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



Seventy-fourth meeting of the Standing Committee Lyon (France), 7 - 11 March 2022

Strategic matters

ROLE OF CITES IN REDUCING RISK OF FUTURE ZOONOTIC DISEASE EMERGENCE ASSOCIATED WITH INTERNATIONAL WILDLIFE TRADE: REPORT OF THE WORKING GROUP

1. This document has been submitted by Canada as Chair of the working group on the role of CITES in reducing risk of future zoonotic disease emergence associated with international wildlife trade.*

Introduction

- 2. As part of its functions detailed in Annex 1 of Resolution Conf. 18.2 on *Establishment of Committees* the Standing Committee is charged with advising on emerging operational or policy issues identified by Parties or the Secretariat until direction on the matter is provided by the Conference of the Parties. In January 2021, Canada raised the role of CITES in reducing risk of future zoonotic disease emergence associated with international wildlife trade with the Standing Committee. In their proposal, Canada noted that the ongoing COVID-19 pandemic has shone a spotlight on the trade in wildlife and the associated risks to human health and the global economy. It has underscored the connection between biodiversity loss and pandemics. Further, the COVID-19 pandemic suggests that Governments should review lessons learnt and, where appropriate, strengthen the global ability to prevent, detect, and respond to zoonotic diseases. Actions to reduce the future risk of pandemics may, for example, require strengthening of the global governance system and greater cooperation between nations and international bodies. In the context of this international discourse, the role CITES may have in supporting efforts to reduce the risk of zoonotic disease transmission has been raised. It is appropriate for CITES Parties and representatives, through the Standing Committee, consider the views and recommendations being proposed and consider what advice it might provide to the CITES Conference of the Parties.
- 3. As outlined in <u>Notification 2021/031</u>, the Standing Committee subsequently decided to establish an intersessional working group on the role of CITES in reducing risk of future zoonotic disease emergence associated with international wildlife trade with a mandate as follows:

Taking into account relevant materials, including the outcomes of the workshop of the <u>Intergovernmental</u> <u>Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES)</u> on biodiversity and pandemics, the working group shall review the nexus between international wildlife trade and zoonotic diseases as follows:

a) provide a summary of views on the current contribution of CITES, if any, to identifying and mitigating zoonotic disease risk;

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- b) taking into consideration the context and scope of the Convention, identify opportunities, as well as constraints on how, if anything, CITES could further support an integrated approach to animal, human and environmental health, and contribute to global efforts to reduce the risk of future zoonotic disease emergence associated with wildlife trade; and
- c) report its conclusions to the 74th meeting of the Standing Committee.

In undertaking its work, the working group could include consideration of:

- current evidence and information gaps regarding the links between international wildlife trade and zoonosis risk, including areas where advice might be sought from the Animals Committee;
- existing Resolutions and Decisions and whether additional guidance to CITES Parties is needed; and
- the strengthening of existing cooperative relationships, or development of new relationships, between CITES and other intergovernmental organizations, including those involved in animal or public health, trade, food and transport.
- The membership of the working group was as follows (32 Parties; 32 Observers): Australia, Bahamas, 4. Bangladesh, Belgium, Benin, Bolivia (Plurinational State of), Brazil, Burkina Faso, Canada (Chair), China, Colombia, Ecuador, European Union, Gabon, Germany, Israel, Japan, Kenya, Lebanon, Mexico, Netherlands, New Zealand, Niger, Peru, Republic of Korea, South Africa, Sweden, Switzerland, Thailand, Uganda, United Kingdom of Great Britain and Northern Ireland, United Republic of Tanzania, and United States of America; Food and Agriculture Organization of the United Nations, United Nations Environment Programme, United Nations Environment Programme-World Conservation Monitoring Center, United Nations Office on Drugs and Crime; International Union for Conservation of Nature, World Organisation for Animal Health (OIE); ADM Capital Foundation, Animal Welfare Institute, Association of Fish and Wildlife Agencies, Association of Zoos and Aquariums, Born Free Foundation, Center for Biological Diversity, David Shepherd Wildlife Foundation, EMS Foundation, Eurogroup for Animals, FACE- European Federation for Hunting and Conservation, Fauna & Flora International, Global Guardian Trust, Humane Society International, International Fund for Animal Welfare, International Fur Federation, Ivory Education Institute, IWMC-World Conservation Trust, Lewis & Clark- International Environmental Law Project, San Diego Zoo Wildlife Alliance, TRAFFIC, Wildlife Animal Protection Forum South Africa, Wildlife Conservation Society, Wildlife Justice Commission, World Resources Institute, World Wide Fund for Nature and Zoological Society of London.

