

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

SUMMARY

THURSDAY 4 OCTOBER
AFTERNOON

29. Review of Significant Trade in specimens of Appendix-II species

29.3 Country-wide Significant Trade Reviews

The Standing Committee noted document SC70 Doc. 29.3 and invited the Chairs of the Animals and Plants Committees, in consultation with the Secretariat, to further develop and submit the draft decisions in paragraph 9 of document SC70 Doc. 29.3 for consideration by the Conference of the Parties, in replacement of Decision 17.111, noting the suggestions to include in the draft decisions: the establishment of an advisory body, the necessity to adapt to the proposed Compliance Assistance Programme, and the inclusion of timeframes and the consideration of the need for external funding.

30. Enforcement

30.1 Enforcement matters: Report of the Secretariat

and

30.4 Wildlife crime enforcement support in West and central Africa

The Standing Committee agreed to recommend to the Conference of the Parties that Decision 17.85, paragraph b), has been implemented and can be deleted, and that strengthening cooperation and collaboration between CITES, the United Nations Convention against Corruption and the United Nations Convention against Transnational Organized Crime, be further pursued in accordance with the provisions of Resolution Conf. 17.6, paragraph 15.

The Standing Committee requested the Secretariat to:

- a) in consultation with the Chair of the Standing Committee, review the findings and recommendations emanating from the threat assessment commissioned in accordance with Decision 17.97, paragraph a),
- b) take into consideration the content of document SC70 Doc. 30.4 and the *Strategic Areas of Intervention and Priority Recommendations to Develop a Counter Wildlife Trafficking Response in West Africa* available in information documents SC70 Inf. 2 and SC70 Inf. 3 in developing recommendations for the sub-region; and
- c) as anticipated by Decision 17.98, prepare recommendations for consideration at the 18th meeting of the Conference of the Parties.

The Standing Committee encouraged all Parties, particularly bear range and consuming countries, to review their implementation of Resolution Conf. 10.8 (Rev. CoP14) on *Conservation of and trade in bears*, to ensure the effective implementation of the Resolution, and to continuously review poaching and trafficking trends, to ensure that the measures implemented to prevent and combat illegal trade in bear parts and derivatives, remain effective and are quickly adapted to respond to any new emerging trends;

The Standing Committee noted the *Customs-Police Cooperation Handbook* jointly developed by INTERPOL and the World Customs Organization, and encouraged Parties to promote the use of the handbook amongst their national customs and police authorities.

The Standing Committee encouraged Parties to, where the creation of closed user groups was requested, communicate the establishment of such closed user groups to their relevant national authorities, and to encourage their use.

The Standing Committee noted document SC70 Doc. 30.4.

The Standing Committee requested the Secretariat to distribute the questionnaire reproduced in the Annex to document SC70 Doc. 30.4 and the *Strategic Areas of Intervention and Priority Recommendations to Develop a Counter Wildlife Trafficking Response in West Africa* to CITES Parties and other stakeholders in a CITES Notification to support the *West Africa Strategy on Combating Wildlife Crime Steering Committee* in the efforts they lead to develop the *West Africa Strategy on Combating Wildlife Crime (WASCWC)* and its associated implementing mechanisms.

30.2 International Consortium on Combating Wildlife Crime (ICCWC): Report of the Secretariat

The Standing Committee noted document SC70 Doc. 30.2.

30.3 Combating wildlife cybercrime

30.3.1 Report of the working group

and

30.3.2 Report of the Secretariat

The Standing Committee agreed to propose to the Conference of the Parties revisions to Resolution Conf. 11.3 (Rev. CoP17) on *Compliance and enforcement* under **Regarding e-commerce of specimens of CITES-listed species** as follows:

Regarding illegal online trade in e-commerce of specimens of CITES-listed species

11. RECOMMENDS that Parties:

- a) evaluate or develop their domestic measures to ensure that they are sufficient to address the challenges of controlling legal wildlife trade, investigating illegal wildlife trade and punishing the perpetrators, giving high priority to the offer for sale of specimens of species listed in Appendix I;
- b) establish, at the national level, a unit dedicated to investigating wildlife crime linked to the Internet or incorporate wildlife trade issues into existing units that investigate or monitor computer or cyber-crime; ~~and~~
- c) establish at the national level a mechanism to coordinate the monitoring of Internet-related wildlife trade and to provide for the timely sharing between designated contact points in CITES Management and Enforcement Authorities of information that results from these activities; ~~and~~
- d) appoint national points of contact with knowledge and training on online investigations, evidence gathering, and prosecutions to serve as focal points for enquires from other Parties and intergovernmental organisations;

