

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



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SUPPLEMENTARY INFORMATION ON PEREGRINE FALCON

This document has been submitted by Canada in relation to amendment proposal CoP17 Prop. 17 on peregrine falcon (*Falco peregrinus*).

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SUPPLEMENTARY INFORMATION ON PEREGRINE FALCON

A. Introduction

The purpose of this information document is to provide supplementary information to complement the CoP17 proposal to transfer peregrine falcon to CITES Appendix II (CoP17 Prop. 17).

Section B of this document provides details on trade in peregrine falcon from range States, as obtained from the CITES trade database. Section C provides peregrine falcon population information as reported by key traders (those range states that responded to detailed surveys distributed by Canada)¹. Section D contains responses of the key traders pertaining to effectiveness of legislation in controlling legal trade and illegal trade, and population monitoring. Section E provides a summary of consultations with other range states.

B. Trade in peregrine falcon

Between 2010 and 2014 a total of 2,759 live peregrine falcons were exported with an average of 552 live birds exported per year. Although the peregrine falcon occurs in almost all countries of the world, the vast majority of trade is among 24 Parties.

The following list identifies countries that exported at least 1% of the total export of peregrine falcon between 2010 and 2014. Key traders (those range states that responded to a survey distributed by Canada) are shown in underlined text: United Kingdom of Great Britain and Northern Ireland (United Kingdom; 20% of total export), Germany (17%), Austria (11 %), United Arab Emirates (10%), Netherlands (6%), United States of America (5%), Qatar (5%), Spain (4%), Canada (4 %), Czech Republic (4%), Belgium (3%), Saudi Arabia (3%), Peru (2%) and Denmark (1%). Total live peregrine falcons exported over this time period by country ranged from a total of 32 birds (Denmark) to 502 birds (United Kingdom). There are 17 other countries that each exported less than 1% of the global total of peregrine falcons.

The following list identifies countries that imported at least 1% of the total import of peregrine falcon between 2010 and 2014. Key traders (those that responded to a survey distributed by Canada) are shown in underlined text: United Arab Emirates (47% of total import), Qatar (22%), Kazakhstan (7%), Japan (5%), Jordan (4%), Mexico (1%), Kuwait (1%), Saudi Arabia (1%), Algeria (1%), Azerbaijan (1%), Austria (1%), Spain (1%), Malta (1%), Taiwan (1%), United Kingdom (1%) and Turkey (1%). Total live peregrine falcons imported by country ranged from 15 birds (Turkey) to 1292 birds (United Arab Emirates). There are 35 other countries that each imported less than 1% of the global total of peregrine falcons.

Details on methodology for extracting data from the CITES Trade Database using the CompTab report are provided in CoP17 Prop. 17.

C. Population Information

Key trading countries provided information to Canada on the occurrence of peregrine falcon in their country (Table 1). This information is useful to better understand species management in the context of population size and breeding status for each country.

Table 1. Number of breeding pairs, subspecies and breeding status of falcons as reported by key traders, organized by continent. The use of “n/a” indicates that the information was not known or not provided.

Continent / Key trader	Breeding pairs	Subspecies	Breeding Status
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¹ In May 2016 Austria re-submitted their survey to us after noticing that their survey response had not been addressed in the proposal. We have incorporated information received from Austria into this information document where appropriate.