Background

- 5. The working group Chair first invited the members of the working group to share the existing reports, journal articles and assessments of the link between zoonotic disease emergence and trade that had been prepared by various experts in wildlife and health. The Chair provided links to documents prepared by IPBES as well as the Tripartite Plus (WHO/FAO/OIE/UNEP) as a start point, recognizing much more has been published on the subject.
- 6. A virtual meeting of the working group was convened 28 October 2021. Participants were invited to explore and reflect on questions related to what is known about zoonotic disease emergence associated with international wildlife trade, what is unknown and what global efforts are currently occurring. The working group reflected on opportunities for CITES to engage, issues where CITES is well placed to address, as well as concerns or constraints in considering the role of CITES. The working group members were asked to describe what they believe CITES can/should do and what CITES cannot/ should not do.
- 7. During the meeting, working group members were asked to freely express their views, without censor, on the breadth of the issue, the problems that most concerned them, their views on the current role or functions of CITES and areas for action that merit exploration, as well as those that do not. The report of the working group discussions is found in the Annex to this document.
- 8. Following from the meeting, the working group Chair prepared and circulated the meeting report for comment. The Chair further requested the working group members provide views on the ideas generated during the virtual meeting, indicating those they felt are most important, feasible or realistic as well as those that they would not support.

- 9. During the subsequent email discussion, many working group members drew attention to the actions under the World Health Assembly to launch a process to negotiate and draft a convention, agreement or other international instrument under the World Health Organization on pandemic prevention, preparedness and response. Some working group members encouraged CITES authorities to engage fully with their national leads in the negotiating process to ensure a robust international agreement.
- 10. Based on the email discussion, the working group Chair drafted possible recommendations to the Standing Committee and convened a second virtual meeting on 11 January 2022 to seek additional views from the working group. As a result of the discussion, the working group Chair's proposed recommendations are presented for the consideration of the Committee. In considering the possible recommendations, the working group was requested to take into account that possible actions should:
 - be legally viable
 - be able to demonstrate success on the ground
 - fall within the CITES mandate and align with the aim of the Convention
 - aim to avoid duplication of existing efforts or initiatives
 - be commensurate to the result ("worth the effort")
 - be practical and feasible, and avoid duplication with other efforts
- 11. Proposed **Decision 19.za** directs the Secretariat to issue a notification requesting Parties provide information on and experiences with existing measures they have taken to mitigate the risk of pathogen spillover from international wildlife trade. This information would be provided to the Animals Committee and Standing Committee to inform their advice regarding the development of a joint program of work with the OIE as proposed in Decisions 19.zd and 19.zf. This information could additionally provide useful example and lessons learned for the benefit of all Parties.
- 12. Proposed Decisions 19.zb, 19.zd and 19.zf suggest working with the OIE under the auspices of the existing cooperation agreement. The working group expressed considerable support for working with existing bodies and leveraging existing relationships, notably with the OIE. There was also a concern from some regarding urgency to act. As such, in this proposed suite of Decisions, the COP would direct the Secretariat to work immediately with the OIE to develop and implement relevant collaborative actions through a joint program of work. Recognizing that there is existing cooperation with OIE, the Secretariat would additionally be invited to report on its current areas of collaboration and evaluate whether updates to the cooperation agreement would be useful to support a joint program of work. The Secretariat would be directed to work in close consultation with the Animals and Standing Committee Chairs, who through their respective members, would support and provide direction to the Secretariat on building a work program. Based on the discussions in the working group, this collaborative effort could firstly focus on ways to provide practical guidance for the appropriate housing, care and handling of CITES-listed live animals in international trade in order to mitigate the risk of pathogen spillover and disease transmission, building on the lessons learned from the responses to the notification proposed in Decision 19.za.

