

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

Seventy-first meeting of the Standing Committee  
Colombo (Sri Lanka), 22 May 2019

Interpretation and implementation matters

General compliance and enforcement

IMPLEMENTATION OF RESOLUTION CONF. 17.7 ON *REVIEW OF TRADE IN ANIMAL SPECIMENS  
REPORTED AS PRODUCED IN CAPTIVITY*: REPORT OF THE SECRETARIAT

1. This document has been prepared by the Secretariat.

Background

2. At its 17th meeting (CoP17, Johannesburg, 2016), the Conference of the Parties adopted a new compliance procedure through Resolution Conf. 17.7 on *Review of trade in animal specimens reported as produced in captivity*. It concerns trade in specimens using the source codes C, D, F or R as defined in paragraph 3 i) of Resolution Conf. 12.3 (Rev. CoP17) on *Permits and certificates*. The Animals Committee, together with the Standing Committee and in cooperation with the Secretariat, is directed to play a key role in the implementation of this Resolution.
3. The review is designed to consider biological, trade and other relevant information regarding animal species subject to significant levels of trade using source codes C, D, F or R, to identify problems associated with the implementation of the Convention and to develop solutions.

Selection of species-country combinations for review and responses from countries

4. At its 29th meeting (AC29, Geneva, July 2017), in accordance with paragraph 2 c) of Resolution Conf. 17.7, the Animals Committee reviewed a summary from the CITES Trade Database of annual report statistics of specimens of species traded between 2011 and 2015 under source codes C, D, F or R. This summary is found in [Annex 1 of document AC29 Doc. 14.1](#). The Committee selected a number of species-country combinations for review under the Resolution, taking into account the biology of the species. In making the selection, the Committee was mindful of paragraph 2 e) of the Resolution which refers to the need to “determine if the correct source codes have been used, under the applicable Resolutions, for specimens claimed to be produced in captivity” and of paragraph 2 g), which refers to the need to “determine if trade is in compliance with Article III and Article IV of the Convention, as well as Article VII, paragraphs 4 and 5”.
5. In accordance with paragraph 2 c) of the Resolution, for each species-country combination selected for review, the Animals Committee drafted general or specific questions to be addressed by the Secretariat to the Parties concerned.
6. In accordance with paragraph 2 e) of the Resolution, the Secretariat, on 30 August 2017, notified the countries concerned that certain species produced in captivity in their country had been selected for review providing them with an overview of the review process and an explanation for the selection provided by the Animals Committee. Copies of the responses received can be found in [Annex 2 of document AC30 Doc. 13.2 \(Rev. 3\)](#) and its [addendum](#). The Secretariat removed all personal details concerning the facilities/operations referred to in the replies and the names of inspectors who may have been cited as visiting them.

