

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

SUMMARY

THURSDAY 6 FEBRUARY
AFTERNOON

31. National laws for implementation of the Convention (*Decisions 19.60 and 19.61*)

31.2 Request by the Sultanate of Oman to lift the suspension of international trade..... SC78 Doc. 31.2

Kuwait (Committee Member for Asia) called for a vote under Rule 15.1 of the Rules of Procedure of the Standing Committee which was supported by Brazil (Committee Member for Central and South America and the Caribbean). The Committee voted on a motion to agree the following recommendation in paragraph 6 of document SC78 Doc. 31.2:

The Committee approves the lifting of the suspension of international trade with the condition of Oman commits to the following:

- a) submitting periodic reports to the Secretariat on the progress made towards adopting the executive regulations every three months; and*
- b) adhering to the final deadline of October 2025, as per the timeline for issuing the executive regulations*

The motion was rejected by a simple majority of 7 votes against and 5 in favour.

The Committee encouraged Oman to make the progress outlined in the document.

32. National reports

32.1 Submission of annual reports..... SC78 Doc. 32.1

The Committee instructed the Secretariat to determine whether Bahamas, Guinea-Bissau, Liberia, Malawi, Mali and Samoa have failed to provide annual reports for three consecutive years, without having provided adequate justification. If so determined, the Secretariat will issue a Notification (60 days after the closure of this 78th meeting of the Standing Committee) recommending that Parties not authorize any trade in specimens of CITES-listed species with those Parties until they have provided the missing reports.

Membership of in-session drafting groups

The Committee agreed that Senegal, as acting Member for the African region, could be added to the drafting group on indigenous peoples and local communities.

19. CITES and forests (Decision 19.34) SC78 Doc. 19

and

16. Cooperation with Multilateral Environment Agreements and other international organizations (Decision 19.34) SC78 Doc. 16 Add.

The Committee:

- a) in accordance with Decision 19.34 paragraph a), noted progress made in the implementation of Decisions 19.32 and 19.33 as reported in document SC78 Doc. 19;
- b) in accordance with Decision 19.34 paragraphs b) to d), noted the preliminary feedback provided in plenary on the draft of the *Report on the interdisciplinary study on CITES and forests* as of 5 December 2024 contained in the Annex to document SC78 Doc. 19, noting the rejection of the use of the term 'global forest commitments' in the draft report by Brazil and other Parties that supported their intervention;
- c) requested the Secretariat to prepare a second draft *Report of the interdisciplinary study on CITES and forests* with all completed Chapters taking into account the comments made in plenary at SC78 for consideration of progress in implementation of Decisions 19.32 to 19.34 by the 20th meeting of the Conference of the Parties;
- d) requested the Secretariat to prepare an assessment of the implementation of Decisions 19.32 to 19.34, and recommendations relating to possible revised or new decisions on CITES and forests, outlining the CoP20-CoP21 intersessional consultation process with the Plants and Standing Committees, for consideration at CoP20; and
- e) requested the Secretariat, in consultation with the Chair of the Standing Committee, to finalize a response to the letter received from the Chair of the 20th session of the United Nations Forum on Forests (UNFF20) using as a basis addendum SC78 Doc. 16 Add., as well as feedback received at SC78.

24. CITES Tree Species Programme (Decision 19.50) SC78 Doc. 24

The Committee:

- a) agreed to submit the draft decision contained in the Annex to document SC78 Doc. 24 and amended by the United States of America, on behalf of the North American region, for consideration of the Conference of the Parties at its 20th meeting; and
- b) agreed that Decisions 19.49 and 19.50 can be proposed for deletion.

DRAFT DECISION ON CITES TREE SPECIES PROGRAMME

Directed to the Secretariat, the Plants Committee and the Standing Committee

20.XX The Secretariat shall:

- a) report to the Plants and Standing Committees on the implementation of the CITES Tree Species Programme as appropriate, bringing to the attention relevant technical and scientific results;
- b) taking into account the outcomes of the interdisciplinary study on CITES and forests, when available, seek advice and guidance from the Plants and Standing Committees to assess the potential of for the CITES Tree Species Programme to be made a permanent programme;
- c) provide opportunities for the Plants Committee and the Standing Committee to be involved in the governance of the programme, including funding decisions; and
- ed) report on the implementation of this Decision at the 21st meeting of the Conference of the Parties.

