

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

CITES Partnership strategy (draft)

COMMENTS RECEIVED BY THE SECRETARIAT

1. This document has been submitted by the Secretariat in relation to agenda item 16.\*
2. In response to the Notification No. 2024/108, issued by the Secretariat on 30 September 2024, comments and feedback were received by ten Parties, i.e. the Australian Member of the Plants Committee (on behalf of Oceania), Benin, Brazil (MA and SA), China, Germany, Mexico, Niger, Senegal, Togo and the United States of America, as well as a number of observer organizations. The comments are included in the annex to this information document as received.

*Summary of comments received*

3. Comments received by the Parties included some textual recommendations aiming at enhancing clarity of specific parts of the draft strategy, as well as more general comments relating to the entire document, or some of its sections; the comments can be summarized as follows:
  - Need for clarifications on the alignment of the document with the mandate given by CoP decision and the main elements of the strategy included in SC77 Doc.18.
  - Attention to be paid on any potential risks of broadening the Secretariat's scope of work beyond its core mandate through partnerships.
  - Need for clarifications on the role and involvement of Parties, through respective CITES governing bodies, in defining the priority thematic areas and the selection of partnerships.
  - Proposal to add some operational elements of the partnership strategy, including a detailed way forward, i.e. roadmap for future partnerships, assessment indicators, approval/vetting process, modalities of operationalization of partnerships and relation with existing MoUs.
  - More information to be shared with the Standing Committee on the internal partnership mapping and evaluation undertaken by the Secretariat before the preparation of the strategy.
  - More information and concrete examples to be provided for existing partnerships mentioned in the document, demonstrating their impact and added value, i.e. ICCWC, RFMOs etc.
  - Proposal of additional thematic areas (i.e. international trafficking of endemic species, trade in invasive alien species etc.), and changes/clarifications in the existing or identified new areas, including in some cases their removal or precision (i.e. forests, zoonotic diseases, aims of capacity building).

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

- Refinements proposed on some categories of partners listed in the strategy, especially regarding partnerships with the private sector, including provisions on risk management.
  - Strengthening of the expected role of some actors, i.e. academia, rural communities, and industry/sector bodies representing government facilities, as well as key strategic partners, such as the CBD Secretariat.
4. Comments received by observer organizations varied in scope and content, and covered many of the issues listed above, including the need for further details and clarifications on the implementation of the strategy in practice, additional information on the application of the UNEP partnership policy, the role of CITES Parties and governing bodies in the definition of partnership priorities and the selection of partners, the process, scope and modalities of partnering with the private sector, the process for evaluation of partnerships by the Secretariat, the links with the Resource Mobilization Strategy, the alignment with the Secretariat's core mandates and some text-specific proposals etc.

## COMMENTS AS RECEIVED

### Parties

#### Plants Committee Member of Australia (on behalf of Oceania)

**Comment on para. 33 :** *Further, CITES is a science-based convention, covering 40,000 different species, implemented by national authorities. It is also relevant for a number of economic sectors. In addition to existing partnerships with civil society organizations and other non-State actors, it would appear that CITES could benefit from strengthened relationships with **groups of actors** such as those listed below to support science-based decision-making, enhance visibility and collaboration with industry and the private sector, including the finance sector, to increase the effectiveness of the Convention and the resources available for its implementation.*

**Comment:** *It would be beneficial to include a section on the industry/sector bodies that represent organisations and government facilities, and how they could be of benefit. For example, organisations such as Botanic Gardens Conservation International and World Association of Zoos and Aquariums provide much needed support and coordination across their respective sectors, providing CITES with valuable opportunities to align approaches, build capacity and coordinate communications to aid implementation of the convention.*

#### Benin

Le Secrétariat de la CITES entretient actuellement, des partenariats avec plusieurs organisations internationales, notamment : l'ICCCWC, le Groupe de liaison des conventions relatives à la biodiversité (BLG), la FAO, l'OIBT, INTERPOL, etc...

La décision 19.20 demande au Secrétariat de préparer, sous réserve de financements externes et pour examen par le Comité permanent, une stratégie de partenariat pour que les Parties, le Comité permanent et le Secrétariat identifient des priorités en matière de collaboration qui renforcent notamment l'application de la Convention ainsi que son efficacité et son efficience à travers des partenariats stratégiques. Sur cette base, le Secrétariat a donc fourni un projet de stratégie qui sera discuté lors du prochain comité permanent (SC78) en février 2025.

