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

Seventieth meeting of the Standing Committee
Rosa Khutor, Sochi (Russian Federation), 1-5 October 2018

Interpretation and implementation matters

Trade control and traceability

SIMPLIFIED PROCEDURES FOR PERMITS AND CERTIFICATES: RESPONSES TO NOTIFICATION TO THE PARTIES NO. 2017/071

1. This information document has been submitted by Australia, as Chair of the Standing Committee Working Group on Simplified Procedures for Permits and Certificates in relation to agenda item 36.*

2. This document presents the responses received to Notification to the Parties No. 2017/071 on Permits and certificates. These responses helped inform the report submitted by the Working Group on Simplified Procedures for Permits and Certificates.

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

Responses to Notification to Parties No. 2017/071 on "Simplified procedure for permits and certificates"

PARTIES

Australia……3

Canada……18

EU……21

Switzerland……25

Thailand……26

Tunisia……28

USA……30

ORGANIZATIONS

Florida Museum of National History ……31

ICCAT……33

IOTC……35

IUCN SSC WHSG……36

Otlet (Australia) ……43

Shark Specialists……44

Society for Wildlife Forensic Science……46

MEA Strategies……50

PARTIES

AUSTRALIA

Notification 2017/071 Simplified Procedure for Permits and Certificates

Australian Response

Context

The Notification requests Parties to report on their implementation of, and experiences with the simplified procedures to issue permits and certificates to facilitate and expedite trade that will have a negligible impact, or none, on the conservation of the species concerned, as agreed under Section XII of Resolution Conf. 12.3 (Rev. CoP17) on Permits and certificates. See Attachment A for an extract of that section.

Parties are asked to submit a compilation of this information and its recommendations for consideration by the Standing Committee prior to the 18th meeting of the Conference of the Parties.

The Standing Committee is also asked to examine mechanisms to facilitate the efficient international movement of samples for forensic or enforcement purposes, for consideration by the 18th Conference of the Parties.

Parties and other stakeholders are invited to submit information to the Secretariat in one of the working languages on:

a) implementation of Section XII of Resolution Conf. 12.3 (Rev. CoP17) in national legislation, if any; and
b) experiences with the use of simplified procedures to issue permits and certificates to facilitate and expedite trade with no or negligible impact on the conservation of species concerned.

Australian experiences with the use of simplified procedures

Australia currently applies simplified procedures for low-risk commercial trades of some Appendix II-listed specimens through the use of multiple consignment authorities. These authorities provide a significant benefit to traders, as they allow the movement of products internationally in a relatively quick and flexible manner. Data sharing between the Australian CITES Management Authority and border officials supports oversight of shipments. Matching processes internationally could further avoid shipping delays for international movements of wildlife specimens. Australian legislation would allow this mechanism to be extended to other types of shipments such as biological samples of Appendix II-listed species. Further information on multiple consignment authorities is outlined below.

For shipments of Appendix I listed specimens, or unknown specimens, Australia has several legislative provisions that would allow quick and flexible movement for identification, training, education, enforcement and health. There are also provisions that would allow the international movement of specimens suspected to contain CITES listed species but where the exact species is unknown. These provisions have rarely been used but could provide a mechanism to employ simplified permitting procedures for some scientific, forensic or research samples.

Australia operates a scientific exchange system in line with the exemption provided by Article VII, paragraph 6, of the Convention. This exemption for certain scientific specimens is designed to facilitate scientific research of species, including in their taxonomy, conservation and management. We believe

that there may be scope for the scientific exchange provisions to be extended to the exchange of some forensic samples under limited circumstances, perhaps for the exchange of reference samples. Further details on Australia's application of the scientific exchange provisions are included below.

Implementation of Section XII of Resolution Conf. 12.3 (Rev. CoP17) in national legislation

Simplified procedures in Australian law

Identification, training, education and enforcement purposes

Australian legislation allows for the issuance of a permit for the export of a specimen for identification, education and/or training provided the importer is a relevant CITES Authority. These provisions also allow for the issuance of a permit to export a seized specimen for enforcement purposes and the recipient is not necessarily limited to CITES authorities. Similar provisions allow the import of seized specimens and specimens for identification, education, training and/or enforcement. These permits have rarely been used. Australia could investigate using these provisions to support simplified permit procedures for wildlife forensic samples. See Attachment B for relevant extracts from Australia's international wildlife trade law.

Moving biological samples of unknown species

Australian legislation allows for the international movement of 'specimens', which could be taken to include specimens derived from an unknown species. In addition, an Australian legislative provision enables treatment of 'things represented to be CITES specimens' as CITES specimens for the purposes of the law. This provision has generally been used to allow for the seizure of specimens that purport to contain regulated specimens, for example, medicinal powder packaged as tiger bone. There may be scope to use this provision to apply relevant permit requirements in a streamlined manner to specimens suspected to contain products from CITES-listed species. Further investigation is required to clarify how this could be applied practically. See Attachment C for relevant extracts from Australia's international wildlife trade law.

Emergency provisions

Australian international wildlife trade law includes provisions to allow for the urgent international movement of a specimen in order to meet an emergency involving danger to the life or health of a human or an animal. See Attachment D for relevant extracts from Australia's international wildlife trade law.

Australia's multiple consignment authorities (MCAs)

Section XII of Resolution Conf. 12.3 (Rev. CoP17) recommends Parties use simplified procedures to issue permits and certificates to facilitate and expedite trade that will have a negligible impact, or none, on the conservation of the species concerned, e.g. … in other cases judged by a Management Authority to merit the use of simplified procedures.

The Australian CITES Management Authority has determined that some commercial exports, re-exports and imports of species listed on Appendix II to CITES represent a low risk to the conservation of the species concerned. For these international movements, the Management Authority can issue a multiple consignment authority, which authorises the holder to generate individual export permits to accompany individual shipments. The Australian CITES Management Authority must be informed of the details of each shipment that occurs under the authority. This advice can be cross checked with export and import data collected by border authorities. The Management Authority can revoke multiple consignment authorities where necessary, and maintains records of individuals and businesses considered eligible to use multiple consignment authorities.

A multiple consignment authority is limited to a particular exporter, for specified species and product types. The authority is valid for up to six months. If the exporter is not a primary producer, the authority will be for a defined quantity, based on evidence of the quantity held by the exporter. If the

exporter is a primary producer, the authority will not necessarily define a quantitative limit. The multiple consignment authority is issued on the condition that exported quantities will be within any quota set by the approved program. Shipments must be acquitted and acquitted quantities are recorded for monitoring purposes.

Australia's international wildlife trade law allows for the use of multiple consignment authorities, provided the fundamental requirements of CITES are met, i.e. the Scientific Authority has determined the trade will not be detrimental, the specimen was legally acquired from an approved program, or the exporting country has given permission of the export or re-export of the specimens.

Commercial exports

Any Australian wild harvest, ranching or captive breeding/artificial propagation program intending to export products from CITES-listed species must be assessed by the Australian CITES Scientific Authority to determine that the program would not be detrimental to the survival of the species in the wild (i.e. a non-detriment finding is made).

An exporter must demonstrate they are either directly responsible for the harvest of a product from an approved program, or they have legally acquired a set of stock from an approved program, before the CITES Management Authority can authorise the export of the specimens. See Attachment E for relevant extracts from Australia's international wildlife trade law.

Commercial imports

Australia has in place a stricter domestic measure requiring the prior issuance of import permits for commercial imports of specimens containing species listed on Appendix II to CITES. Australia can issue a multiple consignment authority to an importer provided the importer can provide copies of the overseas export permits for the shipments to be imported under the authority at the time of the application. See Attachment F for relevant extracts from Australia's international wildlife trade law.

Commercial re-exports

Multiple consignment authorities can be issued for re-exports of specimens where the re-exporter can provide evidence that all the specimens were legally imported. These authorities can be particularly useful for businesses that import bulk consignments and ship small quantities, such as an internet trade business model.

Pre-Convention (export)

Following the listing of *Dalbergia* rosewoods under CITES, the Australian CITES Management Authority has offered multiple consignment export authorities for pre-convention stocks for companies that can prove they held stocks of pre-convention rosewood (through an audit or equivalent). A stock-take is undertaken every six months and remaining stocks are reconciled with shipment acquittals and other relevant business records.

Implementation of Article, paragraph 6 and Resolution Conf. 11.15 (Rev. CoP 12) in national legislation

Registered scientific institutions may exchange certain specimens of CITES-listed species (except for certain exempt specimens), provided they are part of an exchange of non-commercial scientific specimens. Such scientific transfers do not require a formal export or import permit, but under this exemption must carry a label detailing specific information regarding the specimen(s).

Both the Australian and overseas scientific institutions must be registered with the CITES Management Authority in their country if they wish to exchange specimens derived from species listed under CITES. The loan, donation or exchange of specimens must be done without monetary compensation, and the specimens must have been legally obtained. For further information, see Attachment G.

Extract from Resolution 12.3 (Rev. CoP17) on Permits and Certificates

XII. *Regarding the use of simplified procedures to issue permits and certificates*

20. RECOMMENDS that:

a) Parties use simplified procedures to issue permits and certificates to facilitate and expedite trade that will have a negligible impact, or none, on the conservation of the species concerned, e.g.:

i) where biological samples of the type and size specified in Annex 4 of the present Resolution are urgently required:

A. in the interest of an individual animal;

B. in the interest of the conservation of the species concerned or other species listed in the Appendices;

C. for judicial or law enforcement purposes;

D. for the control of diseases transferable between species listed in the Appendices; or

E. for diagnostic or identification purposes;

ii) for the issuance of pre-Convention certificates in accordance with Article VII, paragraph 2;

iii) for the issuance of certificates of captive breeding or artificial propagation in accordance with Article VII, paragraph 5, or for the issuance of export permits or re-export certificates in accordance with Article IV for specimens referred to in Article VII, paragraph 4; and

iv) in other cases judged by a Management Authority to merit the use of simplified procedures;

b) Parties, in order to simplify procedures concerning the issuance of permits and certificates under the circumstances outlined above:

i) maintain a register of persons and bodies that may benefit from simplified procedures, as well as the species that they may trade under the simplified procedures;

ii) provide to registered persons and bodies partially completed permits and certificates that remain valid for a period of up to six months for export permits, 12 months for import permits or re-export certificates, and three years for pre-Convention certificates and certificates of captive breeding or artificial propagation; and

iii) authorize the registered persons or bodies to enter specific information on the CITES document when the Management Authority has included in box 5, or an equivalent place,

the following:

A. a list of the boxes that the registered persons or bodies are authorized to complete for each shipment; if the list includes scientific names, the Management Authority must have included an inventory of approved species on the face of the permit or certificate or in an attached annex;

B. any special conditions; and

C. a place for the signature, or its electronic equivalent, of the person who completed the document;

c) concerning trade in biological samples of the type and size specified in Annex 4 of the present Resolution, where the purpose is among those specified in paragraph a) of this section, permits and certificates be accepted that were validated at the time the documents were granted, rather than at the time a shipment was exported or re-exported provided that the container bears a label, such as a Customs label, that specifies 'CITES Biological Samples' and the CITES document number; and

d) when processing applications for the export of biological samples of the type and size and for the use specified in Annex 4 to the present Resolution, Scientific Authorities develop generic non-detriment advice that would cover multiple shipments of such biological samples, taking into account the impacts of the collection of the specimens of species included in Appendix I or II to determine whether the export or import of biological samples would be detrimental to the survival of the species;

Annex 4 Types of biological samples and their use

Type of sample	Typical size of sample	Use of sample
blood, liquid	drops or 5 ml of whole blood in a tube with anticoagulant; may deteriorate in 36 hours	haematology and standard biochemical tests to diagnose disease; taxonomic research; biomedical research
blood, dry (smear)	a drop of blood spread on a microscope slide, usually fixed with chemical fixative	blood counts and screening for disease parasites
blood, clotted (serum)	5 ml of blood in tube with or without a blood clot	serology and detection of antibodies for evidence of disease; biomedical research
tissues, fixed	5 mm^3 pieces of tissues in a fixative	histology and electron microscopy to detect signs of disease; taxonomic research; biomedical research
tissues, fresh (excluding ova, sperm and embryos)	5 mm^3 pieces of tissues, sometimes frozen	microbiology and toxicology to detect organisms and poisons; taxonomic research; biomedical research
swabs	tiny pieces of tissue in a tube on a swab	growing bacteria, fungi, etc. to diagnose disease
hair, skin, feathers, scales	small, sometimes tiny pieces of skin surface in a tube (up to 10 ml in volume) with or without fixative	genetic and forensic tests and detection of parasites and pathogens and other tests
cell lines and tissue cultures	no limitation of sample size	cell lines are artificial products cultured either as primary or continuous cell lines that are used extensively in testing the production of vaccines or other medical products and taxonomic research (e.g.
DNA	small amounts of blood (up to 5 ml), hair, feather follicle, muscle and organ tissue (e.g. liver, heart, etc.), purified DNA, etc.	sex determination; identification; forensic investigations; taxonomic research; biomedical research
secretions, (saliva, venom, milk)	1-5 ml in vials	phylogenetic research, production of anti-venom, biomedical

Identification, training, education and enforcement purposes

Relevant extract from Australia's international wildlife trade law, Part 13A of the Environment Protection and Biodiversity Conservation Act 1999

303GC Permit authorising the Secretary to export or import specimens

(1) The Secretary may apply to the Minister for a permit to be issued under subsection (2).

(2) The Minister may, on application made by the Secretary under subsection (1), issue a permit to the Secretary. This subsection has effect subject to subsections (4) and (5).

(3) A permit under subsection (2) authorises the Secretary to take the action or actions specified in the permit, in the permitted period, without breaching section 303CC, 303CD, 303DD or 303EK.

(3A) For the purpose of subsection (3), the ***permitted period*** is the period specified in the permit as the period during which the action or actions specified in the permit may be taken. The period so specified must start on the date of issue of the permit and end not later than 12 months after that date.

(4) The Minister must not issue a permit under this section to export a specimen unless the Minister is satisfied that:

(a) both:

(i) the recipient of the specimen will be a relevant CITES authority of a country; and

(ii) the specimen will be used by that relevant CITES authority for the purpose of the identification of a specimen and/or for the purpose of education or training; or

(b) both:

(i) the specimen has been seized under this Act; and

(ii) the specimen will be used to facilitate investigations in or outside Australia in relation to trade relating to wildlife.

(5) The Minister must not issue a permit under this section to import a specimen unless the Minister is satisfied that:

(a) the specimen will be used by the Secretary for the purposes of the identification of a specimen; or

(b) both:

(i) the sender of the specimen will be a relevant CITES authority of a country; and

(ii) the specimen will be used for the purpose of the identification of a specimen and/or for the purpose of education or training; or

(c) the specimen was exported from Australia in contravention of:

(i) this Part; or

(ii) the *Wildlife Protection (Regulation of Exports and Imports) Act 1982*; or

(d) the specimen will be used to facilitate investigations in or outside Australia in relation to trade relating to wildlife.

