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



Twenty-seventh meeting of the Plants Committee Geneva (Switzerland), 8 – 13 July 2024

Appendices of the Convention

Annotations

ANNOTATION OF CAPE ALOE (ALOE FEROX)

- This document has been prepared by the Secretariat.
- 2. At its 19th meeting (CoP19, Panama City, 2022), the Conference of the Parties adopted Decisions 18.323 (Rev. CoP19) to 18.326 (Rev. CoP19) on *Annotation of Cape aloe* (Aloe ferox) 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.

Directed to the Secretariat

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).

- 3. At its 26th meeting (PC26; Geneva, June 2023), the Plants Committee noted document PC26 Doc. 41 containing the report of the Secretariat on the implementation of Decision 18.323 (Rev. CoP19), and the information received in response to Notification to the Parties 2023/021 of 2 March 2023 concerning amended annotation #4 and international trade in Aloe ferox. The Committee also requested the Secretariat to undertake the following activities, to the extent that it did not require external funding to do so (see summary record PC26 SR):
 - a) analyse updated trade data (including CITES annual report and illegal trade report data for 2022);
 - b) issue another Notification to the Parties in early 2024;
 - c) consult with the Cactus and Succulent Plant Specialist Group of the Species Survival Commission (SSC) of the International Union for Conservation of Nature (IUCN) and other relevant experts to assess the impact of the exemption on the conservation of the species; and
 - d) prepare an updated report for the Plants Committee for its 27th meeting.

Analysis of updated trade data

4. An analysis of the CITES trade database for *Aloe ferox* exports from South Africa (data downloaded on 5 March 2024) shows that the number of aggregate trade records from South Africa has considerably decreased since the exemption of finished products ready for retail trade for the species came into force after the 18th meeting of the Conference of the Parties (CoP18; Geneva, 2019). The number of aggregate annual records decreased from around 150 per year to around 60 per year:

	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
# aggregate trade records	114	124	148	140	143	162	157	60	65	60

- 5. Annex 1 contains a graphical summary of annual trade volumes of *Aloe ferox* from South Africa for the period 2013 to 2022, as reported by exporters and importers [source code W, purpose code T]. The analysis suggests that:
 - a) trade reported by importing countries from South Africa is predominantly reported in kilogrammes. Reported annual imports revolve around 300,000 kg and seem to remain essentially stable, despite any confounding effect of the COVID-19 pandemic, the decline in the number of trade records, and possibly with a slight increase of reported import volumes since the exemption of finished products ready for retail trade came into effect.
 - b) trade reported by the exporting country has been predominantly reported in kilogrammes until 2019, and without units since 2020. South Africa confirmed that reports without units were reporting errors and are meant to be interpreted as weight units (kg, g, or mg). The Secretariat decided to reflect the data as reported without units, as it is not clear whether any of the permits were intended to be issued in g, or mg. Considering the absolute volume of exporter reported trade from South Africa, annual trade levels have revolved around 500,000 kg, despite the exemption of finished products ready for retail trade.
- 6. The illegal trade database (as of 29 January 2024) reflects 67 seizures of *Aloe ferox* specimens between 2018 and 2021. Almost all reported seizures occurred in 2018 and 2019. One seizure was reported in 2020 and one seizure was reported in 2021. Most seizures occurred in the European region, with a few seizures in the North American region. Most seized specimens are described as extracts (36 seizures) or medicine (17 seizures). Some are also reported as cosmetics, derivatives, live, or powder. Total seizures are reported as 852 kg, 139 litres, 4,198 items reported as NUM (Number), and 7 items reported as BOT.¹

The Secretariat notes that the unit BOT is unclear. The <u>Guidelines for the preparation and submission of the CITES annual illegal trade reports</u> advise that "the quantity should always be recorded as number of specimens and never in non-standard units such as 'boxes', 'cartons,' 'containers' or 'bales'. Where possible, all seizures reported should include both quantity and weight/volume for each specimen and species type seized during an incident".

