

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



Sixty-sixth meeting of the Standing Committee  
Geneva (Switzerland), 11-15 January 2016

Interpretation and implementation of the Convention

Compliance and enforcement

National reports

SUBMISSION OF NATIONAL REPORTS

1. This document has been prepared by the Secretariat.

Compliance with annual report submission requirements

2. In Resolution Conf. 11.17 (Rev. CoP16) on *National reports*, the Conference of the Parties:

*URGES all Parties to submit their annual reports required under the provisions of Article VIII, paragraph 7 (a), by 31 October following the year for which they are due and in accordance with the most recent version of the Guidelines for the preparation and submission of CITES annual reports distributed by the Secretariat, as may be amended with the concurrence of the Standing Committee;*

*INSTRUCTS the Standing Committee to determine, on the basis of reports presented by the Secretariat, which Parties have failed, for three consecutive years and without having provided adequate justification, to provide the annual reports required under Article VIII, paragraph 7 (a), of the Convention within the deadline (or any extended deadline) provided in the present Resolution;*

and

*RECOMMENDS that Parties not authorize trade in specimens of CITES-listed species with any Party that the Standing Committee has determined has failed, for three consecutive years and without having provided adequate justification, to provide the annual reports required under Article VIII, paragraph 7 (a), of the Convention within the deadline (or any extended deadline) provided in the present Resolution.*

3. Afghanistan (see Notification to the Parties [No. 2013/018](#) of 17 May 2013), Lesotho (see Notification to the Parties [No. 2013/020](#) of 17 May 2013) and Somalia (see Notification to the Parties [No. 2006/074](#) of 14 December 2006) remain subject to a recommendation to suspend trade for the non-submission of annual reports.
4. At its 65th meeting (SC65, Geneva, July 2014), the Standing Committee

*determined that Comoros, Gambia, Lao People's Democratic Republic, Malawi and Saint Vincent and the Grenadines had failed to provide annual reports for three consecutive years, without having provided adequate justification, and agreed that if they did not provide their missing reports within 60 days of the present meeting the Secretariat would issue a Notification recommending that Parties not*

authorize any trade in specimens of CITES-listed species with those Parties until the missing reports were provided.<sup>1</sup>

5. Comoros, Lao People's Democratic Republic, Malawi and Saint Vincent and the Grenadines submitted their missing annual reports by the deadline.
6. The Secretariat issued Notification to the Parties [No. 2014/046](#) on 13 October 2014 informing Parties that, in accordance with Resolution Conf. 11.17 (Rev. CoP16), the Conference of the Parties recommended that they not authorize trade in specimens of CITES-listed species with Gambia until further notice. On 26 November 2014, following receipt of Gambia's missing reports, the Secretariat issued Notification to the Parties [No. 2014/055](#) withdrawing the recommended trade suspension against Gambia with immediate effect.
7. The deadline for annual reports is 31 October each year for trade in the previous calendar year (e.g. 31 October 2014 for the 2013 CITES annual report). Pursuant to Resolution Conf. 11.17 (Rev. CoP16), the Secretariat would like to inform the Standing Committee that its records show that the following Parties have failed to submit annual reports for three consecutive years (or more) during the period 2011 - 2014 without having provided adequate justification: Bahamas, Bhutan, Bolivia, Burkina Faso, Canada, Cabo Verde, Central African Republic, Congo, Fiji, Grenada, Guinea, Jordan, Liberia, Libya, Mali, Mongolia, Myanmar, Nicaragua, Niger, Palau, Panama, Papua New Guinea, Republic of Moldova, Rwanda, Samoa, San Marino, Sao Tome and Principe, Seychelles, Sierra Leone, Solomon Islands, Sudan, Vanuatu, and Yemen.
8. The Secretariat will send reminders to the Parties mentioned in paragraph 7 above to bring this potential compliance matter to their attention and obtain the missing reports. In this regard, it would appreciate relevant assistance from the Standing Committee's regional representatives concerned.
9. In addition, the Secretariat's table of annual report submissions shows that the following Parties have not yet submitted their annual reports for the past two years (2013 and 2014):<sup>2</sup> Albania, Armenia, Belize, Benin, Chad, Comoros, Djibouti, Brunei Darussalam, Dominica, Egypt, Equatorial Guinea, Eritrea, Gambia, Ghana, Honduras, Kyrgyzstan, Lao People's Democratic Republic, Malawi, Mauritius, Monaco, Nigeria, Oman, Russian Federation, Saint Lucia, Syrian Arab Republic, Togo, Uganda and Ukraine. If the above-mentioned Parties fail to submit their 2015 CITES annual report, due on 31 October 2016, they could be subject to a Standing Committee recommendation to suspend trade in the future. The Standing Committee may therefore wish to urge the submission of these missing reports.

