

CONVENCIÓN SOBRE EL COMERCIO INTERNACIONAL DE ESPECIES  
AMENAZADAS DE FAUNA Y FLORA SILVESTRES



Sesiones conjuntas de la 31ª reunión del Comité de Fauna y  
de la 25ª reunión del Comité de Flora  
Ginebra (Suiza), 17 de julio de 2020

Cuestiones estratégicas

Cooperación con organizaciones y acuerdos ambientales multilaterales

PLATAFORMA INTERGUBERNAMENTAL CIENTÍFICO-NORMATIVA SOBRE  
DIVERSIDAD BIOLÓGICA Y SERVICIOS DE LOS ECOSISTEMAS (IPBES)

1. Este documento ha sido preparado por la Secretaría en relación con el punto 11 del orden del día de AC31 y 14 de PC25 sobre *Plataforma intergubernamental científico-normativa sobre diversidad biológica y servicios de los ecosistemas (IPBES)*.
2. En la Resolución Conf. 18.4, sobre *Cooperación con la Plataforma Intergubernamental Científico-normativa sobre diversidad biológica y servicios de los ecosistemas*, la Conferencia de las Partes encomienda al Comité Permanente que colabore con las Presidencias de los Comités de Fauna y de Flora y con la Secretaría para llevar a cabo una serie de actividades relacionadas con la colaboración con la IPBES. Además, en el párrafo 3 e) de la Resolución Conf. 18.4, se encarga que la Secretaría remita las aportaciones a la IPBES, en nombre del Comité Permanente, con el respaldo de la Presidencia del Comité Permanente tras consultar con el Comité y las Presidencias de los Comités de Fauna y de Flora. En consecuencia, la Secretaría desea presentar el siguiente resumen de las actividades realizadas desde su informe mixto con el Comité Permanente sobre esta cuestión presentado en la 18ª reunión de la Conferencia de las Partes (CoP18, Ginebra, 2019) en el documento CoP18 Doc. 15.4.
3. El Memorando de Cooperación firmado entre las Secretarías de la CITES y la IPBES para reforzar los vínculos entre ambos organismos expiró a finales de 2019 y, en consecuencia, una primera modificación del Memorando de Cooperación se firmó el 25 de noviembre de 2019. La modificación hace referencia al programa de trabajo renovable de la IPBES hasta 2030 y a la adopción de la Resolución Conf. 18.4 de la CITES y enmienda el Memorando de Cooperación de modo que siga siendo eficaz hasta el 31 de diciembre de 2030.
4. Como se especifica en el documento CoP18 Doc. 15.4, la IPBES está realizando una Evaluación temática del uso sostenible de las especies silvestres. El mandato (informe de análisis inicial) para la evaluación se encuentra en el Anexo 1 al documento CoP18 Doc. 15.4. La evaluación examinará varios enfoques para una mejor sostenibilidad del uso de especies silvestres y reforzar las prácticas, medidas, capacidades y herramientas conexas para su conservación mediante ese uso. El objetivo principal es identificar los desafíos y las oportunidades para establecer o reforzar medidas y condiciones para garantizar y promover el uso sostenible de las especies silvestres. Se espera que la evaluación se complete y adopte en la novena sesión plenaria de la IPBES en 2022.
5. Un primer encargo de proyecto de los capítulos de la evaluación se puso a disposición para su examen externo del 27 de agosto al 20 de octubre de 2019. La Secretaría publicó una Notificación a las Partes el 6 de septiembre de 2019 alentando a las Partes a que contribuyesen a ese examen, prestando especial atención a las cuestiones de interés para la CITES. Además, de conformidad con el párrafo 3 e) de la Resolución Conf. 18.4, la Secretaría formuló comentarios sobre el primer encargo de proyecto de los capítulos a la IPBES con el respaldo de la Presidencia del Comité Permanente.

6. Las 600 páginas del primer encargo de proyecto de los capítulos de la evaluación estaban disponibles en inglés para su consulta únicamente por aquellos registrados en el sitio web de la IPBES como examinadores externos. La Secretaría reconoce particularmente la contribución de la Presidencia del Comité de Fauna. El texto de la presentación de la CITES se adjunta como Anexos 1 y 2 al presente documento. Los comentarios formulados se centraron principalmente en garantizar que en el proyecto de los capítulos se reconoce debidamente la función y las experiencias de la CITES.
7. En calidad de observadores oficiales, las Presidencias de los Comités de Fauna y de Flora recibieron una invitación para asistir a la 14ª reunión del Grupo de Multidisciplinario de Expertos de la IPBES, que tuvo lugar en Bonn, Alemania, el 21-22 de enero de 2020. Tras examinar el proyecto del orden del día, las Presidencias concluyeron que su presencia física no era necesaria en esta ocasión.