(6) A permit under this section:

(a) comes into force on the date on which it is issued; and

(b) unless it is sooner cancelled, remains in force until all of the following periods have ended:

(i) the permitted period (within the meaning of subsection (3A));

(ii) each period for which one or more conditions of the permit are expressed to apply.

Moving biological samples of unknown species

Relevant extract from Australia's international wildlife trade law, Part 13A of the Environment Protection and Biodiversity Conservation Act 1999

527D Things represented to be CITES specimens

(1) For the purposes of this Act, if a thing is represented by an accompanying document, the package or a mark or label, or from any other circumstances, to be:

(a) the skin, feathers, horns, shell or any other part of a CITES listed animal; or

(b) part of a CITES listed plant; or

(c) reproductive material from a CITES listed animal or a CITES listed plant; or

(d) an article produced by or from, or derived from, one or more CITES listed animals or one or more CITES listed plants, whether with or without any other material;

then the thing is taken to be a CITES specimen.

Note: This subsection has the effect (among other things) of widening the scope of sections 303CC, 303CD and 303GN, which are offence provisions relating to the export, import and possession of specimens.

(2) The Minister must not issue a permit under section 303CG authorising the export or import of a thing that is taken under subsection (1) to be a CITES specimen unless the thing is a CITES specimen apart from subsection (1).

(3) In this section:

CITES listed animal means an animal of a species included in Appendix I, II or III to CITES.

CITES listed plant means a plant of a species included in Appendix I, II or III to CITES.

export has the same meaning as in Part 13A.

import has the same meaning as in Part 13A.

Emergency provisions for human or animal health emergencies

Relevant extract from Australia's international wildlife trade law, Part 13A of the Environment Protection and Biodiversity Conservation Act 1999

303GW Part not to apply to certain specimens

Emergency

(5) For the purposes of this Part, if:

(a) the Minister, the Director of Biosecurity, a prescribed person or a prescribed organisation is satisfied that, in order to meet an emergency involving danger to the life or health of a human or an animal, it is necessary or desirable that a specimen that could be used in treating that person or animal should be sent out of, or brought into, Australia or an external Territory; and

(b) that specimen is sent out of, or brought into, Australia or that Territory, as the case requires, to meet that emergency;

that specimen is taken not to have been exported or imported, as the case may be.

Exports of CITES Appendix II-listed specimens for commercial purposes

Relevant extracts from Australia's international wildlife trade law, Part 13A of the Environment Protection and Biodiversity Conservation Act 1999

An exporter must demonstrate they are either directly responsible for the harvest of a product from an approved program, or they have legally acquired a set of stock from an approved program, before the CITES Management Authority can authorise the export of the specimens.

Re-exports must demonstrate that they entered the country legally and were legally sourced.

303CC Exports of CITES specimens

(1) A person commits an offence if:
  (a) the person exports a specimen; and
  (b) the specimen is a CITES specimen.

  Penalty: Imprisonment for 10 years or 1,000 penalty units, or both.

  Authorised export—permit

(2) Subsection (1) does not apply if the specimen is exported in accordance with a permit that was issued under section 303CG, 303GB or 303GC and is in force.

…

303CG Minister may issue permits

(3) The Minister must not issue a permit unless the Minister is satisfied that:
  (a) the action or actions specified in the permit will not be detrimental to, or contribute to trade which is detrimental to:
    (i) the survival of any taxon to which the specimen belongs; or
    (ii) the recovery in nature of any taxon to which the specimen belongs; or
    (iii) any relevant ecosystem (for example, detriment to habitat or biodiversity); and
  (b) the specimen was not obtained in contravention of, and the action or actions specified in the permit would not involve the contravention of, any law of the Commonwealth, of a State or of a Territory; and

…

  (e) if the permit authorises the export of a CITES specimen:

…

    (ii) the relevant conditions set out in the table in section 303CH have been met; and

…

303CH Specific conditions relating to the export or import of CITES specimens for commercial purposes

(1) The following table sets out the conditions mentioned in paragraphs 303CG(3)(e) and (f):

…

4	CITES II	Export	(a) the specimen is not a live native mammal, a live native amphibian, a live native reptile or a live native bird; and

(b) the proposed export of the specimen would be:

(i) an export from an approved captive breeding program in accordance with section 303FK; or

(ii) an export from an approved artificial propagation program in accordance with section 303FL; or

(iia) an export from an approved cultivation program in accordance with section 303FLA; or

(iii) an export in accordance with an approved wildlife trade operation (section 303FN); or

(iv) an export in accordance with an approved wildlife trade management plan (section 303FO).

…

Imports of CITES Appendix II-listed specimens for commercial purposes

Relevant extracts from Australia's international wildlife trade law, Part 13A of the Environment Protection and Biodiversity Conservation Act 1999

An importer must demonstrate the specimen has a relevant CITES export or re-export permit from the country of last (re)export, before the CITES Management Authority can authorise the export of the specimens.

303CD Imports of CITES specimens

(1) A person commits an offence if:

(a) the person imports a specimen; and

(b) the specimen is a CITES specimen.

Penalty: Imprisonment for 10 years or 1,000 penalty units, or both.

Authorised import—permit

(2) Subsection (1) does not apply if the specimen is imported in accordance with a permit that was issued under section 303CG, 303GB or 303GC and is in force.

…

303CG Minister may issue permits

(3) The Minister must not issue a permit unless the Minister is satisfied that:

(a) the action or actions specified in the permit will not be detrimental to, or contribute to trade which is detrimental to:

(i) the survival of any taxon to which the specimen belongs; or

(ii) the recovery in nature of any taxon to which the specimen belongs; or

(iii) any relevant ecosystem (for example, detriment to habitat or biodiversity); and

(b) the specimen was not obtained in contravention of, and the action or actions specified in the permit would not involve the contravention of, any law of the Commonwealth, of a State or of a Territory; and

…

(f) if the permit authorises the import of a CITES specimen:

…

(ii) the relevant conditions set out in the table in section 303CH have been met; and

…

303CH Specific conditions relating to the export or import of CITES specimens for commercial purposes

(1) The following table sets out the conditions mentioned in paragraphs 303CG(3)(e) and (f):

…

3	CITES II	Import	(a) for any specimen—the country from which the specimen is proposed to be imported has a relevant CITES authority and permission to export the specimen from that country has been given by a relevant CITES authority of that country; and

Scientific Exchange – non-commercial loan, donation or exchange between registered scientific institutions

Australia operates a scientific exchange system consistent with the exemption provided by Article VII, paragraph 6, of the Convention.

This exemption for certain scientific specimens is designed to facilitate scientific research of species, including in their taxonomy, conservation and management.

Registered scientific institutions may exchange certain specimens of CITES-listed species (except for certain exempt specimens), provided they are part of an exchange of non-commercial scientific specimens. Such scientific transfers do not require a formal export or import permit, but under this exemption must carry a label detailing specific information regarding the specimen(s).

Both the Australian and overseas scientific institutions must be registered with the CITES Management Authority in their country if they wish to exchange specimens derived from species listed under CITES.

The loan, donation or exchange of specimens must be done without monetary compensation, and the specimens must have been legally obtained.

Specimens that are covered under the Scientific Exchange program:

- herbarium specimens (e.g. dried or pressed plants and flowers)
- preserved, dried or embedded specimens (e.g. microscope slides or specimens preserved in alcohol, taxidermy specimens, or tanned skins)
- frozen specimens (e.g. frozen tissue samples)
- live plant material (e.g. whole plants or specimens collected in the field)
- animal DNA derived from preserved, dried or embedded museum specimens or plant DNA derived from live plants, herbarium specimens or preserved, dried or embedded museum specimens
- Specimens that are not covered:
- live animals
- any specimens that ARE NOT first accessioned into the collection of a registered institution (e.g.: fresh blood, sera or semen samples, or specimens collected by field researchers)

Registration for exchange

To be registered for exchange, Australian institutions must demonstrate that they meet the following standards:

- its collections of animal or plant specimens, and records of them, are permanently housed and professionally curated;
- its specimens are accessible to all qualified users, including those from other institutions;
- its accessions are properly recorded in a permanent catalogue;
- it keeps permanent records for loans and transfers of specimens to other institutions;
- it acquires specimens primarily for research that is to be reported in scientific publications;
- its specimens are prepared and collections are arranged in a way that ensures their utility;
- it keeps accurate data on specimen labels, permanent catalogues and other records;
- it acquires and keeps specimens securely and in accordance with the laws of the jurisdiction in which it operates;

- its specimens of species mentioned in Appendix I to CITES are permanently and centrally housed under its direct control, and managed in a way that prevents the use of the specimens for decoration, trophies or other purposes incompatible with the principles of CITES.

Institutions registered Australia for exchange are provided to CITES for lodgement at https://cites.org/eng/common/reg/e_si.html. Overseas institutions seeking exchange with Australian institutions must first be registered with their country's CITES Management Authority and lodged at https://cites.org/eng/common/reg/e_si.html.

Implementation of exchange

Registered Australian institutions are issued with official scientific exchange labels specific to that institution. When exporting from Australia, specimens must be packaged with the official exchange label that includes the:

- scientific and common name of the specimen
- quantity and a short description of the specimen
- Australian institution's name and registration code number
- receiving institution's name and registration code number
- date on which the package was sealed
- name and signature of the person authorised to exchange specimens, and the designation or title of that person
- Appendix to CITES in which the species is listed.

For import into Australia, CITES specimens must be accompanied by documentation issued or endorsed by the exporting country's CITES Management Authority complying with the CITES provisions for exchange of scientific specimens (Article VII.6 and Resolution Conf 11.15).

Registered institutions must maintain records for all loans, donations and exchanges of specimens. This is a requirement for continued registration and this information may be requested by the Australian CITES Management Authority for audit and reporting purposes. Reviews of the register of scientific institutions aims to ensure that the information is up-to-date and that all institutions continue to meet the requirements of registration. Institutions that no longer meet the requirements or that may have been exchanging specimens contrary to the requirements outlined above will be removed from the Register.

CANADA

This document provides the answers from Canada to the questions set out in **Notification No. 2017/071 – Simplified procedure for permits and certificates.**

> " 3. For the Secretariat to assist the Standing Committee in providing recommendations for consideration at the 18th meeting of the Conference of the Parties, Parties and other stakeholders are invited to submit information to the Secretariat in one of the working languages on:
> **a)- implementation of Section XII of Resolution Conf. 12.3 (Rev. CoP17) in national legislation, if any; and**
> **b) experiences with the use of simplified procedures to issue permits and certificates to facilitate and expedite trade with no or negligible impact on the conservation of species concerned."**

Canada has implemented simplified permitting processes in a few specific scenarios which have met our criteria for being of negligible impact to the conservation of species as well as facilitating low-risk trade. There was no special language or provisions which were needed in our legislation in order to implement the simplified processes. The language in our legislation was flexible enough (i.e. not prescriptive) to allow simplified processes to be encompassed under the language for standard permitting.

The simplified processes (mainly referred to as multi-shipment permitting in Canada) are used based on an initial verification of the legal origin and source of the material which will be exported over a 6-month period under a CITES export authorization. This simplified method is only used when permittees have shown over time that they fully understand the CITES requirements and processes. This "privilege" can be revoked if the Canadian Management Authority deems that the permit holder has contravened the procedures outlined for the use of this type of permit. Multi-shipment permits will be partially filled out by the CITES permit office – permittee information, species and description of specimen. The permit holder will fill out the consignee information and the quantities being shipped.

The cases where these permits are issued in Canada include:

a. Commercial export of American ginseng root (*Panax quinquefolius*) sourced from registered ginseng producers. There are large farms where ginseng is cultivated in Canada, producing tons of ginseng for export each year. Permits are issued to allow multiple shipments of ginseng from these farmers or distributors that source their ginseng from the registered farms.
b. Export of live artificially propagated plants grown in nurseries/greenhouses from verified parental stock.
c. Biomedical samples taken from colonies of macaques which are kept in university or private research laboratories. The origin of the macaques in the colonies is verified before granting of the permits to ship samples from those macaques. The multi-shipment permits are also useful for these laboratories in case of emergency situations (e.g. monkey bites), since samples from the monkey must be tested in qualified laboratories in the shortest delay possible for diseases which could infect the injured human.
d. Export of leather products (e.g. boots, watchstraps) made from skins (alligator, python, arapaima, etc) which were imported into Canada. Small to medium sized manufacturers of leather products import volumes of skins with which they make

products for export. The origin of the skins and the quantities are verified before allowing the multiple shipment permits to be used.

e. Export of wood products (e.g. guitars, woodworking tools) made from wood (rosewood, bubinga) imported into Canada. Medium to large sized manufactures of wood products import volumes of wood, or have declared their stocks of pre-convention wood, which they use to make their products for export. The origin and quantities are verified before allowing the issuance of multi-shipment permits.

f. Pilot project is underway to determine whether the simplified multi-shipment procedure can work with Canadian captive breeders. One reptile breeder has been allowed so far to test out the use of this process. His parental stock and breeding history has been recorded and tracked. To date, this process seems to be working, so this process may be expanded to other approved captive breeders. There are only a small number of reptile breeders in Canada for which this procedure might apply.

2. Ginseng stickers

American ginseng is a protected species in Canada, which means that personal quantities of ginseng cannot be exported under permitting exemptions (e.g. as a tourist souvenir). It is however a very popular product in Canada and many tourists wish to return home with small packages of ginseng. It would be impossible for the permitting office to issue the required number of permits for the tourists (approximately 20 000 per year), therefore a "sticker" has been developed to "permit" packages of ginseng. The sticker is a mini-permit. Retailers of ginseng products contact the permitting office to obtain the stickers. The same verification is done as for the commercial ginseng exporters (legal origin and sourced from registered farmers). The retailer is granted a master permit to which is associated a series of stickers (the stickers have the master permit number printed on them as well as the expiration date of the master permit). The retailer will indicate on a register as well as on the sticker the quantity and destination country, affix the sticker the package and send a copy of the register to the permit office for record-keeping.

3. Variants

   a. Custom build permits

      i. This is a variation of the multi-shipment permits. In this case, the exporter meets most of the requirements for multi-shipment permitting, but does not have the level of experience required or the export volume to justify the standard use of multi-shipment permits. In this case, the multi-shipment information is stored in the electronic permitting system as per usual. No permits are granted initially. The permit holder informs the permit office when they are ready to ship, providing the destination contact information and the quantities for shipment. The permit office generates the completed permit. The time required for permit issuance is much shorter than for a standard single-use permit, since all the verifications have been done in advance.

   b. Standby permits

      i. This is a variation on the single-use permits. In this case, the exporter has an item that they want to sell and likely will be exported (e.g. a guitar). Since they do not know the consignee, it is not possible to issue a permit. However, the permit office can receive the request for a permit, validate all the information and put the permit on hold in the system until the exporter has identified the buyer in another country and can provide the consignee contact information. This is a way of pre-loading the permit and performing

validation in advance, to optimize the issuance at the end when there are often time constraints for shipping the items (e.g. for online sites for selling guitars, the seller must ship within 1 week. It is not possible for the permit office to perform the required verifications and issue standard permits within such a short timeframe).