- e) establish an ongoing national monitoring programme, and in conjunction with relevant experts, develop a list of Appendix II specimens that are most commonly found in illegal trade on digital and online platforms;
- f) require the national points of contact under paragraph d) to identify key contacts at online technology and data companies that can facilitate the provision of information upon request from Parties in support of investigations;
- g) engage online platforms to:
 - i) introduce and publish policies to address and prevent the use of such platforms for illegal trade in wildlife including measures to ensure compliance with such policies;
 - ii) ensure that such policies are presented as clearly and visibly as possible;
 - iii) encourage them to inform their users about illegal online trade in wildlife, by using targeted alerts and other technology to ensure users are aware of relevant laws and website policies;
- h) Raise awareness of illegal online trade in wildlife through public outreach and by engaging directly with online technology companies; and
- i) Encourage the cooperation and engagement of postal, transport, logistical and financial service providers and relevant retail sectors;

12. RECOMMENDS further that Parties and ICPO-INTERPOL:

- a) submit information to the Secretariat on methodologies used by other agencies that may assist in the evaluation of mechanisms to regulate legal commerce of CITES-listed species via the Internet;
- b) ensure that sufficient resources are directed to:
 - i) the investigation and targeting of illegal Internet-related trade in specimens of CITES-listed species;
 - ii) conduct training and awareness raising as well as monitoring and enforcement of illegal online trade in protected specimens;
- c) use the data acquired during monitoring activities to establish strategies regarding enforcement, capacity building and public awareness; and
- d) consider ways in which funding may be provided for the establishment of a full-time position, dedicated to e-commerce aspects of wildlife crime, within the General Secretariat of ICPO-INTERPOL. The responsibilities of such a position should include ensuring that all information or intelligence regarding illegal online trade e-commerce is consistently collected and disseminated to the relevant Enforcement Authorities designated by Parties;

The Standing Committee agreed to submit the following draft decision to the 18th meeting of the Conference of the Parties.

Directed to the Secretariat:

XX. The Secretariat shall include as appropriate terminology relevant to “illegal online trade in wildlife” on the CITES Glossary and the new webpage on *Wildlife crime linked to the Internet* on the CITES website

The Standing Committee agreed to renew Decisions 17.92 and 17.93 with the necessary changes to reporting requirements.

The Standing Committee agreed that it would be more appropriate to use 'wildlife crime linked to the Internet' as per the terminology in Resolution Conf. 11.3 (Rev. CoP17) on *Compliance and enforcement*; and to include in its report to the 18th meeting of the Conference of the Parties, in accordance with Decision 17.96, a recommendation on the most appropriate terminology to use, including recommending that the Secretariat amend all references in relevant Resolutions and Decisions with the terminology agreed at CoP18.

31. Trade in specimens bred in captivity or artificially propagated

31.4 Observations and recommendations regarding the first iteration of Resolution Conf. 17.7 on *Review of trade in animal specimens reported as produced in captivity*

The Standing Committee agreed to propose to CoP18, the following amendments to Resolution Conf. 17.7:

The following new sub-paragraphs be added after paragraph 2 c):

Where the Animals Committee finds that a species/country combination raises concerns better dealt within the process of the Review of Significant Trade, it can introduce that combination into stage 2 of the process in accordance with Resolution Conf. 12.8 (Rev. CoP17), paragraph 1 d) as an exceptional case.

Recommends that the Animals Committee, when selecting species-country combinations for review under paragraph 2 c) of the present Resolution, not select species-country combinations where the Standing Committee has already entered a dialogue with the country concerned over the use of source codes C, D, F or R under another compliance process.

The following new paragraph be added after paragraph 2 j)

Recommends that the Standing Committee, when making recommendations to the country or countries under paragraph 2 j) of the present Resolution in relation to the use of source codes C, D, F or R, avoid duplication with other compliance processes.

