

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

Twenty-fourth meeting of the Plants Committee
Geneva (Switzerland), 20, 21 and 23-26 July 2018

Species specific matters

Maintenance of the Appendices

RESPONSES TO NOTIFICATION 2018/039 ON EAST AFRICAN SANDALWOOD
(*OSYRIS LANCEOLATA*) AND CITES CACTACEAE CHECKLIST

1. This information document has been prepared by the Secretariat in relation to agenda item 27.

Background

2. On April 23rd, 2018, at the request of the Plants Committee, the Secretariat published [Notification No. 2018/039](#), inviting:
 - a) Parties, intergovernmental organizations and non-governmental organizations to indicate their interest in joining the intersessional working group on East African sandalwood; and
 - b) Parties to inform the Secretariat of their experiences of the application and use of the CITES Cactaceae checklist (3rd Edition).
3. The present document includes the responses to the Notification as received by the Secretariat within the established deadline (May 11th, 2018).

Responses to Notification no. 2018/039

4. Three Parties replied to the Notification: Hungary, Germany and the United States of America. Their responses are included verbatim below and in the Annex to this document.

a) Hungary:

In the last months, the Hungarian CITES MA received information from other EU Member States's on illegal offers of *Aztekium valdezii* on ebay from Hungary. Based on these information our criminal police launched an investigation and identified several cacti collectors who traded with *A. valdezi* specimens on ebay. During five house searches, more than 400 live plants and 46 sacks of cacti seeds collected in Mexico have been found and seized. Some of the plants are definitely wild collected, others are artificially propagated. Statements by the offenders show, that the majority of the plants and seeds originated from Czech and Polish collectors. Investigation is in process.

However, the *Aztekium valdezii* is not recognised as separate species by the adopted Cactaceae checklist which creates an enforcement problem. According the adopted standard reference, the *Aztekium valdezii* is only a synonym of *Aztekium ritteri* (Appendix I). However, there are some very clear morphological differences between two species, therefore we want to recommend to review of this genus and split *Aztekium ritteri* to *A. ritteri* and *A. valdezii*, and add the latter species to Appendix I as well. Therefore we recommend the deep analysis by cacti specialists during the Plants Committee.

b) Germany:

Germany is having trade in cacti and therefore making use of the CITES Cactaceae Checklist, 3rd edition (CCC3). Germany is also running an information system on protected species (WISIA), which naturally in case of CITES-listed species needs to refer to standard references of CITES. We are grateful for CCC3, which enables us to implement the Convention for cacti species. We are aware that compiling a CITES standard reference list for an entire family as *Cactaceae*, with so much of continuous taxonomic reviews and subsequent changes is a Herculean task. We therefore explicitly express our deepest gratitude for David Hunt, who took the responsibility for this work. However, we are aware of some issues which we think need to be addressed in a review:

1. Rather minor mistakes should be corrected (incl. typing errors, formatting issues, unclear references).
2. Some inconsistencies should be addressed. E.g. the genera *Pereskia*, *Quiabentia* and *Peresklopsis* are explicitly excluded from the Cites listing. While *Pereskia* is not included in CCC3, *Quiabentia* and *Peresklopsis* are. In addition there are some references from not accepted *Peresklopsis* names to *Pereskia*. We believe that even though these genera are not CITES-listed they should be included in the CITES standard reference in order to help implementation and enforcement.
3. We have noticed that after the first electronic version of CCC3 went online in 2016, it was replaced at intervals by partially corrected versions. A significant correction was that three genera (*Oreocereus*, *Oroya* and *Ortegocactus*), which were omitted in the first version(s) of CCC3, were added later. Further minor corrections have also been incorporated. However, all these corrected versions of CCC3 have the same ISBN number and the same publication year printed on them, even the last (?) version, which was published online in June 2017. Since different versions of the CCC3 were available online via different links, even at the same time, the standard reference adopted by COP 17 circulates in different versions.

Therefore, we propose to prepare a finally revised edition of CCC3 (perhaps as CCC4?) and subsequent submission to the COP for the renewed adoption as standard reference list.