Canada also has an expedited permitting process for the granting of permits to law enforcement officials for forensic or enforcement purposes. The permits are issued within days of receipt of the application.

EUROPEAN UNION

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EUROPEAN COMMISSION
DIRECTORATE-GENERAL
ENVIRONMENT
Directorate F - Global Sustainable Development
ENV.F.3 - Multilateral Environmental Cooperation

Brussels

02 FEV. 2018

Ares(2018) CITES

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

Subject: Reply to CITES Notification 2017/071:
simplified procedure for permits and certificates

In response to CITES Notification 2017/071 of 22 November 2017, Parties were invited to provide the Secretariat with information on the implementation of Section XII of Resolution Conf. 12.3 and to share their experiences with the use of simplified procedures.

We are pleased to provide hereafter the CITES Secretariat with information received from some Member States

Croatia

The provision has been implemented in Croatian national legislation (Article 13 of the Act on Transboundary Movement and Trade in Wild Species (OG, 94/2013) since July 2013. So far the CITES MA did not have to issue any document as no application has been submitted so far for registration.

Estonia

Estonia does not use the simplified procedure to issue permits and certificates and has not implemented Section XII of Resolution Conf. 12.3 (Rev. CoP17) in their national legislation.

France

France implements the CITES provisions on simplified procedures through Art. 18 (s*implified procedures with regard to certain trade in biological samples*) and Art. 19 *{Simplified procedures with regard to export or re-export of dead specimens*) of Commission Regulation (EC) No 865/2006 of 4 May 2006 *laying down detailed rules concerning the implementation of Council Regulation (EC) No 338/97 on the protection of species of wild fauna and flora by regulating trade therein.*

In 2007, the French e-permitting system was amended in such a way that it fully sticks to these new provisions. Taking into account both the needs expressed by the private sector and the

scientific advices, the CITES National Management Authority regularly enters in its e-permitting system species / source code combinations that are eligible for the use of simplified procedures.

The use of the simplified procedure is strictly supervised by the French Management Authority. The companies which wish to benefit from these procedures must:

1. show that their trade would benefit from simplified procedures and prove sufficient knowledge of the UE CITES rules;
2. commit to completing in the e-permitting system the electronic file of their permit certificate issued under simplified procedure identically to the hard copy, as soon as they complete this document ;
3. contract with their local Management Authority (logistical requirements, training of their staff, etc.)

Failing to comply with these rules leads to the withdrawal of their simplified procedure access.

The CITES e-permitting system makes possible to easily conduct checks and extract data. In addition, endorsement through the Customs system is restricted to permits / certificates whose electronic files have been duly completed only.

Simplified procedures have always proven extremely satisfactory, both for applicants and for French Management Authorities. On the 4th of January 2018, 2 laboratories are licensed for *Simplified procedure with regard to certain trade in biological samples* and about 100 companies for *Simplified procedure with regard to export or re-export of dead specimens* (some of those companies have several retail points, which all have their own contracts, thus more than 150 contracts have been signed). *Simplified procedures with regard to re-export of dead specimens* are especially appreciated by leather products industries. Some pharmaceutical and cosmetic companies, as well as musical instrument makers are also benefiting from these simplified procedure (in 2017, following the listing of *Dalbergia* spp, simplified procedures were extended to rosewood products companies).

In 2016, 16.423 re-export certificates and 152 export permits were issued through simplified procedures (respectively 11.171 and 204 in 2015). Almost all of them concerned dead specimens (specimen codes LPS, LPS, MED, CAR, etc).

Germany

Section XII of Resolution Conf. 12.3 (Rev. CoP17) has been implemented by EU regulations, i.e. Article 18 and 19 Commission Regulation (EC) No 865/2006.

With regard to certain trade in biological samples simplified procedures (Art. 18 ComR 865/2006) have not been used in Germany.

In 2017, there were three sections with all together three registered applicants/firms/companies where 'simplified procedures' [Section XII of Resolution Conf. 12.3 (rev. CoP17)] under Article 19 Commission Regulation (EC) No 865/2006 were applied.

2. Cosmétique products or extracts for cosmetics known as 'caviar crème' containing very small portions of captive bred specimens of the species *Acipenser baerii*, *Acipenser gneldenstaedtii and Acipenser transmontanus.*
3. Snake venom for medical products using the species *Daboia russelii* (App. Ill CITES; Annex C of Council Regulation EC No 337/97) from captive bred specimens, imported mainly from USA and less from Sweden.
4. Medical products (MED) using wild specimens of the plant species *Cyclamen purpur as cens* (medicine), originated in France. Taking from the wild has been allowed by the

competent regional authority in France. The products do contain only a very small share (homeopathy) of the protected plant species.

In 2017, all together 3331 re- export certificates have been issued in Germany using that simplified procedure. That was made transparent in 'Annual reports' using 'REMARKS' with the text "blade form-blankett".

In general, 'simplified procedures' are less burdensome for personal resources in CITES MAs when there is a certain amount of applications and when the applicant is able to complete boxes in documents without any mistakes. You should be aware that Germany is reporting on actual trade and it is controlled whether permits were used or not.

Until 2013 pre-issued documents were used as simplified procedures for re-exports of hair brushes made of *Mustela sibirica* (App. Ill CITES).

Greece

The procedure has not been used until now in Greece.

Ireland

Ireland deals with each request on a case by case basis and issue the necessary import and export permits where required. Section XII of Resolution Conf 12.3 (Rev CoP 17) has not been included in any national legislation pertaining to CITES

Slovakia

Section XII of Resolution Conf 12.3 (Rev. CoP 17) has been implemented in Article 18 and Annex XI of the Commission Regulation (EC) No 865/2006. SK does not have any other special provisions in their national legislation.

Regarding their experience, SK did not issue any permit or certificate for biological samples under simplified procedure. Until now SK received only one application for export of biological samples in 2015 for which they issued a normal export permit under the normal procedure as there was no necessity to issue the permit urgently. The exporter did not plan to export next samples and eventually the export was not realised due to complications in relation with the transport.

SK issued normal export permit in normal procedure as there was not necessary to issue the permit urgently.

Spain

The kind of simplified procedure for issuance of permits and certificates most used in Spain is the issuance of pre-issued re-export certificates for small leather items and wooden musical instruments made with CITES Appendix II species and Annex B species, that are sold by bona-fide shops to tourists. The re-export permits are issued with all the details except the country of destination and the data of the consignee, which are filled in by the shop at the time of the sell. A few of these re-export certificates are submitted to the exporting Customs Office to clear the shipment and complete box 27; it seems that most of these transactions are not declared to the exporting Customs office, but we have no information about the presentation of the re-export certificate to the country of destination Authorities.

These kind of pre-issued certificates is highly appreciated by the traders and allows to obtain the relevant CITES paperwork without delay, although perhaps the submission to the Customs Office is an aspect that should be improved in each State.

Other kind of export permits / certificates to which Res Conf 12.3 section XII refers, are not usually granted.

United Kingdom

In general, APEIA's (Animal & Plant Health Agency) experience of simplified procedures is that it is complicated for the customer to do; they have difficulty with understanding the requirements and it results in miss-use of the system. Customers have to be able to print the missing information on the partly completed permits either by installing the appropriate software or by using a typewriter.

APHA found that many customers misused these simplified permits by handing them out to customers in stores (high end fashion houses) for them to take with their leather goods (this is not appropriate as the permits were in the name of the fashion house and not the customer). These permits were never declared and if leather goods were no longer required the goods were often returned to the country without the relevant permits. This would then cause problems for the fashion house as they could no longer trade with an illegally imported specimen. The other issue was that if the permit they had filled in got lost (which happens frequently), it could not be replaced by the UKMA and the customer had no way of replacing the same permit.

Due to the issues stated above that were causing customers to be non-compliant, APHA reduced the number of our customers using this facility from 30 to below 10.

In regards to the second part of the notification about mechanisms to facilitate the efficient international movement of samples for forensic or enforcement purposes, APHA reported that they rarely get these types of requests. However, if this was required by our enforcement authorities, APELA stated that they would simply put this application as a priority in order that the case was not held up. As such, APHA does not feel that it is necessary to develop a procedure for this.

Yours sincerely,

Emmanuelle Maire
Head of Unit

Annex: listings for 2015 and 2016 for France (only electronically)
Cc.: CITES Management Authorities

SWITZERLAND

The Management Authority of Switzerland currently does not use simplified procedures to issue CITES certificates as recommended in Resolution Res. Conf. 12.3, Section XII as none of the cases listed under this item pose a problem for the issuance of CITES certificates.

In Switzerland, the time to issue CITES certificates is between 5 hours and 2 days for routine applications. The electronic permitting system, through which over 98% of the 115’000 applications are treated, allows for a very rapid permitting process, without having to go through the simplified procedures outlined in the Resolution Res. Conf. 12.3. The remainder of applications can be treated within a maximum of five days, and for emergency cases a rapid deliverance is secured.

THAILAND

Simplified procedure for permits and certificates of CITES Management Authority of Thailand

CITES M.A. of Thailand has implemented and experienced with the simplified procedures to issue permits and certificates to facilitate and expedite trade that will have a negligible impact, or none, on the conservation of the species concerned as follows:

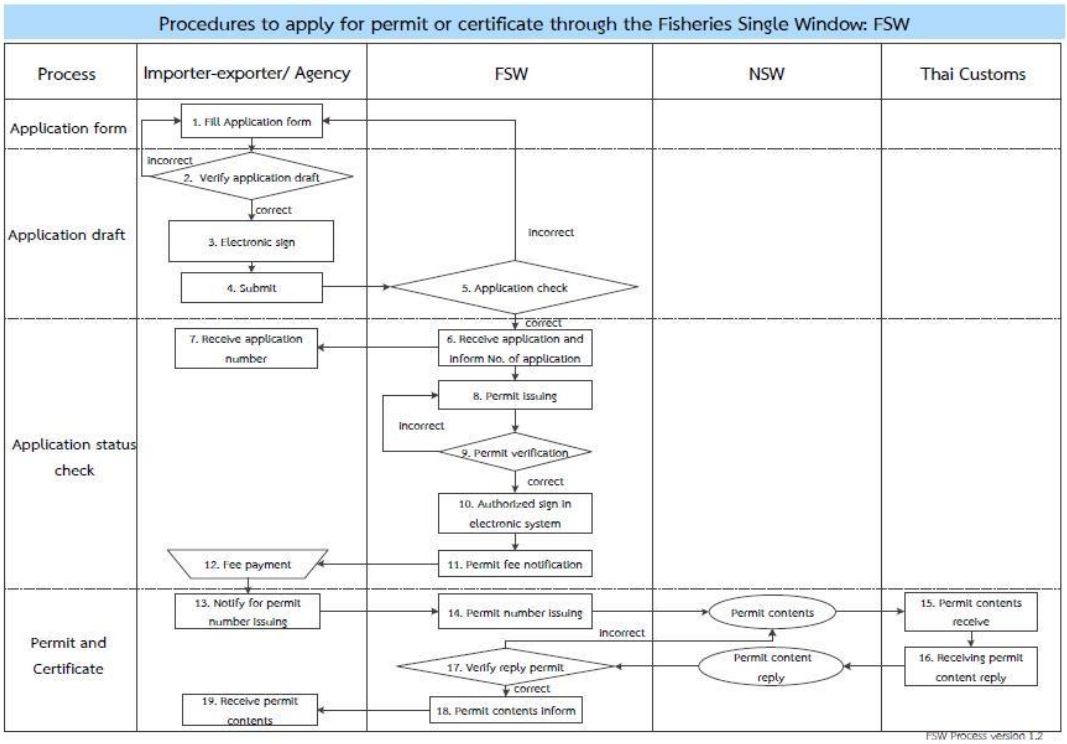
1. Implementation of section XII of Resolution Conf. 12.3 (Rev. CoP17) in national legislation

- Department of National Parks, Wildlife and Plants Conservation and Department of Fisheries issued Regulations and Notifications to allow applicants to submit application form for permit or certificates online through the National Single Window including the Notification of Department of National Parks, Wildlife and Plants Conservation dated 30 September 2015 and the Notification of Department of FisheriEs dated 16 January 2012.

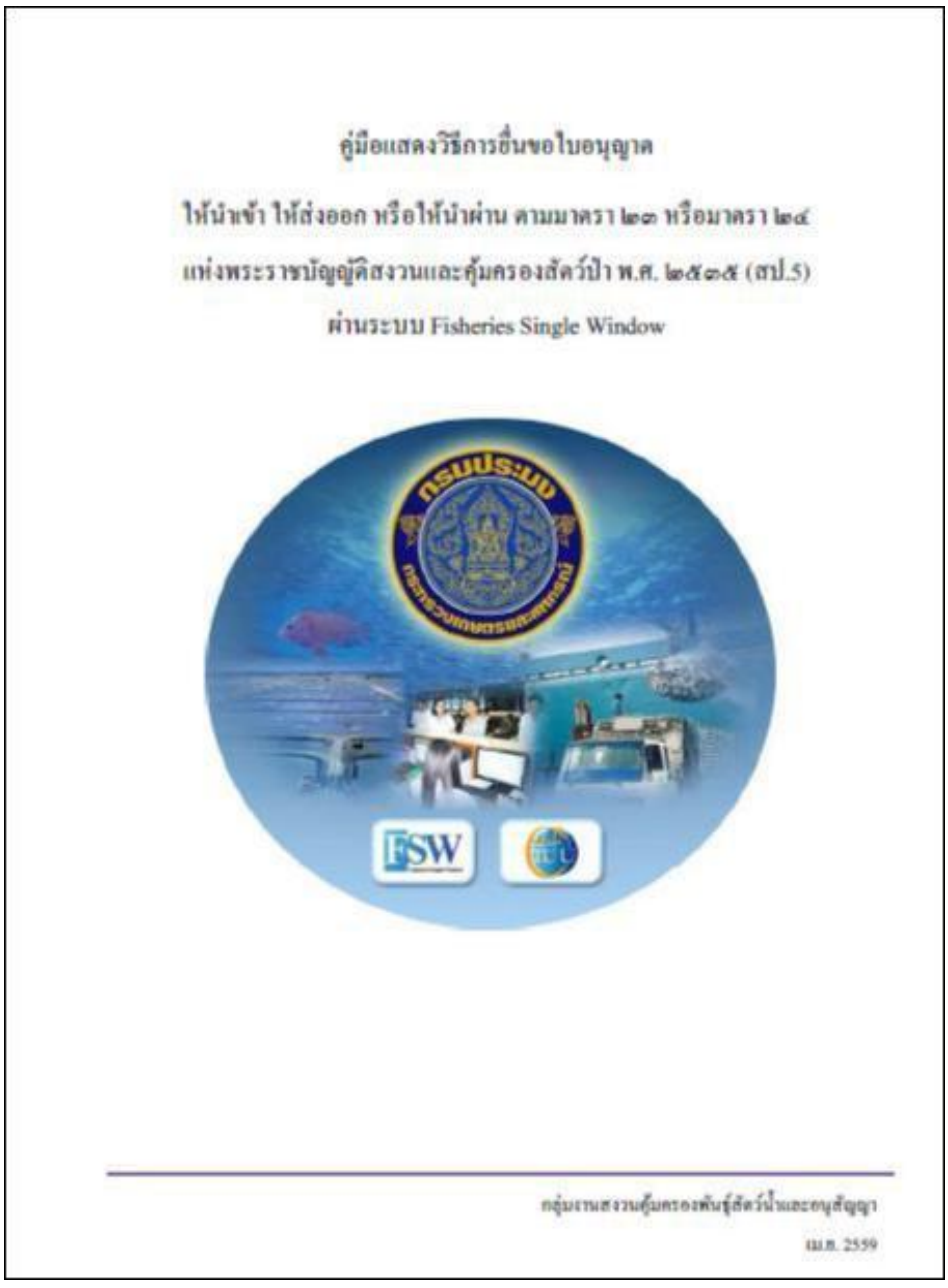
2. Experiences with the use of simplified procedures to issue permits and certificates to facilitate and expedite trade with no or negligible impact on the conservation of species concerned

Thailand has procedures to receive application form for permits or certificates through the National Single Window (NSW) and applies E-Payment to pay permits or certificates fee.