## Review of responses from countries

7. At AC30, under paragraph 2 g) of the Resolution, the Animals Committee reviewed the responses from the countries concerned in order to determine if trade is in compliance with Article III and Article IV of the Convention, as well as Article VII, paragraphs 4 and 5.
8. In some cases, the Animals Committee determined that the trade in specimens with source codes C, D, F or R was in compliance with Article III and Article IV of the Convention, as well as Article VII, paragraphs 4 and 5. In accordance with paragraph 2 g) of the Resolution, the following species-country combinations were therefore excluded from the review and the countries concerned notified accordingly by the Secretariat in September 2018:
  - Macaca fascicularis* from Cambodia
  - Tridacna crocea* from the Federated States of Micronesia
  - Ptyas mucosus* from Indonesia
  - Trachyphyllia geoffroyi* from Indonesia
  - Agalychnis callidryas* from Nicaragua
  - Lorius lory* from South Africa
  - Varanus exanthematicus* from Togo
9. Where the Committee identified concerns appropriately within its remit, it has formulated draft recommendations directed to the relevant countries. The Committee was mindful of paragraph 2 h) of Resolution Conf. 17.7 that these recommendations should be time-bound, feasible, measurable, proportionate, transparent and aimed at ensuring long-term compliance and, where appropriate, aim to promote capacity building and enhance the ability of the country to implement relevant provisions of the Convention. In the case of *Centrochelys sulcata* from Guinea, the Standing Committee did not make any recommendations to the country but agreed to flag this species-country combination for the Standing Committee and the Secretariat to be included in the ongoing Article XIII compliance process involving that Party. This matter is addressed in document SC71 Doc. 10.2.
10. In accordance with paragraph 2 h) of the Resolution, the Secretariat transmitted these draft recommendations and supporting information from the Animals Committee to the Standing Committee.
11. At its 70th meeting (SC70, Sochi, October 2018), the Standing Committee endorsed the Animals Committee's detailed recommendations in relation to 12 species/country combinations and revised a further three. In accordance with paragraph 2 k) of the Resolution, the Secretariat conveyed these recommendations to the Parties concerned on 15 November 2018 inviting them to provide their responses by 1 February 2019. The Annex to the present document contains the text of the recommendations and summary of the responses received to date from the Parties to whom they were addressed.
12. Concerning the consideration of responses received to these recommendations, paragraphs 2 l) and m) of Resolution Conf. 17.7, which are being used for the first time on this occasion, appear to be somewhat contradictory. Paragraph 2 l) calls for the determination of whether the recommendations have been implemented to be made by the Secretariat in consultation with all members of the Standing and the Animals Committees. In the case of recommendations that are deemed not to have been met, the members of the Standing Committee are to consult with the Secretariat on recommendations for appropriate action which are then to be presented to themselves for consideration.
13. Paragraph 2 m) of Resolution Conf. 17.7 directs the Secretariat to present its own evaluations of the implementation of the recommendations and a rationale for those evaluations to the Standing Committee together with a summary of the views of the Animals Committee.
14. This procedure could be clarified during the implementation of Decision 17.107 and the continuation thereof recommended in document CoP18 Doc. 58.
15. The Resolution does not place any time limit on consideration of responses received to the recommendations, but as these issues concern possible breaches of the implementation of the Convention which may be harmfully affecting the conservation of the species involved, the Secretariat recommends that they should be carried out as expeditiously as possible. However, it is the policy of the Secretariat to undertake formal consultations with the Convention's committees in the three working languages of the Convention, which takes additional time.

16. In the interest of moving forward as promptly as possible, in the Annex to the present document the Secretariat provides its own provisional evaluations of the implementation of the recommendations and a rationale for those evaluations. Before the present meeting the Secretariat will continue to seek responses from those Parties which did not reply and clarifications from those which did not fully respond to the recommendations made. The Secretariat will also consult the Animals Committee, through its Chair, about whether, in its view, the recommendations have been implemented and, if not, what appropriate action should be taken by the Standing Committee. The Secretariat will make the views of the Animals Committee and its own final evaluations and recommendations available to the Standing Committee prior to the present meeting as an addendum to the present document.
17. In accordance with paragraph 2 n) of Resolution Conf. 17.7, the Standing Committee is invited to decide on appropriate actions and make recommendations to the countries concerned, keeping in mind that these recommendations should be time-bound, feasible, measurable, proportionate, transparent and should, if appropriate, promote capacity building. In exceptional circumstances, where the country under consideration provides new information on the implementation of the recommendations, the Committee should consult with the Animals Committee intersessionally through its Chair prior to making a decision on appropriate action. The Standing Committee may wish to decide on appropriate actions and make recommendations now or defer these to the 73rd meeting of the Committee, pending the arrival of further information on some or all of the cases under review.