Notification to the Parties

- 7. To invite additional information, the Secretariat published <u>Notification to the Parties No. 2024/012</u> on 10 January 2024. Belgium, Lesotho, South Africa, Sweden, Switzerland, the United States of America, and one individual harvester from South Africa submitted responses. The responses are included in Annex 2 to the present document in the language in which they were received and summarized below:
 - a) Belgium reported no significant change in trade in *Aloe ferox* specimens. Fewer resources had to be invested in the analysis of products shipped in small parcels that may or may not contain extracts of *Aloe ferox*. Belgium therefore considered the exemption a positive change.
 - b) Lesotho, as one of only two range States of the species, reported that it had never issued any export permits for the species. However, there were reported cases of illegal harvest from the wild population. Lesotho further reported that a population assessment is ongoing through a GEF-funded medicinal plant project. Lesotho considered that it was not affected by the exemption and therefore indicated its support for the exemption.
 - c) South Africa, as the second range State and primary exporter of the species, reported the following:
 - i) reported trade in derivatives seemed to have declined due to the exemption, but harvests and exports for various specimens including extracts, derivatives, powder, leaves, medicine/cosmetics, live plants, stems, and stem/timber fragments continue without major changes or shifts in quantities. The dominant commodity in trade remained the raw bitter sap extract that is exported in liquid form (per litre) or crystalised/powdered form (per g/kg);
 - trade in the species remained well regulated, and overall harvest was unlikely to have drastically changed over the last years given the relatively stable trends in exports. A national resource assessment for the species conducted in 2021 found harvesting of *A. ferox* to be taking place in just 30 out of a total of 428 survey sites (7% of sites). Low levels of harvesting were recorded at most of these sites (40% or 12 sites) followed by sites deemed to be extensively harvested (37% or 11 sites), with moderately harvested sites accounting for 23% (or seven) sites. A total of 32,400 harvested plants was recorded in this survey, which represents a relatively insignificant fraction of the total mapped population of approximately 8.32x10⁶ plants (0.39%). These recent findings indicate that only a small proportion of the national population is being harvested and that the harvest of the species continues to be carried out in a sustainable manner across most parts of the region. Furthermore, the national population is healthy and much larger than previously thought. As of 2022, the species' management and conservation are also supported by a national Biodiversity Management Plan that makes provisions for monitoring to assess any changes to/impacts on the wild resource base. Repeat surveys will be conducted after a sufficient period of time; and
 - iii) the Management Authorities tasked with issuing CITES permits have been relieved of the duty of inspecting and reporting products containing minimal amounts of *Aloe ferox* material, while industry members have expressed concerns about the lack of growth in trade due to the COVID-19 pandemic, recent new EU regulations banning certain ingestible products that appear to be related to trade in *Aloe ferox* specimens, and that there remains demand in the world market for products not affected by the exemption, including finished but unlabelled products that are not ready for retail trade. In additional consultations, South Africa also specified that some traders continue to request CITES permits for trade in exempted products, anticipating that consignments could be seized otherwise.
 - d) Sweden responded that it had insufficient data to make conclusions with regard to Decision 18.323 (Rev. CoP19).
 - e) Switzerland confirmed that the exemption had reduced the administrative burden and improved the situation, freeing up resources and allowing authorities to focus on the commodities that are important for the trade in *Aloe ferox* such as leaves, bulk or extract.
 - f) The United States of America responded that the authorities and representatives of the personal care industry in the United States of America were unaware of any conservation impacts related to the international trade in finished products containing parts and derivatives of Aloe ferox.

g) One individual harvester/trader reported that getting CITES permits for trade in the species had not improved since the exemption came into effect.

Consultation with the IUCN SSC Specialist Groups and other relevant experts

- 8. The Secretariat consulted with the Chairs of the IUCN Cactus and Succulent Specialist Group, the Chairs of the IUCN SSC Southern African Plant Specialist Group, the IUCN SSC Southern African Plant Specialist Group Sustainable Use subgroup, and a specialist for Asphodelaceae.
- 9. The inputs received through these consultations align with the responses provided by South Africa to Notification to the Parties No. 2024/012.