Some of the activities that might be found in the joint program of work could include:

- Reviewing, and providing advice to improve draft OIE guidelines for identifying and mitigating the risk of pathogen transmission along the international wildlife trade supply chain, including sharing with and seeking the input of the CITES Committees, through their Chairs, to ensure international wildlife trade expertise is fulling integrated into the work of the Ad Hoc Working Group on Reducing the Risk of Disease Spillover in Wildlife Markets and along the Wildlife Supply Chain;
- Collaboratively identify and collate available data on disease and pathogen spillover risk associations
 with species, conduct an analysis of trade to identify species, origins (e.g. wild, captive bred) and
 activities that present the most likely risk of zoonotic disease transmission and pathogen spillover
 along the international trade supply chain, and propose risk criteria to evaluate the relative risk of
 pathogen spillover from CITES-listed animal species or products in trade;
- Identifying other ways that CITES wildlife trade experts (notably national CITES Authorities as well as the Animals and Standing Committees) could participate in OIE's efforts to develop guidance for regulating the wildlife supply chain;
- Identifying or creating OIE-relevant technical support (subject to the availability of funding) for provision to Parties in order to enhance their capacity to ensure appropriate conditions for international trade of live animals, such as through training in handling wildlife or guidance on appropriate biosecurity precautions;

- Considering opportunities to expedite CITES permitting and improve the rapid exchange of emergency diagnostic specimens in support of detection, prevention and response to zoonotic disease transmission;
- Sharing with CITES Authorities relevant practical guidance developed on identifying trade situations with a high risk of pathogen spillover as well as measures that can be adopted to mitigate against pathogen spillover or disease transmission and prevent damage to health during transport with CITES Authorities, including informing Parties of where to access the latest information;
- Identifying how to best leverage the existing CITES Trade Database, the annual illegal trade database, and processes (such as permitting and traceability systems) in supporting global pathogen surveillance, including consideration of what information collected along the CITES trade chain could constructively contribute to efforts on pathogen surveillance;
- Undertaking joint training, and strengthening exchanges and collaboration between national CITES and OIE entities;
- Working together to integrate wildlife health and wildlife trade expertise into all relevant One Health
 efforts underway and in development by OIE in partnership with WHO, FAO, and UNEP (the Tripartite
 Plus)
- 13. Proposed Decisions 19.zc, 19.ze and 19.zg recognize that there may be additional opportunities under existing cooperative arrangements or activities to further advance. Given constraints on resources, and a desire to ensure there is no duplication of effort, collaborative efforts with existing partners are an effective way of addressing multi-dimensional issues such as the role of international wildlife trade in zoonotic disease transmission. The working group identified new opportunities for collaboration, such as work being undertaken by partners within the International Consortium on Combatting Wildlife Crime (ICCWC). Some working group members also recognized the importance of collaborating with members of the Tripartite Plus, notably WHO and FAO. As there was little time to review existing Resolutions, formal agreements or current activities to see how further collaboration could most effectively be considered, the working group Chair proposes requesting the Secretariat provide advice on cooperation opportunities to the Animals and Standing Committees, in line with existing Resolutions, Decisions or agreements.
- 14. Finally, for the longer term, proposed Decision 19.zh and Decision 19.zi suggest considering the need to develop a Resolution to outline CITES' contribution to advancing a 'One Health' approach, including the role of maintaining healthy ecosystems. It could also encourage actions and measures by Parties that would monitor and reduce the risk of pathogen spillover along the international wildlife trade supply chain for CITES-listed species, as well as encourage domestic collaboration among national wildlife and human health authorities to minimize and mitigate the risk of pathogen spillover or disease transmission. Such a resolution could provide clear instructions to the CITES Committees or Secretariat as appropriate to collaborate and provide CITES expertise to relevant agencies, such as OIE, WHO, UNEP, FAO etc., in order to avoid duplication or conflicting efforts. This could extend to directing relevant CITES Committees or the Secretariat to monitor and report on, as appropriate, member state negotiations on the development of an international instrument on pandemic prevention, preparedness and response (similar to Decision 17.181 on reporting on the development of an international legally binding instrument under the UN Convention on the Law of the Sea, or Resolution Conf. 18.4 on *Cooperation with the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services*). The Resolution could include relevant Annexes to support Parties in strengthening the international wildlife trade dimensions of a 'One Health' approach.
- 15. Additional to the proposed decisions, the working group also suggests working with IATA to review the IATA Live Animals Regulations in order to incorporate new animal and human health risk mitigation measures and strengthen existing measures, as appropriate, as well as to include relevant provisions in its guidelines for the non-air transport of live wild animals and plants. This may also be a further area where the OIE and CITES could work collaboratively. CITES Resolution Conf. 10.21 (Rev. CoP16) on Transport of live specimens already directs the Standing Committee and the Animals and Plants Committees to deal with matters related to the transport of live specimens. It further directs the Standing Committee and the Secretariat, in consultation with the Animals and Plants Committees and IATA, to regularly review, revise and approve amendments to the CITES guidelines for the non-air transport of live wild animals and plants among other activities. Building on these instructions, the Committees and the Secretariat could be instructed to recommend appropriate updates to the existing guidelines to include measures for mitigating risks to animal and human health. In doing so, the Committees could take into consideration expert guidelines developed on mitigating pathogen spillover risk and preventing damage to health, including the results of any collaborative work with the OIE. For example, the majority of working group members recognized the need for guidance on issues such as reducing the risk of pathogen spillover through appropriate care, housing and handling of live animals in international trade and transport, as well as guidance on the