RECOMMENDATIONS OF THE STANDING COMMITTEE AND RESPONSES RECEIVED FROM AFFECTED PARTIES

Standing Committee recommendation	Response from Party concerned
<p><b>1. <i>Centrochelys sulcata</i> from Benin</b></p> <p>The Standing Committee recommends that by 1 February 2019, Benin should:</p> <ul style="list-style-type: none"> <li>– Provide evidence of legal acquisition of all breeding stock for all facilities, including information on source of animals used to augment the breeding stock;</li> <li>– Provide the justification for, and details of, the scientific basis by which it has been established that the quantities of <i>Centrochelys sulcata</i> taken from the wild and used as breeding stock would not be detrimental to the survival of the species;</li> <li>– Provide information on the ability of the facilities in Benin to produce F2 specimens or manage the species in a manner demonstrated to be capable of doing so; and</li> <li>– Agree to restrict export to specimens of less than 15cm straight carapace length.</li> </ul> <p>Benin is further encouraged to:</p> <ul style="list-style-type: none"> <li>– Introduce standard reporting forms to be used by the facilities according to the ones in the guidance</li> <li>– Continue regular monitoring and inspections as appropriate; inspections should</li> </ul>	<p>No response received</p>

<p>occur at the end of the breeding season for each stock.</p> <ul style="list-style-type: none"> <li>– Establish a unique marking system for the breeding stock.</li> </ul>	
<p><u>Evaluation of the Secretariat</u></p>	
<p><b>2. <i>Centrochelys sulcata</i> from Ghana</b></p> <p>The Standing Committee recommends that by 1 February 2019, Ghana should:</p> <ul style="list-style-type: none"> <li>– Provide evidence of legal acquisition of all breeding stock for all facilities, including information on source of animals used to augment the breeding stock;</li> <li>– Provide information on the ability of the facilities in Ghana to produce F2 specimens or manage the species in a manner demonstrated to be capable of doing so; and</li> <li>– Restrict export to specimens of less than 15cm straight carapace length.</li> </ul> <p>Ghana is further encouraged to:</p> <ul style="list-style-type: none"> <li>– Introduce standard reporting forms to be used by the facilities according to the ones in the guidance</li> <li>– Continue regular monitoring and inspections as appropriate; inspections should occur at the end of the breeding season for each stock.</li> <li>– Establish a unique marking system for the breeding stock.</li> </ul>	<p>No response received</p>

Evaluation of the Secretariat

<p><b>3. <i>Varanus exanthematicus</i> from Ghana</b></p> <p>The Standing Committee recommends that Ghana should confirm by 1 February 2019 that it will report all specimens from facilities that are produced under the management practices described in document AC30 Doc. 13.1 A2 as source code W and that accordingly they will undertake a non-detriment finding (NDF) for all exports.</p>	<p>No response received</p>
---	-----------------------------

Evaluation of the Secretariat

<p><b>4. <i>Cacatua alba</i> from Indonesia</b></p> <p>The Standing Committee recommends that Indonesia should explain by 1 February 2019, the high productivity reported by the two facilities breeding this species and confirm whether the facilities have produced specimens to the F2 generation or how they are managing their stock in a manner that has been demonstrated to do so. The Standing Committee noted that Indonesia has suspended all trade in this species since 2017.”</p>	<p>The Indonesian Management and Scientific Authorities have conducted a joint inspection of the two facilities breeding this species in October 2018.</p> <p>Facility 1 has 12 pairs of parental stock, six of which reproduce annually. They are able to breed 2-8 times per year, with a clutch size of 2-3 eggs. Hatching rates are 90%. The facility shows records of pedigree as far as the F3 generation. Photographs of a number of eggs and young birds in incubators are supplied. The Indonesian authorities are satisfied that Facility 1 has demonstrated the ability to produce offspring and eligibility to export specimens as captive bred.</p> <p>Facility 2, which in Annex 2 (Rev. 3) of document AC30 Doc. 13.1 was said to have had 20 breeding pairs, has not produced captive bred specimens since 2018, although the facility still has cages and incubators. There is no mention of any parental stock being present. According to Indonesian regulations, a further inspection would be required if there is a proposal to export captive-bred specimens.</p>
--	--

Evaluation of the Secretariat

The CITES trade database shows the following exports of *Cacatua alba* from Indonesia in recent years:

2011	2012	2013	2014	2015	2016	2017
30	20	45	85	179	200	101

In Annex 2 (Rev. 3) of document AC30 Doc. 13.1, Indonesia stated that the two facilities produced 178 offspring in 2015 and 98 in 2016. More than that were reported exported by Indonesia during those two years, although some of the specimens exported could have been bred in earlier years. The stated production capabilities of Facility 1 – particularly the ability for each pair to breed up to 8 times per year, seems high in relation to the breeding biology of the species reported in Annex 3 of document AC30 Doc. 13.1.