33. Compliance matters

33.2 Expedited application of Article XIII for West African rosewood (*Pterocarpus erinaceus*) for all range States SC78 Doc. 33.2

Progress in the implementation of Article XIII recommendations for range States of *P. erinaceus* subject to a recommendation to suspend trade, including those also undergoing RST recommendations

Gambia (The)*:

a) The Committee:

- i) maintained the recommendation to suspend commercial trade in specimens of the species *Pterocarpus erinaceus* from The Gambia under the expedited application of Article XIII until the conditions of paragraph 10 of Notification to the Parties No. 2022/045 are met;
- ii) with regards to RST, noted that some progress has been made by the Gambia towards the implementation of short-term recommendation b) and the long-term recommendation c), however this progress remains in its early stages; and
- iii) agreed to retain the RST short-term and long-term recommendations.

Guinea-Bissau*:

b) The Committee:

- i) maintained the recommendation to suspend commercial trade in specimens of the species *Pterocarpus erinaceus* from Guinea-Bissau under the expedited application of Article XIII until the conditions of paragraph 10 of Notification to the Parties No. 2022/045 are met;
- ii) with regards to RST, noted that some progress has been made by Guinea-Bissau towards the implementation of short-term recommendation b) and the long-term recommendation c), however this progress remains in its early stages; and
- iii) agreed to retain RST short-term and long-term recommendations.

Mali*:

c) The Committee:

- i) agreed that the RST short-term recommendations a) and b), and long-term recommendation c) have been implemented through the Plants Committee's acceptance of the quota for *Pterocarpus erinaceus* of 55,384.8 m³ in round wood equivalent;
- ii) agreed to retain long-term recommendation d), provided that Mali would wish to make any increase to the quota approved by the Plants Committee at PC26;
- iii) acknowledged the significant progress made by Mali in implementing recommendations under the expedited application of Article XIII and long-term RST recommendations, particularly concerning the submission of evidence of legal acquisition findings for a volume of 39,950.4 m³ of *Pterocarpus erinaceus* in accordance with Notification No. 2024/057 of 29 April 2024, thus achieving a partial withdrawal of the recommendation to suspend trade in *P. erinaceus*;
- iv) noted the progress made by Mali in the preparation of the legal acquisition findings for *P. erinaceus*;
- v) acknowledged the efforts made by Mali, with the support of Senegal, in preparing an inventory of any specimens or stockpiles of timber originating from Mali and possibly present on Senegal's territory, invite Mali to continue liaising with the Secretariat and with Senegal to ensure that these specimens are managed in accordance with the provisions of the Convention; and
- vi) maintained the recommendation to suspend commercial trade in specimens of the species *P. erinaceus* from Mali under the expedited application of Article XIII until Mali finishes providing the

evidence of adequate legal acquisition findings to the satisfaction of the Secretariat and the Chair of the Standing Committee for the remaining 15,434.4 m³ of the quota accepted at PC26 as required under Notification to the Parties No. 2022/045.

Nigeria*:

- d) The Committee:
 - i) acknowledged the progress made by Nigeria in implementing recommendations under the expedited application of Article XIII and long-term RST recommendations in the context of the compliance assistance programme;
 - ii) encouraged Nigeria to continue implementing these recommendations;
 - iii) maintained the recommendation to suspend commercial trade in specimens of the species *Pterocarpus erinaceus* from Nigeria under the expedited application of Article XIII until the conditions of paragraph 10 of Notification to the Parties No. 2022/045 are met; and
 - iv) agreed to retain the RST short and long-term recommendations.

Cameroon, the Central African Republic, Chad, and Togo:

- e) The Committee maintained the recommendation to suspend commercial trade in specimens of the species *Pterocarpus erinaceus* from Cameroon, the Central African Republic, Chad, and Togo under the expedited application of Article XIII until the conditions of paragraph 10 of Notification to the Parties No. 2022/045 are fully met;

Progress in the implementation of RST recommendations for range States of *P. erinaceus* subject to a voluntary zero export quota

Benin*

- f) The Committee:
 - i) agreed that the RST short-term recommendation a) has been implemented by confirming the maintenance of a zero export quota for *Pterocarpus erinaceus* for 2024 and 2025; and
 - ii) agreed to retain RST short-term recommendation b) and the long-term recommendations c) and d).