The Standing Committee agreed to recommend to the Conference of the Parties that Decisions 17.103, 17.105 and 17.107 be replaced by the following draft decisions:

Directed to the Animals Committee

18.AA With the assistance of the Secretariat and in the light of its experiences with its implementation, the Animals Committee shall review the provisions of Resolution Conf. 17.7 (Rev. CoP18) and make any recommendations for improvements to the Standing Committee.

Directed to the Standing Committee

18.BB With the assistance of the Secretariat, taking account of any report from the Animals Committee and in the light of its experiences with its implementation, the Standing Committee shall review the provisions of Resolution Conf. 17.7 (Rev. CoP18) and make any recommendations for improvements to the 19th meeting of the Conference of the Parties.

34. Introduction from the Sea: Report of the Secretariat

The Standing Committee noted document SC70 Doc. 34 and the information contained therein and agreed that adding specific guidance regarding introduction from the sea certificates to Resolution Conf. 12.3 (Rev. CoP17) on *Permits and certificates* would not be necessary.

The Standing Committee agreed to submit to the Conference of the Parties the draft decisions contained in Annex 2 of document SC70 Doc. 34 as a replacement to Decisions 16.48 (Rev. CoP17) to 16.51 (Rev. CoP17).

36. Simplified procedures for permits and certificates: Report of the working group

The Standing Committee noted that wider access of Parties' to electronic permitting services could significantly complement the work of the simplified procedures for permits and certificates working group, and could alleviate many of the concerns regarding slow issuance of permits following application.

The Standing Committee noted the availability of tools to assist in application of forensic research such as the ICCWC Guidelines on Methods and Procedures for Ivory Sampling and Laboratory Analyses¹ and the ICCWC Best Practice Guide for Forensic Timber Identification².

The Standing Committee noted the global review of forensic laboratory capacity undertaken by the Secretariat in conjunction with the United Nations Office on Drugs and Crime³, in particular the areas for future development, as well as the recommendations for resource prioritization, and to take these into account when initiating activities to develop wildlife forensic science, or to promote its use to combat wildlife crime.

The Standing Committee noted that use of simplified permitting procedures depends on the capacity of Parties to implement partially completed permits and to rapidly process applications for these types of permits and welcomed initiatives for capacity-building on using simplified procedures.

The Standing Committee agreed to propose the amendments to Resolution Conf. 12.3 (Rev. CoP17) on *Permits and certificates* in Annex 2 of document SC70 Doc. 36 for consideration at the 18th Conference of the Parties.

The Standing Committee invited the Secretariat, in consultation with the Chair of the Standing Committee and Australia as chair of the intersessional working group, to incorporate the proposed amendments to Resolution Conf. 11.15 on *Non-commercial loan, donation or exchange of museum and herbarium specimens* in Annex 1 of document SC70 Doc. 36, including to ensure consistency in the use of the term research or scientific to qualify forensics laboratories; to change the title of the Resolution to reflect the proposed amendments; to include “, as appropriate” at the end of the first sentence in paragraph 3 b); to replace “every five years” by “at the discretion of the Management Authority” in paragraph 3 e); and to amend paragraph 3 f) ix) to make it less burdensome on Parties, for transmission to the Conference of the Parties.

The Standing Committee noted the responses received by Parties in relation to Notification to the Parties No. 2018/067.

The Standing Committee agreed to transmit the following draft decision to the 18th Conference of the Parties.

Directed to the Secretariat

- 18.XX a) The Secretariat shall issue a notification every five years requesting that Parties review and update their register of scientific institutions that are entitled to the exemption provided by Article VII paragraph 6, of the Convention, and communicate any changes to the Secretariat.
- b) The Secretariat shall issue the first notification 90 days after CoP18. In order to be able to distinguish between the different qualifications of the registered institutions (taxonomic, species conservation research or wildlife forensic research), the Secretariat should encourage Parties to include this information in response to the notification.

38. Definition of the term 'appropriate and acceptable destinations'

38.1 Report of the Secretariat and the Animals Committee

38.2 Report of the working group

¹ http://www.unodc.org/documents/Wildlife/Guidelines_Ivory.pdf

² http://www.unodc.org/documents/Wildlife/Guide_Timber.pdf

³ <https://cites.org/sites/default/files/eng/cop/17/WorkingDocs/E-CoP17-25-A4.pdf>

and

38.3 Definition of the term 'appropriate and acceptable destinations': Trade in live elephants

The Standing Committee agreed to propose to the Conference of the Parties the outline of the non-binding guidance and the set of draft decisions presented in paragraphs 8 and 9 of document SC70 Doc. 38.1, respectively; and confirmed that Decisions 17.178 to 17.180 have been fully implemented.