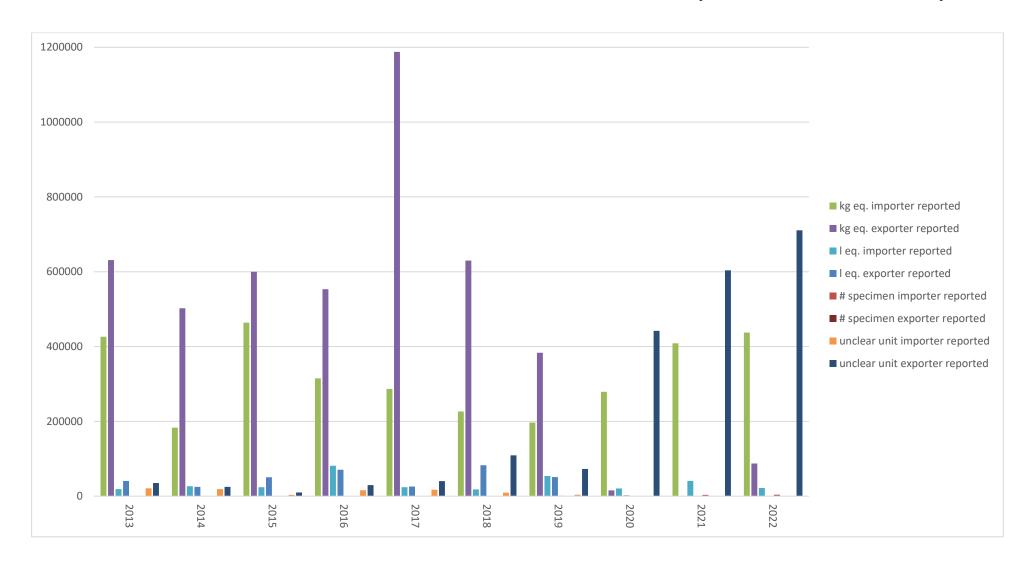
Conclusions

- 10. Considering the information outlined above and contained in Annexes 1 and 2, the Secretariat concludes that:
 - a) some Parties who responded to Notification No. 2024/012 indicated that they have to invest less resources into checking small consignments that may or may not contain small quantities of *Aloe ferox* specimens;
 - b) reported trade volumes have not decreased, and overall trade volume might be increasing, given that some of the specimens can now be traded without CITES permits or reporting requirements; and
 - c) the species seems to be well managed and South Africa appears to be taking steps to ensure trade remains non-detrimental to wild populations.

Recommendations

- 11. The Plants Committee is invited to:
 - a) consider the information provided and the Secretariat's conclusions in paragraph 10 of the present document; and
 - b) agree that Decisions 18.323 (Rev. CoP19) and 18.324 (Rev. CoP19), as well as the additional requests made by PC26 have been implemented and propose the deletion of the Decisions to the 20th meeting of the Conference of the Parties.

ANNUAL TRADE VOLUMES OF ALOE FEROX EXPORTS FROM SOUTH AFRICA FOR 2013 TO 2022 [SOURCE CODE W, PURPOSE CODE T]



Belgium has seen no significant change in trade of specimens of *Aloe ferox*, but we can report that, due to the change of the annotation, we no longer had to invest precious resources into the analysis of products shipped in small quantities as postal parcels, which may (or may not) contain extracts of *Aloe ferox*. We presume this type of trade has no, or only a negligible effect on the conservation of the species and also presume that South Africa, the proponent of the proposal that changed the annotation at CoP18, will keep track of the conservation species of the species concerned.

For Belgium, the change in the annotation is thus perceived as a positive change.

LESOTHO'S RESPONSE TO DECISIONS 18.323 TO 18.326 (REV. COP19) ON ANNOTATION OF CAPE ALOE (ALOE FEROX)

As Lesotho's CITES Management Authority, in consultation with the Country's Scientific Authority, I submit the following response, on behalf of Lesotho in relation to Decision 18.323 to 18.326 on Annotation of *Aloe ferox*:

Lesotho has a significant population of *Aloe ferox*, which is geographically confined in the Quthing District, in the southern part of the Country, hence the vernacular name *Lekhala-la-Quthing* (translating into Aloe of Quthing). Lesotho has never issued any harvesting or export permits/ licence for this plant. Therefore, the plant has neither been legally harvested, nor products developed from it in the Country. However, there are reported cases of illegal harvesting of the plant from its wild population. It is important to note that *Aloe ferox* is protected under the national legislation (Historical Monuments, Relics, Fauna and Flora act 41 of 1967, and Legal Notice No. 36 of 1969, as amended by Legal Notice No. 93 of 2004 and No.38 of 2006), which prohibits the harvesting, damaging or destroying of the plant without written consent of the commission. The Country is currently undergoing processes of assessing the population size of the plant under the GEF-funded Medicinal Plant Project, which is scheduled to begin later this year.