#### Guidelines for the preparation and submission of annual reports

10. General guidance on the electronic submission of national reports was recently updated and is now contained in Notification to the Parties [No. 2015/028](#) of 18 May 2015. The current version of the *Guidelines for the preparation and submission of CITES annual reports* is contained in the [Annex](#) to Notification to the Parties No. 2011/019 of 17 February 2011.
11. At SC65, the Standing Committee agreed that a Notification should be issued inviting comments from Parties on draft revised *Guidelines for the preparation and submission of CITES annual reports*. The Committee also agreed that the Secretariat would further revise the draft Guidelines and present them for consideration at the present meeting. Accordingly, Notification to the Parties [No. 2015/058](#) was issued on 2 November 2015 with a request for comments from Parties by 13 November 2015. The Annex to the present document contains all the comments received to date. The Secretariat proposes to incorporate them in a further revision of the *Guidelines for the preparation and submission of CITES annual reports*.
12. At its 22nd meeting (PC22, Tbilisi, October 2015), the Plants Committee recommended that Parties should continue to report trade in artificially propagated Appendix II plants at the species level when possible, taking into account data entry capacity and in consideration of conservation priorities such as the value in species level reporting for new species in trade. The Committee requested the Secretariat to incorporate the above recommendation into the *Guidelines for the Preparation and Submission of CITES Annual Reports* and this will be done in the final version of the Guidelines.

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<sup>1</sup> See agenda item 24.1 of the [SC65 Summary Record](#).

<sup>2</sup> Available at [http://www.cites.org/sites/default/files/common/resources/annual\\_reports.pdf](http://www.cites.org/sites/default/files/common/resources/annual_reports.pdf)

## Implementation/biennial reports

13. In Notification to the Parties No. 2015/032 of 29 May 2015, in which Parties were invited to comment on draft revised CITES implementation report format and updates to CITES Strategic Vision: 2008-2020, Parties were advised as follows:

*In preparing and submitting their reports on legislative, regulatory and administrative measures taken to enforce the Convention during the period 2013-2014, Parties should use the biennial report format contained in Notification to the Parties No. 2005/035 of 6 July 2005. As the 17th meeting of the Conference of the Parties is expected to take place in South Africa during September/October 2016, reports for the period 2013-2014 should be submitted by September/October 2015 as recommended in Resolution Conf. 11.17 (Rev. CoP16).*

Parties' implementation reports for the period 2013-2014, which were due on 31 October 2015, can be viewed in the Secretariat's table of implementation report submissions.<sup>3</sup>

14. Activities of the Standing Committee Working Group on Special Reporting Requirements and the Secretariat in relation to other aspects of national reporting are described in detail in documents SC66 Doc. 30.2 and Doc. 30.3.

## Recommendations

15. The Secretariat recommends that the Standing Committee, pursuant to Resolution Conf. 11.17 (Rev. CoP16), and on the basis of the present report, and any updated information provided at the present meeting, determine whether the Parties listed in paragraph 7 above have failed to provide annual reports for three consecutive years, without having provided adequate justification. If so determined, the Secretariat will issue a Notification recommending that Parties not authorize any trade in specimens of CITES-listed species with those Parties until they have provided the missing reports.
16. The Secretariat also recommends that the Standing Committee urge the Parties listed in paragraph 9 above to submit their missing annual reports for the years 2013 and 2014.
17. The Secretariat further recommends that the Standing Committee adopt the revised *Guidelines for the preparation and submission of CITES annual reports* circulated with Notification to the Parties No. 2015/058, with the incorporation of the comments made in paragraph 12 and the Annex to the present document.

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<sup>3</sup> See <http://www.cites.org/eng/resources/reports/biennial.php>

**SPAIN**

(comments received on 5 November 2015)

**Antiguo párrafo f):**

Se propone mantener algún tipo de criterio para ordenar el Informe Anual, por ejemplo, siguiendo la estructura en la que publican los apéndices de la CITES

**En lo que respecta a los híbridos:**

Aunque esta Notificación no es el marco para abordarlo, debería de formularse alguna recomendación para identificar los híbridos en los permisos.

Tal y como se recoge en el ejemplo al final de esta Notificación, se sugiere añadir algún párrafo indicando que los nombres de los géneros del híbrido intergenérico, o los nombres de las especies del híbrido interespecífico, podrán especificarse en la columna "Observaciones"

**En lo que respecta al marfil en bruto**

El país exportador debería de informar acerca del año en que se autorizó la exportación con arreglo al cupo, pero sin embargo no parece tener sentido requerir este dato al país importador. Por otra parte se sugiere redactar de otro modo la frase debido a su difícil comprensión.