The Standing Committee agreed to propose to the Conference of the Parties the following additional draft decision:

Directed to the Secretariat

The Secretariat shall consult with Parties whose elephants are listed in Appendix II and who have exported wild caught elephants to a non-elephant range State since CoP11 on their implementation of Resolution Conf. 11.20 (Rev. CoP17), in particular considering the role and responsibility of the State of export in Article IV and Resolution Conf. 16.7 (Rev. CoP17) and Resolution Conf. 11.20 (Rev. CoP17).

The Standing Committee noted the concerns raised in document SC70 Doc. 38. 3 and requested the Secretariat to consult with Parties that have imported live elephants to share their findings that the Scientific Authority of the State of import is satisfied that the proposed recipient of a living specimen is suitably equipped to house and care for it; and that the Scientific Authorities of the State of import and the State of export are satisfied that the trade would promote *in situ* conservation in accordance with Resolution Conf. 11.20 (Rev. CoP17) on *Definition of the term 'appropriate and acceptable destinations'*.

39. Electronic systems and information technologies: Report of the working group

The Standing Committee agreed to submit the following draft decisions to the Conference of the Parties at its 18th meeting:

18.AA *Directed to Parties*

Parties are invited to

- a) support the working group on ~~electronic permit processing and efficient control procedures~~ electronic systems and information technologies; and
- b) consider the *eCITES Implementation Framework* and ~~the recommendations contained within this document~~ in regard to its potential usefulness in when planning and implementing electronic CITES systems and report-back on which information is useful to their own particular efforts and what additional support is needed to address other issues affecting implementation such as governance structure, technical capacity, and law enforcement restrictions. ~~their experiences and lessons learned during the implementation of these systems to be shared in future revisions of this Framework.~~

Parties are requested:

- a) to consider the implementation of electronic CITES systems in a manner designed to increase transparency and efficiency of the permit issuance and control process, to prevent use of fraudulent permits, and to provide quality data for improved sustainability assessment; and
- b) to take note of the UNCTAD eCITES system as a low cost, off-the-shelf solution that is now available to Parties for implementation;
- c) if using electronic CITES systems to:
 - i) Consider UN/CEFACT Recommendation 14 on Authentication of trade documents as good practice when implementing the electronic equivalent of signatures and seals for electronic CITES permitting systems and exchanges;

- ii) ~~Authenticate each all users who that has have~~ access to the electronic system using username and passwords, and/or similar technologies, or both;
- iii) Ensure that electronic CITES systems keep an audit trail, i.e. keep electronic records (including, but not limited to, confirmation of transmission and receipt with associated time stamps and message headers) that enable the Management Authority to identify ~~each the~~ person who requested, approved, processed, issued, endorsed, or altered electronic CITES permits and certificates; and
- iv) Keep archives of audit ~~trails trials~~ for no fewer than 5 years after the expiry date of the permit or certificate, or no fewer than 5 years after the date that the trade was reported in the Party's annual report, whichever is later; and
- v) Provide the CITES Secretariat with copies of all valid electronic signatures it uses for issuance of permits and certificates in accordance with Article IX(4) of the Convention and paragraph 3(p) of Resolution Conf. 12.3 (Rev. CoP17);
- vi) Notify the secretariat immediately when authenticated users are removed or no longer authenticated; and
- vii) Recognize that in electronic CITES systems that meet the above requirements i) – v) the electronic equivalent of a physical signature and a seal ~~is provided~~ may be provided through the authenticated identification of the permit applicant, ~~the identification of the official who that~~ issued or authorized the permit or certificate document, any official who altered the permit or certificate, and the identification of the issuing authority agency, and the endorsement by the inspecting official who endorsed the permit or certificate. Customs office.
- d) to establish a systematic dialogue and ongoing collaboration between their Management Authorities and their national Customs and border control agencies to implement an efficient, risk based control system for cross border trade in CITES listed species where possible and appropriate; and
- e) to provide information to the Secretariat on the state of automation ~~automaton~~ of CITES permit processes and the implementation control systems for cross border trade in CITES listed species and share their lessons learned.