Our ref.: /  
Your ref.:

### **Comments on the first order draft of the IPBES thematic assessment of the sustainable use of wild species**

First it has to be noted that CITES is very grateful to the authors for their work and for the possibility to make comments on this first order draft. A wealth of information has been gathered by the authors and presented in this document. It provides a broad perspective of the topic and its diverse aspects. It is understood that this represents the first iteration of the assessment and that there will be other opportunities to comment on more developed versions. It is hoped that a more comprehensive list of acronyms will be produced at a later stage to help the reader navigate the reports.

With the above in mind, when reading the assessment, it appears that the experiences and information that CITES can offer is not used sufficiently. There are a multitude of analyses about trends in international trade in wild species, and policy decisions on sustainable use of wildlife available through the CITES website and documents therein that could be considered in this First Order Draft. This is particularly the case in chapter 2 on Conceptualizing the sustainable use of wild species and chapter 3 on Status of and trends in the use of wild species, the environment and people.

In chapter 4, sections 4.2.2.1.5 and 4.2.2.1.6, CITES trade data are used and presented in detail. In other instances, there would also be valuable information on trade in CITES listed species that could be used in the discussions.

For example, when considering the methods and tools that exist for assessing measuring and managing the sustainable use of wild species (section 2.4), CITES is not mentioned. However, it is important to highlight that the fundamental basis of CITES is the Non-Detriment Finding (NDF), which seeks to ensure that international trade in CITES-listed species is sustainable. In this regard, there is a dedicated Resolution on NDF [Resolution Conf. 16.7 (Rev. CoP17)] and there is also a dedicated section on the CITES website on NDF with many examples of best practice guidance (<https://www.cites.org/eng/prog/ndf/index.php>), that could also be applied to the management of non-CITES listed species.

In fact, specific guidance on the making of NDFs has been made available to CITES Parties since 2000 (see <https://cites.org/eng/cop/11/info/03.pdf>) and the demand for, and the development of additional or more specific support for making NDFs, had gained significant momentum since then. One of the more comprehensive initiatives in this regard was the hosting by Mexico of an International Expert Workshop on CITES Non-Detriment Findings in Cancun in 2008 (see [http://www.conabio.gob.mx/institucion/cooperacion\\_internacional/TallerNDF/taller\\_ndf.html](http://www.conabio.gob.mx/institucion/cooperacion_internacional/TallerNDF/taller_ndf.html)), which generated guidance on NDFs for a wide range of CITES-listed taxa.

Since that time and following the adoption of Resolution Conf. 16.7 on Non-detriment findings in 2013, Parties have frequently decided that further species- and taxon- specific guidance for the making of NDFs was needed (e.g. for trade in queen conch, sharks, snakes, tortoises and freshwater turtles, timber and agarwood). An increasing number of research projects have been undertaken aimed at assisting Parties in the making of NDFs. As a result, CoP18 has given a mandate to the Secretariat to undertake a gap analysis to identify any specific taxa that may require any updated or additional guidance.

Additional relevant guidance is also available in the form of a handbook on CITES and livelihoods, assisting Parties in assessing and mitigating the impact of CITES decision-making on the livelihoods of rural and indigenous communities that are most affected by those decisions. Further guidance based on livelihoods case studies will be developed in the coming years, as mandated by CoP18.

In terms of monitoring and measuring sustainable use, the CITES trade database is a publicly accessible database with full records of legal trade in CITES-listed specimens, as reported by exporting and importing States. The trade database is reviewed regularly through Resolution Conf. 12.8 (Rev. CoP17) on Review of Significant Trade in Appendix II specimens, whereby the trade data for the most recent 5 year period is

reviewed by the Animals and Plants Committees for possible unsustainable levels of trade (e.g. discrepancies between the data reported by importers and exporters, where export quotas may have been exceeded, sharp increases in global levels of trade, or trade from a particular country, etc.). Each Committee then selects species/country combinations of concern and seeks clarification from the country concerned on the basis that it was determined that the trade would not be detrimental (i.e. the Non-Detriment Finding). In cases where the response is lacking or unsatisfactory, the relevant Committee can make recommendations that the country in question must implement within specific timeframes or potentially face a trade suspension.