En réponse à la Notification N° 2024/108 sur le projet de stratégie de partenariat de la CITES, je vous prie de trouver ci-dessous, les commentaires du Bénin

- Le Bénin est d'accord sur le fait que les partenariats ont le potentiel d'améliorer considérablement la mise en œuvre de la Convention.
- Le projet de stratégie ne fournit pas de processus de sélection des priorités (sujets, activités et organisations partenaires) et propose plutôt des thèmes déjà sélectionnés par le Secrétariat sur la base de sa propre évaluation interne. Il serait indiqué de mettre en place un processus de sélection et de validation des priorités.
- Au paragraphe 3 de la notification, le Secrétariat indique avoir « entrepris une évaluation interne des partenariats en cours ». Le Secrétariat devrait mettre à la disposition des Parties le contenu précis de cette évaluation interne pour leur permettre de se faire leur propre opinion sur le processus de sélection de nouveaux sujets prioritaires qui devrait être inclusif et transparent.
- La décision 19.20 stipule que les Comités permanents et les Parties (et pas seulement le Secrétariat) devraient jouer un rôle de premier plan s'agissant d'identifier les partenariats à prioriser. Il est préoccupant de constater que le projet de stratégie ne laisse aucun rôle ni aux Comités ni aux Parties dans ce processus. Pour cette raison, la stratégie devrait être modifiée avant sa présentation au SC78, afin que les Comités permanents puissent sélectionner les nouveaux partenariats à prioriser pendant chaque période intersessions, sous réserve de l'approbation finale des Parties lors de la CoP.
- Les priorités en matière de partenariats devraient porter sur des questions liées aux fonctions essentielles de la Convention CITES, à savoir la mise en œuvre et l'application des

réglementations, sachant que les ressources et la charge de travail du Secrétariat et des Comités sont déjà gravement surchargées.

- La décision 19.20 et les décisions connexes sont intitulées « Coopération avec les accords multilatéraux sur l'environnement et autres organisations internationales ». Cependant, le projet de stratégie du Secrétariat va au-delà de ce mandat et suggère d'élargir les partenariats pour inclure d'autres organismes « dans différents lieux géographiques », y compris le secteur de l'industrie et le secteur privé. Les partenariats proposés avec l'industrie devraient être exclus car ils pourraient entraver la capacité du Secrétariat à maintenir une vision indépendante et scientifique sur les questions commerciales. La stratégie de partenariat devrait également tenir compte de la capacité des Comités à superviser de manière adéquate les activités liées aux partenariats.

### Brazil (two responses)

#### Management Authority

We believe that the document could be more concise and recommend a more compact version, particularly in the first seven pages of the Draft, which encompasses the first 3 sections (I, II, III A1 and A2).

Brazil cannot agree with the singularization of forests as an example indicated in par. 24.a. We do not believe that CITES is in a position to discuss programs on forests generally speaking. According to information on the CITES website, the Convention regulates the international trade of close to 800 tree species, as well as other fauna and flora species occurring in forest ecosystems. This is nowhere near the biodiversity found in plants in forests in Brazil. Thus, Brazil does not agree that programs on forests are covered by CITES and requests the replacement of the example mentioned in the paragraph.

There is also no clarity on what SDGs related to forests would be dealt with by CITES. Finally, we fail to understand what would be "other global forest-related goals," since there is no internationally agreed term on this.

In paragraph 32a, we believe that the increase or decrease of the number of any species in CITES Appendices should be member-driven. Thus, we find it inappropriate that the Strategy contains such a prescriptive statement. We, thus, request the 2nd phrase: "By building such partnerships, implementation of CITES could be further enhanced for the increasing number of commercially exploited aquatic species listed in the CITES Appendices."

In paragraph 32b, we agree with the general message of including indigenous people and local communities, gender-related groups, and youth. However, we believe that the scope mentioned in the paragraph is too broad. For example, we do not believe that CITES is in a position to discuss recognition of resource tenure and ownership and traditional knowledge. Most of those topics are being dealt with by other international instruments, such as the Convention on Biological Diversity, and we do not see added value in having this kind of discussion in CITES, especially considering the lack of resources and budgetary constraints of the secretariat.

In paragraph 32d, we request the replacement of the expression "tree species and forests" with "plants," as it is in the text of the convention. As indicated before, we do not agree that CITES is the adequate forum to debate forests, since the topic, in general terms, is not in the mandate of the Convention.

In paragraph 33a, it is not true that academia is largely missing from CITES partnership efforts. We would like to emphasize that CITES allows the registration of scientific institutions. We recommend a more precise rephrasing of that sentence.

Paragraph 33c is unclear. We recommend its deletion.

Paragraph 34 is unclear. We recommend further elaboration on capacity building. How would CITES support Parties? With which international organizations would CITES collaborate? The text is not precise and needs improvement aiming at concrete actions.

### **Scientific Authority**

According to the draft, CITES Partnership Strategies can be long-term or medium-term. We agree that long-term partnerships on strategic issues are of great value in monitoring and developing solutions to the problems involving wildlife trade and trafficking.

In turn, the draft mentions thematic areas in which the Secretariat considers it desirable to increase current efforts to develop and implement partnerships. A thematic area that is not mentioned, but that we believe deserves attention, is the international trafficking of endemic species. The growing number of cases of reports and seizures of species endemic to Brazil abroad is causing concern within the country. Working in partnership with other conventions, such as the CBD, can bring useful synergy to better address the problem.

Also deserves attention the implementation of partnerships on invasive alien species. Many studies show that the trade of exotic pets has caused the loss of native biodiversity and the spread of diseases. Partnerships and the formation of working groups at CITES can be encouraged to assess the invasive potential of species, discourage the trade in exotic pets, and raise public awareness of the risks of this practice. In this case, acting with the CBD can also better address the problem.