The following chart is an example of Procedures of NSW of Fisheries Single Window (FSW).



3. To accommodate applicants, CITES M.A. of Thailand published the NSW guideline that under the Licensing Facilitation ACT B.E. 2558 (2015).



คู่มือแสดงวิธีการยื่นขอใบอนุญาต

ให้นำเข้า ให้ส่งออก หรือให้นำผ่าน ตามมาตรา ๒๓ หรือมาตรา ๒๔

แห่งพระราชบัญญัติสงวนและคุ้มครองสัตว์ป่า พ.ศ. ๒๕๓๕ (สป.5)

ผ่านระบบ Fisheries Single Window

กลุ่มงานสงวนคุ้มครองพันธุ์สัตว์น้ำและอนุสัญญา

เม.ย. 2559

USA

U.S. response to Notification to the Parties No. 2017/071, dated 22 November 2017, concerning Simplified procedures for permits and certificates

The United States has implemented Section XII of Resolution Conf. 12.3 (Rev. CoP17) through its CITES regulations at 50 CFR 23.51 (attached). In accordance with paragraph 20. b) of Resolution Conf. 12.3 (Rev. CoP17), to facilitate the issuance of CITES documents for trade that will have a negligible impact or no impact on the conservation of the species concerned, the U.S. Management Authority has developed a procedure for creating "master files." Master files are developed primarily for commercial applicants that have large inventories, have the need for multiple shipments over a short period of time, whose recipients and quantities to be exported or re-exported do not remain the same from shipment to shipment, and where the species concerned are not of high conservation concern. When establishing a master file, the U.S. Management Authority, in consultation with the U.S. Scientific Authority when applicable, evaluates the application, including information on the applicant's entire inventory (or the projected inventory for the near future, e.g., for artificially propagated plants) to be exported under the authorization established by the master file, to ensure that the proposed trade meets CITES provisions and the criteria in our regulations at 50 CFR 23.51. Once the evaluation is completed and the master file is established, the U.S. Management Authority will issue partially completed CITES documents. Typically, the blocks for the consignee, quantity, and if for re-export authorization, the country of last export, are left blank on partially completed documents, with specific instructions on the face of the document for the permittee to include the missing information.

Partially completed CITES documents, valid for 6 months, can either be issued at the time the master file is established or requested by the permittee at any time during the period of validity of the master file (up to 3 years) using a separate application form. Because the master file contains all of the necessary information, partially completed CITES documents, which are identical to each other except for the unique permit number, can be issued quickly. Master files may have reporting requirements to ensure that activities carried out with the partially completed CITES documents are consistent with the U.S. Management Authority's initial assessment of the information submitted by the permittee when establishing the master file.

By creating these master files, we have found that we are able to facilitate and expedite trade that will have a negligible impact or no impact on the conservation of the species concerned. This provides a benefit both to those engaged in such trade, as it reduces the time it takes for them to receive CITES documents, and to the Management Authority, as it reduces the need to review a large volume of duplicative information that would be received if separate applications were submitted for each individual export or re-export.

For example, the U.S. Management Authority has established master files for the biomedical industry, primarily for specimens of macaque species. These species are commonly bred in captivity in the United States or were previously imported. The U.S. Scientific Authority has issued a non-detriment finding for the export of biological samples collected from captive-bred exotic wildlife that meet certain conditions. This further expedites the permitting process for these species. By creating master files for these companies, we reduce delays in the shipment of samples used in vaccines, disease testing, or other biomedical research projects that are a matter of public safety.

We have also created master files for permittees in the musical instrument industry following the listing of Dalbergia spp. in Appendix II at CoP17. For manufacturers, luthiers, and vintage guitar sellers, we evaluated their inventories and established master files, allowing them to continue to conduct business internationally in instruments or wood that qualified as pre-Convention. When the Dalbergia spp. listing entered into effect, our master file system allowed us to more quickly adapt to the new listing and work with the relevant stakeholders to make the permitting process as smooth as possible.

With regard to the issues raised in paragraph 2 of the Notification, the United States has not encountered any particular problems related to movement of samples for forensic or enforcement purposes or with the transport of biological samples from CITES-listed marine species, including when this transport involves introduction from the sea.

Tunisia

Hello Sofie

First of all I hope that my message finds you in very good health.

I am Tahri Jamel of the CITES Management Authority of Tunisia,

If you allow me to clarify further Notification No. 2017/071 on Simplified Licensing and Certificate Procedures and the requested report of the Parties;

For example, Tunisia has not issued permits and certificates for biological samples of marine species covered by CITES provisions on introduction from the sea.

My best regards.

Tahri Jamel

CITES Management Authority of TUNISIA

The Minister of Agriculture

General Directorate of Forests, Tunisia

ORGANISATIONS

Florida Museum of National History

30th January 2018

To the CITES Secretariat and Standing Committee,

Thank you for providing us with the opportunity to comment, via Decision 17.173, on our experiences with the process of using 'simplified and expedited applications' for international tissue samples that have a negligible or no detrimental impact on the status of the CITES-listed marine species we work with.

We are a group of scientists, conducting collaborative research on chondrichthyan fishes. Our research has involved the international transfer of tissue samples from CITES-listed species for research purposes. As such, we qualify for the simplified and expedited processes that CITES signatory countries have been requested to make available for such work. As stated in documents CoP17 Doc. 36, Doc. 56.2 and Doc. 70, concerns have previously been expressed regarding the collection and transport of biological samples from CITES-listed marine species.

We regret to confirm that CITES regulations have proven to be a significant impediment to our research work. This has particularly been the case with exporting tissue samples from sawfishes, listed on CITES Appendix I, from countries including Mexico to the US, Madagascar and Mozambique to the UK, and re-exporting from the UK to the US.

Sawfishes are listed as Critically Endangered (3 species) and Endangered (2 species) on the IUCN Red List. Our research aimed to directly contribute to the conservation of sawfish populations globally by providing critical information on the population structure of sawfish species, to better understand the linkages between populations in different geographical regions. The work we aimed to conduct involved opportunistic collection of dried cartilage, from the rostra ('saws') of sawfishes already captured by local fishers, or exchange of archival specimens that were collected prior to protection from now extirpated populations.

Coordinating permissions to export specimens from their country of origin requires that local permits mesh with export permits, with CITES restrictions and also with import restrictions/permits from the destination countries and institutions. Often the permit process is costly and some permits may expire before all of the various components can be organized and coordinated. This process has proven so challenging that for many of us, it is no longer worth the effort to pursue the research work. Even in cases where our research is based solely on archival specimens and has no impact on extant populations of the species. This means that we are neither effectively using collection material that already exists, nor are able to collect additional information that is necessary to protect the species that CITES has identified as in need of protection.

In one specific instance samples collected from remote locations in Madagascar and Mozambique were confiscated despite our best efforts to navigate the various regulations of export and import countries, as well as attempts to provide unknowingly missing documentation upon import. We were

threatened with legal action and many important samples were ultimately destroyed. When we followed up with the officer to find out how to proceed in the future, he was unable to answer, except to re-state that the paperwork we had submitted did not meet the required criteria for the port of entry under his jurisdiction. In light of our experiences it has become apparent that government employees are often unfamiliar with regulations surrounding import/export of scientific specimens of CITES protected species. We were often given conflicting information from government officials at various agencies and have found it difficult to find accurate information pertaining to the exchange of scientific specimens online, particularly when samples are being exchanged between multiple countries.

We appreciate the efforts of CITES to facilitate the transfer of specimens between registered scientific institutions and recognise the importance of overseeing this process. However, many countries where CITES-listed species are most threatened, primarily in the developing world, do not have a CITES-listed scientific institution to facilitate sample transfers, or are not well-versed in the process of issuing permits. Meanwhile, observations and interview surveys in Madagascar, Mozambique and Papua New Guinea by Ruth Leeney (and in other countries too) have shown that the export of fins from sawfishes continues unabated, due to a lack of capacity in these countries to monitor international trade of CITES-listed species. Given that CITES is designed to help improve the conservation status of these species, and that the current permitting process act as a hindrance to conservation based research, we recommend revision to allow for greater flexibility in time schedules, and a simplification of the process across countries. Developing a system that allows for more streamlined transfer of scientific material without institutional intermediaries would greatly aid conservation research activities. Finally, providing readily available, accurate, internationally relevant procedural documentation regarding the import/export of scientific specimens of CITES protected species, as well as training opportunities for the scientists, government officials and agencies that interact during this process would be helpful.

We are grateful that this issue is being considered, and that the COP has requested our inputs on these important matters. We hope that the countries listed above will continue to streamline and enhance their CITES permitting processes. Please do not hesitate to contact us if you require additional input.

Yours sincerely,

The undersigned:

Ruth H. Leeney, Protect Africa's Sawfishes

Gavin Naylor, Florida Museum of Natural History, University of Florida Jeanette Huber, College of Charleston

Shannon Corrigan, Florida Museum of Natural History, University of Florida James Maclaine, The Natural History Museum, London

ICCAT – Sharks WG

CITES shark listings- difficulties for biological sampling

Dear CITES secretariat

ICCAT would like to thank CITES for engaging other parties in this initiative. It has been an issue of concern for several of our Contracting Parties for several years. To this end, in 2017 the ICCAT Shark Species Working Group made a recommendation to the ICCAT standing Committee on Research and Statistics (SCRS) requesting for the ICCAT Secretariat to make an official request to CITES to facilitate the sampling of CITES listed species for the purposes of scientific research conducted under the auspices of ICCAT research programmes. As such the notification inviting Parties and stakeholders to submit their experiences: https://cites.org/sites/default/files/notif/E-Notif-2017-071.pdf, is welcomed and we would like to share the observations of the ICCAT Shark Species Working Group as requested.

1) The main issue that Contracting Parties have been having with sharks (and other marine) listed species, in particular the highly migratory species, are related to the concept of "introductions from the sea". A specific example, relates to countries with highs seas fleets that have scientific observer programs on their commercial fishing vessels. These programmes routinely collect data and biological samples on the high seas (international waters, outside the EEZs) in areas of competency of the Regional Fisheries Management Organizations (RFMOs, like for example ICCAT or IOTC). Those observers and vessels, in some cases land (or transship in port) the catch along with the scientific samples, in 3rd country ports. These are then transported by container ships to the flag vessel country. This is a violation of the current Introduction from the Sea regulations. In addition, in the RFMOs there are often joint international research programmes and initiatives and therefore the samples might have to be transferred from the country that collected and holds the samples to a further country that will conduct the specific analysis.

   In other words, what occurs is that a vessel from country A that is operating in international waters (with a scientific observer), lands (or transships) the catch in a port of Country B, and then finally the catch (with the samples) go by container ships back to country A. This would represent an "introduction from the sea" between international waters (vessel from country A) into country B, and then a transport between country B back to A (but not between scientific institutes, as the catch goes from commercial port to commercial port and not between institutes). Then, as often the sample processing and analysis is done by another institute (we often share samples internationally), the samples would have to go from country A (sample holder) to country C (that would carry out the analysis).

2) As can be noted from the example above, this is an extremely complex issue, that involves both introductions from the sea as well as multiple transports between several countries (some that might not even have any CITES accredited laboratories). This is so complex, that the scientists simply do not have the time or any type of legal knowledge or precedent on how to do this in a simple and effective manner. So for example, a country like Portugal, when those shark species were listed in CITES they simply stopped all the sample collection on the high seas, which is

actually hindering the science and limiting the advice that can be provided for the management and conservation on those species. This would appear contradictory to the purpose of the regulation for protection of the species in the first place.

3) It should be clearly noted that there are multiple RFMOs Recommendations requesting more biological studies on species of concern, and those often include biological sampling. For example, ICCAT Rec [13-10] specifically provides allowance for the biological sampling of prohibited shark species provided certain key criteria are met. This recommendation was made recognizing the fact that there is an important lack of biological knowledge for many of these species and thus the ICCAT SCRS strongly recommends that such samples be collected. In addition, Rec [16-14] regarding minimum standards for fishing vessel scientific observer programmes, encourages the collection of biological samples from captured species, particularly if they are dead on haul-back.

In conclusion we would like to suggest a possible way forward that may be acceptable to all parties. This would entail CITES permits to be issued directly to the RFMOs (instead of countries or laboratories) allowing both introductions from the sea and the international transport of samples for projects officially ratified or approved by those RFMOs. For example, in ICCAT there is an ongoing Shark Research Project, approved by and indeed funded by the ICCAT Commission (the SRDCP – Shark Research and Data Collection Program). Several Contracting Parties have been collaborating in this project for several years. In this scenario we propose that a permit would be issued to ICCAT, that would then cover and be distributed to the Contracting Party Institutes that are participating in that Project. Of course we understand that there may be some issues that will need to be resolved to facilitate this suggestion, as are we aware that there may be other potential solutions to which we are more than open should they prove relatively easy to implement for all parties and facilitate the continuation of scientific research.

ICCAT looks forward to continuing to collaborate and provide input with CITES to resolve this problem and again are grateful that we have had the opportunity to comment on this important issue.

IOTC

This email is just a quick note to say we endorse ICCAT's response, and note:

- IOTC Resolutions 12/09 and 13/06 specifically provide allowance for the biological sampling of prohibited shark species provided certain key criteria are met.
- IOTC has a sharks stock structure project, funded by the European Commission. We agree that a permit issued to RFMO's that could be distributed to the Contracting Party Institutes that are participating in that Project would be a good way to go.

IUCN SSC WHSG

30 January 2018

Re: Notification to Parties No. 2017/071 on "Simplified procedure for permits and certificates"

Thank you for the opportunity to provide input on behalf of the IUCN Species Survival Commission Wildlife Health Specialist Group (WHSG), a volunteer network of wildlife health experts working around the world to promote the health and survival of threatened species.