18.BB Directed to the Standing Committee

The Standing Committee shall establish a working group on electronic systems and information technologies ~~electronic permit processing and efficient control procedures~~ to work in collaboration with the CITES Secretariat to undertake the following tasks:

- a) work with the United Nations Centre for Trade Facilitation and Electronic Business (UN/CEFACT), the United Nations Conference on Trade and Development (UNCTAD), the International Trade Centre (ITC), the World Bank, the World Customs Organization (WCO), the World Trade Organization (WTO) and other relevant partners, to continue the development of joint projects that would facilitate Parties' access to electronic permitting services and their alignment to international trade standards and norms, such as the further development and implementation of the UNCTAD eCITES system;
- b) work with the World Customs Organization, the United Nations Office on Drugs and Crime, the Global Container Control Programme and other relevant national and international organizations and initiatives to develop recommendations, guidelines and training materials to support the establishment of risk based trade control systems to combat illegal trade in wildlife and facilitate compliant trade where possible and appropriate;
- c) develop recommendations and best practice guidelines for CITES permit issuance and control processes when using electronic CITES permit systems and information exchanges;

- d) work with all relevant partners on the development of standards and solutions for Electronic Permit Information eXchange (EPIX) for the exchange of CITES permits and certificates and to improve the validation of CITES permit data by CITES Management Authorities and Customs officials;
- e) work with the Secretariat of the International Plant Protection Convention (IPPC), National Plant Protection Organizations (NPPOs) and other relevant organizations to learn from their efforts and work towards a harmonization of standards and procedures for licenses, permits and certificates frequently used in conjunction of cross border trade in CITES listed specimen; ~~and~~
- f) monitor and advise on Parties' work related to the development of traceability systems for specimens of CITES-listed species to facilitate their harmonization with CITES permits and certificates;
- g) develop the capacity of Management Authorities, especially those with the greatest needs, to electronically collect, secure, maintain, and transmit data using systems compatible with those of the Secretariat and other Management Authorities;
- h) develop recommendations for any appropriate revision of Resolution Conf. 12.3 (Rev. CoP17) on *Permits and certificates* to ensure electronic CITES permit systems and electronic border clearance processes are compliant with and incorporate the requirements of the Convention, including Articles III, IV, V and VI, examining in particular the issues of presentation and validation, to the 19th meeting of the Conference of the Parties; and
- i) develop recommendations for any appropriate revision of Resolution Conf. 11.17 (Rev. CoP17) on *National reports* and Guidelines for the preparation and submission of CITES annual reports distributed by the Secretariat.

18.CC Directed to the Standing Committee

The Standing Committee shall review the progress of implementation of the above Decision and make recommendations as necessary, including any appropriate suggestions for the revision of Resolution Conf. 12.3 (Rev. CoP17) on *Permits and certificates*, Resolution Conf. 11.17 (Rev. CoP17), on *National reports*, and ~~the amendment of~~ Guidelines for the preparation and submission of CITES annual reports distributed by the Secretariat, to the 19th meeting of the Conference of the Parties.; ~~and~~

18.DD Directed to the Secretariat

The Secretariat shall, subject to the availability of external funding

- a) Organize in collaboration with the working group on electronic systems and information technologies and relevant partners an international workshop on modern customs procedures for improved control of trade in CITES listed species to simplify compliant trade and combat against illegal trade in wildlife and prepare recommendations to the Standing Committee;
- b) Prepare a report on risk management systems for efficient control of trade in CITES listed species and prepare recommendations to the Standing Committee;
- c) Work with national and international organizations such as the World Customs Organization, the United Nations Conference on Trade and Development, the UN regional Commissions, the United Nations Office on Drugs and Crime, the World Trade Organization and the World Bank to support Parties in the implementation of efficient and risk based procedures for control in CITES-listed species using information technologies and modern trade control procedures;
- d) Maintain the eCITES website and publish the results of planned and ongoing projects undertaken by Parties related to automation of CITES procedures and controls and

electronic permit information exchanges and outputs provided by the working group on electronic permit processing and efficient control procedures; and

- e) Provide capacity building and advisory services to support Parties interested in implementing electronic solutions for the management and control of CITES permits and certificates and support Parties in establishing electronic permit systems and information exchanges.