Continent / Key trader	Breeding pairs	Subspecies	Breeding Status
Asia (including Middle East) and North Africa			
Bahrain	No breeding population	<i>F. p. calidus</i>	Transitory
China	100-1000	<i>F. p. calidus</i> <i>F. p. japonensis</i> <i>F. p. peregrinator</i>	Permanent
Iran	Unknown	n/a	Permanent
Kuwait	No breeding population	n/a	Transitory migrant, rare resident
Mongolia	0-10	<i>F. p. peregrinus</i>	Breeding and migrant
		<i>F. p. babylonicus</i>	Breeding and migrant
		<i>F. p. harterti</i>	Passage migrant
Qatar	No breeding population	n/a	Occasional migrant
Saudi Arabia	No breeding population	n/a	Passage migrant and winter visitor
Pakistan	No breeding population	<i>F. p. calidus</i> <i>F. p. peregrinator</i>	Wintering
Tunisia	0-10	<i>F. p. brookei</i>	Permanent
United Arab Emirates	Unknown	n/a	Wintering
Europe			
Austria	100-1000	<i>F. p. peregrinus</i>	Permanent
		<i>F. p. leucogenys</i>	Winter visitor (rare)
Belgium	10 – 100	<i>F. p. peregrinus</i>	n/a
		<i>F. p. calidus</i>	Transitory
Czech Republic	10 – 100	<i>F. p. peregrinus</i>	Breeding and wintering
		<i>F. p. calidus</i>	Wintering
Denmark	10 – 100	<i>F. p. peregrinus</i>	n/a
Finland	100 – 1000	<i>F. p. peregrinus</i>	Seasonally breeding
Germany	100 – 1000	<i>F. p. peregrinus</i>	Permanent
		<i>F. p. calidus</i> (possibly)	Wintering
Greenland (Denmark)	1000-5000	<i>F. p. tundrius</i>	Seasonally breeding
Netherlands	100-1000	<i>F. p. peregrinus</i>	Breeding and wintering
		<i>F. p. calidus</i>	Wintering
Spain	1000 – 5000	<i>F. p. brookei</i>	Permanent
		<i>F. p. calidus</i>	Wintering
		<i>F. p. peregrinus</i>	Wintering
United Kingdom	1000 – 5000	<i>F. p. peregrinus</i>	Breeding resident
North America			
Canada	100-1000 (possibly 1000-5000)	<i>F. p. anatum</i>	Permanent & seasonally breeding
		<i>F. p. pealei</i>	
		<i>F. p. tundrius</i>	Seasonally breeding
United States of America	1000 – 5000	<i>F. p. anatum</i>	Permanent & seasonally breeding
		<i>F. p. pealei</i>	Permanent
		<i>F. p. tundrius</i>	Seasonally breeding

D. Effectiveness of legislation and management measures

Key traders provided information concerning effectiveness of legislation in controlling legal trade and illegal trade, and species management such as population monitoring. This information was used to support development of sections 7 and 8 of CoP17 Prop. 17. The responses, edited for clarity and consistency, and grouped by continent are as follows:

I. Asia (including Middle East) and North Africa

Bahrain There is no illegal trade as existing control measures implemented by the National Guard are considered to be 100% effective. The main challenge is a shortage of trained staff.

There is no specific management plan for the species. The National Guard plays the major role in monitoring and enforcing existing regulations including those related to wildlife which would be applicable to the peregrine falcon (M. Bin Daina, Supreme Council for Environment, in litt. to ECCC, Jan. 12, 2016).

China Illegal take and breeding of peregrine falcon exists. No specific information was provided on the effectiveness of current legislation.

No information was provided on any specific peregrine management program (M. Xianlin, Chinese CITES Management Authority, in litt. to ECCC, Jan. 7, 2016).

Iran Regulatory actions are the responsibility of the border military guards and judiciary. The existing monitoring and enforcement measures by authorities cannot absolutely guarantee that no wild taken peregrine falcons are laundered through registered breeding centers. They estimated that 95% of illegally captured/traded birds would be destined for foreign markets. Challenges to monitoring and enforcement include the many ways to illegally import and export falcons, the lack of enforcement and cooperation, and weak understanding about CITES regulations.

Monitoring of peregrine falcons is the responsibility of the Department of Environment and its provincial offices, through an annual wildlife counts scheme (A. Moboaraki, Iran Dept. of the Environment, in litt. to A. Reuter, March 26 2015).

Kuwait The Environment Public Authority established a national committee to enforce the *Law No. 42 of 2014, The Environment Protection Law*. The mandate of this committee is to enforce the law with relation to biodiversity related issues and conventions. A challenge to effective implementation of the CITES Appendix I listing is CITES enforcement from the neighbour countries (S. Al Salem, Kuwait CITES Management Authority, in litt. to ECCC, Dec. 3, 2015).

Mongolia Challenges to effective implementation of the CITES listing for peregrine falcon include law enforcement and public awareness. CITES regulations are followed if trade is involved (B. Amgalan, Mongolia CITES Management Authority, in litt. to ECCC, Jan. 14, 2016).