While we recognize the importance of routine diagnosis of biological specimens for wildlife health monitoring, it is particularly important to ensure rapid movement of *emergency diagnostic specimens* when complete diagnostic capacities are not available in-country. While there are protocols in place to support rapid international support for diagnosis of disease in humans and livestock, there is no parallel mechanism for wildlife. We recognize the important intent of Res. Conf. 12.3, decision XII (Rev. COP17) to simplify permitting for diagnostic purposes, but our experience indicates that the current process still impedes effective disease investigation in practice.

We are encouraged to see the strong interest and support from collaborating agencies to CITES to assist in wildlife disease investigations, including the formal agreement between CITES and the World Organisation for Animal Health (OIE) signed in 2016. OIE provides an excellent model for a reference laboratory system that is recognized by countries as trusted, reliable and highly beneficial for rapid diagnosis and implementation of proper control measures to prevent detrimental animal health and economic impact that can result from the spread of disease.

In line with the One Health guidance released by the Secretariat of the Convention on Biological Diversity, which promotes effective wildlife disease surveillance and control measures, this conservation issue was raised in plenary at the CBD Subsidiary Body on Scientific, Technical and Technological Advice in December 2017, in which IUCN encouraged collaboration among CBD and CITES authorities to support rapid diagnosis of emergency diagnostic specimens of conservation concern.

The following multi-country case study details process challenges in the current permitting export and import process and the real consequences for timely diagnosis and identification of appropriate control measures for mass morbidity and mortality events of a critically-endangered species. **We propose solutions** based on models from OIE, input from our global network of wildlife health experts, and discussions with Parties at the 66th Meeting of the CITES Standing Committee. The IUCN SSC WHSG welcomes further opportunities to assist the CITES Secretariat and Parties as needed, including via the Inter-Sessional Working Group.

Thank you for considering our input and your action on this critical conservation issue.

Submitted via:

Richard Kock and William B. Karesh, Co-Chairs, and Catherine Machalaba, Programme Officer *IUCN Species Survival Commission Wildlife Health Specialist Group* WHSG@ecohealthalliance.or

Submission by IUCN SSC WHSG to CITES secretariat for inclusion in discussion on simplified procedures for wildlife diagnostic specimens transportation to reference laboratories

Saiga antelope (*Saiga tatarica tatarica)* survive in one of the harshest zones on earth using migration and high calving rates to augment unique physical and physiological adaptations acquired over millions of years, and can thrive in their millions. A disease monitoring programme involving: the Ministry of Agriculture, Kazakhstan and Okhotzooprom (Wildlife Management Authority), including local government and international laboratories (Biosafety Institute and Astana Veterinary Reference Laboratory, Kazakhstan; Pirbright Institute, UK and Froedrich Loeffler Institute, Germany) and, conservation NGOs (ACBK, FFI, FZS, PTES, SCA, UNEP CMS, FAO), and the Royal Veterinary College was set up in 2012. This collaborative team has continued to work since, with a field mission each year during calving to monitor mortalities and health of the population. This was in response to increasing die-off reported over recent decades and at a time of recovery from heavy poaching pressure in the 1990s after the collapse of the Soviet Union. The species was designated as Critically Endangered by IUCN in response to this collapse and was being considered for downlisting when populations had reached about 300,000 in Kazakhstan by 2014, when the photograph below by Albert Salemgarayev of ACBK was taken.

This hope of official recognition of recovery from the poaching crisis was dashed, when a massive mortality event occurred in 2015, in the main population in the Altyn Dala, Central Kazakhstan. The monitoring team were, for the first time, able to undertake careful and detailed study of the cause of mass mortality in this species, which has occurred on a number of occasions since the 1970s.

Over a period of 3 weeks, all the aggregated herds of calving saiga and others in a region of about 200,000 square kilometres died including the calves. Single herds of up to 60,000 animals in a matter of a few days as per the photograph above (S. Zuther) and below (S.A.Wolfs). This extraordinary mass mortality is unprecedented in scientific literature in other mammal species. Nature usually allows for a few survivors, even in the most extreme events.

An event such as this requires a lot of iterative study and sampling, with no National laboratory capacity sufficient in one country to cover all the tests and studies needed. Biological material from such an outbreak needs ideally to be moved rapidly within days to reference centres to get the very best information to support rational actions in conservation or disease control (*Science Advances*, AA02314; see publication attached at end of document).

There are two main areas of regulation enabling the transboundary movement of materials from this species, a) animal health and disease regulations and b) CITES regulations. The animal health regulations can be (and in our experience were dealt with) relatively quickly – a day or two at worst to enable shipment. The CITES permitting on the other hand led to delays of many months. The reason for this is that the procedures are not oriented towards diagnostic timeframes in disease emergencies, rather to prevent illegal trade in wildlife products. This constrains doing timely work, which can help to conserve species and, a paradox in the whole CITES process and purpose.

It is not a problem unique to the saiga and IUCN WHSG has gathered evidence globally on this issue, which impacts many disease scientists and veterinarians trying to do their jobs and support the survival of wildlife and endangered species in a particular.

To illustrate the impact of the complex CITES procedures when practically confronted with a situation like a disease emergency, the following summaries on saiga diagnostics and sample movement are provided reflecting real events, times and costs. They include the 2015 mortality of saiga in Kazakhstan and subsequent work on the species to improve understanding of the disease pathogenesis from samples collected up to 2017. In addition we have an example, from a second mortality event in 2017, this time from a different disease and affecting saiga population in a different country, Mongolia, showing it is not country specific. These examples show how big a problem this is and how ironically CITES procedures are resulting in an increased risk of extinction. A change in the CITES regulation on diagnostic specimens is vital to prevent this in future. If we are unable to resolve the disease threat in saiga where 100% mortality occurs in a population over a matter of days and, cannot do this in a timely manner whilst the risk of these events continues, then it is surely likely that this species will go extinct.

Attempts to simplify the procedures before (Res. Conf. 12.3, XII), in order to assist museums, zoos and the like are still inadequate. For disease emergencies, **there should not be any need to apply for a CITES permit**. It is important to prevent a loop-hole in CITES procedures and to ensure this, the best option would be **a standard permit** for the samples provided to **OIE designated laboratories**, issued by CITES and sent to appropriate authorities in each country for use by outbreak investigation teams. This system exists for the animal health and disease regulations using standard permits issued to reference labs. Samples can be sent virtually immediately when a problem arises and for any number of samples and animals. CITES requires a permit for each animal or part of the animal. In a disease outbreak in an extreme case, this might mean 20 samples to 20 different countries and 20 different permits. **The end result is months of delay in diagnosis.**

Example of saiga Mass Mortality Events CITES application process and time taken

Cases 8-24th May 2015 from two herds across Kazakhstan.

4. Set of blood smears and fixed tissues from live and dead saiga collected 20.05.2015 to be sent to Royal Veterinary College London. CITES permit issued Kazakhstan 17.08.2015. CITES permit applied for UK 08.09.2015 UK CITES permit issued 06.10.2015 **Total delay to laboratories from sampling ~ 5 months.**

Cases 8-20th May 2016 from one herd in Irghiz region Kazakhstan.

5. Set of fixed tissues from dead saiga. CITES permit issued Kazakhstan 04.05.2016 UK CITES permit issued 14.06.2016. **Total delay to laboratories from issuance of permit in Kazakhstan nearly 7 weeks.**

Cases 8-20th May 2017 from one herd in Tengiz region, Kazakhstan.

3. Set of fixed tissues, serum and bone from dead saiga collected up to 20.05.2017. CITES permit issued Kazakhstan 04.10.2017. UK CITES permit issued 22.11.2017 **Total delay to laboratories from sampling ~ 6 months.** One reason for extra delay was a discrepancy on the scientific name between Kazakh permit and UK application process. *S. tatarica borealis* was used in UK when Mongolians used *S. tatarica mongolica.* The reason given for this delay was a new desk officer unfamiliar with the taxonomy.

Cases 2-10TH January 2017 from saiga in Altai Gobi, Mongolia.

4. Set of fresh tissues from saiga collected up to 10th January 2017 for Pirbright UK. CITES permit (1) issued Mongolia 18.04.2017 incorrectly addressed by authority in Mongolia and re-applied for and issued 13.10.2017. UK CITES permit issued 20.11.2017. These tissues containing live virus were couriered in dry ice but in UK London Heathrow, due to the document processing time and a failure of procedures by the shipping company, they remained in customs for 5 days and the virus and tissues were subjected to denaturing. Thus undermining the whole point of the work on unique material. The first cases of a viral disease ever recorded in this species. Cost of shipment was several thousand dollars. **Total delay to reference laboratory from sampling mass mortality event ~ 9 months.**
5. Set of formalin fixed tissues, gut content and parasites for RVC UK. CITES permit (1) issued Mongolia 18.04.2017 UK CITES permits (3) issued 24.04.2017. Total time to laboratory from sampling ~ **4 months**

Summary of possible reasons for delay in samples leaving and reaching UK laboratories. Figures in () equate to normal delays, if uncomplicated and staff available who are experienced in CITES procedures:

1. *Transport of samples from the field (2-4 days).*
2. *Preparation of samples for dispatch, staff time (2 days).*
3. *Preparation and dispatch of application for Veterinary Health permits for source country (1 day) and processing (2 days). Standard permit available for recipient reference laboratory (0 days).*
4. *Preparation of forms and dispatch to CITES authority in country of origin. (Depends on availability of competent staff time aware of CITES regulations for filling complicated forms. This is not a routine activity). (~7 days)*
5. *Processing of application for CITES permit in country of origin at CITES office. (~7 days)*
6. *Dispatch of permit to UK. Preparation of forms and dispatch of forms to CITES authority in UK. (Depends on availability of competent staff time aware of CITES regulations for filling complicated forms. This is not a routine activity). (7 days)*
7. *Processing of application for CITES permit in UK, including complicated payment process, mismatches or mistakes on interpretation of the two, different, source and recipient forms and confusion over scientific names, delayed communication on issues arising etc (the CITES office advises a 3 week process but in reality if any issues arise this can be months).*

8. *Shipping preparation, processing through customs each end (1-7 days), complicated by CITES in particular, animal health permits are not a delaying factor on samples, whereas they might be on live animals.*

The other issue is cost, not only of the complicated shipping process, which amounts to thousands of dollars and made more so by the complex procedures of CITES and pathogen regulations in shipping. In addition CITES permits cost nearly $100 for each set of material shipped and permit issuance. One outbreak can involve many shipments and costs can be several thousands of dollars for one diagnosis even before laboratory costs are included. The lab costs can justifiably also be thousands of dollars for unique problems such as the one illustrated and, often the case with wildlife. If there is a similar epidemic disease in domestic livestock or humans under current regulations the period to diagnosis can be within a couple of weeks and even within a few days, if samples are processed from the field rapidly and there are no delays in health permits which is usually the case with health emergencies.

Otlet

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31st of January 2018

Submission regarding decisions 17.173-174

To members of the secretariat of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES),

I write to the CITES secretariat today with regards to decisions 17.173-174 (CoP17) calling for simplified procedures to issue permits and facilitate trade of species concerned under CITES regulations.

I am a research scientist and co-founder of biological sample sharing platform Otlet. Otlet seeks to reduce the wastage of biological samples collected for the purpose of science. Our platform is exclusively for scientists from research institutions and museums around the world, enabling scientists to share, source and request biological samples globally. I believe Otlet can provide a number of benefits and opportunities with regards to the permitting and shipping of CITES listed species for the purpose of scientific research, these include;

5. A reduction in the risk of CITES protected samples being obtained by non-scientific members. Otlet is exclusively for research scientists, with each new user screened before account approval. Only scientists can access the database and samples are only shared for the purpose of scientific research.
6. Ease in tracking the movements of CITES protected samples. All transactions completed in Otlet can be tracked and a digital record is created. Appeasing- *Resolution Conf. 12.3 (Rev.CoP17), paragraph 2, section b and k.*
7. Protected shipping and transport. While not operational yet, Otlet plans to partner with shipping and transport companies, all details can be tracked digitally and a trusted transport provider will be used at a reduced cost.
8. No additional impact on species and specimens (as per the request of *decision 17.173*). A scientist wishing to sample CITES protected animals will have already undergone rigorous ethics approvals. Once samples are collected, the movement of biological samples does not cause additional harm to species. Appeasing-*Resolution Conf. 12.3 (Rev.CoP17), paragraph 20, section a, i-iv and Annex 4.*

We respectfully propose the following to the CITES secretariat;

6. Permitting for the sharing and shipment of samples between researchers for the purpose of scientific research can be completed through Otlet. Paperwork and creation of a digital blockchain record can be handled by Otlet and provided to CITES as arranged.
7. Permitting could be less intensive, with institutional permitting linked to research scientists individual Otlet accounts

Species that are listed under the protection of CITES are considered threatened, it is these species that require the most attention from research scientists, to ensure conservation and management efforts can be established. Enabling researchers to more easily access biological samples for research is a critical step in providing conservation solutions and protecting biodiversity globally. Otlet aims to help researchers understand all species, and we are eager to explore a potential partnership with the support of the CITES secretariat.
Members of the secretariat may contact myself or my co-founder for more information regarding Otlet and what we are able to offer.

Kind regards, Madeline Green

Shark specialists

To the CITES Secretariat and Standing Committee,

Thank you for providing us with the opportunity to comment, via Decision 17.173, on our experiences with the process of using “simplified and expedited applications” for international tissue samples that have a negligible or no detrimental impact on the status of the CITES-listed marine species we work with.

We are scientists studying chondrichthyan fishes. Our research has involved the international transfer of tissue samples from CITES-listed species for research purposes. As such, we qualify for the simplified and expedited processes that CITES signatory countries have been requested to make available for such work.

As stated in documents CoP17 Doc. 36, Doc. 56.2 and Doc. 70, concerns have previously been expressed regarding the collection and transport of biological samples from CITES-listed marine species.

We are writing to confirm that CITES regulations have proven to be a significant impediment to our research work, and often hinder regional collaboration. This has been the case with exporting tissue, blood, mucus, and total genomic DNA samples from CITES-listed shark and ray species from India, Indonesia, Madagascar, Mozambique, Oman, Pakistan, Philippines, Qatar, Saudi Arabia, Tanzania, Thailand, United Arab Emirates, Japan, Brazil, Mexico, Belize, Ecuador, South Africa, United Kingdom, Australia, and Spain; re-exporting from the United States, Australia and Spain; and importing into Spain, Australia, France and the United States.

Many of our studies are directly relevant to the conservation of these CITES-listed sharks and rays. Given that CITES aims to help improve the conservation status of these species, the current situation, where it is acting as a barrier to conservation-focused and other non-detrimental research, needs to be improved.

We appreciate the efforts of CITES to facilitate the transfer of specimens between registered scientific institutions. However, many countries where CITES-listed species are most at risk do not have a CITES-listed scientific institution to facilitate sample transfers. This often results in long and unpredictable timescales to organise research permits, complex logistics (at odds with fieldwork timings) and, consequently, elevated project costs. Developing a system that allows for more streamlined scientific sample transfers, without requiring an institutional intermediary, would greatly aid our conservation initiatives and other research activities.