Based on the information above, the Country will not be negatively affected by the Annotation of *Aloe ferox*, thus is in support of it

E-Notif-2024-012 on Decisions 18.323 (Rev. CoP 19) To 18.326 (Rev. CoP 19) on Annotation of Cape Aloe (Aloe Ferox)

Finished products of *Aloe ferox*, packaged and ready for retail trade are exempted from CITES regulations through annotation #4 (f). After at least four years of this annotation coming into force, (adopted at the 18th meeting of the Conference of the Parties and enforced since 26 November 2019), the Secretariat has invited Parties and experts to provide information on:

- 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*.

South Africa wishes to submit the following comments pertaining to international trade:

South Africa, as one of only two range States for the species, remains the primary exporter of *Aloe ferox* commodities, which are harvested primarily from the wild. The species continues to be exported in various forms, namely extracts, derivatives, powder, leaves, medicine/cosmetics, live plants, stems, and stem/timber fragments. The dominant commodity in trade remains the raw bitter sap extract that is exported in liquid form (per litre) or crystalised/powdered form (per g/kg). Trade in the raw bitter sap (in all forms) has remained relatively stable with trade records and industry members confirming that no extreme change in demand or quantities exported has been noted since the implementation of the annotation (Fig. 1). Some industry members have expressed concerns over a lull in the expected growth in trade due to the Covid-19 pandemic as well as domestic EU regulations, the latter relating to the banning of consumer ingestible products containing hydroxyanthracene. Nevertheless, the demand for and export of raw primary extracts appears to be stable to slightly increasing (Fig. 1). International trade in other commodities including powder, leaves and other specimens has also remained relatively stable with no observable shifts in the quantities being exported.



Figure 1: Trends in the export of raw Aloe ferox **extract** from South Africa between 2011 and 2022 (CITES Trade Database, UNEP World Conservation Monitoring Centre, Cambridge, UK).

The trade in derivatives appears to have decreased since the annotation came into effect (Fig. 2) as was to be expected as a large proportion of products previously regulated as derivatives comprised of

finished products (see Appendix A of CoP18 Inf. 61), which are now exempt from CITES. The reported trade in derivatives that remains ongoing, post 26/11/2019, comprises of secondary extracts, including the inner leaf jelly (in juice, gel or powder form), and value-added products produced therefrom (such as beverages, medicines, and a range of healthcare and cosmetics) that do not meet the defining criteria as per the annotation (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'). This stands to reason that although the South African finished product industry is easier able to export finished products, a sentiment that has been echoed by several local industry members, there remains a demand for value-added secondary extract and leaf material in the global market. One local contract manufacturer noted that they are often required to ship unlabelled (but otherwise retail ready) units, or 'white label' products (i.e. unbranded products to which the different brand owners add their own branded (and quite often language specific) labelling), which still requires a CITES permit as per the interpretation of the annotation. This would account for the continued reporting of trade in secondary derivatives (Fig. 2).

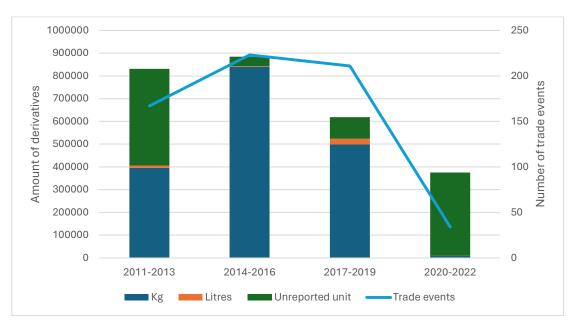


Figure 2: Trends in the export of Aloe ferox **derivatives** from South Africa between 2011 and 2022 (CITES Trade Database, UNEP World Conservation Monitoring Centre, Cambridge, UK).