37. Physical endorsement of permits and certificates

The Standing Committee noted document SC70 Doc. 37 (Rev. 1) and agreed to support the pursuit of intersessional work on this issue between the 18th and 19th meetings of the Conference of the Parties as part of draft decision 18.CC under agenda item 39 above, if such a draft decision is approved by the Conference of the Parties.

40. Traceability: Report of the working group

The Standing Committee agreed the recommendations in document SC70 Doc. 40 Add. and requested the Secretariat, in consultation the Chair of the Standing Committee, Mexico and Switzerland as co-chairs of the intersessional working group, to propose these recommendations in an appropriate format for the Conference of the Parties.

42. Identification of specimens in trade

42.1 Identification Manual and identification of tiger skins: Report of the Secretariat

The Standing Committee noted document SC70 Doc. 42.1 and the proposal by the Secretariat to prepare draft decisions to revise or replace Resolution Conf. 11.19 (Rev. CoP16) on *Identification Manual*; and agreed to propose to the Conference of the Parties that Decisions 17.164 to 17.165 can be considered completed.

42.2 Identification of CITES-listed tree species: Report of the Plants Committee

The Standing Committee noted the progress made by the Plants Committee in its implementation of Decisions 17.166 and 17.167, and the findings and recommendations that the Plants Committee intends to report for consideration by the Conference of the Parties at its 18th meeting.

43. Illegal trade in cheetahs (*Acinonyx jubatus*): Report of the Secretariat

The Standing Committee invited the intersessional working group on cheetahs to review the draft CITES cheetah trade resource kit and the recommendations of the Secretariat as outlined in Decision 17.125; and to formulate comments and recommendations on the finalization and dissemination of the CITES cheetah trade resource kit for consideration by the Standing Committee at its 71st meeting.

The Standing Committee encouraged Parties to communicate the establishment of the cheetah closed user group to their relevant national authorities, and to encourage its use;

The Standing Committee encouraged Parties affected by illegal trade of cheetahs on the Internet to, as appropriate, review their implementation of paragraphs 11 and 12 under *Regarding e-commerce of specimens of CITES-listed species*, in Resolution Conf. 11.3 (Rev. CoP17) on *Compliance and enforcement*, and to pursue the full implementation of these provisions;

The Standing Committee encouraged Parties affected by illegal trade in live cheetahs to, in accordance with the provisions of Annex 3 to Resolution Conf. 17.8 on *Disposal of illegally traded and confiscated specimens of CITES-listed species*, pursue the development of a plan of action that can be executed without delay in the event that live specimens are seized; and

The Standing Committee encouraged Parties affected by illegal trade in cheetahs, in particular destination countries, to consider illegal trade in cheetahs in their implementation of Resolution Conf. 17.4 on *Demand reduction strategies to combat illegal trade in CITES-listed species*.

The Standing Committee noted the concerns expressed by Parties, such as Ethiopia, Kenya and the United States of America, regarding illegal trade in cheetahs.

44. Sturgeons and paddlefish (*Acipenseriformes spp.*)

44.1 Definition of country of origin of caviar: Report of the working group

The Standing Committee acknowledged the different opinions expressed by the members of the working group and noted document SC70 Doc. 44.1.

The Standing Committee invited the Secretariat, in consultation with the Chair of the Standing Committee and Japan as chair of the intersessional working group, to propose a draft decision for consideration by the Conference of the Parties to continue work on this issue, taking into account the advice provided by the United States of America and Hungary at this meeting.

44.2 Identification of sturgeons and paddlefish specimens in trade: Report of the Animals Committee

The Standing Committee noted document SC70 Doc. 44.2 and invited the Secretariat to submit renewed or, as necessary, revised draft decisions concerning *identification of products of Sturgeons and paddlefish (*Acipenseriformes spp.*) specimens in trade* for consideration at the 18th meeting of the Conference of the Parties.

47. Humphead wrasse (*Cheilinus undulatus*): Report of the Secretariat

The Standing Committee agreed to submit to the Conference of the Parties the draft decision in Annex 1 to document SC70 Doc. 47.