We are grateful that this issue is being considered, and that the COP has requested our inputs on these important matters. We hope that the countries listed above will continue to streamline and enhance their CITES permitting processes.

From the undersigned:

1. Dr Simon Pierce, Marine Megafauna Foundation
2. Stephanie Venables, University of Western Australia & Marine Megafauna Foundation
3. Stella Diamant, Madagascar Whale Shark Project
4. Dr. David Robinson, Heriot Watt University, Edinburgh, UK
5. Dr. Rima Jabado, Gulf Elasmo Project, UAE
6. Dr Alistair Dove, Georgia Aquarium
7. Joshua Stewart, Scripps Institution of Oceanography & The Manta Trust
8. Muhammad Moazzam Khan, WWF-Pakistan
9. Dr Julia Spaet, University of Cambridge, UK
10. Dr Peter Kyne, Charles Darwin University, Australia
11. Dr Thomas Vignaud
12. Elitza Germanov, Murdoch University, Australia & Marine Megafauna Foundation
13. Dr Alec Moore, Bangor University
14. Clare Prebble, University of Southampton & Marine Megafauna Foundation
15. Dr Dipani Sutaria, India
16. Dr Tom Kashiwagi, Southern Illinois University Carbondale, USA and Marine Megafauna Foundation
17. Dr. Nicole Phillips, The University of Southern Mississippi
18. Elina Sourisseau, MADA Megafauna, Nosy Be, Madagascar
19. Dr. Jennifer Schmidt, Shark Research Institute, USA
20. Dr. Hua Hsun Hsu, King Fahd University of Petroleum and Minerals, Dhahran, Saudi Arabia
21. Dr Clive Trueman, National Oceanography Centre, University of Southampton, UK
22. Dr Christoph Rohner, Marine Megafauna Foundation
23. Associate Professor Charlie Huveneers, Flinders University, Adelaide, Australia
24. Jürgen Pollerspöck, Authorised CITES expert for sharks, rays and skates, www.shark-references.com
25. Dr. Simon Weigmann, Elasmo-Lab, Elasmobranch Research Laboratory, Germany
26. Dr. Claudio Barría, Marine, Institute of Marine Sciences, Barcelona, Spain
27. Shan-Hui Su, PhD student, Department of Environmental Biology and Fisheries Science, National Taiwan Ocean University, Taiwan
28. Bhagyalekshmi Venugopal, PhD scholar, Department of Aquatic Biology and Fisheries, University of Kerala, India
29. Prof. Gilles Cuny, University Claude Bernard Lyon 1, France
30. Dr. Javier Guallart, Valencia, Spain
31. Assistant Professor Fereidoon Owfi - Director of Marine Ecology Dept. - Iranian Fisheries Science Research Institute - Iran

Society for Wildlife Forensic Science

Subject: FW: International movement of forensic samples - please respond

Hi Rob:

We had a problem with the CITES permitting process, the permit was relatively easy to obtain. However trying to get the samples over to the US was a nightmare. We wanted to send some samples to New Orleans so they could try their instrumentation on these difficult samples but the first time we tried FEDEX returned the samples to us. After several calls to FEDEX, and the fact they had stamped our CITES permit as denied, we had to start the process all over again. Finally we just gave up since there was no guarantee that FEDEX would deliver it.

The other case is every time the Proficiency tests need to come across the border from the US to Canada, the samples get stopped and it takes several phone calls back and forth and days before they are released and delivered to the lab.

It would be great if the process was simplified.

Regards,

Joy Bruno

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Subject: Re: FW: please provide input on repercussions of restrictive permit regulations to forensic investigations

Dear Dr Ogden,

Ngaio Richards asked us to comment on your request. In addition, and I was wondering if you could give me some information on the importation of forensic samples for analysis.

I wrote a chapter in Ngaio's book: Carbofuran and Wildlife Poisoning: Global Perspectives and Forensic Approaches. Regarding your open question on updating the CITES requirements on shipping samples for forensic analysis. While I am not a member of the Society for Wildlife Forensic Science, I have some pertinent experiences relating to this issue. The forensic research was carried out at the Frederick Rieders Center for Forensic Science and Education. https://www.frfoundation.org/

Since you are situated in Edinburgh and since forensics is a small world, you may know some of the principles at the Center, namely Barry Logan and Karen Scott who both hail from Edinburgh.

The issue that caused problems for us in specifically identifying the particular pesticide toxins in wildlife poisoning in Africa was the need to exclude any DNA from the samples sent to us for analysis. If the DNA was from any animal listed in CITES, as well as from a species protected in the Endangered Species Act. To get around this restriction we developed a field pre-preparation to remove the DNA and any proteins from the samples before shipment to us for analysis. The approach we used to address these requirements was to extract biological materials with acetone, filter the acetone solution, evaporate the acetone and ship the dried extracts to our laboratory for pesticide analysis. This removed the DNA and proteins.

The problem has been that the people in the Africa, who have not been trained in forensics, are doing the pre-preparation and have sent us samples where the blanks are not blank due to inadvertent cross contamination, especially when one or more of the samples was very concentrated in a pesticide. Had they been able to simply send the actual samples to us for analysis instead of a pre-preparation, we could have avoided the cross contamination problem.

When the blanks are not blank, this invalidates the rest of the analysis. We have been sent samples from species including poisoned elephants, hippos, wart hogs, buffalos, ducks, geese, and many types of vultures. One of these samples was from a kill of some 108 endangered white backed vultures. This single kill represents about 1-2% of the known population of white backed vultures in Africa. When the tragic results of killing off the Asian vultures in India are considered, documenting the cause of the crash of the vulture population in Africa is exceedingly important. Yet we cannot report out the results due to the cross contamination.

While we could in principle visit a particular cooperator in Africa and train their staff in the fine points of sample pre-preparation, this is not practical because we want to open the program to wildlife advocates throughout Africa, and we cannot train all of them in forensics. The simple solution is to allow the actual poisoning samples to be sent to us for forensic analysis, even if they contain some animal DNA.

Thank you for all you are doing,

Stephen Donovan, PhD

Subject: CITES and delayed forensic analysis

Dear Dr Ogden,

I was recently informed of your interest in examples of cases where forensic investigation was delayed due to lengthy CITES permitting process.

I was based in Cambodia for four years where we developed wildlife health surveillance. In this area, poisoning through agricultural pesticide use or as an intentional hunting practice is a critical threat to conservation. During our surveillance efforts, we had a series of mortality cases affecting small carnivores, vultures, storks etc, that we suspected being linked to pesticide use. It took us about 7 months to finally get a confirmation from a lab outside of Cambodia (no in-country lab able to run the analysis at the time), 4.5 of which were spent waiting for a CITES and export permit. Poisoning in this area was not a new problem, and multiple vulture mortality investigation have failed in the past because of the CITES process. For this more recent case, the laboratory analysis did confirm carbofuran poisoning, consistent with intentional poisoning practices. Although no legal actions were taken in this case, this first documented case had a significant policy impact, and was also the basis for further conservation actions.

This is the most striking example that comes to mind, but I want to highlight a more insidious consequence: the complicated CITES permitting process creates disincentive for proper forensic investigation. There are many investigations that we had to cut short, giving up on the opportunity to establish a cause of mortality, in anticipation of the roadblock that a CITES permit application would represent. At some point we almost gave up on collecting tissue samples since there is no histology lab that can process these and that exporting the tissue is the only option to get histology done (we still do collect formalin fixed tissues, but they are stored and rarely get processed). This is a critical issue in developing countries where capacity for specific analysis is not always available locally and rely on regional or international collaboration.

Let me know if there is any other information I can help with.

Thank you.

Mathieu

Mathieu Pruvot, DVM, MSc, PhD

Veterinary Epidemiologist, Wildlife Health Program

Wildlife Conservation Society

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Colorado State University,

Fort Collins, CO, USA

Subject: Re: International movement of forensic samples - please respond

Dear Tasha and Rob,

I had 1 occasion in which I contacted CITES, (> 1yr ago), for assistance in relation to using reference wolf (*Canis lupus*) hairs in relation to a case alleged illegal importation of a taxidermied *C.lupus*, into Australia. My query whether or not I was contravening any CITES guidelines being a fee for service provider.

At this time I also contacted I David Higgins (Head -Environment Security with interpol for 9 years), his opinion, was that my fees are based on my expertise to identify mammalian species on the basis of morphological characteristics, (or ID species through DNA analyses), and **not** on the basis of the mammals in question being CITES listed spp. However, he was unsure if this was the case.

To date, I have not received any response from CITES.

Until this query is answered/resolved I cannot conduct further conduct studies to identify mammalian spp, using reference hairs from CITES listed species; this situation is is severely impacting on my ability to assist with forensic wildlife investigations and contribute to prevention of wildlife trafficking, through successful prosecution. I have been registered with CITES for several years (Permit No: AU 085).

I fear that if CITES restricts access to invaluable reference material, for bona fide wildlife experts, this would severely impact our ability to successfully conduct forensic examinations, which in turn, would compromise our ability to successfully prosecute illegal wildlife traffickers; in essence, CITES would be throwing out the baby with the bath water if they impose their proposed sanctions.

Kindest regards,

Silvana TRIDICO

MEA Strategies

Input for CITES Working Group on Simplified Procedures for Biomedical Research

27 March 2018

The European Animal Research Association (EARA) is a European organisation that communicates and advocates for biomedical research using animals by providing accurate and evidence-based information. We aim to educate the public on the benefits of animal research, co-operating with research stakeholders, and promoting the creation and development of national networks.

Our **vision** is to enhance the understanding and recognition of research involving animals across Europe, allowing for a more constructive dialogue with all stakeholders and a more efficient climate for research in Europe. Our **mission** is to uphold the interests of biomedical research and healthcare development across Europe. EARA was created by academic institutions, associations and the industry to provide a European platform for the public and other external stakeholders to be informed and learn about animal research, its benefits and limitations.

By providing accurate and evidence-based information of biomedical animal research, EARA informs and educates audiences in support of necessary research and facilitates a balanced debate on the role of animals in scientific research. Being a European-wide organisation, EARA encourages the creation and development of national networks and improve coordination between them.

I. Background and Regulatory Context (EU)

Animal research in the European Union (EU) is regulated under Directive 2010/63/EU on the protection of animals used for scientific purposes. The Directive aims to protect animals in scientific research, with the final aim of replacing all animal research with non-animal methods. The Directive harmonises animal research legislation throughout the EU, to ensure high standards of animal welfare and scientific research. It was implemented into national laws in each EU Member State in 2013.
Animals can only be used in research in EU when there is a convincing scientific justification, when the expected benefits of the research outweigh the potential risks in terms of animal suffering and when the scientific objectives cannot be achieved using non-animal alternative methods. Animals are used for a limited number of research purposes including basic research, applied research into human and animal diseases and cures, the protection of species and the environment, and education and training

The Directive sets out legal requirements to implement the 3Rs principles of replacement, reduction and refinement: replace animals with non-animal methods where possible; reduce the number of animals used to a minimum while still obtaining scientifically valid results; and refine practices to reduce any possible pain, suffering, distress or lasting harm to the animals.

In the EU, animals are used for a limited number of research purposes including basic research, applied research into human and animal diseases and cures, the protection of species and the environment, and education and training. The selection of species depends on the type, aim and

method of the research. Scientists must use the species least able to experience pain and suffering, with which they can obtain relevant results. The origin of animals also matters: species including mice, rats, zebrafish, frogs, rabbits, cats, dogs and non-human primates need to be specifically bred for research purposes. Some animals can only be used if the research cannot be done in any other species or in exceptional circumstances: non-human primates may only be used for basic or specific medical research, or research aimed at conservation of the species.

II. Value of Simplified Procedures for Biomedical Research

Scientific research for biomedical purposes depends upon the timely movement of biological samples taken from research animals from one laboratory to another - often in different countries - to take advantage of complementary equipment, resources, and expertise. Cross-border cooperation also may be required because research protocols for a particular test may be validated in one country but not another. Timeliness in movements of the research samples is critical either because the samples themselves can quickly deteriorate or because of deadlines within approved studies. Greater use of simplified procedures for CITES permitting could significantly reduce delays in shipments of time-sensitive samples for important biomedical research. This in turn could significantly expedite the availability of new medicines and innovations for patients by cutting down the number of days required to bring them to the market.

Interestingly, Switzerland's response to Notification No. 2017/071 reflects that simplified procedures are not needed due to the rapid processing of CITES permits. Standard processing time by Swiss CITES authorities using an electronic permitting system is reported as "between 5 hours and 2 days" for routine requests. Non-routine requests are handled within five days. Rapid response is provided for emergency requests.

Like Switzerland, Germany, does not use simplified procedures for trade in biological samples. Nevertheless, in the experience of EARA, typically issues permits in four to five working days. German authorities also effectively respond to urgent requests to allow for issuance of permits even faster where necessary. In the UK, on the other hand, CITES permits routinely take up to fifteen working days to issue. Part of the reason for the delay is the use of regular post to deliver the permits. In the UK, as elsewhere, permits and certificates occasionally arrive with typographical or other errors. Reliance on regular post by the authorities can result in another eight to ten working days to replace faulty permits with corrected versions.

Information provided by Canada, France, and the United States in response to Notification No. 2017/071 also highlights the significant benefits of using simplified procedures for CITES Management Authorities. According to France, "Simplified procedures have always proven extremely satisfactory, both for applicants and for French Management Authorities." The reduction of time spent on processing and reporting on permits for the import/export of specimens that have negligible or no impact on the conservation of the species concerned directly translates into the possibility of re-purposing that saved time to focus on transactions with potentially serious conservation implications and/or enforcement to crack down on wildlife trafficking.

III. Volume of Shipments of Samples for Biomedical Research

CITES Resolution Conf. 12.3 (Rev. CoP17) "RECOMMENDS that Parties use simplified procedures to issue permits and certificates to facilitate and expedite trade that will have a negligible impact, or none, on the conservations of the species concerned, e.g., 1) where biological samples of the type and size specified in Annex 4 of the present Resolution are urgently required: … E. for diagnostic or identification purposes." Annex 4 of the Resolution shows the various types of samples and their use for biomedical research among other things.

Review of the CITES trade database focusing exclusively on trade in biological sample specimens (Term: "SPE") for "medical (including biomedical research)" purposes (Purpose Code: "M") for the ten-year period of 2006 through 2016 shows massive imports and exports. It should be noted from the outset that imports and exports of specimens for biomedical research are almost exclusively limited to samples from primate species, typically *Macaca fascicularis*. Given the extensive, top quality biomedical research taking place in the UK, it is worth looking at the details of UK imports and exports of biological samples from primates for biomedical research.

First, as the following table demonstrates, biomedical research is a global endeavour. Imports of samples to the UK for biomedical research are limited to just thirteen countries over the ten-year period, however, within that same time the UK exported samples to 35 countries for biomedical research in those countries.