Pakistan There has been limited illegal capture and smuggling of peregrine falcons reported in Pakistan. However, there is no data available regarding the volume of trade. Noted were six successful enforcement interventions for peregrine falcon and/or saker falcon in 2012, three in 2014 and eight in 2015. The main challenges are the high demand in nearby countries coupled with relatively porous land borders with neighboring countries; lack of capacity by enforcement staff in identification of wildlife species; limited enforcement infrastructure and remoteness of border areas; and illegal trade via sea-routes. Even so, Pakistan clearly indicates that the species is protected and will remain so whether listed or not on any appendix of CITES. Confiscated birds are often rehabilitated and released to the wild.

Provincial/territorial governments and non-governmental organisations (NGOs) in collaboration with federal authorities, released rehabilitated peregrine falcons and saker falcons to the wild under the Sheikh Zayed Falcon Release Programme. To date, more than 1,600 falcons have been released in locations including Pakistan, Iran and Kazakhstan. They also produced awareness materials about peregrine falcons; and provided training and capacity building for Pakistan Customs and Provincial/Territorial wildlife department field staff to control illegal wildlife trade (M.S.H. Khan, Ministry of Climate Change, in litt. to A. Reuter, March 23, 2015).

Qatar Qatar implements all requirements under Article III of CITES. There is no evidence of illegal capture and take of peregrine falcon, and there are no challenges in implementation of CITES with

regard to import of falcons into the country (F. A. Al Sowaidi, Qatar Ministry of Environment, in litt. to ECCC, Jan. 14, 2016).

Saudi Arabia Both national and international legal frameworks exist to manage trade. A challenge for effective implementation of the Appendix I listing of peregrine falcon is the existing capacity building efforts (B.I. Alfaleh, Saudi Wildlife Authority, in litt. to ECCC, Jan. 4, 2016). They did not provide information on illegal trade.

Tunisia Tunisia did not provide information on effectiveness of existing legislation or management measures.

United Arab Emirates The falcon passport registration system, implemented in 2002, ensures that falconry and trade for falcon is practiced with only with captive-bred species, and ensures that any wild (or unknown origin) falcons do not enter the pool of “clean” registered falcons within the country. The falcon passport is issued to the owners of legally-acquired falcons who wish to move them frequently across international borders. The falcon passport is issued for specimens that are considered as personal effects and subject to the exemption in Article VII, paragraph 3, of the Convention and in accordance with Resolution Conf. 10.20, *Frequent cross-border movements of personally owned live animals*. All captive-breeding operations are registered with the UAE CITES Management Authority and they are usually licensed after a comprehensive inspection by the relevant authorities (S. Al Dhaheri, SA Environment Agency UAE, in litt. to A. Reuter, March 25 2015).

Enforcement measures in the UAE are strict when it comes to wildlife trade, as indicated by the number of seizures made annually. The trade in Appendix II species in UAE requires the presence of import, export, or re-export CITES certificates. As a country with a strong falconry tradition, a challenge is the assurance that no illegal or wild falcons are entering legal falconry practices (UAE CITES Management Authority, in litt. to ECCC, Jan. 4 2016).

There are peregrine falcon-related conservation, management measures, activities or projects in the country within breeding centres producing falcons for falconry, but details were not provided. The seven Emirates within the UAE would have wildlife monitoring programs. The Environment Agency in Abu Dhabi undertakes wild bird monitoring within the Abu Dhabi Emirate. The Emirates Natural History Group members also contribute to monitoring of peregrine falcon.

II. Europe

Austria The existing monitoring and census figures guarantee that no wild-taken peregrine falcons are laundered through registered breeding operations. There are no known illegal activities and there are no known challenges to effective implementation of the Appendix I listing.

Census figures in one of the federal provinces allow a good knowledge of population size.

Belgium There are no specific challenges for effective implementation of the existing CITES listing. No laundering of wild specimens has been detected by law enforcement authorities, and there is no indication that wild peregrine falcons in any number are laundered through existing captive breeding facilities. Before issuing certificates/permits for captive-bred birds, the CITES Management Authority requires some administrative checks. When in doubt about the declaration of breeding in captivity, a physical inspection can be conducted. This may include, when deemed appropriate, a DNA-analysis to confirm the specimens are offspring of the declared parental birds. National and regional regulation is in place to ensure trade is not a threat to the population of these species.

Peregrine falcons are among the best monitored breeding bird populations in Belgium, with probably almost every breeding pair known and monitored, although this is becoming increasingly difficult as the population is growing steadily (M. Van Looy, Chef de cellule CITES, in litt. to A. Reuter, March 24, 2015).