In this sense, the draft CITES Partnership Strategy could reinforce the partnership that has been growing between CITES and the Convention on Biological Diversity (CBD). These two Conventions have many common objectives that can benefit from synergistic action. The exchange of information, collaboration, identification of gaps and division of efforts between the Conventions could make both more powerful in achieving their objectives.

The draft CITES Partnership Strategy also mentions that the academia is still largely absent from CITES partnership efforts. We believe that this is a fundamental point that needs to be reinforced, as there are many species that are highly trafficked and that require studies on their conservation status in order to be included in the CITES Appendices, in addition to scientific input for the production of NDFs (non-detriment findings). The partnership with academia can bring numerous benefits, such as priority indications, experience exchanges, network formation, as well as enable comprehensive and robust scientific studies.

In regard to command and control, we emphasize the importance of greater exchange of experiences between countries regarding information on monitoring, identification of gaps and investment of resources and knowledge in those that demonstrate security gaps in the control of wildlife trafficking.

No less important, the livelihoods of rural communities addressed by CITES is also of great relevance, since these populations are traditionally dependent on CITES-listed species for their subsistence and, therefore, can be strong allies in their conservation. Strengthening partnerships and supporting traditional populations can be of great value in ensuring the protection, monitoring and sustainable use of the environment.

### **China**

1. Note that there are many parties (30-40 of 184) on the list of non-compliance and then in suspension of trade for a long time. This is the most significant challenge to the effectiveness of CITES.

To this sense, we kindly recommend that the first priority areas for partnership to be narrowed to capacity building for the parties being lack of capacity in implementing the CITES, by supporting sustainable management and use of wild fauna and flora, livelihoods of rural communities, and to avoid the current too broad priority areas.

Regarding the significant role of IGOs in achieving SDG 2030, the partnership in priority is recommended strongly between CITES and IGOs.

2. Note that CITES has had some partners in the recent years. We kindly suggest a more detailed assessment on the existing partnership.

Regarding the particularly important role of ICCWC, the more detailed assessment should focus on its contribution to global success in reducing wildlife trafficking and the gap of commitment promised and enacted by each partner.

3. We also kindly suggest a road-map for developing partnership, which needs consist of but not limited to a list of all potential partners, anticipated objective and goals with each partner, and time schedule.

4. The assessment indicators are needed in section VI, and designed based on the work of assessment on partnership of ICCWC.

## Germany

We have carefully reviewed the Draft Partnership Strategy in view of the process leading to its development and would like to share some rather fundamental points that we have with the draft Partnership Strategy at this stage. We reserve our right to make further comments on this item at a later stage.

First, Decision 19.20 on Cooperation with Multilateral Environmental Agreements (MEAs) and other international organisations should be closely followed taking into account the history of the issue. Specifically, at SC 74 and CoP19, the scope of the issue has been limited, as the title suggests, to cooperation with MEAs and other international organisations. The current Draft CITES Partnership Strategy goes beyond this mandate by addressing potential partnerships with various stakeholders such as industry and finance. This expansion of the Draft Partnership Strategy is not covered by the mandate given to the CITES Secretariat at CoP19 through Decision 19.20. Any such expansion requires that the Parties revise the existing decision or issue a new decision mandating the CITES Secretariat to analyse and evaluate the risks and benefits of a more expansive partnership strategy that includes formally partnering with these stakeholders beyond MEAs and international organisations not least in view of the necessary prioritisation of the Secretariat's tasks.

Second, as in the past, any entering into, renewal of or dissolution of a partnership must remain strictly party-driven. This includes party approval on a case-by-case basis of the entering into any type of partnership with any Multilateral Environmental Agreement or other international organisation. This is to ensure that partnerships (and the implementation an overall partnership strategy) reflect the Parties' priorities for the Convention. For instance, the draft MOU with FAO was closely monitored and modified by the Parties. This fundamental practice should be made explicit in the Draft Partnership Strategy.

Third, it is important to preserve the capacities of the Secretariat to be able to work on the mandates it receives from CITES Parties. The Secretariat has repeatedly reported on its overwhelming workload and difficulties in implementing all decisions taken by the Parties at Conferences of the Parties. Under these circumstances, we would very much caution to have such a broad partnership strategy exploring partnerships in various fields that are more or less adjacent to the Convention, as well as expanding partnerships to novel actors (beyond MEAs and international organisations). We are concerned that this broad approach contravenes the need to focus on the key elements of the Convention and further overextends the resources of the Secretariat.

We therefore suggest that the Draft CITES Partnership Strategy is revised in a manner that reflects the key objectives of the Convention and that rests within the mandate of Decision 19.20.

## Mexico

### Table of contents (page 1)

Ensure that all categories of document SC77 Doc. 18, paragraph 13 are covered:

Type of partnership, type of collaboration, type of agreement.

Ensure that all elements of document SC77 Doc. 18, paragraph 14 are also covered:

Analysis of the current situation, role of the Parties/CoP/SC/AC/PC, conclusion and next steps.