**Trade term code : Código para describir la mercancía**

Se propone no emplear la palabra "comercial" para no generar confusión con el código de finalidad de la transacción. La traducción al español del término "trade term" debe evitarse que sea literal debido a que tiene distintas implicaciones en nuestro idioma.

**Observaciones "especificar las marcas de identificación (número de etiqueta, número de anillo, etc.)"**

Se propone aclarar en qué especies es necesario informar acerca del marcado, ya que además de ser excesivo, en muchas especies puede no tener sentido. Hasta ahora sólo era exigible para los colmillos de elefante. Téngase asimismo en cuenta que en ocasiones el marcado figura en una hoja anexa al permiso debido al elevado número de etiquetas, anillas o microchips, lo que impediría incluir ese dato en el Informe Anual.

**SAW: Rostro de pez espada**

No emplear el código SAW para rostro de pez espada, ya que el código SAW ya se emplea para madera aserrada

**GIL**

No "placas de gill" pero "láminas de branquias"

**WHO**

Estamos de acuerdo con la eliminación del término WHO

**CAR**

Para las máscaras ceremoniales, se propone el código CAR

**Artículo de cuero (LPS/LPL)**

Parece que se ajusta mejor napa (PLA)

**Pieza de piel (SKP), artículo de cuero (LPS/LPL)**

Se opta por pieza de piel (SKP) ya que los otros términos suelen aplicarse a artículos trabajados

**UNITED STATES OF AMERICA**  
(comments received on 10 November 2015)

Dear Mr. Scanlon:

With this email transmission, the United States submits its comments on the draft revised Guidelines on the preparation and submission of CITES annual reports, which were distributed for Party comment in Notification to the Parties No. 2015/058. We have provided our comments page-by-page below:

Cover page

- At the end of the first sentence of the second paragraph starting with "The present guidelines," shouldn't the reference to Resolution Conf. 11.17 state "Resolution Conf. 11.17 (Rev. CoP16)" rather than "Resolution Conf. 11.17 (Rev. CoP131)?"

Page 2

- At PC22, in discussion of agenda item 19, on Trade in artificially propagated plants, the Plants Committee agreed that a revision to paragraph i) of "Regarding plants, Parties should," proposed by the United States, should be adopted and incorporated into this paragraph. The new paragraph i) agreed to by the Plants Committee reads as follows (the new text is underlined):

Regarding plants, Parties should:

i) make every effort to report trade in CITES-listed plants at the species level or, if this is impossible for those taxa included in the Appendices by family, at the generic level; however, artificially propagated Appendix-II orchid hybrids may be reported as such. Parties should report trade of artificially propagated Appendix-II plants at the species level where reasonable, taking into account their data-entry capacity and in consideration of conservation priorities such as the value of species-level reporting for species newly in trade as artificially propagated specimens;

The above new text is not reflected in the draft revised version of the Guidelines sent out in Notification No. 2015/058, and should be incorporated into it.

Page 4

- Under "f) Unit," there is new draft text in the first paragraph stating that "as far as possible, units should be recorded in metric measures." This is true if the preferred unit to be used is a weight, volume, or length, but it is not true if the preferred unit to be used is "no." (numbers of specimens). It seems to us that the new draft text in question should be revised to state that, only in cases where the unit of measure to be used is a weight, volume, or length, should the unit be recorded in metric measures as far as possible.

Page 5

- Under new "h) Permit or certificate number," we suggest the following revision to your revised version of the first and second paragraphs (our suggested revisions are underlined):

In the case of exports and re-exports, only the number of the export permit or re-export certificate issued to cover the shipment is required. For re-exports, if the original export permit number is included, this should be entered in a separate column that is labelled as such.

In the case of imports, only the number of the export permit, re-export certificate or other certificate issued by the Management Authority or competent authority of the exporting or re-exporting country is required. If the import permit number and country of origin permit or certificate number are included, these should be entered in separate columns that are labelled as such.

- Under new "j) Source," the new text indicates that Source Code 'I' should be used for "specimens seized, confiscated or illegally traded." It is our understanding that Source Code 'I' is to be used for specimens that were seized or confiscated in a previous shipment, that are now being legally traded for a purposes such as a return of confiscated specimens, a forensic analysis to be done in the importing country, etc. This is how the United States uses Source Code 'I' in its annual reports.

For a shipment of specimens seized or confiscated upon import or export, there is now a new data field you are proposing, entitled "(k) Status," under which an 'X' is to be recorded for a seizure or confiscation. We fully support the adoption and use of this new "Status" field. We believe that seized or confiscated specimens be recorded in annual reports using this new field and that Source Code 'I' be used as interpreted by the United States.