4. We have noticed that some names of taxa accepted (or provisionally accepted) in earlier editions of the CITES Cactaceae Checklist (CCC1 and CCC2) are no longer listed in CCC3. The reasons for this are obviously taxonomic revisions, due to which the names are now no longer accepted. The omission of synonyms may be appropriate from a taxonomic point of view for a taxonomical checklist. However, some of the affected names may have been used in CITES permits in recent years and they may appear in the CITES trade database or other databases (e.g. WISIA, the information system on species conservation of the German Federal Agency for Nature Conservation). Due to the deletion, these names lost their reference to the names currently accepted in CCC3. Another case are the names that were listed in previous editions of the CCC, but whose application is now classified as indeterminate or doubtful. For clarification of several of these names it is necessary to consult the "New cactus Lexion" (edited by David Hunt in 2006), which is the actual standard reference in the background.

Therefore, we propose that all names previously listed in CCC1 and CCC2 (and CCC3) be retained in a revised edition of CCC with reference to the names currently accepted.

5. Contrary to the requirements of the "International Code of Nomenclature for algae, fungi, and plants" infraspecific names are given without the connecting term denoting the rank. CCC3 explains: "Note: For the purpose of this Checklist, which does not include infraspecific names other than subspecies the rank indicator for subspecies (subsp. or ssp.) is omitted." However, this practice is common in zoology, but not in botany.

Therefore, we propose that names listed in the standard reference for Cactaceae should follow the current use in botany.

6. The concept of alternative names may be helpful from a taxonomic point of view to point out changes in flux. Alternative names are explained on page 11 in CCC3. That leads e.g. to the following two entries: [14727 *Lobivia bridgesii* ≡ *Echinopsis bridgesii*] and 00472 *Echinopsis bridgesii* [Lo]...BO. For a standard reference of CITES the use of alternative names is rather confusing. It is not clear whether only accepted or also provisionally accepted names can be used for CITES documents (permits).

Therefore, we propose to add an explanation of how to deal with alternative names in CITES documents or even better to replace alternative names in the standard reference of CITES by synonyms.

7. We believe that CITES needs a code of practice how to deal with cases, where new standard references lead to a change of appendices of species. Especially where such changes are hidden in lists of thousands of species names. This happened for example to *Aztekium valdezii*, which after description in 2013 was automatically included in the Appendix II listing of Cactaceae. After adoption of CCC3 by the CoP this species, considered to be a synonym to *A. ritteri* in CCC3, became Appendix I.

Therefore, we propose that parties need to be made aware of such substantial changes before adoption of reference lists.

Comments and suggested corrections as mentioned above have already been sent by us directly to the compiler of CCC3, David Hunt.

We think that it is necessary to approve a revised new version of the checklist at the next CoP in order to make possible changes comprehensible. Until then, as agreed on at the last CoP, parties should work with a (frozen) 3rd edition of the checklist.

c) **United States of America***

The original response of the U.S.A. is included as an **Annex to the present information document, and below is an abstract of the core of their response.*

This letter provides the U.S. response to Notification to the Parties No. 2018/039, concerning East African sandalwood (*Osyris lanceolata*) and CITES Cactaceae checklist. At the 23rd meeting of the Plants Committee (Geneva, 2017), the United States was included as a member in the intersessional working group on East African sandalwood. For your information, the U.S. representative to that working group will be Anne St. John (anne_stjohn@fws.gov). We look forward to working with Ms. Koumba Pambo and Ms. Khayota and the other working group members on the conservation of and trade in this species.

With regard to the other information requested in this Notification, concerning the CITES Cactaceae checklist, we provide the following information concerning issues that may arise as they apply to the list. Overall, the Cactus Checklist represents a large and important effort to bring CITES up-to-date with the newly described cacti species and use of new names. We wish to express our appreciation for the magnitude of this undertaking and provide comments on our experiences using the new checklist.

Following are general comments on the Checklist, while the enclosed table provides some more specific comments.

- **Regarding the new typography:** We continue to find the variety of new symbols and typography used in the checklist to be cumbersome and disorienting. It is a departure from previous CITES checklists and we hope that future checklists will not continue in this vein. In our view, this Checklist is not just for scientists, although it is or should be used by the Scientific Authorities, although we note that Management Authorities, enforcement officers, and traders are also important users of the Checklist. The enclosed table provides a few examples of species entries that we found confusing and believe may be confusing to others as well. These may be topics for the Nomenclature Committee to discuss.
- **Regarding indecisive elements in the Checklist:** The Checklist provides elements of indecision, including “alternative” genus names denoted in brackets ([]); “alternative” species names in bold italics; names followed by “[uncertain]”; and names recommended for rejection denoted by ®. Page 11 of the Checklist includes a remit of sorts to the Plants Committee:

“To draw attention to proposed or potential changes in the catalogue of genera, without accepting them for the purpose of this edition of the Checklist, the compiler has suggested listing generic names proposed or reinstated by authors in the light of molecular or other evidence as ‘alternative’ names, and the suggestion has been approved by the CITES Plants Committee.”