<p><b>5. <i>Ornithoptera croesus</i> from Indonesia</b></p> <p>The Standing Committee recommends that Indonesia provide a report on the ranching operation to the Secretariat by 1 February 2019 and confirm that an NDF will be made prior to authorizing exportation of any specimens with source code 'R'. The Standing Committee noted that Indonesia has suspended all trade in this species since 2017.</p>	<p>Indonesia states that it ceased to export specimens with source code 'R' and that since that time, captive-bred specimens have been exported from one facility. However, the Indonesian government may encourage villagers in other areas to breed or ranch <i>Ornithoptera croesus</i> and, if this involved ranching, the Indonesian government understands that an NDF is required and that it should undertake to make such an NDF and notify the NDF results to the Secretariat before authorizing exports with source code 'R'.</p>																																																						
<p><u>Evaluation of the Secretariat</u></p>																																																							
<p>Indonesia reports that it stopped exporting specimens with source code 'R' in 2013, but the CITES trade database nevertheless still shows importing Parties continuing to report such trade:</p>																																																							
<table border="1"> <thead> <tr> <th>Year</th> <th>Importer</th> <th>Exporter</th> <th>Quantity reported</th> <th>Term</th> <th>Purpose</th> </tr> </thead> <tbody> <tr> <td>2014</td> <td>AU</td> <td>ID</td> <td>80</td> <td>bodies</td> <td>T</td> </tr> <tr> <td>2014</td> <td>DK</td> <td>ID</td> <td>115</td> <td>bodies</td> <td>T</td> </tr> <tr> <td>2014</td> <td>FR</td> <td>ID</td> <td>6</td> <td>bodies</td> <td>P</td> </tr> <tr> <td>2014</td> <td>JP</td> <td>ID</td> <td>223</td> <td>bodies</td> <td>T</td> </tr> <tr> <td>2014</td> <td>MY</td> <td>ID</td> <td>260</td> <td>bodies</td> <td>T</td> </tr> <tr> <td>2014</td> <td>NZ</td> <td>ID</td> <td>7</td> <td>bodies</td> <td>T</td> </tr> <tr> <td>2014</td> <td>US</td> <td>ID</td> <td>200</td> <td>bodies</td> <td>T</td> </tr> <tr> <td>2016</td> <td>JP</td> <td>ID</td> <td>5</td> <td>bodies</td> <td>T</td> </tr> </tbody> </table>		Year	Importer	Exporter	Quantity reported	Term	Purpose	2014	AU	ID	80	bodies	T	2014	DK	ID	115	bodies	T	2014	FR	ID	6	bodies	P	2014	JP	ID	223	bodies	T	2014	MY	ID	260	bodies	T	2014	NZ	ID	7	bodies	T	2014	US	ID	200	bodies	T	2016	JP	ID	5	bodies	T
Year	Importer	Exporter	Quantity reported	Term	Purpose																																																		
2014	AU	ID	80	bodies	T																																																		
2014	DK	ID	115	bodies	T																																																		
2014	FR	ID	6	bodies	P																																																		
2014	JP	ID	223	bodies	T																																																		
2014	MY	ID	260	bodies	T																																																		
2014	NZ	ID	7	bodies	T																																																		
2014	US	ID	200	bodies	T																																																		
2016	JP	ID	5	bodies	T																																																		
<p><b>6. <i>Varanus timorensis</i> from Indonesia</b></p> <p>The Standing Committee recommends that by 1 February 2019, Indonesia should agree to require all facilities breeding this species to maintain records of their activities in line with page 11 of the <i>Guidance for inspection of captive breeding and ranching facilities</i> and carry out regular inspection and monitoring. The Standing Committee notes that Indonesia has suspended all trade in this species since 2017.</p>	<p>The Indonesian authorities have completed inspections of all five facilities breeding this species in captivity. All facilities are exporting captive-bred specimens. Indonesia confirms that the inspections followed the recommendations in the <i>Guidance for inspection of captive breeding and ranching facilities</i>. Indonesia agrees to the Standing Committee's recommendation about the record keeping, and guidelines about studbooks and logbooks have been promulgated in national legislation by the Management Authority.</p>																																																						