Page 7

We agree with all of the new terms you have suggested adding to the table to describe parts and derivatives found in trade, but suggest a different code for "sawfish rostrum" other than "SAW." The term "SAW" is already used in the table to describe "sawn wood," and we believe it would be confusing to have the same code refer to two separate things. Therefore, we suggest using the code 'ROS' for "sawfish rostrum." We also suggest that the following additional terms be added to that table:

- o CPR: Coral products
- o ESH: Eggshells - raw or unworked
- o HAP: Hair products
- o IJW: Ivory jewelry
- o JWL: Jewelry (other than ivory jewelry)
- o KEY: Ivory piano keys
- o NES: Nests
- o PIV: Pianos with ivory keys
- o RUG: Rugs
- o SPR: Shell products
- o TRI: Trim (shoe trim, garment trim, or other decorative trim)
- o WPR: Wood products

If our proposal to use 'ESH' for "eggshells" is adopted, it will be necessary to redefine 'SHE' so that it apply to "shells" but not to 'eggshells.'" Finally, we agree that the term "Whole (WHO)" can be deleted from the table.

This completes our comments on the draft revised Guidelines on the preparation and submission of CITES annual reports distributed in Notification No. 2015/058. We thank you for the opportunity to review the draft and look forward to further discussion of this issue at SC66 in January.

**EUROPEAN UNION**  
(comments received on 13 November 2015)

Please find attached the comments compiled from a number of EU Member States to CITES Notification 2015/058 of 2 November 2015 on draft revised guidelines for the preparation and submission of CITES annual reports. Due to the tight deadline, it was not possible to obtain comments from more EU Member States, so that the attached document can only be considered as a provisional contribution to the exercise aiming to revise the guidelines for the preparation and submission of CITES annual reports. We invite the Secretariat to take account of the elements sent in our document and we look forward to further discussions on this issue at the Standing Committee.

## **BELGIUM**

Belgium does agree with most of the changes proposed in the annex to Not. 2015/058. We have although some comments listed below:

- 1) We see that the listing of species according to taxonomical order (for animals) or alphabetical order of families (for plants) is no longer recommended. What is the reason for that ? (see pt e)
- 2) The new column "Description of specimens" as proposed is meant to "include additional details on the description on the type of specimen" however the column "Remarks" is also meant to indicate details on the specimen traded such as id marking, sex and size. It would make more sense to include all relevant information regarding the details regarding the specimens in the column "Description of specimens".
- 3) In "other proposed modifications", the tree-letter code "SAW" is already been used for "sawn wood" therefore not advisable to be used for "sawfish rostrum".

## **FRANCE**

1. 3ème page (numérotée 2), 1er paragraphe sous "b) espèce"

"Indiquer le nom scientifique de l'espèce ou de la sous-espèce en notant son binôme (genre et espèce) ou son trinôme (genre, espèce et sous-espèce). Chaque ligne du rapport annuel ne doit **faire apparaître qu'une seule association espèce/nom**. Dans le cas où plusieurs espèces et/ou plusieurs types de spécimens d'une espèce donnée feraient l'objet d'un même permis, chacun(e) d'entre elles/eux devra apparaître sur une ligne distincte et être assorti(e) du code descriptif correspondant et des données sur la quantité, la source, le numéro de permis, etc."

Pour le début de la deuxième phrase, il me semble préférable d'écrire : "**Chaque ligne du rapport annuel ne doit concerner qu'une seule espèce**".

2. 3ème page (numérotée 2), 2ème paragraphe sous "b) espèce"

"Les noms scientifiques utilisés doivent être ceux figurant dans les annexes ou, **pour les espèces couvertes en tant que partie** d'un taxon supérieur inscrit, ceux inclus dans les listes normalisées de noms approuvées par la Conférence des Parties."

Compte tenu du sens du mot "partie" dans le cadre de la CITES (je me réfère ici à "partie" avec un "petit p"), l'expression "les espèces couvertes en tant que partie d'un taxon supérieur inscrit" impose de lire 2 ou 3 fois la phrase pour réussir à la comprendre.

Il me semble plus simple d'écrire : "Les noms scientifiques utilisés doivent être ceux figurant dans les annexes ou, **pour les espèces inscrites au niveau d'un taxon supérieur**, ceux inclus dans les listes normalisées de noms approuvées par la Conférence des Parties."

Option B : "Les noms scientifiques utilisés doivent être ceux figurant dans les annexes, ou **ceux inclus dans les listes normalisées de noms approuvées par la Conférence des Parties lorsqu'il s'agit d'espèces inscrites au niveau d'un taxon supérieur**."