identification and care of sick specimens. Incorporation of guidelines, developed as part of a joint program of work with the OIE, may help Parties ensure the appropriate international transport of live animals.

Recommendations

16. The Standing Committee is invited to submit the following Decisions for consideration by the 19th meeting of the Conference of the Parties:

Directed to the Secretariat

- **19.za** The Secretariat shall issue a Notification to the Parties, requesting Parties to identify and describe any new or existing domestic measures, or stricter domestic measures on in-transit shipments, imports and (re-) exports, on live wildlife trade or markets, and for what purposes they have adopted such measures; and make the results available to the Animals Committee and the Standing Committee for their information and consideration in undertaking Decisions 19.zd and 19.zf.
- **19.zb** The Secretariat shall, in line with the cooperation agreement between the CITES Secretariat and the OIE, work with the OIE and its Wildlife Working Group, including through the new *Ad Hoc Working Group on Reducing the Risk of Disease Spillover in Wildlife Markets and along the Wildlife Supply Chain,* in order to, *inter alia,* develop a joint program of work to collaboratively help fill knowledge gaps and identify effective and practical solutions for reducing pathogen spillover risk in wildlife supply chains. In undertaking this work, the Secretariat shall seek the views of the Animals and Standing Committee on the joint program of work to the Animals Committee, the Standing Committee and the 20th meeting of the Conference of the Parties. The Secretariat shall also review its Cooperation Agreement with OIE to identify any necessary updates to reflect guidance provided by the Animals and Standing Committees.
- **19.zc** The Secretariat shall prepare a report summarizing existing activities or formal agreements with other entities (such as, among others, FAO, WHO and ICCWC) as well as possible emerging opportunities, and identify opportunities for additional practical collaboration towards reducing the risk of pathogen spillover or zoonotic disease transmission in international wildlife trade supply chains for consideration by the Animals Committee and the Standing Committee.

Directed to the Animals Committee

- **19.zd** The Animals Committee shall review the report of the Secretariat on its implementation of Decision 19.zb and make recommendations, including on priorities for the joint program of work and taking into the consideration the responses to the Notification prepared under Decision 19.za.
- **19.ze** The Animals Committee shall review the report of the Secretariat under Decision 19.zc and make recommendations on opportunities for practical collaboration under the direction of existing Resolutions, Decisions or agreements.

Directed to the Standing Committee

- **19.zf** The Standing Committee shall review the report of the Secretariat on the implementation of Decision 19.zb, taking into account the recommendations of the Animals Committee, and make its own recommendations, including on priorities for the joint program of work and taking into consideration the responses to the Notification prepared under Decision 19.za.
- **19.zg** The Standing Committee shall review the report of the Secretariat under Decision 19.zc, and make recommendations on opportunities for practical collaboration under the direction of existing Resolutions, Decisions or agreements.
- **19.zh** The Standing Committee shall, in consultation with the Animals and Plants Committees, consider the development of a Resolution on actions CITES Parties and others could take to advance a 'One Health' approach as it pertains to international wildlife trade, and provide its recommendations, which may be in the form of a new draft Resolution, to the 20th meeting of

the Conference of the Parties. In developing any resolution, the Standing Committee may consider, *inter alia*, encouraging Parties to undertake actions that would improve monitoring and reduce the risk of pathogen spillover along international wildlife trade supply chains; encouraging or enhancing collaboration with national wildlife and human health authorities to minimize and mitigate the risk of disease transmission; providing instructions to the CITES Committees or Secretariat to collaborate with relevant agencies and instruments to strengthen the consideration of wildlife health and international wildlife trade in a 'One Health' approach; and contributing their expertise in discussions on the development of an international instrument on pandemic prevention, preparedness and response.