Specifically concerning Chapter 3, Section 3.3.1 shows out of date, obsolete figures that are seriously misleading. More contemporary literature is available that should be used. This is particularly the case for sections 3.3.1.1.1., 3.3.1.1.2, and 3.3.1.1.2, and to a lesser extent 3.3.1.1.5. It is also not clear why the case for trade in fishmeal is highlighted in such detail in a chapter on "Taxonomic groups", when the species/taxa concerned are often unknown. Section 3.4.2 would benefit from highlighting a case study involving wildlife of which the trade is regulated under CITES. From a policy and 'lessons learned' perspective, a comparison between the sustainable utilization of CITES vs. non-CITES listed species would be very valuable and informative.

In the Key Messages section, the few 'key messages' that the study provide are evident and unsurprising, but worth reemphasizing through this forum. However, the current focus is very much on the connection between use of wild species and people. The connection between use of wild species and biodiversity, and in particular conservation of biodiversity, is not taken up as a key message, even though it is discussed extensively later. An addition such as "sustainable use of wild species can benefit the conservation of the species concerned but also to biodiversity as a whole" might remedy this.

International cooperation in making sure use of wild species is carried out at sustainable levels is key in the conservation of biodiversity as exemplified by the work of MEA's, in particular the CITES Convention. This should also be reflected in the key messages.

Aims and functioning of CITES as well as other MEA's dealing with use of wildlife in a nutshell as a box text might be helpful. The Conventions are regularly mentioned in the text. However, someone not familiar with the functioning and aims of these Conventions may not understand why that Convention is mentioned in the particular context.

The success stories in CITES where a well-regulated and managed trade in wildlife has led to a recovery of the species, its habitats and benefits to the local people are not really mentioned and discussed. They might provide important messages under what circumstances sustainable use of wildlife can benefit conservation in general.

The discussion on the role political decisions, which are not governed by scientific reasoning but rather emotional reactions on conservation, is very important. For certain species, scientific reasoning is disregarded in favour of emotional views on the utilization of wild species, which may have perverse effects for the long-term conservation of the species and its habitats. For instance, countries with successful conservation programs that incorporate sustainable use of wild species may feel "left alone" and are frustrated as their conservation strategies seem not to be rewarded or recognized accordingly.

For the CITES Convention, a critical assessment of how CITES is perceived by the Parties most affected by its rules and regulations is lacking. For instance: how do Parties view the Convention's requirements to make non-detriment findings (i.e. sustainability assessments) and legal acquisition findings before authorizing the export of CITES-listed species; how do Parties perceive the process of Review of Significant Trade; how do compliance measures imposed on Parties change the use of wild species; or what are the needs for Parties in capacity building and how are they perceived when rendered. This would instruct our discussions on the functioning and perception of many key processes enshrined in the Convention.

October 2019

**Template for comments for the external review of the first order draft of the sustainable use of wild species thematic assessment.  
The review runs from Monday, 26 August, 2019 to Sunday, 20 October, 2019**

**Please provide all necessary information as per below and please do not modify this excel sheet.  
For a general comment on the chapter, record it as page 0, line 0**

| Reviewer Name | Chapter    | From Page (start) | From Line (start) | To Page (end) | To Line (end) | Comments / Feedback  |
|---------------|------------|-------------------|-------------------|---------------|---------------|--|
| CITES         | Throughout |                   |                   |               |               | References to CITES Resolutions and Decisions need updating following CITES CoP18 in August 2019.  |
| CITES         | 1          | 1                 | 3                 |               | 14            | In the Key Messages section, the focus is very much on the connection between use of wild species and people. The connection between use of wild species and biodiversity and in particular conservation of biodiversity is not taken up as a key message, even though it is discussed in the lines 29 to 41. I would suggest an addition in the sense of "sustainable use of wild species can benefit the conservation of the species concerned but also to biodiversity as a whole". |
| CITES         | 1          | 1                 | 3                 |               | 14            | International cooperation in making sure use of wild species is carried out at sustainable levels is key in the conservation of biodiversity as exemplified by the work of MEA's, in particular the CITES Convention. This should also be reflected in the key messages.   |
| CITES         | 1          | 1                 | 17                |               |               | It would be important to set the scene at the outset by clearly defining what is covered under the heading "wild species", noting that it is outlined in more detail in Chapter 2. However, perhaps it could be outlined in a footnote.  |
| CITES         | 1          |                   | 39                |               | 41            | Other examples where an extensive but well managed use of wild species have led to the recovery of these species and in many cases the whole habitat including many other species are found in the CITES context: American Alligator, Vicugna other plants?  |
| CITES         | 1          | 2                 | 50                |               |               | The sentence beginning the Rather is incomplete or incorrect   |
| CITES         | 1          | 3                 | 57                | 3             | 57            | Unless I missed it, I see no discussion of what a species is. A the fundament currency of many efforts aimed at sustainable use, this should be addressed. Increasingly there is a tendency to focus efforts at lower taxonomic of biogeographical levels - sometimes by revising or adjusting the species concept.  |
| CITES         |            |                   | 88                |               | 91            | This connection is not clear when reading the sentences. It needs more explanation.  |

