

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



Seventy-eighth meeting of the Standing Committee
Geneva (Switzerland), 3-8 February 2025

Appendices of the Convention

Annotations

ANNOTATION #15

1. This document has been prepared by the Secretariat.
2. At its 19th meeting (CoP19; Panama City, 2022), the Conference of the Parties revised Decisions 18.321 (Rev. CoP19) and 18.322 (Rev. CoP19) on *Annotation #15* as follows:

Directed to the Secretariat

18.321 (Rev. CoP19) *The Secretariat shall:*

- a) *subject to available resources, undertake a study to assess the effect on Dalbergia/Guibourtia species in international trade of the exemptions contained in annotation #15 for finished musical instruments, parts and accessories, and the conservation implications thereof;*
- b) *bring any scientific or technical issues to the attention of the Plants Committee and seek its advice; and*
- c) *report the results of its evaluation along with its recommendations to the Standing Committee.*

Directed to the Standing Committee

18.322 (Rev. CoP19) *The Standing Committee shall in the context of its work on annotations under the relevant Decisions, consider any report by the Secretariat in accordance with Decision 18.321 (Rev. CoP19), undertake additional evaluation if necessary and report to the 20th meeting of the Conference of the Parties. If warranted, the Standing Committee may work with relevant Parties in preparing an amendment proposal for the 20th meeting of the Conference of the Parties.*

3. The Chair of the Plants Committee reported progress in the implementation of paragraph b) of Decision 18.321 (Rev. CoP19) to the Standing Committee at its 77th meeting (SC77; Geneva, November 2023) in document [SC77 Doc. 6](#). The Standing Committee noted the information in said document.
4. At the 27th meeting of the Plants Committee (PC27; July, Geneva 2024), in document [PC27 Doc. 35](#), the Secretariat provided an update on the study to assess the effect of the exemptions contained in annotation #15 for finished musical instruments, parts and accessories on *Dalbergia/Guibourtia* species in international trade, and the conservation implications thereof.
5. At PC27, the Plants Committee:

- a) noted the feedback provided on the progress reported on the implementation of Decision 18.321 (Rev. CoP19); and
 - b) agreed the approach proposed in paragraphs 9 and 10 of document PC27 Doc. 35 to provide the opportunity to Members of the Plants Committee to provide scientific or technical advice on the preliminary results of the study to assess the effect on *Dalbergia/Guibourtia* species in international trade of the exemptions contained in annotation #15 for finished musical instruments, parts and accessories, and the conservation implications thereof, ahead of the 78th meeting of the Standing Committee; and
 - c) invited the Secretariat to publish a Notification to the Parties informing Parties that the preliminary findings of the study had been submitted to the Members of the Plants Committee and inviting Parties to send their comments on the preliminary findings to their regional representatives.
6. In accordance with the Plants Committee recommendations at PC27, the Secretariat shared with the Plants Committee an advance draft of the report on annotation #15 requesting feedback by 29 November 2024, and published [Notification to the Parties No. 2024/124](#) of 8 November 2024 on *Ongoing consultations with the Plants Committee in preparation for the 78th meeting of the Standing Committee (SC78)*.
 7. The draft report shared with the Plants Committee is structured as follows:
 - Chapter 1 provided an overview and analysis of the supply-chain of specimens exempted through annotation #15;
 - Chapter 2 consists of a regionally balanced set of case studies on the effects of exemptions contained in annotation #15 on *Dalbergia/Guibourtia* species in international trade, including but not limited to finished musical instruments, parts and instrument accessories; and
 - Chapter 3 consists of closing reflections and preliminary recommendations in support of the implementation of Decisions 18.321 (Rev. CoP19) and 18.322 (Rev. CoP19).
 8. Amongst the key findings of the draft report, the Secretariat would like to highlight the following:
 - a) Parties are actively implementing annotation #15. While some interpretative challenges exist, it is generally functional and aligns with the main principles of the use of annotations in Appendices I and II [paragraph 6 b) of Resolution Conf. 11.21 (Rev. CoP19)], which state that annotations for plants should focus on commodities that first enter trade from range States and primarily drive demand for the wild resource.
 - b) Annotation #15 has proven effective in regulating trade while accommodating the unique needs of certain industries, such as musical instrument manufacturing of *Dalbergia* and *Guibourtia* specimens. The findings suggest that Decisions 18.321 (Rev. CoP19) and 18.322 (Rev. CoP19) have been largely implemented.
 - c) Exemptions under annotation #15 have a low conservation impact for most species of *Dalbergia* and *Guibourtia*, but gaps in traceability and oversight persist, particularly for raw materials that transition into exempted products.
 9. The draft report also included reflections on future work to improve the implementation of annotation #15, specifically on harmonized reporting, traceability, capacity-building, industry engagement, and additional guidance on the interpretation of terms and expressions used in annotation #15.