UK Exports		**UK Imports**
Bangladesh	Mongolia	Barbados
Brazil	Morocco	Canada
Bulgaria	Nepal	China
Canada	Pakistan	France
Chile	Paraguay	Israel
Croatia	Romania	Mauritius
Egypt	Russian Federation	Peru
Ethiopia	Saudi Arabia	Singapore
Hong Kong	Senegal	South Africa
India	Singapore	Switzerland
Indonesia	South Africa	Taiwan
Iran	Sri Lanka	United States
Israel	Switzerland	Vietnam
Japan	Thailand	
Jordan	Tunisia	
Kazakhstan	Turkey	
Kuwait	United Arab Emirates	
Lao	United States	
Malaysia	Vietnam	
Mexico		

Secondly, the UK data demonstrates that hundreds of thousands of CITES permits are being issued to move samples for biomedical research. If we focus exclusively on reporting for samples by number of pieces (excluding data regarding samples that are traded and reported by units of measure e.g., g, mg, l, ml, etc.), the CITES database indicates that the UK alone imported **232,059**

specimens and exported **372,941** specimens for medical purposes in ten years. The UK has repeatedly emphasised in recent months that it intends to focus heavily on maintaining and growing scientific research and innovation in both the public and private sectors in the post-Brexit period: increased demand for timely movement of research samples therefore is likely to swell in the coming years.

Finally, the UK trade data presented in the table below shows that biomedical research depends primarily on movement of samples from Appendix-II listed primate species. In the ten-year period described above, **none of the 232,059 imports were from Appendix I-listed species**. Of the **372,941** specimens that were exported, only **31** samples from Appendix I-listed primate species. This is highly relevant given that simplified procedures are applicable only for Appendix II-listed species.

2006-2016	**United Kingdom**	
	Imports	**Exports**
Appendix I species	0	31
Appendix II species	232,059	372,910
Total SPE for M	**232,059**	**372,941**

France and Germany also are important countries for biomedical research. Tables attached in Annexes 1 and 2 of this document and summarised in the table below show gross imports and exports of sample specimens from primate species for biomedical research to/from each country for the ten-year period. Again, focusing only on shipments of specimens (SPE) for medical purposes (M) recorded by the number of samples, the figures reflect a large volume of trade in samples (and very few samples of Appendix I-listed species).

2006-2016	France		Germany	
	Gross Exports	**Gross Imports**	**Gross Exports**	**Gross Imports**
App. I	0	0	6	6
App. II	45,917	46,111	304,833	304,833
Total SPE for M	**45,917**	**46,111**	**304,839**	**304,839**

Obviously, an applicant may apply to send multiple samples in a single shipment, thus expediting processing and permitting, however, it should be noted that biomedical research is iterative by nature, requiring samples to be send over periods of time. This results in the repeated need to apply for and obtain CITES permits for individual shipments.

It also is necessary to recall that some countries, such as the UK, require that each type of sample is addressed in separate permits. Accordingly, whereas Germany would record various types of samples (e.g., plasma, serum, and fixed tissues samples) on a single permit, the UK would require three permits for the same samples.

Given the speed with which Switzerland issues permits and that it also is an important player in research and development for human and veterinary medicines, it also is interesting to consider the extent to which it is processing applications for the movement of samples for biomedical research. As shown in Annex 3, Switzerland has exported **87,195** specimens with the M purpose code (as reported by exporting country and excluding specimens recorded in g, ml, etc. as above).

IV. Positive Experience with Simplified Procedures

The submissions of Canada and the United States show significant current use of simplified procedures to move biological samples from *Primates spp.* for medical purposes. Australia indicates that its legislation also would permit use of simplified procedures for shipments of biological samples of Appendix II-listed species.

The CITES Parties that use simplified procedures have highlighted various mechanisms to avoid abuse and ensure effective control and enforcement concerning the activities eligible for the procedures. The "multi-shipment permitting" system in Canada relies on an initial verification of the legal origin and source of material and revocation of the "privilege" in the case of any contravention. To qualify for a "master file" in the U.S., applicants must provide information about their entire inventory which is evaluated by U.S. CITES authorities. U.S. authorities also may impose reporting requirements as part of establishing a master file. As permits are only valid for six months, those benefiting from simplified procedures must repeatedly return to the CITES authorities for additional permits, thus providing an extra measure of control. Australia's system (which is not currently used for biomedical research samples) goes a step further and requires entities given "multiple consignment authorities" to inform the CITES authorities of each shipment. This data can

then be cross-checked with customs data collected at the borders. Such mechanisms provide sufficiently robust controls to avoid misuse.

V. Additional Benefits could be realised with E-Permitting

Switzerland credits its lack of need to implement simplified procedures to its use of an electronic permitting system. According to the submission, 98% of the applications Switzerland receives are handled electronically and impressive processing times result.

The EU submission also reflects the positive experience of France with e-permitting and its value for enforcement and control purposes. According to the information provided by France, "The CITES e-permitting system makes possible to easily conduct checks and extract data. In addition, endorsement through the Customs system is restricted to permits/certificates whose electronic files have been duly completed only."

The power of e-permitting to facilitate but also to control and report on legal trade should not be underestimated. Its use in combination with simplified procedures could bring achieve substantial improvements in the interest of biomedical research.

VI. Experiences of Applicants

EARA experience with the movement of samples sheds light on how processing times can enable or inhibit biomedical research. Attached in Annex 4 are unedited comments provided by several EARA members in response for information on their positive or negative experiences with CITES permitting for the movement of biological samples for biomedical research. Comments are broken down by type of company and geographical focus. While they underline the benefits of simplified procedures (and e-permitting), the comments also reflect the need for further improvements even where simplified procedures are used. The U.S. master file approach and the French electronic permitting system appear to be appreciated.

VII. Conclusion

What is obvious from the foregoing review is that there is a tremendous volume of imports and exports of biological samples (predominately from Appendix II-listed specimens) that pose negligible or no threat to conservation of the species but which create significant costs for both applicants and CITES authorities in terms of manpower and delays related to CITES permitting.

Efficient electronic systems such as those used by the Swiss can eliminate the need for a simplified system, but Swiss results will not be achieved everywhere and certainly not overnight. Therefore, the positive experience of Canada and the U.S. among others with the use of simplified procedures should be considered by more Parties to effectively expedite permitting for movement of samples for biomedical research while providing sufficient controls to enable oversight and enforcement.

To date, only the UK has indicated that it has experienced problems with utilising simplified procedures, however, these problems related to attempts to use simplified procedures for retail

goods bought by consumers, not biomedical samples taken from the same animals that are repeatedly shipped by known research institutions and companies.

EARA and its members urge all CITES Parties in which substantial biomedical research takes place to make a small investment now to implement simplified procedures and to further explore the use of e-permitting to expedite sample shipment in the interest of human and animal health and to conserve resources for more critical CITES work.

Yours sincerely,

Kirk Leech
Executive Director
European Animal Research Association

ANNEX 1 - FRANCE

Gross Exports from France of SPE for M (2006-2016)						
Appendix II-listed species						**TOTAL**
Chlorocebus	*Macaca*		*Papio*		*Primate spp*	
46	10251	90	2	2	14	
	1211		6	3		
	8193		25	3		
	112		6	3		
	7196					
	3145					
	9562					
	506					
	5541					
46	**45717**	**90**	**39**	**11**	**14**	**45,917**

Gross Imports to France of SPE for M (2006-2016)											
Appendix II-listed species											**TOTAL**
Chlorocebus	*Macaca*						*Papio*			*Primate spp*	
46	13	394	84	5	27	10251	2	2	2	14	
	52	10	170	2	16	1198	6	3	16		
	34	6968			3	7720	25	3	3		
	23	1703			9	52	6	3	3		
	38	7556			34	202					
	63	250			19	1404					
	81	3691				1850					
	1646	70				141					
	16					10					
						172					
46	**1966**	**20642**	**254**	**7**	**108**	**23000**	**39**	**11**	**24**	**14**	**46,111**

ANNEX 2 - GERMANY

Gross Exports from Germany of SPE for M (2006-2016)

Appendix I-listed species			Appendix II-listed species						TOTAL
Gorilla	*Microcebus*	*Pongo*	*Callithrix*	*Chlorocebus*	*Macaca*				
1	4	1	2435	3	1513	70	5193	12	
			3875	23	11991		2693	12	
			8239	28	9776		6	10	
			3366	49	21844		443		
			3150	50	17609		699		
			324	78	41709		4401		
			2689		25190		6		
			102		23050		1543		
			621		27172		15		
			3		41761				
					43080				
1	4	1	24804	231	264695	70	14999	34	304,839

Gross Imports to Germany of SPE for M (2006-2016)

Appendix I-listed species			Appendix II-listed species																				TOTAL
Gorilla	*Microcebus*	*Pongo*	*Callithrix*				*Chlorocebus*			*Macaca*													
1	4	1	3348	125	333	2435	23	5	3	52	928	11252	96	1120	2512	160	35	1513	57	70	443	5193	12	
			3310		823	3875	23		29		2027	15031			1501	945		11991			695	2693	12	
			3150		44	4558	20		50		1321	19029			2152			8848			4401	6	10	
			621			56			78		4221	13478			929			8080			6	4		
			3			324					1422	14435			1557			1042			15	1543		
						1741						7828			1836			20528						
						58						13292			8930			10783						
												7632			2996			4974						
																		16187						
																		14038						
																		29937						
1	4	1	10432	125	1200	13047	66	5	160	52	9919	101977	96	1120	22413	1105	35	127921	57	70	5560	9439	34	304,839

ANNEX 3 - SWITZERLAND

Year	App.	Taxon	Importer	Exporter	Origin	Importer reported quantity	Exporter reported quantity	Term	Purpose
2006	II	Macaca fascicularis	US	CH	MU	176		specimens	M
2007	II	Chlorocebus aethiops	US	CH		72		specimens	M
2007	II	Macaca fascicularis	GB	CH	MU	30		specimens	M
2007	II	Macaca fascicularis	GB	CH	MU	471		specimens	M
2007	II	Macaca fascicularis	US	CH	MU	168		specimens	M
2009	II	Callithrix jacchus	DE	CH	DE	150	150	specimens	M
2009	II	Macaca fascicularis	CA	CH	PH	53	53	specimens	M
2009	II	Macaca fascicularis	DE	CH	MQ		45	specimens	M
2009	II	Macaca fascicularis	DE	CH	MU	5206	4771	specimens	M
2009	II	Macaca fascicularis	FR	CH	DE		3	specimens	M
2009	II	Macaca fascicularis	FR	CH	MU		13	specimens	M
2009	II	Macaca fascicularis	GB	CH	CN		228	specimens	M
2009	II	Macaca fascicularis	GB	CH	MU	464	1000	specimens	M
2009	II	Macaca fascicularis	GB	CH	VN		30	specimens	M
2009	II	Macaca fascicularis	IN	CH	PH		132	specimens	M
2009	II	Macaca fascicularis	US	CH	PH	1	56	specimens	M
2009	II	Macaca fascicularis	US	CH	VN		36	specimens	M
2009	II	Macaca mulatta	US	CH	FR		18	specimens	M
2009	II	Macaca mulatta	US	CH	FR		40	specimens	M
2009	II	Macaca mulatta	US	CH			1	specimens	M

2010	I	Gorilla gorilla	DK	CH		2	2	specimens	M
2010	II	Macaca fascicularis	DE	CH	CN	4	4	specimens	M
2010	II	Macaca fascicularis	DE	CH	DE	4	4	specimens	M
2010	II	Macaca fascicularis	DE	CH	KH	4	4	specimens	M
2010	II	Macaca fascicularis	DE	CH	MU		512	specimens	M
2010	II	Macaca fascicularis	DE	CH	MU	7343	5058	specimens	M
2010	II	Macaca fascicularis	FR	CH	MU		40	specimens	M
2010	II	Macaca fascicularis	GB	CH	CN		60	specimens	M
2010	II	Macaca fascicularis	GB	CH	PH		30	specimens	M
2010	II	Macaca fascicularis	JP	CH	MU		342	specimens	M
2010	II	Macaca fascicularis	US	CH	MU		1221	specimens	M
2010	II	Macaca fascicularis	US	CH	PH	4	4	specimens	M
2010	II	Macaca mulatta	GB	CH	CN		6	specimens	M
2010	II	Macaca mulatta	GB	CH	FR		19	specimens	M
2010	II	Macaca mulatta	GB	CH	FR		10	specimens	M
2010	II	Macaca mulatta	US	CH	CN		42	specimens	M
2010	II	Macaca mulatta	US	CH	FR		140	specimens	M
2010	II	Macaca mulatta	US	CH	FR		70	specimens	M
2011	II	Macaca fascicularis	CA	CH	MU		820	specimens	M
2011	II	Macaca fascicularis	CN	CH	MU		3	specimens	M
2011	II	Macaca fascicularis	DE	CH	MU	1756	2343	specimens	M
2011	II	Macaca fascicularis	DE	CH	VN	325		specimens	M
2011	II	Macaca fascicularis	DE	CH	VN		325	specimens	M

2011	II	Macaca fascicularis	FR	CH	CN		6	specimens	M
2011	II	Macaca fascicularis	FR	CH	MU	40		specimens	M
2011	II	Macaca fascicularis	FR	CH	PH		4	specimens	M
2011	II	Macaca fascicularis	FR	CH	VN	17		specimens	M
2011	II	Macaca fascicularis	GB	CH	CN	30	99	specimens	M
2011	II	Macaca fascicularis	GB	CH	MU	101	2762	specimens	M
2011	II	Macaca fascicularis	GB	CH	VN		2538	specimens	M
2011	II	Macaca fascicularis	JP	CH	MU	342		specimens	M
2011	II	Macaca fascicularis	US	CH	ID		875	specimens	M
2011	II	Macaca fascicularis	US	CH	KH	250	250	specimens	M
2011	II	Macaca fascicularis	US	CH	MU	256	256	specimens	M
2011	II	Macaca fascicularis	US	CH	PH	164		specimens	M
2011	II	Macaca mulatta	US	CH	CN	42		specimens	M
2011	II	Macaca mulatta	US	CH	FR	140	10	specimens	M
2011	II	Macaca mulatta	US	CH	FR	70	60	specimens	M
2012	II	Chlorocebus aethiops	AU	CH	XX		1	specimens	M
2012	II	Macaca fascicularis	CA	CH	CN		891	specimens	M
2012	II	Macaca fascicularis	CA	CH	MU		44	specimens	M
2012	II	Macaca fascicularis	DE	CH	CN	50	55	specimens	M
2012	II	Macaca fascicularis	DE	CH	DE	10	10	specimens	M
2012	II	Macaca fascicularis	DE	CH	KH	35	35	specimens	M
2012	II	Macaca fascicularis	DE	CH	MU	1415	1399	specimens	M
2012	II	Macaca fascicularis	DE	CH	PH	9		specimens	M