Evaluation of the Secretariat

Indonesia appears to have implemented the Standing Committee's recommendations.

**7. *Geochelone elegans* from Jordan**

The Standing Committee recommends that Jordan immediately and until the Standing Committee recommends otherwise, establishes a zero export quota for *Geochelone elegans* from all sources and provides the following to the Secretariat by 1 February 2019:

- evidence of Legal acquisition of all breeding stock for all facilities, including information on source of animals used to augment the breeding stock
- information on the ability of the facilities in Jordan to produce F1 and/or F2 in an amount that corresponds to the number of specimens exported by this facility or manage the species in a manner demonstrated to be capable of doing so.

Jordan advises that it has stopped all exports of this species (and other tortoise species) from the only breeding facility in the country pending the owner providing documents to prove his claims.

Jordan states that the breeding facility was established in 2003 and that the breeder claims that the founder stock (nearly 200 females and 500 males) was imported from Lebanon, which was not a CITES Party at the time, and so the shipment may have been imported under national regulations established by the Jordanian Ministry of Agriculture. Neither the latter, nor the owner have any documentary evidence of this importation. Official records in Jordan are not retained for more than eight years. The breeder also claims to have imported supplementary breeding stock from the United States of America for which there are no records.

Details submitted on the ability of the facility to produce F1 and/or F2 specimens in an amount that corresponds to the number of specimens exported by the facility or to manage the species in a manner demonstrated to be capable of doing so, are the same as provided in 2018 and made available to the Animals Committee in Annex 2 (Rev. 3) of document AC30 Doc. 13.1.

The Secretariat notes that a proposal to include this species in Appendix I has been submitted for debate at the present meeting. If adopted, any facilities breeding specimens of this species for commercial purposes should register under Resolution Conf. 12.10 (Rev. CoP15) on *Registration of operations that breed Appendix-I animal species in captivity for commercial purposes* before exporting specimens.

Evaluation of the Secretariat

Jordan has complied with the Standing Committee's recommendation to stop all exports of specimens of *Geochelone elegans* from the facility concerned, but only until the owner provides documents to prove his claims, rather than until the Standing Committee recommends otherwise. It appears that there is no documentary evidence that the breeding stock was established in accordance with the provisions of CITES and relevant national laws and in a manner not detrimental to the survival of the species in the wild. The specimens cannot therefore be defined as bred in captivity as they do not appear to comply with paragraph 2 b) ii) A. of Resolution Conf. 10.16 (Rev.) on *Specimens of animal species bred in captivity*.

The owner of the facility has also written to the Secretariat to say that he has no such documentary evidence and cannot truly confirm the original country [or origin] of the breeding stock. He nevertheless asks to be able to export 1000 specimens of the species measuring 3-5cms each in order cover feeding costs for his stock until a final decision is taken.

The Jordanian Management Authority has repeatedly asked for guidance about what can be done with the many thousands of tortoises at the facility if the owner cannot export them. The Secretariat would appreciate the Standing Committee's view on this point. It seems most unlikely that a large number of specimens 3-5 centimetres in size could have been collected in the wild and it could be presumed therefore that the specimens concerned were bred at the facility. However, the lack of evidence of legal acquisition means that they may not be considered as meeting the definition of 'bred in captivity' adopted by the Parties.