There is no national management plan specifically for peregrine falcons in the Flemish Region. However, a private raptor organisation has been hanging nest boxes for peregrine falcons on tall buildings since the 1990s. Recently, similar local initiatives have been initiated by local nature NGO's. Populations are monitored under a rare breeding bird monitoring scheme, which is coordinated in the Flemish Region by the Research Institute for Nature and Forest, as well as by members of the aforementioned private raptor NGO.

All breeding attempts are known in the Brussels Capital Region and Walloon Region and occasionally, nest boxes are placed by Brussels Environment, nature NGO's or the Royal Belgian Institute of Natural Sciences.

Nest sites are known through monitoring by citizens and scientists (Royal Belgian Institute of Natural Sciences and the association de protection de la nature [NATAGORA]). This information is used to create breeding bird atlases (M. Van Looy, Chef de cellule CITES, in litt. to A. Reuter, March 24, 2015).

Czech Republic There are controls in place to prevent illegal trade, possession and/or laundering. These include guarding wild nests, and marking and registration of captive-bred specimens, with DNA analysis available to confirm parentage. Protection of the species and assurance that no birds from the wild are illegally traded is implemented through regular controls of breeders, training of police and customs, and prohibition of commercial activity involving these species without the necessary documents. Illegal capture and trade in wild birds occurs very rarely in the Czech Republic.

Peregrine falcon populations are monitored by the Nature Conservation Agency of the Czech Republic in cooperation with ornithologists from NGOs (e.g. the Czech Society for Ornithology). About 15 workers monitor the species under the authority of the *EU Birds Directive (79/409/EEC)*. Since 1995, the Nature Conservation Agency of the Czech Republic has been supervising a rescue program for *Falco peregrinus* (B. Kaminiecka and J. Benes, Czech CITES Scientific Authority, in litt. to A. Reuter, March 23, 2015).

Denmark There is no evidence of illegal collection of peregrine falcons in Denmark. Captive breeding operations are subject to controls which include the taking of blood samples from both parents and offspring for DNA analysis [to confirm parentage].

Populations are monitored by ornithologists and the Danish Ornithological Society (M. F. Munk, Danish Nature Agency, in litt. to A. Reuter, March 23, 2015).

Finland Finnish Customs is very efficient in detecting attempts to illegally trade birds and other animals. The relevant legislation is strict, and monitoring and enforcement measures guarantee that no wild take of peregrine falcons occurs.

Breeding populations of peregrine falcons are surveyed each year during the breeding season by the Finnish Forest Agency, which includes examination of all known existing (and some potential) nest sites (O. Bistrom, Finland Scientific Authority, in litt. to A. Reuter, April 29, 2015).

Germany There have been no cases of illegal wild take of peregrine falcons in the past 10 years. Captive breeding operations are regularly checked by competent authorities and breeding sites are well monitored, especially by dedicated environmentalists. The availability of specimens bred in captivity seems to sufficiently satisfy the domestic demand for falconers, breeders and exporters. Our experience is that peregrine falcons are not the priority species sought by importers in the Middle East. Regulations associated with the CITES Appendix I listing are understood and accepted by authorities, environmentalists and stakeholders/users.

Peregrine Falcon monitoring is part of the national rare breeding bird survey. On national level monitoring of breeding bird species is coordinated by the Federation of German Avifaunists (*Dachverband Deutscher Avifaunisten*) in close cooperation with and funded by BfN Wild peregrine falcons are monitored by volunteers, with nearly all nests of the German breeding population being visited and counted yearly. Monitoring of Peregrine Falcon is a special programme carried out by regional peregrine falcon conservation groups ("Arbeitsgemeinschaft Wanderfalkenschutz") (I. Sprotte, CITES Management Authority, in litt. to A. Reuter, April 15, 2015).

Greenland (Denmark) There is a ban on import and export of peregrine falcon according an executive order. There are no major challenges with effective implementation of CITES.

No specific management efforts were mentioned other than the implementation of national legislation and CITES Appendix I (N. Holm, Greenland Cites Management Authority, in litt. to ECCC, Jan. 8, 2016).

Netherlands The most important action to prevent illegal trade of wild Dutch peregrine falcons is nest monitoring. Since the peregrine falcon occurs in low numbers, and has its own working group, the status of this raptor in the Netherlands is well known. Nesting failures due to human actions are reported, and enforcement measures are legislated.