3. 4ème page (numérotée 3), paragraphe iii) sous "concernant les plantes"

"consultent **leurs organisations nationales chargées des bois** afin de déceler d'éventuelles anomalies dans leur rapport annuel et, s'il y a lieu, envisagent avec elles les rectifications nécessaires; et"

Cette rédaction est trop vague (peut-être à dessein). En tout état de cause, elle n'est pas utile, car on ne comprend pas de quelles organisations il s'agit. Cette phrase mériterait donc d'être précisée.

4. 4ème page (numérotée 3), 2ème paragraphe sous "concernant les trophées de chasse"

"Dans le cas **où seule une partie d'un trophée** serait commercialisée, elle sera enregistrée séparément à l'aide du code descriptif le plus proche (p. ex. "SKI" ou "SKU"). Un corps entier naturalisé sera enregistré sous "BOD". Une peau seule sera enregistrée sous "SKI", etc.

Puisque cette partie qui serait commercialisée seule résulte en réalité d'un trophée, nous ne voyons pas ce qui justifie que le code TRO ne soit pas utilisé pour la décrire. Pour quelle raison une même partie pourrait-elle faire l'objet de 2 codes différents selon qu'elle est expédiée seule ou en même temps qu'une autre partie du même animal ?

5. 4ème page (numérotée 3), paragraphe débutant par "concernant les coraux noirs"

"Concernant les coraux noirs, les Parties s'emploient **à établir au niveau de l'espèce les rapports** sur le commerce, mais si cela n'est pas faisable, elles suivent les indications suivantes :"

La rédaction suivante me semble plus claire : ""Concernant les coraux noirs, les Parties s'emploient **à établir les rapports sur le commerce en les rédigeant au niveau de l'espèce**. Si cela n'est pas faisable, elles suivent les indications suivantes :"

NB - Cette même proposition concerne plusieurs passages du document.

6. 5ème page (numérotée 4), 1er paragraphe sous "f) Unité de mesure"

"Utiliser **le code correspondant à l'unité de mesure qui convient** à l'aide de la liste figurant au point 5 a)."

Il s'agit ici d'un **contre-sens**. Cette phrase devrait être rédigée de la façon suivante : "**Utiliser l'unité de mesure correspondant au code qui convient**, à l'aide de la liste figurant au point 5 a)."



7. 6ème page (numérotée 5), le NB figurant tout en bas de la page et
8. 7ème page (numérotée 6), 1er paragraphe sous "h) Numéro du permis ou certificat"

"N.B. La mention du pays d'origine ne devrait être indiquée qu'en cas de réexportation. Dans le cas où la transaction représenterait une exportation directe vers ou à partir du pays auteur du rapport, **le champ correspondant au pays d'origine devrait rester vierge.**"

et

"En cas d'exportation ou de réexportation, **seul le numéro du permis d'exportation ou du certificat délivré pour l'envoi doit être indiqué.** Dans le cas où le permis d'exportation d'origine serait **compris**, ce **point** devrait être **indiqué** dans une colonne distincte désignée en tant que telle."

La mise en œuvre de ces dispositions entraînera une perte de traçabilité. Elle ne nous paraît donc pas souhaitable. Il n'est pas souhaitable d'indiquer aux Parties qu'en cas de réexportation elles peuvent s'abstenir de rapporter le numéro du permis d'exportation délivré par le pays d'origine.

En outre, la dernière phrase citée ci-dessus serait plus claire avec les modifications suivantes :  
"Dans le cas où le **numéro du** permis d'exportation d'origine serait **indiqué**, **cette information** devrait être **précisée** dans une colonne distincte désignée en tant que telle."

**Mêmes observations et suggestions pour le second paragraphe sous "h) Numéro du permis ou certificat".**

9. 7ème page (numérotée 6), paragraphe sous "k) Etat"

"Inscrire **un X**" pour chaque enregistrement de **spécimens saisis/confisqués** et laisser le champ vide pour tous les enregistrements de spécimens dédouanés."

Le code source qui doit être utilisé pour les spécimens introduits en provenance de la mer est le code X. Utiliser ici le code X même suivi du symbole des guillemets (= X") sera source d'erreurs.

Nous recommandons utiliser un autre code pour identifier les spécimens saisis/confisqués.

10. 8ème page (numérotée 7), 1er paragraphe, 2ème ligne

"– indiquer si un permis remplace un autre permis soumis dans le rapport d'une année antérieure. Tout **rapport** annulé, remplacé ou arrivé à expiration pendant la période couverte par le rapport annuel doit être retiré du rapport de sorte que [etc.]"