Burkina Faso*

- g) The Committee:
 - i) requested Burkina Faso to confirm a voluntary zero export quota for 2024 and 2025 for *Pterocarpus erinaceus*; and
 - ii) agreed to retain the short and long-term RST recommendations.

Ghana*

- h) The Committee:
 - i) agreed that the RST short-term recommendations a) and b), have been implemented through the Plants Committee's acceptance at PC27 of the 40,000 m³ quota in round wood equivalent for the off-reserve underwater (Volta Lake) operations;
 - ii) noted that the long-term recommendations c) and d) are in process of implementation, pending the Plants Committee's review of the additional quota for 18,719.93 m³ living stands of *Pterocarpus erinaceus*; and

- iii) reminded Ghana that the next step to follow in implementing the PC27-accepted quota is the presentation of LAF to the satisfaction of the Secretariat and the Chair of the Standing Committee, having regard to Resolution Conf. 18.7 (Rev. CoP19).

Sierra Leone*

- i) The Committee:
 - i) agreed that the RST short-term recommendations a) and b), and long-term recommendation c) have been implemented through the Plants Committee's acceptance of the quota for *Pterocarpus erinaceus* of 76,324.5m³ in round wood equivalent;
 - ii) agreed to retain long-term recommendation d), provided that Sierra Leone would wish to make any increase to the quota approved by the Plants Committee at PC27; and
 - iii) reminded Sierra Leone that the next step to follow in implementing the PC27-accepted quota is the presentation of LAF to the satisfaction of the Secretariat and the Chair of the Standing Committee, having regard to Resolution Conf. 18.7 (Rev. CoP19).

With regards to Parties with voluntary zero export quotas not subject to further specific recommendations (Côte d'Ivoire, Guinea, Niger and Senegal)

- j) The Committee noted that no further recommendations with regard to Côte d'Ivoire, Guinea, Niger and Senegal are required.

CITES regional workshop on non-detriment findings (NDF) and legal acquisition findings (LAF) for West African rosewood (*Pterocarpus erinaceus*)

- k) The Committee:
 - i) noted the elements provided in Section 3 of document SC78 Doc. 33.2 and the report of the workshop contained in Annex 3; and
 - ii) encouraged Parties to continue sharing experiences and best practices concerning NDFs and LAFs for *Pterocarpus erinaceus* in order to share knowledge and build capacity in the implementation of the Article XIII and RST recommendations for this species.

Reflections on the simultaneous implementation of the expedited application of Article XIII and RST for *P. erinaceus*

- l) The Committee welcomed the proposal that, when Article XIII and RST processes are running concurrently, the RST recommendations be included within the Article XIII recommendations to facilitate reporting.

33.4 Application of Article XIII in Cameroon SC78 Doc. 33.4

The Committee:

- a) noted the progress made by Cameroon in the implementation of the recommendations of the Standing Committee at its 77th meeting and congratulate the country for this;
- b) determined that there are no longer any compliance matters regarding trade in CITES-listed tree species from Cameroon, including *Pericopsis elata*; and
- c) encouraged Cameroon to continue strengthening the implementation of the Convention regarding specimens of CITES-listed species in transit through Cameroon, specifically by:
 - i) submitting an annual report on illegal trade, in accordance with Resolution Conf. 11.17 (Rev. CoP19), paragraph 3;
 - ii) continuing to develop the SIGIF2 information system, particularly the creation of the CEMAC (Central African Economic and Monetary Community) module to record timber from third

countries, particularly the Central African Republic and the Congo, thus enabling a better monitoring of statistics, volumes and timber species from neighbouring countries and a better traceability of specimens during their entire transit through Cameroon, considering the Convention and the provisions of Resolution Conf. 9.7 (Rev. CoP15) on *Transit and transshipment*; and

- iii) promptly conducting an evaluation of the role and methods of work of the Société d'Exploitation des Parcs à Bois du Cameroon (SEPBC) for the management of stocks of timber at the ports of shipment, ensuring a clear and strict separation between stocks of specimens from Cameroon and those of specimens from neighbouring countries, and between the different types of specimens traded.