How will the decision to approve the suggestions in the Checklist be made? Does the Plants Committee plan to review such indecisive elements? Should we begin a process to do so? Can the author provide us with a list of all such items for us to consider?

We are concerned that the decision concerning the acceptance or rejection of a name is not strictly a taxonomic one, as noted below.

- **Regarding names recommended for rejection (as denoted by ®):** While the decision to accept or reject a species name is a taxonomic one, the decision as it pertains to CITES-accepted names is not merely scientific. Rather, it has much to do with names that are used in trade, which has been and should remain a paramount consideration as it pertains to CITES-accepted nomenclature. Meanwhile, the list also needs to be clear and consistent that such names may remain the CITES-accepted names.
 - For example: The 3rd ed. of the CITES Cactaceae Checklist, *Eriosyce kunzei* (endemic to Chile) is listed as ® recommended for rejection [uncertain] (page 55), with no accepted name for this taxon. The taxon is included in the CITES Checklist of Species and is commonly traded under this binomial.

There are other taxa in the Checklist that are also “recommended for rejection” that are known to be in trade. The Parties need a practical approach for such taxa. Other examples include:

Armatocereus ghiesbreghtii > *Armatocereus* sp.

Borzicactus serpens [intermediate]

Cleistocactus serpens > *Borzicactus* sp. not positively identifiable]

Consolea rubescens

Copiapoa malletiana [intermediate]

Echinopsis lamprochlora

Echinopsis spachiana

Eriosyce kunzei

Gymnocalycium mucidum

Mammillaria goodridgei

Opuntia crassa

Parodia erubescens

Rhipsalis rhombea

- **Regarding Country Codes:** We have two comments:
The country code VI should clarify whether it is U.S., British or Spanish.

The term “Lesser Antilles” is used but it does not mention which countries are meant to be included. By some accounts, this could include the Virgin Islands, or other CITES Parties (such as Barbados and Aruba) that have native cactus species.

- **Regarding trinomials:** The Checklist includes several trinomials as “CITES-accepted” nomenclature. For instance, *Espostoa melanostele nano* and *Ferocactus emoryi covillei*. Some of these are new and others appear to have been included in the previous cactus checklist. Is or will the CITES Checklist of Species (and CITES Trade Database) be able to accommodate trinomials? If not, should the CITES-accepted name be the binomial?
- **Regarding updates to the CITES Checklist of Species:** When does UNEP plan to complete the update to cactus species to reflect Hunt 2016? Is there an estimate of how many species entries were affected by the adoption of this standard reference?

We hope you will find this information useful to the Secretariat’s evaluation. If you have any questions regarding this response, please contact Dr. Rosemarie Gnam, Chief, Division of Scientific Authority at rosemarie_gnam@fws.gov.



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Washington, D.C. 20240



IN REPLY REFER TO:
FWS/DMA/TRE 1-06e.

MAY 10 2018

CITES Secretariat
International Environment House
11 Chemin des Anémones
CH-1219 Châtelaine-Geneve
Switzerland

Via email: info@cites.org

Dear Sir or Madam:

This letter provides the U.S. response to Notification to the Parties No. 2018/039, concerning East African sandalwood (*Osyris lanceolata*) and CITES Cactaceae checklist. At the 23rd meeting of the Plants Committee (Geneva, 2017), the United States was included as a member in the intersessional working group on East African sandalwood. For your information, the U.S. representative to that working group will be Anne St. John (anne_stjohn@fws.gov). We look forward to working with Ms. Koumba Pambo and Ms. Khayota and the other working group members on the conservation of and trade in this species.

With regard to the other information requested in this Notification, concerning the CITES Cactaceae checklist, we provide the following information concerning issues that may arise as they apply to the list. Overall, the Cactus Checklist represents a large and important effort to bring CITES up-to-date with the newly described cacti species and use of new names. We wish to express our appreciation for the magnitude of this undertaking and provide comments on our experiences using the new checklist.

Following are general comments on the Checklist, while the enclosed table provides some more specific comments.