Il faut remplacer le mot rapport (en rouge ci-dessus) par **"permis"**.

11. 9ème page (numérotée 8), propositions de nouveaux codes descriptifs

- Il manque un "l" à "Pulpes"
- Le code SAW existe déjà pour désigner le bois scié. Il ne faut donc pas l'utiliser pour les rostres de poissons-scie

12. 9ème page (numérotée 8), dernière ligne

Que signifie les 3 lettres "cor" après le mot "lambi" ?

13. 10ème page (numérotée 9), 4ème ligne

Les codes LPS et LPL sont très connotés "maroquinerie", le "L" signifiant "leather" (cuir). Utiliser le même code pour désigner des oreillers artisanaux réalisés en lynx ne semble pas adapté (apparence plus fourrure que cuir pour ce produit).

## **GERMANY (unofficial translation)**

### Fundamental considerations

In our opinion, the guidelines for the drafting of the CITES annual report should only be reviewed once the Standing Committee at its 66th meeting (January 2016) has taken a decision on the proposals made by the SC Working Group "Report requirements". Otherwise, the guidelines revised might have to be revised again or adapted to the decisions taken by the SC at that meeting.

The present draft guidelines contain contradictions between the examples in the annexed tables and the text of the Guidelines. We would therefore propose that the mandate of the SC working group on revision and adaptation of the Guidelines is expanded accordingly.

In principle, only data which are relevant for an evaluation should be reported in the CITES annual report.

The German CITES management authorities have the following comments on the abovementioned notification:

### Main categories of the Annual report

There are currently two main categories "import" and "(re-)export" in the annual report. We propose, in addition to the categories, to introduce a third category "special permits". The guidelines should specify that the special permits (such as travelling exhibition certificates, sample collection certificates, musical instrument certificates, or travelling certificates), which are valid both as import and export documents, should be reported in a format to be defined. All special permits which are valid during the reporting period, should be included in this category, stating the date of issuance. Since these authorisations can be used without restriction several times within 3 years and are valid in all CITES Parties, we believe that it makes no sense to report on each use during the validity period. This proceeding would artificially increase trade figures through multiple registration, despite the fact that the relevant documents have to be returned to those countries where the respective special documents had been issued.

### Reporting of seized/confiscated consignments

We do not support the declaration of legal and illegal trade in a single report, since this may easily lead to wrong interpretations, which occurred several times in the past.

In the proposal, seized/confiscated consignments shall be reported within the annual report and a new column "status" shall be included in the reporting format. All seized/confiscated consignments should be marked with the symbol "x" in the status column.

However, the SC working group “report requirements” has tabled a proposal to SC 66 that in the future seized consignments should be included in a separate annual report. We support this proposal. If the proposal is adopted, the guidelines would have to be amended accordingly, as these consignments would have to be taken out again of the annual report concerning the legal trade. This is another reason to task the existing Working Group “Report requirements”, by extended its mandate, with the revision of the Guidelines.

#### Indication on the labelling of raw ivory

In our view, the collection of this identification in column “remarks” is redundant, as this information is not published in the WCMC trade database and is therefore not searchable. This not only concerns the labelling of raw ivory, but also other markings (ring and transponder numbers, tags for the identification of hunting trophies, etc.). Such information should, where necessary, be exchanged between the competent authorities on the basis of the licences issued.

#### New codes for the product description

We support the introduction of these new codes. However, the proposed new code “SAW” (for sawfish rostrum) already exists for sawn wood and must therefore necessarily be changed (e.g. “SAR”). In addition, we propose a new code for Cosmetics (COS).

In our opinion, the proposed column "Descriptions of specimens" in the reporting format is superfluous if the product description can be deduced in a meaningful way from the column "Term codes", taking into account the explanations for the use of the codes.

### **FINLAND**

The revised guidelines are in general much clearer than the old guidelines, and they address several issues and details that quite often have caused confusion. Just to pick one detail: when reporting the quantities, the adding of a column in order to separate the numbers of specimens from the unit used will hopefully clear a lot of misunderstandings.

Page 2, General description.

- point 2 g) is about seized and confiscated specimens, and it refers to recommendation 3 i). But shouldn't it instead refer to point 3 j)? Or rather, to several points: 3 i), 3 j) and 3 k).

Page 7, proposed modifications to terms describing parts/derivatives + clarifications of terms.

- we don't have any specific comments on the new terms proposed (more or less unfamiliar products for us), but it seems as a good idea to be able to discern carvings CAR made of different animal materials (ivory, bone, horn)

- what we would like to see in the guidelines is a clarification for which term should be used for a stuffed animal, that is not a whole animal (sc. full mounts) but only part of the animal is stuffed (sc. half mounts / quarter mounts, where head and shoulders are stuffed, or sometimes half of an animal). At present BOD is recommended for whole stuffed trophies, TRO when more than one part of the animal is included in shipment. The matter is also discussed in the draft on page 3, but this specific item (which is very common in trophy trade) is not mentioned there either.