Cameroon should report to the Secretariat on progress made in the implementation of these recommendations 90 days before the 81st meeting of the Standing Committee (SC81) in order for the Secretariat to consider it in its report to the Standing Committee.

77. Annotation #15 [Decision 18.322 (Rev. CoP19)]..... SC78 Doc. 77

The Committee:

- a) noted the feedback provided on the second draft of the report contained in the Annexes 1 and 2 to document SC78 Doc. 77;
- b) requested the Secretariat to issue a Notification to the Parties following SC78 inviting Parties and relevant stakeholders to provide feedback on the draft report;
- c) requested the Secretariat to revise this second draft of the report taking into consideration the comments made at SC78 and in response to the Notification and submit a final report for consideration at CoP20; and
- d) agreed that Decisions 18.321 (Rev. CoP19) and 18.322 (Rev. CoP19) have been implemented and can be proposed for deletion at CoP20.

33. Compliance matters

33.11 Malagasy palisanders and rosewoods (*Dalbergia* spp.) and ebonies (*Diospyros* spp.) (Decision 19.73).....SC78 Doc. 33.11

The Committee noted document SC78 Doc. 33.11 and the progress made by Madagascar.

Madagascar requested Parties and relevant partners, such as the International Tropical Timber Organization (ITTO), the Food and Agriculture Organization of the United Nations (FAO) and other intergovernmental and non-governmental organizations, to provide technical and financial assistance in support of the implementation of Decision 19.71.

38. Enforcement matters

38.3 Task Force on illegal trade in specimens of CITES-listed tree species (Decision 19.91) SC78 Doc. 38.3 (Rev. 1)

The Committee:

- a) noted the information provided by Parties in their responses to Notification to the Parties No. 2024/079;
- b) agreed to propose the renewal of Decision 19.89 as presented in the Annex to document SC78 Doc. 38.3 (Rev. 1) to the Conference of the Parties;
- c) agreed to submit draft decisions 20.AA and 20.BB as presented in the Annex to document SC78 Doc. 38.3 (Rev. 1), to the Conference of the Parties; and
- d) agreed Decisions 19.90 and 19.91 can be deleted.

DRAFT DECISIONS ON
TASK FORCE ON ILLEGAL TRADE IN SPECIMENS OF CITES-LISTED TREE SPECIES

Directed to Parties

- 19.89** Parties are encouraged to fully implement the measures and activities outlined in the [Outcome document of the CITES Task Force meeting on illegal trade in specimens of listed tree species](#), as relevant to them, to prevent and combat illegal trade in specimens of CITES-listed tree species, and to report on the implementation of this Decision to the Secretariat.

Directed to the Secretariat

- 20.AA** Subject to extrabudgetary resources, the Secretariat shall:

- a) organize a workshop on illegal trade in timber species to facilitate the exchange of experiences, promote collaboration, and advance the implementation of the measures and activities outlined in the outcome document of the CITES Task Force meeting on illegal trade in specimens of listed tree species;
- b) work with the UNODC and the World Customs Organization to provide training in regions affected by illegal trade in CITES-listed tree species, on physical inspection of timber shipments and to support the undertaking of risk assessments to develop national risk indicators specific to this illegal trade; and
- c) report to the Standing Committee on the implementation of Decisions 19.89 and 20.AA, together with any recommendations the Secretariat may have.

Directed to the Standing Committee

- 20.BB** The Standing Committee shall consider the report and recommendations of the Secretariat in accordance with Decision 20.AA and make recommendations to the Parties or the Secretariat, as appropriate.

73. [Brazil wood \(*Paubrasilia echinata*\) \(Decision 19.253\)](#)..... SC78 Doc. 73

The Committee:

- a) noted the feedback provided to the draft report contained in the Annexes 1 and 2 to document SC78 Doc. 73 and requested the Secretariat to revise the draft report and to submit it to CoP20;
- b) agreed to establish a drafting group to review the draft decisions in paragraph 9 of document SC78 Doc. 73 and submit the revision as an in-session document for consideration by the Standing Committee. Membership was agreed as follows: Brazil, Poland and the United States of America; and
- c) agreed that Decisions 19.249 to 19.253 have been implemented and can be proposed for deletion.