- **Regarding the new typography:** We continue to find the variety of new symbols and typography used in the checklist to be cumbersome and disorienting. It is a departure from previous CITES checklists and we hope that future checklists will not continue in this vein. In our view, this Checklist is not just for scientists, although it is or should be used by the Scientific Authorities, although we note that Management Authorities, enforcement officers, and traders are also important users of the Checklist. The enclosed table provides a few

examples of species entries that we found confusing and believe may be confusing to others as well. These may be topics for the Nomenclature Committee to discuss.

- **Regarding indecisive elements in the Checklist:** The Checklist provides elements of indecision, including “alternative” genus names denoted in brackets ([]); “alternative” species names in bold italics; names followed by “[uncertain]”; and names recommended for rejection denoted by (R).

Page 11 of the Checklist includes a remit of sorts to the Plants Committee:

“To draw attention to proposed or potential changes in the catalogue of genera, without accepting them for the purpose of this edition of the Checklist, the compiler has suggested listing generic names proposed or reinstated by authors in the light of molecular or other evidence as ‘alternative’ names, and the suggestion has been approved by the CITES Plants Committee.”

How will the decision to approve the suggestions in the Checklist be made? Does the Plants Committee plan to review such indecisive elements? Should we begin a process to do so? Can the author provide us with a list of all such items for us to consider?

We are concerned that the decision concerning the acceptance or rejection of a name is not strictly a taxonomic one, as noted below.

- **Regarding names recommended for rejection (as denoted by (R)):** While the decision to accept or reject a species name is a taxonomic one, the decision as it pertains to CITES-accepted names is not merely scientific. Rather, it has much to do with names that are used in trade, which has been and should remain a paramount consideration as it pertains to CITES-accepted nomenclature. Meanwhile, the list also needs to be clear and consistent that such names may remain the CITES-accepted names.
 - For example: The 3rd ed. of the CITES Cactaceae Checklist, *Eriosyce kunzei* (endemic to Chile) is listed as (R) recommended for rejection [uncertain] (page 55), with no accepted name for this taxon. The taxon is included in the CITES Checklist of Species and is commonly traded under this binomial.

There are other taxa in the Checklist that are also “recommended for rejection” that are known to be in trade. The Parties need a practical approach for such taxa. Other examples include:

Armatocereus ghiesbreghtii > *Armatocereus* sp.
Borzicactus serpens [intermediate]
Cleistocactus serpens > *Borzicactus* sp. not positively identifiable]
Consolea rubescens
Copiapoa malletiana [intermediate]
Echinopsis lamprochlora
Echinopsis spachiana

Eriosyce kunzei
Gymnocalycium mucidum
Mammillaria goodridgei
Opuntia crassa
Parodia erubescens
Rhipsalis rhombea

- **Regarding Country Codes:** We have two comments:
The country code VI should clarify whether it is U.S., British or Spanish.
The term “Lesser Antilles” is used but it does not mention which countries are meant to be included. By some accounts, this could include the Virgin Islands, or other CITES Parties (such as Barbados and Aruba) that have native cactus species.
- **Regarding trinomials:** The Checklist includes several trinomials as “CITES-accepted” nomenclature. For instance, *Espostoa melanostele nano* and *Ferocactus emoryi covillei*. Some of these are new and others appear to have been included in the previous cactus checklist. Is or will the CITES Checklist of Species (and CITES Trade Database) be able to accommodate trinomials? If not, should the CITES-accepted name be the binomial?
- **Regarding updates to the CITES Checklist of Species:** When does UNEP plan to complete the update to cactus species to reflect Hunt 2016? Is there an estimate of how many species entries were affected by the adoption of this standard reference?

We hope you will find this information useful to the Secretariat’s evaluation. If you have any questions regarding this response, please contact Dr. Rosemarie Gnam, Chief, Division of Scientific Authority at rosemarie_gnam@fws.gov.

Sincerely,



Craig Hoover, Chief
Division of Management Authority

Enclosure

U.S. Comments on Specific Taxon Entries
May 9, 2018

This table provides specific examples of questions or comments we have regarding the updated CITES Cactaceae Checklist (Hunt 2016). Our comments are grouped by Missing Genera, Missing Species, Confusing Entries or Possible Typos.