Directed to the Animals and Plants Committee

- **19.zi** The Animals and Plants Committee shall consider scientific elements that could be included in a possible Resolution on actions CITES Parties and others could take to advance a 'One Health' approach as it pertains to international wildlife trade, and provide its recommendations to the Standing Committee.
- 17. The Standing Committee is further invited to submit the following amendments to Resolution Conf. 10.21 (Rev. CoP16) on *Transport of Live Specimens* for consideration by the 19th meeting of the Conference of the Parties:
 - a) proposed amendment to paragraph 2 e), in underline text below, that would read:
 - 2. RECOMMENDS that:

[...]

- e) the Standing Committee and the Secretariat, in consultation with the Animals and Plants Committees and IATA, regularly review, revise and approve amendments to the CITES guidelines for the non-air transport of live animals and plants, including recommending any appropriate updates to include measures to mitigate risks to animal and human health posed by international trade in CITES-listed species;
- [...]
- b) proposed amendment to paragraph 3 to insert a new subparagraph (c), in underline text below (renumbering subsequent subparagraphs), that would read:
- 3. DIRECTS the Standing Committee and the Animals and Plants Committees, in consultation with the Secretariat:
 - [...]
 - c) to review and recommend any appropriate updates to the *IATA Live Animals Regulations* to incorporate measures to mitigate risks to animal and human health posed by international trade in CITES-listed species;
 - [...]

Standing Committee working group on the Role of CITES in reducing risk of future zoonotic disease emergence associated with international wildlife trade

> REPORT OF THE 28 OCTOBER 2021 VIRTUAL MEETING OF THE WORKING GROUP

The Working Group began by recognizing some areas of common understanding, including those areas where there are knowledge gaps. It was recognized that there needs to be a common knowledge foundation notably in the area of: achieving a common understanding of the species or taxon groups that pose the highest risk of pathogen spillover; and achieving a good understanding of the risk of pathogen spillover/ transmission and what influences that risk.

Risk factors identified included:

- Intrinsic risk related to taxon, with a higher risk of transmission from mammals and birds (CITES and non-CITES listed)
- Risk can vary depending on the capture, handling, housing, care and transport of wild animals
- Type of product and market, with a high risk in live animal trade, domestic wildlife markets and urban wildlife markets. There is also a risk of pathogen spillover from domesticated animals or livestock other than from wildlife; and mixing of different species, as well as mixing domesticated animals with wildlife, can potentially increase the risk. However, knowledge gaps remain on the risk profiles of live animals vs. products such as fresh skins or meat.
- Risk of pathogen shedding continues further down the trade or supply chain and increases with the stresses on and number of animals involved, including risks in the transport of animals/products.
- The risk of pathogen spillover exists in both legal and illegal trade.

It was recognized that the proportionality of risk needs to be understood, noting that risk is both the likelihood of pathogen transmission and the potential magnitude of the resulting problem. Improved surveillance might help better identify the factors that increase the risk of pathogen spillover. However some working group members recognized that, while international wildlife trade and transport may not be the greatest source or highest risk for pathogen transmission, international wildlife trade does pose some pathogen transmission risks that make it relevant for CITES to consider.

In this regard, working group members identified areas of need including:

- protocols for care and transport of wildlife to safeguard human and animal health in wildlife trade, to complement those that exist for the domesticated animal trade/livestock;
- a better analysis of risk factors along the supply chain including guidance on how to analyze and mitigate risk of pathogen spillover;
- a better understanding of where health expertise is available along the wildlife trade chain, which appears generally less regulated than trade in domesticated animals
- a better understanding of the potential pathogens or diseases carried by species in wildlife trade to complement our knowledge of wildlife species in trade

The working group then discussed opportunities for CITES to play a role, and well as constraints.