<p><b>8. <i>Centrochelys sulcata</i> from Mali</b></p> <p>The Standing Committee recommends that by 1 February 2019, Mali should:</p> <ul style="list-style-type: none"> <li>– Provide evidence of legal acquisition of all breeding stock for all facilities, including information on source of animals used to augment the breeding stock;</li> <li>– Provide the justification for, and details of, the scientific basis by which it has been established that the quantities of <i>Centrochelys sulcata</i> taken from the wild and used as breeding stock would not be detrimental to the survival of the species; and</li> <li>– Agree to restrict export to specimens of less than 15cm straight carapace length.</li> </ul> <p>Mali is further encouraged to:</p> <ul style="list-style-type: none"> <li>– Introduce standard reporting forms to be used by the facilities according to the ones in the guidance</li> <li>– Continue regular monitoring and inspections as appropriate; inspections should occur at the end of the breeding season for each stock.</li> <li>– Establish a unique marking system for the breeding stock.</li> </ul>	<p>Mali advises that there are six companies producing specimens of this species in nine facilities in total and all six are exporting specimens with source code 'R'.</p> <p>The parental stock for all the facilities (some 687 in total) is said to be from the wild in Mali. None of the facilities have taken supplementary specimens from the wild – presumably since their establishment in 2001, 2010 or 2011, depending on the facility. All facilities are said to be legally registered with the local authorities, but no evidence as such of legal acquisition of parental stock is provided.</p> <p>The Malian government confirms that the trade in these specimens will not be detrimental to the survival of the species in the wild, but no details of the scientific basis by which this finding has been made are provided.</p> <p>All specimens are said to be 5-15cms at point of sale (export).</p>
<p><u>Evaluation of the Secretariat</u></p> <p>Mali has confirmed the legal acquisition of the parental stock and the non-detriment finding, but not provided the evidence or scientific basis required.</p>	

<p><b>9. <i>Oophaga pumilio</i> from Nicaragua</b></p> <p>The Standing Committee recommends that by 1 February 2019, Nicaragua should confirm that it will export specimens from facilities breeding this species with source code “W” or “F” and will make legal acquisition and non-detriment findings prior to authorising export.</p>	<p>Nicaragua confirms that it will export specimens from facilities breeding this species with source code ‘F’ and will make legal acquisition and non-detriment findings prior to authorising export.</p>
<p><u>Evaluation of the Secretariat</u></p> <p>Nicaragua has confirmed that it will implement the recommendation of the Standing Committee.</p>	
<p><b>10. <i>Oophaga pumilio</i> from Panama</b></p> <p>The Standing Committee recommends that by 1 February 2019, Panama should confirm that it will export specimens from facilities breeding this species with source code “W” or “F” and will make legal acquisition and non-detriment findings prior to authorising export.</p>	<p>No response received</p>
<p><b>11. <i>Vulpes zerda</i> from Sudan</b></p> <p>Sudan shall establish a zero export quota for <i>Vulpes zerda</i> from all sources. Sudan should provide responses to the questions posed by the Animals Committee at its 29th meeting to the Secretariat by 1 February 2019.</p>	<p>Sudan sent a holding reply, apologizing for the delay, but saying that they were still in the process of listing the existing wildlife farms and would send the required report as soon as possible.</p>
<p><b>12. <i>Centrochelys sulcata</i> from Sudan</b></p> <p>Sudan shall establish a zero export quota for <i>Centrochelys sulcata</i> from all sources. Sudan should provide responses to the questions posed by the Animals Committee at its 29th meeting to the Secretariat by 1 February 2019.</p>	<p>Sudan sent a holding reply, apologizing for the delay, but saying that they were still in the process of listing the existing wildlife farms and would send the required report as soon as possible.</p>