Species or Species Entry	Issue
Genus <i>Helianthocereus</i>	Need a crosswalk to get from <i>Helianthocereus</i> to <i>Echinopsis</i> . It was apparently in Hunt 1999 (because it is in the UNEP CITES Checklist) but is not in Hunt 2016.
Genus <i>Neoportia</i>	This genus (or any equivalents) is not mentioned. It is in trade.
Genus <i>Notocactus</i>	Not mentioned at all; generally = <i>Parodia</i> ; commonly found in trade.
Genus <i>Oreocereus</i>	This genus (or any equivalents) is not mentioned. It is in trade.
<i>Echinopsis bruchii</i>	No species entry in Hunt 2016. Previously associated with <i>Lobivia bruchii</i> and synonym of <i>Soerhrensia bruchii</i> .
<i>Neoportia nidus</i> and <i>Neoportia nidus senilis</i>	No species entry in Hunt 2016. Previously associated with and continues to be traded as <i>Eriosyce kunzei</i> .
<i>Parodia aureispina</i> & <i>Parodia herzogii</i>	No species entry in Hunt 2016. Previously associated with <i>Parodia microsperma</i> and <i>Parodia microsperma ssp. microsperma</i>
<i>Rebutia violaciflora</i>	No species entry in Hunt 2016. Was in Hunt 1999 and is in the current UNEP CITES checklist as a synonym of the CITES-accepted name: <i>R. miniscula</i> .
<i>Weingartia multispina</i>	No species entry in Hunt 2016. Was in Hunt 1999 and is in the UNEP CITES checklist as a synonym of the CITES-accepted name: <i>R. neocumingii</i>
<i>Echinomastus macdowellii</i>	No species entry in Hunt 2016. Was in Hunt 1999 and is in the current UNEP CITES checklist as a synonym of the CITES-accepted name: <i>Thelocactus macdowellii</i>
<i>Mammillaria dolichocentra</i>	No species entry in Hunt 2016. May be in trade as <i>M. polythele</i>
<i>Mammillaria dealbata</i>	No species entry in Hunt 2016. A controversial name but used in trade so needs to be a crosswalk; previously associated with <i>M. haageana</i> .

<i>Lemaireocereus euphorbioides</i>	No species entry in Hunt 2016.
<i>Parodia aureispina</i> seems to have disappeared	No species entry in Hunt 2016. used to be associated with <i>P. microsperma</i> , but not in the new checklist at all
04574 <i>Cylindropuntia congesta</i> [x] 00043 <i>Arrojadoa albiflora</i> [x]	[x] connotes hybrids; it should be clarified whether these are considered to be natural hybrids or man-made.
12049 (R) <i>Eriosyce kunzei</i> [uncertain]	Italics denote a synonym, but no 'preferred name' (a.k.a. CITES-accepted) is provided. Note that this species remains in trade as <i>Eriosyce kunzei</i> , which would be an important consideration for retention.
01387 <i>Melocactus salvadorensis</i>	Italics denote a synonym, but no 'preferred name' (a.k.a. CITES-accepted) is provided.
[09211 <i>Glandulicactus uncinatus</i> ≡ <i>Ferocactus uncinatus</i>]	Bold italics refer to alternative names and ≡ indicates that <i>Ferocactus uncinatus</i> is the preferred (a.k.a. CITES-accepted) name, but the entire entry is in brackets. What does this mean?
In the 3 rd Checklist: 02613 (R) <i>Haageocereus multangularis</i> : No recommendation <i>Haageocereus chrysacanthus</i> : No entry 00870 <i>Haageocereus turbidus</i> > <i>H. pseudomelanosteles turbidus</i>	In the first group, there is no suggestion of what name to use for the first taxon and is recommended for rejection with no clear CITES-accepted name; the second taxon has not species entry in Hunt 2016; and the third suggests a trinomial.
CITES Species Cklist: <i>Haageocereus multangularis</i> = <i>H. pseudomelanosteles</i> <i>Haageocereus chrysacanthus</i> = " <i>H. turbidus</i> = no entry	In the second group, the first two species are synonymous and there is no entry for the third species. NOTE: According to some of our older findings, these species may be in trade as <i>H. aureispinus</i> or <i>H. chrysanthus</i> ; but we now have at least one finding using <i>H. multangularis</i> .
10724 <i>Parodia uebelmanniana</i> > <i>Parodia microsperma</i> <i>microsperma</i>	Typo? Should <i>P. uebelmanniana</i> be in italics?