Outcomes of consultations with the Plants Committee following PC27

10. The Plants Committee commended the report for its practical approach and valuable insights into the implementation challenges of annotation #15. Feedback emphasized the complexities arising from varying interpretations among Parties, which result in data reporting inconsistencies and difficulties in trade regulation. The need for clearer guidelines and improved collaboration with stakeholders was underscored, with particular attention to ensuring that exemptions under annotations have no undue conservation impact. Concerns about ambiguities or inconsistencies in trade data reporting amongst Parties were highlighted (such as the interchangeable use of the terms “finished products” and “carvings”), along with

recommendations to strengthen reporting mechanisms and enhance clarity in trade descriptions to better reflect finished wood products in trade.

11. Specific issues raised by members of the Plants Committee on the report included: the need to ensure that references to distribution of species of *Dalbergia* is consistent with that of the *CITES Dalbergia Checklist* (2022) [Resolution Conf. 12.11 (Rev. CoP19) on *Standard nomenclature*]; and the omission of a reference to a case study on *Dalbergia latifolia* in the bibliography.
12. While acknowledging the limitations of the CITES Trade Database, such as inconsistent use of descriptors and challenges in quantifying finished products, the feedback from the Plants Committee seems to confirm the robustness of the study's overall outcomes. Some suggestions included avoiding favouring specific stakeholders or industries when excluding specimens from CITES controls in future annotations.

Progress achieved since PC27 and assessment of the implementation of Decisions 18.321 (Rev. CoP19) and 18.322 (Rev. CoP19)

13. In accordance with paragraph c) of Decision 18.321 (Rev. CoP19), the Secretariat has prepared a second draft of the report titled "Report on the impact of CITES exemptions for *Dalbergia* and *Guibourtia*", taking into account the feedback outlined in paragraphs 11 and 12 above. The executive summary of this second draft is available in all working languages in Annex 1 to this document, while the full draft report, available only in English, is included in [Annex 2](#).
14. The Secretariat is of the view that feedback on the second draft of the report from the Standing Committee at SC78, as per Decision 18.322 (Rev. CoP19), will be essential to inform the finalization of the report for consideration at the 20th meeting of the Conference of the Parties (CoP20).

Recommendations

15. The Standing Committee is invited to:
 - a) provide feedback on the second draft of the report contained in the Annexes 1 and 2 to the present document;
 - b) request the Secretariat to revise this second draft of the report taking into consideration the comments made by the Standing Committee and submit a final report for consideration at CoP20; and
 - c) agree that Decisions 18.321 (Rev. CoP19) and 18.322 (Rev. CoP19) have been implemented and can be proposed for deletion at CoP20.

Draft “Report on the impact of CITES exemptions for *Dalbergia* and *Guibourtia*”

EXECUTIVE SUMMARY

This report evaluates the implementation and impact of annotation #15 for *Dalbergia* and *Guibourtia* species listed in Appendix II. Covering the period from 2013 to 2023, the study examines trade patterns, conservation implications, and regulatory challenges.

Background and overview of the report

At its 19th meeting (CoP19; Panama City, 2022), the Conference of the Parties revised [Decisions 18.321 \(Rev. CoP19\) and 18.322 \(Rev. CoP19\)](#) on *Annotation #15*.

Annotation #15 applies to the following listings in Appendix II (valid from 23 February 2023):

- *Dalbergia* spp. **#15** (Except for the species included in Appendix I)
- ***Guibourtia demeusei* #15**
- ***Guibourtia pellegriniana* #15**
- ***Guibourtia tessmannii* #15**

Annotation #15 reads as follows:

All parts and derivatives, except:

- a) *Leaves, flowers, pollen, fruits, and seeds;*
- b) *Finished products to a maximum weight of wood of the listed species of up to 10 kg per shipment;*
- c) *Finished musical instruments, finished musical instrument parts and finished musical instrument accessories;*
- d) *Parts and derivatives of *Dalbergia cochinchinensis*, which are covered by Annotation # 4; and*
- e) *Parts and derivatives of *Dalbergia* spp. originating and exported from Mexico, which are covered by Annotation # 6.*

The interpretation section of the Appendices (valid from 23 February 2023) includes the following definitions for the terms and expressions used in annotation #15:

Finished musical instruments

A musical instrument (as referenced by the Harmonized System of the World Customs Organization, Chapter 92; musical instruments, parts and accessories of such articles) that is ready to play or needs only the installation of parts to make it playable. This term includes antique instruments (as defined by the Harmonized System codes 97.05 and 97.06; Works of art, collectors' pieces and antiques).