### **1. Objective and Purpose of the Strategy (page 2)**

#### **Comment:**

The purpose of the strategy is clearly framed in terms of international cooperation for CITES implementation, but lacks specificity as to the concrete results expected from this cooperation. Goal 5 of the Strategic Vision is mentioned as a guide, but there is no explicit breakdown of how partnerships will contribute to key objectives. This section could be strengthened by mentioning specific cases where strategic partnerships have already generated positive results.

- Suggest a greater focus on the practical impact of the strategy by including historical examples where international cooperation has been instrumental to the success of CITES. For example, the collaboration between CITES and agencies such as INTERPOL in combating illegal trade in species has been a key partnership that could serve as an example. In addition, the creation of synergies with Sustainable Development Goals (SDGs) 14 and 15 could be noted to highlight alignment with global targets.

### **2. Definitions and Scope (p. 3-5)**

#### **Comment:**

The definitions are clear, but it would be useful to expand on the concept of "non-traditional partnerships" mentioned above. In the current context, collaboration with non-conventional actors (e.g. private sectors or indigenous communities) is gaining relevance. The paper could be improved by outlining cases where such partnerships have already proven to be effective.

Include examples of non-traditional collaborations that have been successful in other environmental agreements, such as partnerships with NGOs specialising in technology to improve monitoring or traceability. Such collaborations could focus on the use of new technologies (blockchain, digital traceability systems, etc.) to strengthen the control and monitoring of species trade.

Also, deepen how the strategy considers the participation of private actors, such as the financial sector, to innovate in the financing of conservation-related projects.

### **3. Basic Principles and Approaches of the Partnership (p. 5-11)**

#### **Comment:**

The cost-benefit analysis is a key point, but could be more detailed in terms of the investment of time and resources by the Parties. While the value of partnerships is clearly highlighted, transaction costs in terms of time and human resources are treated in a generic way. The

Parties could benefit from clearer guidance on how to reduce these costs or how to balance them with the benefits obtained.

- Include assessment tools that Parties can use to measure in advance whether a proposed partnership will generate more value than it costs. This could involve the development of a value assessment tool (already mentioned in the SDG Partnership Guidance). In addition, it would be interesting to mention examples of failed partnerships where the costs outweighed the benefits and detail what was learned from these cases. This approach could help to prevent future partnerships that do not meet the expected criteria.

In section A.2 Value creation through strategic partnerships, paragraph 20, reference would be highly recommended.

A1. The CITES value proposition, Point e. (p. 7)

Comment:

CITES promotes elements of legality in trade law enforcement, but does not have a "policing" function.

This idea would be better suited to other partners in the International Consortium on Combating Wildlife Crime, such as INTERPOL.

#### **4. Priority Areas for CITES Strategic Partnerships (p. 13-16)**

**Comment:**

The identification of key areas such as species conservation, rural livelihoods, and illegal trade is timely, but could be enriched by adding a clearer focus on the prioritisation of specific actors. Indigenous peoples and local communities are mentioned, but how their participation will be encouraged or facilitated in practice is not comprehensively explained.

- Propose formal mechanisms for the active inclusion of indigenous peoples and local communities, such as the creation of permanent consultation forums or spaces for co-creation of policies that allow them to contribute their traditional knowledge. It would be beneficial to mention how this inclusion can improve compliance with the Convention in protected areas or regions where illegal trade directly affects these communities.
- Include more details on partnerships in the fisheries sector, as this area is of high importance to CITES. Partnerships with regional fisheries bodies could be better specified with case studies showing how these collaborations have contributed to the sustainable management of marine species.

Paragraph 30., subparagraph b. Information sharing and knowledge management (including the Virtual College); (p. 13)

Comment: Not only sharing and managing, but also generating information and knowledge.

Paragraph 32., sub-paragraph b. Stakeholder involvement: (p. 14)

Indigenous peoples and local communities, gender-related groups and youth should be further considered as partners who could add value. significant addition to partnerships working on relevant issues such as livelihoods, traditional knowledge and rights.

Comment: Consider including a reference to governance.

Paragraph 33., subparagraph c. Partnerships with industry... (p. 16)



Comment: With caution, consider preventing "conflicts of interest".

## **5. Operational context**

### **Risk Management (p. 17)**

#### **Comment:**

The strategy addresses risk management in a general way, but could be more proactive on the specific risks faced by CITES by working with new types of partners, such as private actors or sectors with less experience in implementing the Convention.

- Provide a more detailed list of specific risks related to the involvement of private actors, such as misuse of sensitive information, conflicts of interest or lack of compliance with international regulations. In addition, it should highlight how CITES plans to mitigate these risks through regular monitoring mechanisms or audits of partnerships.

## **6. Monitoring and Evaluation (p. 19)**

#### **Comment:**

Monitoring is well structured, but lacks concrete indicators that would allow Parties to measure the success of partnerships at local and regional level, not only from the perspective of the Secretariat.

- Suggest that specific key performance indicators (KPIs) be developed for each thematic priority area (e.g. number of indigenous communities involved, reduction in illegal trade in species, etc.). These indicators could be reviewed annually or at defined time periods, which would provide Parties with a solid basis for assessing whether partnerships are generating the expected value.

