these species in commercial products such as remedies, herbal mixes, ice cream and tea (salep) and others.

Sweden mentions that there is some trade in native orchid species, including illegal collections from the wild. However, this does not seem to be a major problem for the conservation status of the species because, according to their knowledge, this trade is mainly domestic or within the EU and not international.

Switzerland stressed the problem of online trade in MAPs (*Saussurea costus*, *Rhodiola* spp., Cactaceae spp., *Prunus africana*).

b) Technical issues

Austria stressed the illegal trade with medicinal supplements as an issue and would tie capacities that may be needed elsewhere.

Latvia states that they have a shortage of botanists who could identify exotic species, especially woody species. There was a case where an Scientific Authority expert agreed to try to identify specimens of supposedly *Dalbergia* spp., but the expert came to the conclusion that neither the laboratory doesn't have suitable equipment for sample extraction and experience is lacking to determine difficult species.

Portugal stressed the identification of timber as a paramount issue. Due to the more recent listings into CITES appendices there was an increase in applications for timber/wood products: applications for import/(re)export permits, for EU certificates or for the National CITES Registry.

Slovenia reported that both Management and Scientific Authorities are understaffed and underfunded for any activities above regular work of MA and SA (granting permits and certificates, preparing NDFs, controlling breeding operations etc.)

Sweden mentioned that one issue in Sweden concerning regulation of trade in CITES-listed plant species is sufficient competence to identify species, including the source of specimens and whether they are wild-sourced or artificially propagated (this is particularly an issue in trade with seeds), and prioritizing control of CITES-listed plant species by the enforcement and regulatory authorities. Similar to many other EU member states, Sweden has a relatively large market and trade in plant-derived health food/food supplements and medicinal products, however they have not been able to fully document the extent of the trade and problems involved. There is also a relatively large market and trade in different ornamental species, such as cacti and orchids. Most of this trade appears to be artificially propagated plants, however their enforcement and regulatory authorities have limited resources to be able to prioritize exercising control and supervision on this type of trade.

It is not possible to conduct physical controls in private homes in cases of suspected/potential possession of CITES-listed species. While possession of CITES-listed species is not illegal, it becomes an issue when the person trades with the species e.g., over the internet and sends the plants/seeds/plant-derived products by post. They are currently looking into how to improve and strengthen regulation and supervision of the online trade, as these limitations and difficulties are not unique for trade in plants but also trade in other taxonomic groups.

According to their trade data, Sweden does not have high volumes of imports of CITES-listed timber species although this could change with the new listings at CoP19. There are several CITES-listed tree species available on the Swedish market and it is likely that this timber enters the EU through other members states with large ports (e.g., Belgium, the Netherlands and Germany) and then moved to Sweden. This is not limited to plant and timber species but generally true for several CITES-listed species. An issue is limited competence to be able to identify timber species and prioritize control and supervision of the market and trade in timber.

For Sweden, a significant aspect of plant trade, particularly regarding the domestic trade, are the quantities of furniture made from pre-conventional *Dalbergia nigra*. Within the EU, a CITES certificate is required to permit such trade. The Scandinavian furniture industry extensively used this timber during the 1950s and 1960s, and these pieces still hold considerable value, as well as involve remaining stock from past production. This aspect occupies a substantial portion of the administrative authority's activities in regards to issuing CITES certificates.

Another concern, encountered by several agencies in law enforcement, is the adversity experienced when trying to fully grasp the correct scope of listings connected to annotations and exemptions for

specific plant species. There are many annotations at hand, and as some annotations could be of relevance to specific listed plants (parts or derivatives of) it causes confusion in enforcement. The regulatory and legal framework for plants is sometimes perceived to be overly, and sometimes unmotivated, complex. Targeted trainings are very much needed in this area.

Switzerland reported a lack of resources and training opportunities.

Turkey stressed that sometimes, there would be a problem in the approval of CITES documents issued by the Turkish Management Authority by the country of import and that there would be no need to hesitate about the validity of the document. Turkey would like this to be taken into account.

United Kingdom of Great Britain and Northern Ireland stated that the identification guides for enforcement need updating.

6. Other topics related to CITES (i.e. medicinal plants, timber....)

Ireland mentioned Artificially propagated listed species

Latvia reported that there would be not many cases of illegal plant specimen trafficking. They only had 12 cases in the last 16 years and most cases were with supplements or medicinal products with CITES-listed plant extracts. That is also the reason why management authority in every day work doesn't come by with boarder-line cases.

Slovakia emphasized identification challenges – timber, medicinal plants in finished products for retail trade, lack of experience, expertise, difficulties with reading “Chinese” letters, multiple composition descriptions for one product – may be very confusing, after certain products are seized, original “web page” may be gone – difficulties with approval of CITES listed species, using channels as EU-TWIX for sharing information e.g. seized products, results of any product analysis/expertise

Switzerland reported problems with Cactaceae spp. as ingredients in food supplements, MAPs.

United Kingdom of Great Britain and Northern Ireland mentioned that Cacti and succulents and their use in supplements needs attention, online trade in plants is not recognised as a serious problem by e-commerce platforms

Germany participated at a conference of the 'German Timber Trade Association'. The new tree species listed on COP 19 were presented and the resulting measures for im- and re-exports were discussed in a presentation and in roundtable discussions.

7. Work to be done until next Plants Committee PC26 (if not already mentioned above)

There was nothing reported by any party.

8. Other issues

Portugal pointed out that a joint action with Brazilian CITES MA is under preparation concerning capacity building on identification of tropical wood.