Finished musical instrument accessories

A musical instrument accessory (as referenced by the Harmonized System of the World Customs Organization, Chapter 92; musical instruments, parts and accessories of such articles) that is separate from the musical instrument, and is specifically designed or shaped to be used explicitly in association with an instrument, and that requires no further modification to be used.

Finished musical instrument parts

A part (as referenced by the Harmonized System of the World Customs Organization, Chapter 92; musical instruments, parts and accessories of such articles) of a musical instrument that is ready to install and is specifically designed and shaped to be used explicitly in association with the instrument to make it playable.

Shipment

Cargo transported under the terms of a single bill of lading or air waybill, irrespective of the quantity or number of containers or packages; or pieces worn, carried or included in personal baggage.

Ten (10) kg per shipment

*For the term "10 kg per shipment", the 10 kg limit should be interpreted as referring to the weight of wood of each individual annotated species of genus *Dalbergia* or *Guibourtia* present in the items in the shipment. The 10 kg limit is to be assessed only against the individual weights of the portions of wood of each individual annotated species contained in each item of the shipment, and not against the total weight of the shipment. The total weights present of each individual annotated species are considered individually to determine whether a CITES permit or certificate is required for each individual annotated species, and weights of different individual annotated species are not added together for this purpose.*

The current annotation #15 is the result of an amendment to the Appendices adopted by the Conference of the Parties at its 18th meeting (CoP18; Geneva, 2018), see also [Notification to the Parties no. 2019/052](#).

In accordance with paragraph a) of Decision 18.321 (Rev. CoP19), on 15 February 2024, the Secretariat initiated a study with three expected outputs, respectively corresponding to chapters 1 to 3 of the present report:

- Output 1 (Chapter 1): An overview and analysis of the supply-chain of specimens exempted through annotation #15;
- Output 2 (Chapter 2): A regionally balanced set of case studies on the effects of *Dalbergia*/*Guibourtia* species in international trade of exemptions contained in annotation #15, including but not limited to finished musical instruments, parts and instrument accessories; and,
- Output 3 (Chapter 3): Closing reflections and preliminary recommendation in support of the implementation of Decisions 18.321 (Rev. CoP19) and 18.322 (Rev. CoP19).

Key findings

- On the implementation of annotation #15 by Parties:
 - Parties are actively implementing annotation #15, and while some interpretative challenges exist, it is generally functional and aligns with the main principles of the use of annotations in Appendices I and II [paragraph 6 b) of Resolution Conf. 11.21 (Rev. CoP19)], which state that annotations for plants should focus on commodities that first enter trade from range States and primarily drive demand for the wild resource.
 - Annotation #15 has proven effective in regulating trade while accommodating the unique needs of certain industries, such as musical instrument manufacturing of *Dalbergia* and *Guibourtia* specimens. The findings suggest that Decisions 18.321 (Rev. CoP19) and 18.322 (Rev. CoP19) have been largely implemented.
- On trade patterns: Finished musical instruments dominate the trade in exempted products, with most manufacturing occurring outside the range States. This underscores the importance of monitoring non-exempt raw materials used in production.
- On conservation impact: Exemptions under annotation #15 have a low conservation impact for most species, but gaps in traceability and oversight persist, particularly for raw materials that transition into exempted products.

- On data gaps: Trade data for exempted and non-exempt specimens are inconsistent, limiting the ability to fully assess conservation outcomes and ensure compliance.
- On recommendations for clarification: Specific aspects of annotation #15's interpretation, such as shipment thresholds for finished products, would benefit from additional guidance to ensure consistent application.

Reflections on future work

The draft report closes with reflections that could serve as a foundation for future work and possible mandates (such as CITES Decisions) resulting from the implementation of Decisions 18.321 (Rev. CoP19) and 18.322 (Rev. CoP19), and building upon the report:

1. Harmonized reporting: Develop standardized guidelines to improve data collection for specimens not exempted under annotation #15, particularly raw materials (e.g., logs, sawn wood) that are transformed into finished products. This will enhance monitoring and compliance.
2. Traceability systems: Encourage range States to implement robust traceability systems for non-exempt raw materials to ensure transparency and legal trade, especially for materials entering international supply chains.
3. Capacity-building: Provide technical and financial support to range States for monitoring and enforcement efforts, focusing on the transition of raw materials into exempted products under annotation #15.
4. Industry engagement: Foster collaboration with industries benefiting from exemptions, such as musical instrument manufacturers, to ensure sustainable sourcing and to address traceability challenges for raw materials.
5. Guidance on the interpretation of annotation #15: Develop guidance to clarify interpretative aspects of the terms and expressions of annotation #15, to ensuring consistent implementation across Parties.