Paragraph 49., subparagraph a Has the CITES Partnership Strategy enabled the CITES Partnership Strategy to respond to international environmental priorities and to take account of new international initiatives, consistent with ~~the terms and scope~~ of the Convention?

Comment: Replace: "the terms" by "the scope".

## **Niger**

1. Il est préoccupant que le projet de stratégie ne fournisse pas de processus de sélection des priorités (sujets, activités et organisations partenaires) et propose plutôt des thèmes déjà sélectionnés par le Secrétariat sur la base de sa propre évaluation interne.
2. Au paragraphe 3 de la notification, le secrétariat indique avoir « entrepris une évaluation interne des partenariats en cours ». Le Secrétariat devrait mettre à la disposition des Parties le contenu précis de cette évaluation interne. Le processus de sélection de nouveaux sujets prioritaires devrait être inclusif.
3. La décision 19.20 stipule que les Comités permanents et les Parties (et pas seulement le Secrétariat) devraient jouer un rôle de premier plan s'agissant d'identifier les partenariats à prioriser. Il est préoccupant de constater que le projet de stratégie ne laisse aucun rôle ni aux Comités ni aux Parties dans ce processus. Pour cette raison, la stratégie devrait être modifiée avant sa présentation au SC78, afin que les Comités permanents puissent

sélectionner les nouveaux partenariats à prioriser pendant chaque période intersessions, sous réserve de l'approbation finale des Parties lors de la CoP.

4. Les priorités en matière de partenariats devraient porter sur des questions liées à l'accompagnement des états dans la mise en œuvre de la convention CITES, c'est pourquoi à notre avis les nouveaux partenaires à coopter doivent œuvrer dans le même sens.
5. Les partenariats ont le potentiel d'améliorer considérablement la mise en œuvre de la Convention.
6. La décision 19.20 et les décisions connexes sont intitulées « Coopération avec les accords multilatéraux sur l'environnement et autres organisations internationales ». Cependant, le projet de stratégie du Secrétariat va au-delà de ce mandat et suggère d'élargir les partenariats pour inclure d'autres organismes « dans différents lieux géographiques », y compris le secteur de l'industrie et le secteur privé. Les partenariats proposés avec l'industrie devraient être exclus car ils pourraient entraver la capacité du Secrétariat à maintenir une vision indépendante et scientifique sur les questions commerciales.

La stratégie de partenariat devrait également tenir compte de la capacité des Comités à superviser de manière adéquate les activités liées à la mise en œuvre de la convention.

## Senegal

1- À sa 19e session (CoP19, Panama City, 2022), la Conférence des Parties a adopté la décision 19.20, Coopération avec les accords multilatéraux sur l'environnement et autres organisations internationales, au titre de laquelle, sous réserve de financements externes, le Secrétariat prépare, pour examen par le Comité permanent, une stratégie de partenariat pour que les Parties, le Comité permanent et le Secrétariat identifient des priorités en matière de collaboration qui renforcent notamment l'application de la Convention ainsi que son efficacité et son efficience à travers des partenariats stratégiques

**La stratégie, telle qu'elle est proposée, n'a pas tenu compte de la décision 19.20, car aucun rôle n'est souligné ni pour les Comités ni pour les Parties dans le processus de sélection de partenariats. Nous pensons qu'il serait pertinent d'associer au tant que possible les comités ou les parties dans le processus de sélection de partenariats.**

2- Au paragraphe 32 du projet de la stratégie, il est écrit : Il ressort de l'évaluation par le Secrétariat des partenariats actuels (y compris ceux mis en place au nom de la Conférences des Parties à la CITES et des Comités permanents).

**Il serait important de partager l'évaluation réalisée par le Secrétariat aux parties et aux comités permanents, dans la mesure où certains des partenariats sont mis en place par les parties et ou par les comités.**

3- Paragraphe 49, il est écrit : À la fin de la période 2021-2030 couverte par la Vision de la stratégie, le Secrétariat procédera à un examen interne de la stratégie en matière de partenariats afin d'évaluer si elle a rempli son objectif jusqu'à présent ou si elle est en bonne voie de le faire. Lors de cet examen, le Secrétariat tiendra compte des questions suivantes.

**Nous trouvons pertinent de faire participer aux parties et aux comités à l'examen de la stratégie en matière de partenariat d'autant plus que les parties et les comités ont participé à la mise en oeuvre de la stratégie**

## Togo

- Au paragraphe 3 de la notification, le Secrétariat indique avoir « entrepris une évaluation interne des partenariats en cours ». Le Secrétariat devrait mettre à la disposition des Parties le contenu précis de cette évaluation interne. Le processus de sélection de nouveaux sujets prioritaires devrait être inclusif et élargi.

- La décision 19.20 stipule que les Comités permanents et les Parties (et pas seulement le Secrétariat) devraient jouer un rôle de premier plan s'agissant d'identifier les partenariats à prioriser. Il est constaté que le projet de stratégie laisse moins de rôle aux Comités et aux Parties dans ce processus. Pour cette raison, la stratégie devrait être modifiée avant sa présentation au SC78, afin que les Comités permanents puissent éventuellement sélectionner les nouveaux partenariats à prioriser pendant chaque période intersessions, sous réserve de l'approbation finale des Parties lors de la CoP.