80. [Information system for trade in specimens of CITES-listed tree species \[Decision 18.317 \(Rev. CoP19\)\]](#)..... SC78 Doc. 80

The Committee:

- a) noted the updated report provided by the Secretariat on the implementation of Decision 19.265; and
- b) agreed to propose the deletion of Decision 18.317 (Rev. CoP19) and Decision 19.265 to the Conference of the Parties at its 20th meeting.

34. [Review of Significant Trade in specimens of Appendix-II species](#)

- 34.1 [Overview of the Review of Significant Trade](#) SC78 Doc. 34.1 (Rev. 1)

The Committee:

- a) noted document SC78 Doc. 34.1 (Rev. 1);
- b) encouraged Parties subject to the Review of Significant Trade process to volunteer as case studies to be included in the RST module on the CITES Virtual College; and
- c) agreed that Decision 17.110 (Rev. CoP19) can be proposed for deletion at the next meeting of Conference of the Parties, pending the launch of the RST module on the CITES Virtual College.

34.2 Implementation of the recommendations of the Animals Committee..... SC78 Doc. 34.2

- a) Concerning *Anguilla anguilla* / Algeria, the Committee:
 - i) commended Algeria for the progress made;
 - ii) agreed that recommendations i) and j) have been implemented;
 - iii) invited Algeria to provide an update on the FAO-General Fisheries Commission for the Mediterranean (GFCM) project to the 34th meeting of the Animals Committee (AC34); and
 - iv) invited Algeria to implement recommendation l) through the preparation of a non-detriment finding for *A. anguilla* taking into consideration the preliminary CITES NDF guidance materials and present this to AC34.
- b) Concerning *Anguilla anguilla* / Tunisia, the Committee:
 - i) commended Tunisia for the progress made;
 - ii) agreed that recommendations g) to k) have been implemented;
 - iii) invited Tunisia to provide an update on the FAO-General Fisheries Commission for the Mediterranean (GFCM) project to the 34th meeting of the Animals Committee (AC34); and
 - iv) invited Tunisia to implement recommendation l) through the preparation of a non-detriment finding for *A. anguilla* taking into consideration the preliminary CITES NDF guidance materials and present this to AC34.
- c) Concerning *Hippocampus algiricus* / Senegal, the Committee:
 - i) agreed that recommendation a) has been implemented;
 - ii) invited the Secretariat and the Animals Committee to work with Senegal and relevant experts to advise Senegal on the development of a non-detriment finding for *H. algiricus*; and
 - iii) urged Senegal to provide an update on the implementation of recommendations b) to g) 90 days before the documentation deadline for AC34.
- d) Concerning *Pandinus imperator* / Togo, the Committee
 - i) withdrew the recommendation to suspend trade in *Pandinus imperator* from Togo;
 - ii) removed *Pandinus imperator* / Togo from the Review of Significant Trade, subject to the publication of an annual export quota of 20,000 live specimens, including a size restriction of a maximum total length of 10 cm (or maximum body length, excluding the tail, of 5 cm) for live specimens of source code R to be exported, which should be published with the export quota; and
 - iii) reminded Togo that any increase in the quota above 20,000 live specimens should be communicated to the Chair of the Animals Committee and the Secretariat for their agreement in advance of any trade taking place, with a non-detriment finding, including a justification of how the change is conservative, based on estimates of sustainable offtake that make use of best available scientific information.