<p><b>13. <i>Testudo hermanni</i> from North Macedonia (previously the former Yugoslav Republic of Macedonia)</b></p> <p>North Macedonia shall establish immediately, and until the Standing Committee recommends otherwise, a zero export quota for <i>Testudo hermanni</i> from all sources. North Macedonia should provide responses to the questions posed by the Animals Committee at its 29th meeting to the Secretariat by 1 February 2019.</p>	<p>North Macedonia did not respond to the recommendation of the Standing Committee to establish immediately, and until the Standing Committee recommends otherwise, a zero export quota for <i>Testudo hermanni</i> from all sources.</p> <p>North Macedonia provided responses to the questions posed by the Animals Committee at its 29th meeting. Five registered breeders/exported retain this species in six facilities. If the Secretariat understands correctly, the breeding stock at these farms in 2018 was 13,546 animals and these have produced 26,602 specimens in 2016, 29,927 specimens in 2017 and 32,948 specimens in 2018. The facilities are regularly inspected and must produce annual reports for the Environment Administration. Removal of tortoises from the wild is now prohibited, but four breeders/exporters were able to retain the tortoises in their possession and a further breeder/exporter obtained stock from one of these original breeders/exporters.</p>
<p><u>Evaluation of the Secretariat</u></p> <p>After a gap of some years, the Secretariat is pleased to have established contact again with the CITES Management Authority of North Macedonia. Detailed information on the breeding of this species in captivity has been supplied and they seem well controlled. However, North Macedonia has not complied with the main recommendation of the Standing Committee to establish a zero export quota.</p>	
<p><b>14. <i>Centrochelys sulcata</i> from Togo</b></p> <p>The Standing Committee recommends that:</p> <p>By 1 February 2019, Togo should</p> <ul style="list-style-type: none"> <li>– provide evidence of Legal acquisition of all breeding stock for all facilities, including information on source of animals used to augment the breeding stock</li> <li>– Provide the justification for, and details of, the scientific basis by which it has been established that the quantities of <i>Centrochelys sulcata</i> taken from the wild and used as breeding stock would not be detrimental to the survival of the species.</li> <li>– Provide information on the ability of the facilities in Togo to produce F2 or manage the species in a manner demonstrated to be capable of doing so.</li> </ul>	<p>Togo endorses the recommendations of the Standing Committee, but does not provide evidence of legal acquisition of all breeding stock, the justification for, and details of the scientific basis for NDFs or information on the ability of the facilities in Togo to produce F2 or manage the species in a manner demonstrated to be capable of doing so.</p> <p>Concerning the activities that Togo is encouraged to undertake, Togo agrees, but asks for time to put these into effect given the limited financial resources in the country.</p>

<ul style="list-style-type: none"> <li>– Restrict export to specimens of less than 15cm straight carapace length</li> <li>– Confirm that they will export specimens produced in these facilities with source code “F” only and make a legal acquisition and non-detriment finding prior to authorizing export, until such time that a given facility is able to produce to F2 generation in which case source code “C” can be used those specimens in accordance with Resolution conf.10.16 rev.</li> </ul> <p>Togo is further encouraged to:</p> <ul style="list-style-type: none"> <li>– introduce standard reporting forms to be used by the facilities according to the ones in the guidance</li> <li>– Continue regular monitoring and inspections as appropriate at the end of the breeding season</li> <li>– Establish a unique marking system for the breeding stock</li> <li>– Re-evaluate their existing export quota in consultation with the scientific authority</li> </ul>	
<p><u>Evaluation of the Secretariat</u></p> <p>Evidence of legal acquisition of all breeding stock producing specimens to be exported and the justification for and details of the scientific basis for NDFs is still missing.</p> <p>Togo’s endorsement of the Standing Committee’s recommendations might suggest that they agree to restrict export to specimens of less than 15cm straight carapace length and will export specimens produced in these facilities with source code ‘F’ only and make a legal acquisition finding and an NDF prior to authorizing export, but this needs confirming.</p>	
<p><b>15. <i>Hippocampus comes</i> from Viet Nam</b></p> <p>The Standing Committee recommends that by 1 February 2019, Viet Nam should confirm that if export of specimens recommence from these or similar facilities it will export specimens from</p>	<p>No response received</p>

these facilities with source code "W" or "F" and will make legal acquisition and non-detriment findings prior to authorising export.	
<u>Evaluation of the Secretariat</u>	