- Les priorités en matière de partenariats devraient porter sur des questions liées aux fonctions essentielles de la Convention CITES, à savoir la mise en œuvre et l'application des réglementations, sachant que les ressources et la charge de travail du Secrétariat et des Comités sont déjà surchargées.

- Les partenariats ont le potentiel d'améliorer considérablement la mise en œuvre de la Convention.

- La décision 19.20 et les décisions connexes sont intitulées « Coopération avec les accords multilatéraux sur l'environnement et autres organisations internationales ». Cependant, le projet de stratégie du Secrétariat va au-delà de ce mandat et suggère d'élargir les partenariats pour inclure d'autres organismes « dans différents lieux géographiques », y compris le secteur de l'industrie et le secteur privé. Les partenariats proposés avec l'industrie devraient être exclus car ils pourraient entraver la capacité du Secrétariat à maintenir une vision indépendante et scientifique sur les questions commerciales. La stratégie de partenariat devrait également tenir compte de la capacité des Comités à superviser de manière adéquate les activités liées aux partenariats.

## USA

### General comments

The United States has several concerns with the draft partnership strategy. Overall, we found the draft strategy to be overly detailed and prescriptive. We believe any such strategy should be concise and should not attempt to predict possible partnerships. It should also clearly explain why it is necessary to introduce partnership categories and how these differ from existing structures/mechanisms currently in place (such as MOUs, committees/subcommittees, and intersessional working groups), including with respect to vetting and/or approval. We are concerned that the Secretariat has included specific suggestions for partnerships in the draft strategy, including in several areas relevant to committees, subcommittees, or working groups that were not consulted in the development of the draft strategy. We are also concerned with the inclusion of elements in the draft strategy that are not relevant to the mandate of CITES or all CITES Parties.

### General questions:

- How does a partnership differ from other mechanisms that CITES currently has in place, such as MOUs?
- Is there an intention to replace MOUs or other existing mechanisms with partnerships, or renegotiate MOUs to be in line with the partnership strategy?
- The document refers repeatedly to "combining resources" which suggests pooling funds. Was this the intent, or is something like "using complementary resources" a better descriptor?
- What are the proposed vetting and approval processes for establishing partnerships?
- Why are granular definitions needed for an overarching strategy?

Paragraph 21.b.iii (p. 7) – The example is too absolute. Digitalization, by itself, does not reduce vulnerability to fraud. It depends. The language should be softened from “(for example, the digitalization of permits reduces their vulnerability to fraud)” to “(for example, the digitalization of permits can help reduce their vulnerability to fraud)” or something to that effect.

Paragraph 24.a. (p. 8) – If retained, the example needs more explanation of the added value for CITES.

#### Fisheries

The United States supports the proposal for CITES to strengthen its partnership with Regional Fishery Bodies, including Regional Fishery Management Organizations, given the increased need for cooperation and information sharing on sharks and rays that are included in the CITES Appendices but also fall under the competence of these regional bodies.

#### Academia

We think this section could be strengthened by the recognition of a role and inclusion of scientific societies in this section. It is not simply academic institutions themselves but the professionals in scientific societies that could play a role in addressing species knowledge gaps.

#### Partnerships with industry

We suggest adding the following text (shown in underlined text) to paragraph 33. c:

Partnerships with industry could add value by offering access to additional and complementary information on trade and markets, where the demand is, value chains, supply chains, harvest methodologies, species use alternatives/substitutions, etc.

#### Capacity-building support

We suggest adding to paragraph 34 an additional concept to consider whether it would be helpful to consider how Parties could provide support and technical assistance to each other to build their capacity to implement CITES (e.g., a program pairing newer Parties with more experienced Parties in the same region for technical exchange; regional exchanges for particular implementation issues, etc.). We note that other Conventions and fora have used peer review or peer support in different ways. We suggest adding a sentence to paragraph 34 along the lines of, “Additionally, it may be useful for CITES to explore how to facilitate peer-to-peer technical assistance between Parties to strengthen implementation of the Convention.”

#### Dependencies and operating environment

We believe that the Secretariat’s development of new partnerships should not incur a risk to carrying out core functions of the Secretariat that may not be as attractive but are of importance to Parties.

Paragraph 49.e.ii (pp. 17-18) – We think an additional sub-bullet to paragraph 49.e. paralleling 49.e.ii. would be useful, e.g.: Has the strategy enabled CITES to find/enter partnerships that do create value-added (for both the Convention and partners)?