- e) Concerning *Varanus oranatus* / Togo, the Committee:
 - i) commended Togo for its progress in implementing the recommendations of the Animals and Standing Committees;
 - ii) invited Togo to undertake a comprehensive non-detriment finding assessment to justify their proposed quota; and
 - iii) invited Togo to submit the updated non-detriment finding to the Secretariat by 31 July 2025 for consideration by the Animals Committee ahead of the 79th meeting of the Standing Committee.
- f) Concerning *Carcharhinus longimanus* / Kenya, the Committee:
 - i) requested the Secretariat to publish a zero export quota for *C. longimanus* until Kenya provides information to justify a higher quota to be agreed with the AC Chair; and
 - ii) invited Kenya to provide an update on the implementation of recommendations b) to g) 90 days before the documentation deadline for AC34.
- g) Concerning *Carcharhinus longimanus* / Yemen, the Committee:
 - i) requested the Secretariat to publish a zero export quota for *C. longimanus* until Yemen provides information to justify a higher quota to be agreed with the AC Chair; and
 - ii) invited Yemen to provide an update on the implementation of recommendations b) to h) 90 days before the documentation deadline for AC34.
- h) Concerning *Kinixys homeana* / Ghana, the Committee:
 - i) agreed that recommendations a) and b) have been implemented; and
 - ii) invited Ghana to provide an update on the implementation of recommendations c) to j) 90 days before the documentation deadline for AC34.
- i) Concerning *Mobula* spp. / Sri Lanka, the Committee:
 - i) requested the Secretariat to publish a zero export quota for *Mobula* spp. until Sri Lanka provides information to justify a higher quota to be agreed with the AC Chair; and
 - ii) invited Sri Lanka to provide an update on the implementation of recommendations b) to g) 90 days before the documentation deadline for AC34.
- j) Concerning *Python regius* / Benin, the Committee invited Benin to provide an update on the implementation of recommendations a) to j) 90 days before the documentation deadline for AC34.
- k) Concerning *Python regius* / Ghana, the Committee:
 - i) agreed that recommendations a) and b) have been implemented; and
 - ii) invited Ghana to provide an update on the implementation of recommendations c) to k) 90 days before the documentation deadline for AC34.
- l) Concerning *Python regius* / Togo, the Committee:
 - i) acknowledged the progress that Togo has made in the implementation of the Animals Committee recommendations;
 - ii) requested Togo to establish, in consultation with the Chair of the Animals Committee and the Secretariat, an interim conservative annual export quota for source codes W and R within 90 days for *Python regius* and communicate the quota to the Secretariat; and

- iii) invited Togo to provide an update on the implementation of recommendations b) to g) 90 days before the documentation deadline for AC34.
- m) Concerning *Sphyrna lewini* / Kenya, the Committee:
 - i) requested the Secretariat to publish an annual export quota of 50 live specimens for *S. lewini* until Kenya provides information to justify a higher quota to be agreed with the AC Chair; and
 - ii) invited Kenya to provide an update on the implementation of recommendations b) to g) 90 days before the documentation deadline for AC34.
- n) Concerning *Sphyrna lewini* / Mexico, the Committee:
 - i) agreed that recommendations a) and b) have been implemented; and
 - ii) invited Mexico to provide an update on the implementation of recommendations c) to g) 90 days before the documentation deadline for AC34.
- o) Concerning *Sphyrna lewini* / Nicaragua, the Committee:
 - i) agreed that recommendations a) and b) have been implemented; and
 - ii) invited Nicaragua to provide an update on the implementation of recommendations c) to g) 90 days before the documentation deadline for AC34.
- p) Concerning *Sphyrna lewini* / Sri Lanka, the Committee:
 - i) requested the Secretariat to publish a zero export quota for *S. lewini* until Sri Lanka provides information to justify a higher quota to be agreed with the AC Chair; and
 - ii) urged Sri Lanka to provide an update on the implementation of recommendations b) to g) 90 days before the documentation deadline for AC34.
- q) Concerning *Sphyrna lewini* / Yemen, the Committee:
 - i) requested the Secretariat to publish a zero export quota for *S. lewini* until Yemen provides information to justify a higher quota to be agreed with the AC Chair; and
 - ii) invited Yemen to provide an update on the implementation of recommendations b) to g) 90 days before the documentation deadline for AC34.
- r) Concerning *Sphyrna mokarran* / Mexico, the Committee:
 - i) agreed that recommendations a) and b) have been implemented; and
 - ii) invited Mexico to provide an update on the implementation of recommendations c) to f) 90 days before the documentation deadline for AC34.
- s) Concerning *Testudo horsfieldii* / Uzbekistan, the Committee
 - i) removed *Testudo horsfieldii* from Uzbekistan from the Review of Significant Trade; and
 - ii) reminded Uzbekistan that any increase in the quotas for W or R should be communicated to the Chair of the Animals Committee and the Secretariat for their agreement in advance of any trade taking place, with a non-detriment finding, including a justification of how the change is conservative, based on estimates of sustainable offtake that make use of best available scientific information.
- t) The Committee invited the Secretariat to ask Benin, Ghana and Togo in its consultation on the species *Python regius* to provide information on the application of source code R and the collection of gravid females and eggs and how this is considered in a quota when developing a non-detriment finding.