2012	II	Macaca fascicularis	DE	CH	VN	6	12	speci mens	M
2012	II	Macaca fascicularis	ES	CH	CN		1802	specimens	M
2012	II	Macaca fascicularis	ES	CH	MU		788	specimens	M
2012	II	Macaca fascicularis	FR	CH	CN	131	125	specimens	M
2012	II	Macaca fascicularis	FR	CH	VN	183	12	specimens	M
2012	II	Macaca fascicularis	GB	CH	MU	792	939	specimens	M
2012	II	Macaca fascicularis	GB	CH	MU	4790	3697	specimens	M
2012	II	Macaca fascicularis	IT	CH	MU	72	72	specimens	M
2012	II	Macaca fascicularis	US	CH	CN	32	32	specimens	M
2012	II	Macaca fascicularis	US	CH	KH	8	8	specimens	M
2012	II	Macaca fascicularis	US	CH	MU		732	specimens	M
2012	II	Macaca fascicularis	US	CH	MU	1662	2101	specimens	M
2012	II	Macaca fascicularis	US	CH	PH		1	specimens	M
2012	II	Macaca mulatta	DE	CH	CN	2596	2596	specimens	M
2012	II	Macaca mulatta	DE	CH	VN	6		specimens	M
2012	II	Macaca mulatta	FR	CH	FR	13	9	specimens	M
2012	II	Macaca mulatta	FR	CH	FR	9		specimens	M
2013	I	Elephas maximus	NL	CH	LK	2		specimens	M
2013	I	Elephas maximus	NL	CH	MM	2		specimens	M
2013	I	Elephas maximus	NL	CH	XX	4		specimens	M
2013	I	Elephas maximus	NL	CH		2		specimens	M
2013	I	Pongo abelii	DE	CH	DE		3	specimens	M
2013	I	Pongo abelii	DE	CH	DE		3	specimens	M
2013	I	Pongo abelii	DE	CH	XX		3	specimens	M

2013	I	Pongo abelii	DE	CH			12	specimens	M
2013	I	Pongo abelii	ES	CH	ID	5	8	specimens	M
2013	I	Pongo pygmaeus	ES	CH	ID	7	7	specimens	M
2013	I	Pongo pygmaeus	ES	CH	MY	3	4	specimens	M
2013	II	Cebus xanthosternos	NL	CH			6	specimens	M
2013	II	Macaca fascicularis	DE	CH	CN	4	14	specimens	M
2013	II	Macaca fascicularis	DE	CH	CN	4		specimens	M
2013	II	Macaca fascicularis	DE	CH	MU	2895	3048	specimens	M
2013	II	Macaca fascicularis	DE	CH	PH	6	8	specimens	M
2013	II	Macaca fascicularis	DK	CH	MU		24	specimens	M
2013	II	Macaca fascicularis	FR	CH	MU		72	specimens	M
2013	II	Macaca fascicularis	GB	CH	MU	945	1190	specimens	M
2013	II	Macaca fascicularis	GB	CH	MU	5739	7010	specimens	M
2013	II	Macaca fascicularis	US	CH	KH		98	specimens	M
2013	II	Macaca fascicularis	US	CH	MU	2973	5132	specimens	M
2013	II	Macaca fascicularis	US	CH	MU		3087	specimens	M
2013	II	Macaca fascicularis	US	CH	MU	1091		specimens	M
2013	II	Macaca fascicularis	US	CH	PH	82		specimens	M
2013	II	Macaca fascicularis	US	CH	VN		6	specimens	M
2014	II	Callithrix jacchus	FR	CH	DE		10	specimens	M
2014	II	Cebus xanthosternos	NL	CH			2	specimens	M
2014	II	Macaca fascicularis	DE	CH	CN	8		specimens	M
2014	II	Macaca fascicularis	DE	CH	MU	2826	3254	specimens	M

2014	II	Macaca fascicularis	DE	CH	PH	2		specimens	M
2014	II	Macaca fascicularis	ES	CH	CN	320	320	specimens	M
2014	II	Macaca fascicularis	FR	CH	MU	13		specimens	M
2014	II	Macaca fascicularis	FR	CH	PH	9	9	specimens	M
2014	II	Macaca fascicularis	GB	CH	GB		405	specimens	M
2014	II	Macaca fascicularis	GB	CH	MU	1288		specimens	M
2014	II	Macaca fascicularis	GB	CH	MU	1238	1254	specimens	M
2014	II	Macaca fascicularis	GB	CH	VN	982		specimens	M
2014	II	Macaca fascicularis	US	CH	CN	35	233	specimens	M
2014	II	Macaca fascicularis	US	CH	ID		24	specimens	M
2014	II	Macaca fascicularis	US	CH	KH	50		specimens	M
2014	II	Macaca fascicularis	US	CH	MU	374	376	specimens	M
2014	II	Macaca fascicularis	US	CH	MU	1143	2392	specimens	M
2014	II	Macaca mulatta	GB	CH	AT		3	specimens	M
2015	I	Pan troglodytes	DK	CH		3		specimens	M
2015	I	Pan troglodytes	DK	CH		3		specimens	M
2015	II	Callithrix jacchus	DE	CH	DE	81	81	specimens	M
2015	II	Callithrix jacchus	FR	CH	DE		5	specimens	M
2015	II	Callithrix jacchus	FR	CH	ZA		1	specimens	M
2015	II	Macaca fascicularis	CA	CH	CN		1550	specimens	M
2015	II	Macaca fascicularis	DE	CH	CN	24	386	specimens	M
2015	II	Macaca fascicularis	DE	CH	MU	6410	9517	specimens	M
2015	II	Macaca fascicularis	DE	CH	PH	29	2	specimens	M

2015	II	Macaca fascicularis	FR	CH	MU	2528	2660	specimens	M
2015	II	Macaca fascicularis	FR	CH	PH	2	4	specimens	M
2015	II	Macaca fascicularis	GB	CH	GB	1595	1595	specimens	M
2015	II	Macaca fascicularis	GB	CH	MU	1420	1620	specimens	M
2015	II	Macaca fascicularis	GB	CH	VN		357	specimens	M
2015	II	Macaca fascicularis	SE	CH	MU	8	8	specimens	M
2015	II	Macaca fascicularis	US	CH	CN	85	741	specimens	M
2015	II	Macaca fascicularis	US	CH	MU	349	352	specimens	M
2015	II	Macaca fascicularis	US	CH	MU		153	specimens	M
2015	II	Macaca fascicularis	US	CH	MU	284		specimens	M
2016	II	Callithrix jacchus	DE	CH	DE	249		specimens	M
2016	II	Macaca fascicularis	DE	CH	CN	84		specimens	M
2016	II	Macaca fascicularis	DE	CH	MU	4826		specimens	M
2016	II	Macaca fascicularis	DE	CH	PH	18		specimens	M
2016	II	Macaca fascicularis	DE	CH	VN	320		specimens	M
2016	II	Macaca fascicularis	FR	CH	MU	408		specimens	M
2016	II	Macaca fascicularis	GB	CH	MU	438		specimens	M
2016	II	Macaca fascicularis	US	CH	MU	144		specimens	M
TOTAL						**71,006**	**87,195**		

ANNEX 4 – COMPANY COMMENTS

Company No. 1: Global Pharmaceutical Company with CA/US focus

1. The transport of tissues and research samples from Contracted Research Organizations in Canada to the USA is unduly complex and is required for *each* tissue and sample from *each* covered species (e.g. typically *M. fascicularis*, a common research species).
2. The ability to obtain a permit for a research sample can significantly delay preclinical research studies and in some instances impacts the ability to obtain critical information that will support drug development (e.g. shipping of fragile and perishable samples for advanced scientific assays or analysis in the US, peer review of histologic samples)
3. It is not always possible to anticipate the need to ship samples internationally in advance for optimal analysis. This is a science driven, time-sensitive decision and process. The current process does not easily allow timely permit approval to facilitate this need.
4. The permit process can inhibit the ability to ship samples time-critical or fragile samples internationally for additional analysis. This impacts the ability to maximize the value of these tissues and data and could compromise sample integrity.
5. The CITES permit process can drive where studies are performed, domestically vs. internationally. This complicates and can delay studies based on CRO availability and capability or impact the ability to use international expertise.
6. The process must be repeated for each shipment in each direction (e.g. tissues sent from Canada to the US and then again to be returned)
7. Tracking of all samples can lead to significant administrative burdens.
8. E-permits and or SP's would be a great improvement
9. CITES covered tissues or samples can directly support Clinical studies and FDA filings and delays may impact the time required to bring innovative medicines to the market.

Company No 2: Global CRO with US/EU focus

Country	Process	Website	Time to receive permits	Cost - Fees	Comments
United States	Application form CITES required document copies Courier Cheque processing	Website for forms	90 days	$75 -$100	Multi-use available (Master File) Time to get permits long.
France	Download documents required (Import CITES Export Cites, Sanitary Certificate…) for the application and fill in all the information needed on form.	Dedicated website. Registration required	2-3 weeks	$0.00	The website is easy to use and efficient.
Canada	Fill out application form and CITES Summary form provided by Environment Canada (EC) Copies of all CITES required documentation Application and CITES docs are scanned and emailed to EC	Website available for general application forms	4-6 weeks typically	$0.00	Easy communication and resolution of any issues Multi-use permits possible EC uses our FedEx account to send permits to us Application form we use is 'prototype' for us

United Kingdom	Application form Copies of all CITES documents Cross match with all the import and export licenses prior to application, quantify the materials, use correct descriptions and keep it consistent with inventory documents. If there are samples from animals imported under multiple original import applications, we must split them onto separate applications. One per import (from the originating country, e.g. China).	Courier and Post	3 (90%)-6 (100%)weeks	£37	Multiple payment options There is a discount for additional forms under the same import, so it doesn't add much expense, just more forms!

Company No. 3: Global Pharmaceutical Company with US/UK focus

1. From the viewpoint of the United States, importing CITES material is relatively smooth as a CITES import permit are only required for Appendix-I species (which aren't typically used in the pharma industry).
2. The process for getting an Export or Re-Export CITES permit can very lengthy, it can take several months to gather the information that United States Fish Wildlife Service (USFWS) require to be submitted with the application. Then the USFWS can often say to allow 60 days for review.
3. When a customer enquires about a shipment of CITES material we typically tell them to expect the process to take 3-6 months!
4. USFWS did streamline things a few years ago for repeat shipments, so you can set up a master permit and then it is much quicker to obtain individual export permits against that master. But this will only cover shipments from the original animals documented in the master file.

Company No. 4: Global Pharmaceutical Company/CRO with US/DE focus

There is no way to know how long it will take. It is not unheard of to take 2-3 months, and at least once, nearly 6 months. No reason/explanation is ever given.

1. Communications regarding problems with the application can be very frustrating. At least once, I had an application expire, causing us to start again because we didn't know there was an outstanding question from the reviewer. The reviewer claimed to have left a phone message but no one received anything on our end, and no further attempt was made to contact us. With no response from us for two weeks, they declared it an abandoned application and dismissed it.

2. You cannot routinely call to check up on the status of an application, as that might anger them, so it is a risky road to pursue. Applications can also expire if they have been in the system for a certain period of time without action. Likewise, a permit expires in 6 months if not used, so this company couldn't apply for an entire study all at once, they had to be phased in. Each shipment required a separate permit, even though it was samples from all the same animals.

3. As a CRO, our studies depend on us being able to send samples or slides to labs in Europe and it was a minefield to try and get the permits in time for the various samples (these could be blood, plasma, tissue, or glass slides), and then have them in hand before the permit expired.

4. The Pharmaceutical Industry seemed to get better treatment compared to CROs. For instance, a couple of my clients in pharma would tell me that they were issued permits fairly quickly because they maintained an NHP master file, with identifications of animals that were pre-cleared. When we tried to do the same I was told that system was a bit cumbersome, and they were "not allowing new master files to be created".

5. At the time we had to pay by cheque, not sure if this is still the case, but they would not take a credit card as they didn't have the capacity to do that. We learned to mail separate applications in separate envelopes with separate cheques. It happened on a couple of occasions that we got one check to cover two applications sent together. They cashed the check, processed one application, and told me that the other had been rejected because there was no payment attached.

6. In the US, this process is managed by the FWS who have at times (verbally) admitted that research permits for the bio-medical research are sometimes given lower priority than zoos and sanctuaries depending on who is assigned that particular application, and also evidence of allowing permit applications to languish for weeks due to their process time and staffing. A lot of people are strong proponents of a e-permit system.

Company No. 5: Global Pharmaceutical Company with FR/US focus

1. The French system is viewed as being quite an efficient system in general. One suggestion for improvement is to get an annual permit for redundant shipments as exists in the US.
2. We have been using e-permitting for 2 years now to import samples from the US. I have obtained a total of 6 import permits. Once the initial application is in, I do get approval the same day and receive the original document within 2 days by mail e-permitting makes things easy.

Company No 6: Primate Importer with MU/US/IL focus

1. One area which is very important are samples. If you have a worker bitten by monkey and you want to send the serum sample sometimes it takes 2 weeks then another week to ship it and another week to do the test. By that time if the animal has B virus the worker is already dead.
2. In research CITES is relevant only when wild animals are involved. When you transfer a wild animal or part of a wild animal it makes sense to be under CITES rules, but it makes much less sense when we want to ship a sample for medical testing.
3. When we have a case of a worker or a person bitten by a macaque the scientific procedure in all hospitals in most of the countries is to test immediately the monkey for herpes B and to start some kind of treatment to the affected person. In those cases, time is important and many times from my experience of working with thousands of macaques there is understandably a level of hysterical reaction by the bitten person and his family.
4. The need of CITES permit for exporting 0.5 ml of serum for medical testing for person or animal who need to be treated is not logical. The permit in some countries is issued on specific days and the whole process is between 5-20 days. Then you need to ship the sample usually to the USA and then lab has to do its work. This is too long and patient might be already treated if not dead when this is done.
5. We suggest to have an option to send serum/blood samples without CITES permit as it has nothing to do with trade or to have the online option for that.
6. We would also suggest that the CITES professional committee should have scientific representative from the research community, this will help to better communicate with the unique needs of this community.

Company No. 7: Global Pharmaceutical Company with DE/IT focus

1. For Italy there are no simplified procedures in place for CITES applications. We believe this causes us severe problems.
2. In Germany we have the possibility to make an application, the “collective application/notification” (§37 TierSchVerV). With this you can apply in one document for equal procedures. It is the same template as for the “normal” German applications and notifications.
3. A collective notification might be a toxicology procedure, with the same procedures/methods but different indications of the compounds (e.g. oncology and immunology, neurology etc.). If the collective application/notification is approved, we have the requirement to inform the competent authority at least 10 working days prior to start a study about the specifics of this test: e.g. specific animal number, name of the test compound, methods used in this test, start of the testing. Then we have to wait for the approval of this study.
4. At the moment this system seems to work ok, do not have any problems with it. Our regional government (competent authority) is very fast in the approval of the specific studies. It is a little bit more work for the scientists to write for any new study under a permission a short document and send it to the competent authorities. But until now we had no delay in a study because of that.