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| CITES | 1 | 12 | 362 | 12 | 368 | The provisions of the Convention apply to all specimens, whether "wild" or not. The reference to "wild population" in Resolution Conf. 9.24 (Rev. CoP17) is used to help frame a judgement about whether CITES provisions should be applies to the taxon, rather than whether the taxon is considered "wild" <i>per se</i> . More pertinent are the exclusion of <i>Bos frontalis</i> , <i>Bos grunniens</i> , <i>Bubalus bubalis</i> , <i>Canis lupus familiaris</i> , <i>Canis lupus dingo</i> , <i>Equus asinus</i> and the domestic forms of <i>Capra hircus aegagrus</i> Felidae spp. <i>Chinchilla</i> spp. from the CITES Appendices by annotation, but these exclusions themselves have not been the subject of great discussion.  |
| CITES | 1 | 12 | 364 | 12 | 366 | It is the specimens that are treated as "wild", not the populations. The term used in the Convention is "bred in captivity", not "captive bred".   |
| CITES | 1 | 12 | 366 | 12 | 368 | This sentence is misleading. Consider replacing with "CITES Parties have developed complex criteria for deciding if a specimen can be considered "bred in captivity" or "artificially propagated"" [Resolution Conf. 10.16 (Rev.), Resolution Conf. 11.11 (Rev. CoP18), Resolution Conf. 16.10 and Resolution Conf. 10.13 (Rev. CoP18) ]   |
| CITES | 1 | 13 | 391 | 13 | 397 | This text is important and should be highlighted as it explains what is covered in the assessment. Perhaps it could be placed in a box. It should also specify that it covers animals, plants and fungi.   |
| CITES | 1 | 16 | 435 | 16 | 449 | Under this section on Practices it is not clear whether all parts and derivatives of both plants and animals are covered, though I assume that they are.   |
| CITES | 1 | 16 | 447 | 12 | 449 | It would be interesting to hear more about the rationale for this categorization. On the face of it, butterfly collecting would appear to be hunting in the air and fishing hunting in water.  |
| CITES | 1 | 17 | 483 | 17 | 483 | Presumably the term used excludes us for trade (either formal or informal)? If not, the distinctions are not clear.  |
| CITES | 2 | 6  | 224 | 6  | 229 | CITES should be considered here and in particular the concept of the Non-Detriment Finding (NDF), which seeks to ensure that trade in CITES-listed species is sustainable. In this regard, there is a dedicated Resolution on NDF [Resolution Conf. 16.7 (Rev. CoP17)] and there is also a dedicated section on the CITES website on NDF with many examples of best practice guidance ( <a href="https://www.cites.org/eng/prog/ndf/index.php">https://www.cites.org/eng/prog/ndf/index.php</a> ).   |
| CITES | 2 | 7  | 263 | 9  | 264 | CITES is missing from Table 2.1. In this context, the CITES Vision Statement reads as follows: "By 2030, all international trade in wild fauna and flora is legal and sustainable, consistent with the long-term conservation of species, and thereby contributing to the halting biodiversity loss, to ensuring its sustainable use and to achieving the 2030 Agenda for Sustainable Development".<br>The purpose of the Strategic Vision is two-fold:<br>1. As a priority, to improve the working of the Convention, so that international trade in wild fauna and flora is conducted legally at sustainable levels and supports the conservation of listed species; and<br>2. To ensure that CITES policy developments are mutually supportive of international initiatives, consistent with the terms of the Convention. |