Notwithstanding several reporting errors, most notably the absence of units presented in trade reports of exported commodities (increasingly since 2020), trade in the species (from South Africa), remains well-regulated. Although the strict interpretation of the annotation has not completely absolved suppliers of secondary extracts of requiring permits, 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. Products are now easily marketed at local tourism stores and fairs abroad with importers also happier to purchase products without needing additional documentation. Market analyses have demonstrated a robust appetite for natural and organic skincare products tied to ecofriendly and sustainable beauty solutions and, over time, we may expect to see new entrants trying to establish their presence in the market as consumer awareness and interest in the species grows.

The amended annotation has also certainly had a positive impact on issuing authorities who are no longer over-burdened with having to inspect and report on dozens of consignments of products containing minimal amounts of *A. ferox* material. Issuing authorities in South Africa have reported a decrease in the number of CITES export permits being issued, whilst the major commodities that

dominate the trade and the demand from the wild resource (i.e. raw A. ferox extracts) remains under strict control (Fig. 3).

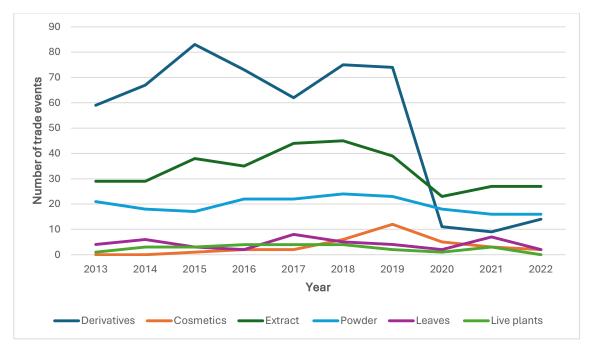


Figure 3: Reported trade events involving Aloe ferox commodities (CITES Trade Database, UNEP World Conservation Monitoring Centre, Cambridge, UK).

South Africa wishes to submit the following comments pertaining to the impact of the amended annotation on the wild resource base:

Harvest of the resource is unlikely to have changed drastically over the past four years, given the relatively stable trends observed in exports reported during this time. A national resource assessment for the species conducted in 2021 found harvesting of A. ferox to be taking place in just 30 out of a total of 428 survey sites (7% of sites). Low levels of harvesting were recorded at most of these sites (40% or 12 sites) followed by sites deemed to be extensively harvested (37% or 11 sites), with moderately harvested sites accounting for 23% (or seven) sites. A total of 32 400 harvested plants was recorded in this survey, which represents a relatively insignificant fraction of the total mapped population of approximately 8.32 x10⁶ plants (0.39%). These recent findings reveal that only a small proportion of the national population is being harvested and that the harvest of the species continues to be carried out in a sustainable manner across most parts of the region. Furthermore, the national population is healthy and much larger than previously thought. As of 2022, the species' management and conservation are also supported by a national Biodiversity Management Plan that makes provisions for monitoring to assess any changes to/impacts on the wild resource base. Repeat surveys will be conducted after a sufficient period of time. Bearing in mind the low levels of harvest throughout the range of the species, any differences since the baseline survey in 2021 are likely to be negligible and undetectable.

Rural communities in the Eastern and Western Cape provinces of South Africa use traditional methods to harvest leaves from *Aloe ferox* plants and tap the primary bitter sap. It is estimated that between 1% and 20% of the harvested leaf materials are collected for further processing into finished products. The remainder of the leaves are discarded in the field as waste. It is thus highly unlikely that the amended annotation is going to lead to additional leaves being harvested solely for the production

of finished products. Rather, it is more likely that the annotation will encourage the more efficient use of discarded leaf materials.

From: Erik.Dalarud@jordbruksverket.se

Sent: 22 January 2024 15:26 **To:** Martin Otto Hitziger

Cc:Marie Dahlström; UNOG-UNEP-CITES InfoSubject:Sweden's response to notification 2024/012

Vissa som fått det här meddelandet får inte ofta e-post från erik.dalarud@jordbruksverket.se. Se varför det är viktigt

Dear Secretariat,

Regarding notification 2024/012 on trade in Aloe Ferox, Sweden's position remains as stated in our previous response to notification 2023/021. We have no new developments to report.