An important aspect on the reporting is whether the recorded data is based on permits issued or whether the actual import/export indeed took place. Since the data for at least some countries

probably include a mix of these two, it could be a good idea that the countries for which this is relevant, use two different reporting tables (one for actual trade and one for 'the rest'/permits issued but not endorsed by Customs). I am not sure in what kind of terms this has been discussed before, and whether a party that would report data like this in two parts could become subject to awkward questions about why custom's endorsement is missing etc. So I leave it to you Dörthe/Commission to judge if this suggestion is feasible/smart to put forward at this stage. I'll give you an example: permits issued by Finland are returned by Customs to the MA in 85-90 % of cases, 5 % are never used (sent back unused to MA or replaced), 5 - 10 % of permits we usually cannot track/don't know whether the trade actually took place or not. Our AR therefore includes mixed data: most records are based on actual trade that took place but some only on permits issued, and we do not tell which is which (there is no column for that in the tables, since it is assumed that the data is either based on actual trade or on permits issued).

## **NETHERLANDS**

The CITES management authority of the Netherlands would like to draw attention to the following points of the proposed draft.

### 2.A.e.

In the current report, we don't mention which licenses have been cancelled / expired / lost / replaced. For the most part, we don't register this. We do, however, report which permits are actually used. We feel this is sufficient. If we do have to register at this level, this entails additional work.

### 2.A.h.

If a permit is issued where an exception applies, such as personal property, a remark is made in the column 'remarks'. Currently we do not do this and would also entail a lot of extra work and probably even a system change. The proposed change does not seem advisable to us and we do not see the necessity either. The 'nature' of the application is already traceable by the source code and / or object code.

### 3.b. Regarding Hybrids

Mentioning "hybrids" in the species field means that we have to add it to the species options of the system. This can be done, however we question the necessity. Currently we mention hybrid species in the genus field with spp, for example Falco spp. We believe this is sufficient.

### 3.c. an 3.d.

An additional column 'description of specimen' means a system change, which is undesirable. If we can't find a suitable three-letter code, we currently use DER.

### 3.e.

Quantity can be difficult to specify. For example, if antique ivory or tortoiseshell is integrated in an object, it is difficult to specify the amount. We regard this as being one instrument or one cabinet.

### 3.g.

“The country of origin should only be used for re-exports. If the transaction represents a direct export either to or from the reporting country, the country of origin field should be left blank.” This change would mean that the information on the permits no longer corresponds to the information in the annual report and we need to change this manually. In our application system it's required to fill in the country of origin. With re-exports the country of origin is entered, as is the country of last re-export. It is much more logical that with a direct export, the field containing the country of last re-

export remains empty. This illogical change would also mean major changes to our methods and systems. Therefore highly undesirable.

3.n.

We should, in agreement with the Secretariat, only report the actual trade and not the issued permits.

5.a.

With the introduction of the new codes IVC, BOC and HOC, when do we use these codes, and when do we use CAR?

## **UNITED KINGDOM**

It may not be feasible for all Parties to include all the proposed fields in their licensing systems.

For example, our system does not have fields for 'size' or 'status' and it's not something we can readily change until we put a new licensing system in place, and the timing of that is most uncertain. This means we cannot readily provide this data in our annual reports. I suspect other Parties running older systems will find it similarly problematic.

**Observaciones del Servicio Agrícola y Ganadero (SAG) a Proyecto de versión revisada de las Directrices para la preparación y presentación de los informes anuales CITES**