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| CITES | 2                 | 11 | 312   | 13 | 313  | CITES should be included in table 2.2 as a global binding agreement covering international trade in CITES-listed species (live or dead and covering parts and derivatives). There are approximately 36,000 species listed in the CITES Appendices, of which around 6,000 species concern fauna and 35,000 species concern flora. Parties can check to see whether or not a species is listed in CITES and in which Appendix (I, II or III) using the Checklist of CITES species or Species +. Approximately 1,000 species are listed in Appendix I, which means that they are the most threatened with extinction and so trade for commercial purposes is not allowed. The remainder (approx. 35,000 species) are listed in Appendix II or III and can be traded internationally through a system of permits and certificates, as long as such trade is legal and sustainable. To demonstrate sustainability Parties must make a non-detriment finding or NDF (see Resolution Conf. 16.7 (Rev. CoP17), which contains some guiding principles for determining whether or not trade is sustainable). |
| CITES | 2                 | 13 | 315   | 13 | 315  | Madsen, J., Bunnefeld, N., Nagy, S., Griffin, C., Defos du Rau, P., Mondain-Monval, J.Y., Hearn, R., Czajkowski, A., Grauer, A., Merkel, F.R., Williams, J.H., Alhainen, M., Guillemain, M., Middleton, A., Christensen, T.K. & Noe, O. 2015. Guidelines on Sustainable Harvest of Migratory Waterbirds. AEWa Conservation Guidelines No. 5, AEWa Technical Series No. 62. Bonn, Germany?   |
| CITES | 2                 | 34 | 826   | 36 | 831  | Table 2.8 considers CITES listing criteria under Resolution Conf. 12.8 (Rev. CoP17) but it should also make specific reference to other Resolutions, including Resolution Conf. 16.7 (Rev. CoP17) on NDF.   |
| CITES | 2                 | 45 | 9.2.2 | 45 | 944  | This section could take into consideration CITES non-detriment findings, the Review of Significant Trade process and trade suspensions in the context of developing approaches towards sustainable use indicators.  |
| CITES | 3                 |    | 101   |    | 110  | In this section the CITES Convention as the major body dealing for over 40 years with sustainable use of Wildlife should be specifically mentioned and the data should also be used and evaluated.  |
| CITES | 3                 | 19 | 472   | 19 | 474  | Beetles from Cameroon, perhaps not, but beetles collected from Bolivia and South Africa are regulated by CITES, so this is a case-specific remarks and not one with any wider lesson.   |
| CITES | 3                 | 21 | 529   | 21 | 532  | This remark may have some pertinence, but it does not apply to <i>Iguana iguana</i> which is the example given. Trade in this species IS regulated by CITES Parties.  |
| CITES | 3.4.1. and 3.4.2. |    |       |    |      | In these subchapters, no mention is made of the use of CITES in discussing methods and data to detect trends of use of wild species, even though there is a wealth of information through the CITES trade database, where information of international trade in wild species for over forty years is available. The discussion is very much biased by the discussion of fisheries. There are many case examples for trends in international trade that could be picked up and discussed. There is only mention of trafficking and no mention of sustainable legal trade in wildlife...  |
| CITES | 3                 | 69 | 1740  | 69 | 1741 | Why unfortunately? [bred, not breed]  |

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| CITES | 3                   | 88 | 2228 | 88 | 2290 | This sentence implies that international trade in wild meat is all illegal, but many wild species are legally traded as "meat".  |
| CITES | 3                   | 87 | 2215 | 87 | 2222 | The statistics on the value of the annual trade in this paragraph should be merged with those in the last paragraph (lines 2231 to 2236).  |
| CITES | 4.2.2.1.6           |    |      |    |      | Very much information, not very structured information. Could be much improved in structure and content if more would be shown with graphics. The general question is what this paragraph is intended to present. At this stage it is a rather wild set of data that would benefit from a better and clearer structure. On example is the trends being described of a shift from wild taken specimen to captive bred ones. There is no discussion what this trend means. Is it a positive trend for wildlife or not? Could is mask misuse of source codes. Cites has implemented a new process dealing with such doubts. So in general this section is not very helpful nor instructive. |
|       | 4.2.2.1.6           |    | 1016 |    | 1022 | In this paragraph trade in live animals is considered to be primarily of illegal nature: however, no evidence for this assumption is given.  |
| CITES | 4.2.3.1             |    | 1355 |    | 1356 | I suppose, this paragraph will be considerably expanded to give the topic as much weight as the previous on CBD  |
| CITES | 4.2.3.3 and 4.2.2.4 |    |      |    |      | A discussion on how international agreements such as CITES are perceived in this context and how the informal and formal governance and institution work together to comply with CITES requirements would be very helpful for our Convention. It might for instance give CITES information in the context of compliance processes.   |
| CITES | 4.2.4.2.5           |    |      |    |      | The policy recommendations do not really spell out what has been said before. It is not necessarily the aim to have people abandon use of wildlife, as long as it is sustainable ecologically but also from a social perspective. If sustainability can be assured, use of wildlife can even be beneficial to conservation in the long term.   |
| CITES |                     |    | 2600 |    | 2613 | Another way of influencing non sustainable use may be through a process of setting and controlling quotas in trade. This form of intervention is frequently used in CITES.   |
| CITES | 4.2.2.1.1.2         |    | 782  |    | 783  | The statement that hunting "can only be sustainable when scientific management is enforced for the determination of sustainable yields" is pertinent, but doesn't this apply to all types of extractive/consumptive use? Why is this noted only for trophy/recreational hunting?   |
| CITES | 4.2.2.1.1.2.        |    | 805  |    | 806  | Statistics to indicate the extent of trophy hunting included the number of skins exported for commercial purposes; however, no all skin trade is trophy hunting. For example, bobcat skins from north America are a result of trapping to provide skins (primarily for fashion trade) and not a product of recreational hunting  |
| CITES | 4.2.2.1.5           |    | 1073 |    | 1177 | The section on biofuels seems out of place in the sequencing of this chapter   |
| CITES |                     |    | 1336 |    | 1336 | The Migratory Birds Convention (Canada and USA) was signed in 1916; a similar time frame for the migratory birds treaty between USA and Mexico I believe; This agreement was   |