### Observer Organizations

**Orchestras (American Federation of Violin and Bow Makers, Chambre Syndicale de la Façture Instrumentale (CSFI), Confederation of European Music Industries (CAFIM), Fender Musical Instruments Corporation, International Alliance of Violin and Bow Makers for Endangered Species, International Society of Violin and Bow Makers, League of American Orchestras, Mike Born Consulting, LLC, National Association of Music Merchants (NAMM), PRS Guitars, Taylor Guitars**

We wish to emphasize the constructive role that industry partners can play in fostering international cooperation that advances the goals of CITES, and specifically the benefit of collaboration with those representing commercial and noncommercial trade. The draft report includes the following brief reference to industry partners:

*IV.(33)(c.) Partnerships with industry could add value by offering access to additional and complementary information on trade and markets, where the demand is, value chains, supply chains, harvest methodologies, etc.*

The report's sections III. (A)(19)(b) and (c) reference the importance of sustainable use and compliance in the CITES value proposition. Effective implementation of CITES relies on successful navigation of CITES rules and permit procedures by partners engaged in commercial and noncommercial trade of CITES species, as well as proactive action by industry stakeholders to advance strategies for sustainable trade in CITES-listed species. As long-term participants in CITES deliberations, our organizations have offered essential insights into the practical application of CITES permit procedures, produced compliance guidance and training events for global industry stakeholders, and shared innovative strategies that engage both producers and consumers in new practices to advance administrative efficiencies and sustainable trade. In addition, a number of organizations in our sector are directly investing in the conservation and science of timber species, and can offer valuable perspectives based on those experiences.

Beyond the potential added value of trade and supply chain data from industry referenced in the draft, the report could elaborate on these other areas of ongoing partnership among the Secretariat, Parties, and nongovernmental and trade organizations, and specify that partnership with industry could add value by contributing views on **strategies to enhance compliance with CITES procedures** and ongoing and new efforts to **support conservation and sustainable trade**.

### **Association of Fish and Wildlife Agencies, United States**

While we agree in principle with the objectives of the strategy, we wish to raise several concerns about the draft document.

Section B.44 suggests that the Secretariat will determine how a partnership agreement is set up, once the strategy is adopted: "... the Secretariat may develop a more detailed Partnership Plan for how it envisages to implement and deliver the Partnership Strategy..." There is no information or details on this. There is a reference to a U.N. document on partnerships:

**"As the Secretariat of a Multilateral Environmental Agreement (MEA) administered by UNEP, the CITES Secretariat is subject to the UNEP Partnership Policy (footnote added here) and its respective procedures, insofar as there is no specific decision from CITES governing bodies mandating a separate process."**

However, the details of the UNEP Partnership Policy are not available to us as it resides in a protected site. We believe that it is imperative that this draft strategy be accompanied with draft details on its implementation. Those details should be subject to comment by the Parties, just as the broad strategy was made available to us.

To that end, we recommend that the implementing procedures be developed now and annexed to the draft strategy. Therefore, there should be another opportunity to review and comment on a revised draft policy and procedures document.

A primary concern is the potential for an out-size role of some nongovernmental organizations (NGOs) in influencing policy via a partnership arrangement. We can see how a formal partnership would give those NGOs a stronger voice at the table, over and above other NGOs, and potentially having extensive influence over CITES activities. It could become a matter of who has the deep pockets, staff, and money to stand up a partnership agreement, to the exclusion of other NGOs or entities that do not have the capacity to do so.

This underscores the importance of reviewing the draft implementing procedures first, to ensure that partnership agreements are truly available to any interested party without regard to wealth or influence.

We noted the listing of "Academia" as a potential source of partners. We do not agree with this as scholars within academia already play a key (and appropriate) role within the governance of the International Union for Conservation of Nature (IUCN). In particular, the role of academics on IUCN's Specialist Groups as scientific experts is very significant, and their work is exceptionally useful in informing decisions of the CITES Parties. We question the need or benefit, however, about including academics in any sort of formal partnership with the Secretariat.

Also, in 19b, we recommend removing the word "traceable" as this is not in the original Convention text and to focus on the mandate of the Convention to ensure legal and sustainable trade.

Specifically: "19b. As the only legally binding instrument regulating international wildlife trade to ensure it's legal, **and** sustainable, and traceable, thereby ensuring that sustainable use contributes to the long-term conservation of species, CITES is an expression of sustainable development balancing social, economic and environmental objectives."

## ATIBT

Nous partageons pleinement l'objectif de la Convention visant à promouvoir la coopération internationale pour protéger certaines espèces de faune et de flore sauvages contre la surexploitation liée au commerce international. À ce titre, nous reconnaissons également l'importance de garantir une utilisation durable de ces ressources, bénéfique non seulement pour les écosystèmes, mais aussi pour les communautés locales.

L'ATIBT, fortement engagée dans la gestion durable des forêts tropicales, la promotion du commerce légal et responsable du bois tropical, voit dans cette stratégie une opportunité pour renforcer la coopération entre les acteurs de la chaîne de valeur et contribuer aux objectifs globaux de développement durable.

Nous serions ravis de collaborer activement dans ce cadre, notamment en ce qui concerne l'amélioration des pratiques d'exploitation, la transparence et le renforcement des capacités des acteurs impliqués dans le commerce des espèces ligneuses listées aux annexes de la CITES.