It was noted that there is new momentum in worldwide efforts to implement a One Health approach, as well as efforts to understand and manage risk along trade chains. One participant noted UNGA Resolution 75/L.116 on *Tackling Illicit Trafficking in Wildlife* which calls for partnerships and cooperation to address health and environmental aspects of wildlife trade, notably with WHO, OIE, UNEP and FAO (operative para. 4) as well as encouraging countries to enforce their sanitary measures and best practices when selling live and dead wild animals to protect human or animal health (operative para. 32).

Ideas for CITES role that were shared included:

1. Expanding the mandate of CITES through an amendment to the Convention, to regulate trade in wildlife to minimize risk to animal and human health;

- 2. Creation of an international protocol under CITES to regulate trade in wildlife to minimize risk to animal and human health;
- 3. Working collaboratively with other relevant organizations where CITES can bring its expertise in wildlife trade to strengthen the environment pillar of a One Health approach
- 4. Encouraging more interagency collaboration to address risk of and response to pathogen spillover, such as considering further how to expedite permitting for sharing of samples
- 5. Working collaboratively with relevant wildlife disease experts or organizations, supporting surveillance for pathogens along the wildlife trade supply chain notably through monitoring live animal trade. This could also include the establishment of a new purpose code for trade for "human consumption".
- 6. Providing a targeted analysis of live animal trade
- 7. Providing an analysis or reference list of species with a higher risk of pathogen spillover
- 8. Helping to fill the need for guidance on assessing and reducing risk along the trade or supply chain
- 9. Working collaboratively with relevant experts, providing guidance on mitigating pathogen transmission risk through provision of health protocols or guidelines for safe handling and transport of wild animals, similar to those used for domestic animal trade
- 10. Considering how to leverage the existing CITES Trade Database and the established CITES processes related to the permitting system and traceability in supporting global surveillance, including consideration of what new data might be collected along the CITES trade chain that could constructively contribute to efforts on pathogen surveillance, and identifying risk of disease transmission by asking how we make the CITES data most useful to other agencies involved in pathogen surveillance
- 11. As Parties, provide more support for a One Health approach including support to national counterparts in WHO pandemic preparedness and prevention negotiations
- 12. Nationally, encouraging Parties' wildlife trade experts to get involved in local and national health protection plans, build their understanding of domestic wildlife trade and risks, encourage strong (surveillance and mitigation) protocols to safeguard wildlife and health in domestic wildlife trade, and work with and learn from veterinary colleagues

In discussing the ideas for the role of CITES, the following constraints or considerations were raised:

- a. A clear problem statement is needed and a clear understanding of what, precisely, should be regulated
- b. Additionally, there is a concern with the lack of precise definitions to ensure consistency of language and understanding e.g. consistent definition of "wildlife trade" or "wet markets" or "wildlife markets/live animal markets/high-risk markets"
- c. Concern the time it would take to make the change (including obtaining the necessary ratifications) to CITES mandate is prohibitive and there is a need to prioritize high risk trade (such as live animal trade) that an amendment to CITES may would not address.
- d. Concern with overstretching CITES mandate or diluting the core value/intent of the Convention, including concern with addressing (or ignoring) species that potentially carry a high risk for pathogen spillover and are not listed on the CITES Appendices
- e. Concern with the capacity of Parties to implement additional measures as well as the associated resource implications and thus the need for a proportionate response
- f. In this regard, there is a level of uncertainty around how much risk of pathogen spillover arises from international trade and whether actions focusing on international trade will have a meaningful impact to merit the investment of resources
- g. Concern with the risk of duplication such that it is important to leverage existing mechanisms and not conflict with ongoing processes or collaborations
- h. Associated is the concern that there has been no evaluation of tools already available to assess and mitigate the risk of pathogen transmission along the wildlife trade chain

In the course of discussion, one working group member proposed some framing elements that could be applied to evaluating opportunities and options for CITES role in reducing the risk of zoonotic disease transmission for which there was general support. These were:

- Actions should be legally viable
- Should be able to demonstrate success on the ground
- Should fall within the CITES mandate
- Should be commensurate to the result ("worth the effort")
- Should be practical and feasible