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|       |           |   |      |      |      | aimed at the protection of migratory bird species (which were at conservation risk due to overexploitation/hunting) and is over 100years old; merits mention in Table 4.1                                      |  |
| CITES | 4.2.3.1   |   | 1355 |      | 1356 | Considering the relevance of CITES, this statement needs considerably more support and elaboration   |  |
| CITES | 4.2.5.3.9 |   | 2600 |      | 2601 | "in through a trade ban"; the statement implies CITES functions only to ban trade; which does not capture the intent of CITES and its aim to ensure sustainable trade for the majority of species it regulates |  |
| CITES |           | 4 | 78   | 2600 | 78   | 2602   | Commercial trade is banned in only 3% of CITES-listed species.   |
| CITES |           | 4 | 80   | 2658 | 80   | 2659   | Demand for illegal specimens is rising? Or demand overall?   |
| CITES |           | 4 | 80   | 2658 | 80   | 2662   | Numbers of tigers and rhinos in the wild seem to be rising   |
| CITES |           | 4 | 80   | 2665 | 80   | 2669   | Would be interesting if there was any evidence of this. MacMillan et al., 2017 not detailed in the references to the chapter.  |
| CITES |           | 5 |      | 2664 |      | 2665   | That sentence should be "ideally trade bans should be accompanied. All too often this is not the case. Pangolins are a prime example, where after the species were transferred into App I of CITES only little effective conservation action has been implemented on the ground. |
| CITES | 6.3.1.    |   |      |      |      |  | CITES is also getting more and more involved in the sustainability discussion of marine organisms "Introduction from the sea"  |
| CITES | 6.3.2.    |   |      | 232  |      | 239  | CITES policy statement on sustainable use should also be mentioned   |
| CITES |           | 6 | 15   | 462  | 15   | 462  | (98 in force after CoP18 in 2019)  |
| CITES |           | 6 | 15   | 463  | 15   | 463  | Figures need updating after CoP18 in 2019  |
| CITES |           | 6 | 15   | 467  | 15   | 467  | Worth pointing out that this refers to biological sustainability?  |
| CITES |           | 6 | 15   | 469  | 15   | 469  | Replace "decisions and resolutions" with "actions": Decisions and Resolutions are something else. a. and b. [lines 472 and 482] may be guided by Resolutions and Decisions, but they arise from the text of the Treaty   |
| CITES |           | 6 | 15   | 477  | 15   | 480  | The NDF is made by a national Scientific Authority in relation to the status of the species within the territory of the Party concerned.   |
| CITES |           | 6 | 15   | 483  | 15   | 493  | Compliance measures may be introduced under a wider range of circumstances - see footnote 1 on page 4 of Resolution Conf. 14.3 (Rev. CoP18) on CITES compliance procedures. This list itself is not however exhaustive.  |
| CITES | 6.4.1.1.1 |   |      |      |      |  | One of three pillars in the work of the CITES Convention is the process of Review of Significant Trade. This process is very important and would deserve explanation in this context.  |