## **SSN (Animal Alliance of Canada, Animal Welfare Institute, Born Free Foundation, David Shepherd Wildlife Foundation, Fondation Franz Weber, Humane Society International, Law of the Wild, Pro Wildlife and Species Survival Network)**

We welcome the opportunity to provide comments on this document. However, we have serious concerns about its appropriateness and acceptability. As an initial matter, we are concerned that the document is vague and lacks specific details, making it difficult to determine exactly what the Secretariat is proposing to do (or with whom). Moreover, it provides a short turnaround time for comments that constrains the Parties' ability to thoroughly assess its implications. In addition, given the length of the

Standing Committee's agenda there is unlikely to be sufficient time for meaningful discussion of the document at SC78.

The strategy proposed in this document could introduce **substantial new workstreams** for the Secretariat at a time when the Secretariat, the Parties, and the Permanent Committees are already constrained by increasing workloads and limited resources. We object strongly to any strategy that would direct CITES' limited resources to ancillary projects, 'partnerships', or any other activities that lie outside the core mandate of the Convention, without the explicit direction and approval of the Parties.

Decision 19.20 instructs the Secretariat to develop a partnership strategy ostensibly aimed at helping "the Parties, the Permanent Committees, and the Secretariat" identify priorities for collaboration that enhance the implementation of the Convention. However, the document proposes a process that appears to suggest that the Secretariat will identify and initiate partnerships independently, **without direction from the Parties** (i.e. via Decision or Resolution, which is the established practice) **or input from the Permanent Committees**.

This is not acceptable.

In addition, the related Decisions focus on "cooperation with **Multilateral Environmental Agreements and other international organizations**" (emphasis added). The CITES Strategic Vision<sup>1</sup> refers to collaboration with "relevant international partners" and "international financial mechanisms and other related institutions".<sup>1</sup> However, the draft strategy suggests expanding "partnerships" to include a broader audience than provided for in the Decisions, including regional fishery bodies, indigenous peoples and local communities, "actors from the climate change community", private industry, and the financial sector. This expansion should be avoided absent a new Decision adopted by the Parties.

For example, one 'value' of partnerships is described as, "leverage[ing] financial resources to support the implementation of the Convention and its Resolutions and Decisions". This appears to suggest partnerships with industry, but it is unclear the purpose of such partnerships, how partners would be identified, or how such partnerships would be monitored and by whom. As an example, in the mid-1980s, it was reported that the CITES Secretariat's Ivory Trade Unit was predominantly funded by a single trade association.<sup>2</sup> In addition, at CoP6, the Secretariat proposed that its work on ivory trade controls be funded by fees collected on traded ivory.<sup>3</sup> Upon review, these trade controls were deemed to have 'failed dramatically'.

The Notification reports that "the Secretariat may present a report to the 21<sup>st</sup> session of the Conference of the Parties (TBC, 2028) to take stock of progress achieved with the implementation of this partnership strategy". We fail to see how the Parties can be asked to take stock of 'progress' in an activity the details of which (partners, goals, MoUs) they have not seen and have yet to agree should be carried out at all.

Instead, **any strategy of this type should be presented to CoP 20** not as a *fait accompli* already in progress, but as a proposed activity requiring the Parties' approval. We suggest that the Secretariat provide the Standing Committee, at its 78th meeting with:

– A list of current partnerships and any existing assessments of these, description of the related work involved (including links to relevant memoranda of understanding), and analysis of cost / benefit and effectiveness in order to evaluate the feasibility of expanding partnerships at the level (and covering the thematic areas) being suggested by the Secretariat; and

– An amended draft partnership strategy directing the Secretariat to provide the Standing Committee,<sup>6</sup> at the first full meeting post-CoP, a list of proposed new or amended partnerships (including description of the related work involved). The Standing Committee should review this list and select those partnerships of interest, with the Secretariat providing a cost benefit analysis on the selected proposed partnerships at the Standing Committee's next meeting where the Committee may make a further selection to be submitted for consideration to the CoP in the form of draft Decisions.

The Parties should not only be asked to review and debate the proposed strategy but, if it is approved, to develop terms of reference for any work they may direct the Secretariat to undertake with regard to/as part of the partnerships.

The Notification also reports that the CITES Secretariat is currently undertaking an exercise to develop a **CITES Resource Mobilization Strategy**, which may affect (and be affected by) the emerging thematic areas (paragraph 32) and partnerships with the finance sector (paragraph 33). However, no details are provided as to what this means or to how it will operate. With regard to partnerships with the finance sector it should be ensured that these do not serve any vested interests and that the independence of the Convention and its bodies is maintained. We would also note that there are existing processes enabling donors to fund agreed processes/work requiring external funding, thus the aim/scope of partnerships with the financial sector are unclear.

The Secretariat is, or ought to be, under a requirement to direct its available resources only to the activities directed to it by the Parties. If the purpose of a Resource Mobilization Strategy is to do this efficiently and with regular oversight and review by the Parties, it could be a helpful process. As noted above, we request that this new initiative, including any new proposed partnerships or thematic areas, be presented to the Standing Committee at its 78<sup>th</sup> meeting for review before being submitted at CITES CoP20 for wider Party consideration.