1. En el punto 2 a), sobre Principios generales, se hace indicación que se reemplaza el párrafo g) por el f). Al revisar el texto propuesto se observa que no existe párrafo con la letra f)
2. El texto propuesto como último párrafo de la letra e), no es muy aclaratorio. No se entiende, por ejemplo, si se refiere a cualquier tipo de informe o si sólo hace referencia a aquellos en que se indican todos los permisos emitidos.
3. En el punto 3, sobre Instrucciones específicas, epígrafe b) Especies, aclarar “Inclúyase solamente una combinación de especie/término por renglón...”, específicamente la palabra “término”.
4. En el punto 3, en párrafo explicativo de los híbridos, se solicita agregar además un ejemplo con Género y otro con Familia.
5. Pareciera más apropiado incluir el párrafo “Respecto a los trofeos de caza”, señalado en la letra e) del epígrafe Especies, en la letra d), sobre “Descripción del espécimen”.
6. En punto 3, letra h) “Número del permiso o certificado”, se sugiere eliminar texto “de exportación” en la primera frase del párrafo “Cuando se trate de exportaciones y reexportaciones, se requiere solo el número del permiso o certificado de exportación que ampara la expedición”. Parece redundante toda vez que, al comienzo de la frase, ya se indica que se trata de exportación o reexportación.
7. En letra k), punto 3, se sugiere cambiar la palabra “liberados” por “aceptados”.
8. En el punto 5 “Terminología” se propone añadir nuevos términos para describir las partes y derivados que se comercializan. Al respecto, se hacen los siguientes comentarios, si los términos son incluidos en la nueva versión:
  - . IVC: Tallas de marfil ¿Cómo se diferencia de TUS, en caso de colmillo trabajado?
  - . BOC: Tallas de hueso. Se sugiere eliminar la palabra “hueso” de la columna explicativa para el término “Talla”
  - . HOC: Tallas de cuerno. Se sugiere eliminar la palabra “cuerno” de la columna explicativa para el término “Talla”
9. En el punto 5 “Terminología”, aunque no es un tema planteado en la propuesta de modificación, se solicita aclarar concepto y diferencia entre EGG de caviar y huevo.
10. En Punto 5 “Terminología”, surge una duda con respecto a cómo se debería informar un espécimen, que según su descripción indicada en el permiso o certificado de exportación o reexportación que lo ampara, no concuerda con los códigos establecidos. Por ejemplo, un permiso que ampara el comercio de correas de reloj, pero que además está indicado como LPL en el permiso, como si se tratase de un artículo de cuero grande ¿cómo se debe registrar en el informe anual?

## AUSTRALIA

Comments received on 16 November 2015

Dear Secretariat,

Please find below a response from the Australian CITES Management Authority on the revised guidelines for the preparation and submission of the CITES annual reports.

Overall, we think the proposed changes make the guidelines clearer, easier to follow and more comprehensive. We do have a few queries, particularly in relation to the guidance around hunting trophies.

Under the CITES glossary definition, hunting trophies are: *A whole animal, or a readily recognizable part or derivative of an animal, specified on any accompanying CITES permit or certificate, that:*

- I. is raw, processed or manufactured;*
- II. was legally obtained by the hunter through hunting for the hunter's personal use; and*
- III. is being imported, exported or re-exported by or on behalf of the hunter, as part of the transfer from its country of origin, ultimately to the hunter's State of usual residence.*

We suggest that this definition should be clearly referenced in the guidelines so as to avoid confusion (i.e. that 'Trophy' is only applicable to specimens that were legally obtained by the hunter through hunting for personal use and NOT for whole animals purchased and imported).

Also, for clarification it might be helpful if the Secretariat could provide advice on the following scenarios:

1. Where there is another applicable code, if only one item/part from a hunted animal was to be imported, for example antlers were exported from the country of origin to the hunter, should they be included under description code TRO - Trophy or should they be identified under the other applicable product code (in this case HOR – Horn)?
2. If an individual has imported a trophy and now wishes to re-export it as part of a household move, would that be considered a 'Trophy' or 'Personal'?

Further to our questions in relation to hunting trophies, we would like to note the following:

- We agree with the new terms proposed to be added to the table in a) to described parts and derivatives found in trade.
- We agree with the removal of the term 'Whole' from table a) to describe parts and derivatives found in trade
- We agree with the clarifications for 'explanation of specimen in trade'

Just a final comment. The format the paper was sent in (PDF with track changes) was very difficult to read. While we understand the intent was that the document should be read-only, it might be helpful in future to also provide a word document in track changes.

Many thanks

**HONG KONG SAR**  
Comments received on 16 November 2015

Dear Secretariat,

Greeting from the CITES Management Authority of Hong Kong SAR.

I am writing regarding the Notification to Parties no. 2015/058 regarding revision to the guidelines for CITES Annual Report. There are two points that we are not sure about.

	CITES Requirements under the Revised Guidelines at Annex	HKSAR's Comments
1	Under 2 f) at p.2 Summaries of trade in manufactured products of species in Appendix II and III need indicate only the following: the number and type of permits and certificates granted...	It is observed that the number and type of permits and certificates granted are not shown in the sample report at p.10. It is therefore not clear whether or not such information should be included in the report.
2	Under 3 k) at p.5 Status Fill the field with an 'X' for each record of seized / confiscated specimens and leave this field blank for all records of cleared specimens.	Seized / confiscated specimens came from illegal trade. It is unclear whether the annual report should cover records of legal trade only or those of illegal trade as well.

I would be grateful for your clarification on the above.