Sincerely,

Erik Dalarud CITES Management Authority of Sweden Swedish Board of Agriculture

From: Erik.Dalarud@jordbruksverket.se

Sent: 24 March 2023 15:32 **To:** Martin Otto Hitziger

Cc: Marie Dahlström; Selam.Petersson@jordbruksverket.se;

Negar. Aslund@jordbruksverket.se

Subject: Sweden's response to notification 2023/021

Follow Up Flag: Follow up Flag Status: Completed

Sie erhalten nicht oft eine E-Mail von 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

From: Ursula.Moser@blv.admin.ch

Sent: 07 February 2024 16:02

To: Martin Otto Hitziger

Cc: UNOG-UNEP-CITES Info

Subject: Notification 2024/012 Annotation of Cape aloe (Aloe ferox)

Follow Up Flag: Follow up Flag Status: Flagged

Dear Martin,

regarding the impact of the amended annotation #4 to the international trade in *Aloe ferox* specimens the following:

Switzerland has had many imports of finished *Aloe ferox* products in recent years and with the modification of the annotation #4 the species protection control of these products does no longer apply. The control of the many finished products of *Aloe ferox* has tied up a lot of resources and with the change we can focus on the commodities that are more important for the trade with *Aloe ferox*, such as leaves, bulk or extract. For Switzerland an improvement of the situation.

Kind regards Ursula

Ursula Moser, Biologist Scientific Officer

CITES MA of Switzerland and Lichtenstein

International Affairs
Species Concervation in international Trade
Federal Food Safety and Veterinary Office FSVO

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United States Department of the Interior



FISH AND WILDLIFE SERVICE International Affairs 5275 Leesburg Pike, MS: IA Falls Church, VA 22041-3803

March 20, 2024

In Reply Ref. to: DSA\CITES\Response to Notification 2024/012

Mr. 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@cites.org

Dear Martin:

This letter provides the United States response to Notification to the Parties No. 2024/012 – *Annotation of Cape aloe* (Aloe ferox), which, in line Decision 19.326 (Rev. CoP19), requests information on "whether, and if so how, the amended annotation #4 has impacted the international trade in *Aloe ferox* specimens."

The Scientific Authority of the United States (i.e., U.S. Fish and Wildlife Service, Division of Scientific Authority) contacted representatives of the personal care industry in the United States to inquiry whether they are aware of any conservation impacts of the international trade in finished products packaged and ready for retail trade of *Aloe ferox*.

We also contacted the United States plant inspection agency (U.S. Department of Agriculture - Animal Plant Health Inspection Service-Plant Protection and Quarantine (USDA/APHIS/PPQ)), and the Management Authority of the United States (i.e., USFWS, Division of Management Authority) regarding this matter.

According to the entities contacted, they are unaware of any conservation impacts related to the international trade in finished products containing parts and derivatives of *Aloe ferox*.

Because these specimens are no longer subject to CITES controls, and therefore, do not require CITES documents in international trade, the United States does not have trade data for import,

export, or re-export of such commodities. Therefore, we are also unaware of any conservation impacts related to the international trade in finished products containing parts and derivatives of *Aloe ferox*.

If you have any questions concerning the information above, please feel free to contact me at rosemarie gnam@fws.gov.

Sincerely,

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

cc: info@cites.org

From: theo@ottoaloe.co.za

Sent: 12 March 2024 15:54

To: Martin Otto Hitziger

Cc: UNOG-UNEP-CITES Info

Subject: "Notification 2024/012 on Aloe ferox

Some people who received this message don't often get email from theo@ottoaloe.co.za. Learn why this is important

Dear Martin,

I am glad this topic of excluding aloe products from CITES came up.

But for me as an exporter the CITES regulations was not made easier but more difficult to get a CITES, especially to get it endorsed!

There is so much time wasting regulations now to get the CITES endorsed that it makes it difficult to export. Also to courier a sample of 300grams to clients require a CITES these days.

This is a time-wasting thing that is costing me driving all around to get the samples checked and CITES endorsed and then to get it couriered.

My grandfather started harvesting Aloe Ferox in the 1940`s and we are still harvesting on the same farms. No harm was done, and the harvesters know to take care of the plants.

Please let me know if you need any more info or has questions.

Best regards, Theo Otto



Tel no.: +27 82 829 5409 Web: ottoaloe.co.za