Every peregrine falcon kept legally in the Netherlands requires a CITES certificate with proof of paternity and a closed leg ring. The document and leg ring number are reviewed when the owner applies for a CITES certificate. Even though there are no confirmed records of illegal capture of peregrine falcons in the Netherlands, there is strong circumstantial evidence that illegal human interference caused the removal of two clutches and the frequent disturbance of two additional pairs, but it is unclear if this is related to trade or persecution. In practise, there is very little control of peregrine falcons kept in captivity and their trade; e.g. there have been various incidences of closed leg rings fitted to wild-caught raptors. The numbers of people in possession of raptors has grown fast and there is very limited follow-up to verify the authenticity of paternity documents, closed leg rings or CITES certificates. Enforcement capacity regarding wildlife crime is limited and government measures are focused on informing stakeholders regarding the rules. Enforcement is mainly practiced in response to large-scale wildlife crime. The majority of crimes involving raptors remain unsolved.

The monitoring of birds of prey is done by volunteers; it is not initiated or financed by governmental organizations. Most breeding pairs are closely monitored and their chicks are measured and banded before fledging (Anja Pel, Ministry of Economic Affairs, The Netherlands, in litt. to ECCC, Jan. 4, 2016).

Spain Even though no official breeder registry exists, all breeding centers that want to be certified must submit a request to one of the 12 CITES offices. These operations must provide a list of all their reproductive stock and their legal documentation, and then a physical inspection takes place. If the breeder meets all requirements, an internal code is assigned to that breeding center and from then on, they must report on eggs produced, hatchling, and when marking of the offspring will take place. If considered necessary, paternity tests are conducted in the presence of CITES inspectors, and following an established protocol. All specimens of these species must have a Community Use certificate (Certificado de uso comunitario). The respondent suggested that it is difficult to guarantee that no laundering of wild birds takes place through existing breeding facilities but that controls are very rigorous including paternity tests for birds to certify their origin.

Monitoring of peregrine falcon populations in Spain is the responsibility of the Autonomous Communities. The information collected is submitted to the General State Administration and shared with international authorities and bodies (e.g. the EU) in compliance with the *EU Birds Directive* 2009/147/CE. The results of monitoring programs are compiled in a National census, the last being in 2008 (Subdirección General de Inspección, Certificación y Asistencia Técnica de Comercio Exterior, in litt. to A. Reuter, April 7, 2015).

United Kingdom Measures introduced some time ago, including registration and the use of DNA technology to assess claims of captive breeding, are considered to be an effective deterrent against any laundering of illegal take of wild peregrines through captive breeding facilities. However, they cannot guarantee that such laundering does not occur on occasions but it seems that this is at relatively low levels. Information on any illegal activity is, by its nature, difficult to obtain. Recent prosecutions involving peregrine falcons relate to offences under domestic regulations, such as sale or display without first obtaining the necessary exemption certificate.

The UK conservation agencies provide advice to UK police forces, through the National Wildlife Crime Unit, on conservation priorities for enforcement of crimes against wildlife. Birds of prey (including peregrines) are currently one of the priorities for the enforcement of wildlife crime in the UK (A. Littlewood, UK CITES Scientific Authority, in litt. to A. Reuter, March 24, 2015).

Enforcement priorities for wildlife crimes are determined by a process advised on by the Wildlife Crime Conservation Advisory Group (see <http://jncc.defra.gov.uk/page-4098>). Illegal trade in CITES listed raptors is currently a UK enforcement priority and a down-listing to Appendix II would not have an effect on this process in itself (J. E. Malpass, Policy Officer, in litt. to ECCC, Dec. 23, 2015).

There are no specific conservation actions other than the enforcement of legislation aimed at the protection of the species—that is, to deter and prosecute any illegal killing, take or trade in the species. Some Special Protection Areas under the *EU Birds Directive* are also classified in the UK for which peregrine falcon is a qualifying feature (A. Littlewood, UK CITES Scientific Authority, in litt. to A. Reuter, March 24, 2015).

Breeding peregrines in both Great Britain and the UK as a whole have been subject to full national censuses at approximately ten year intervals since 1971. Between these censuses, wild populations are less intensively monitored by voluntary fieldworkers (working under license) in raptor study groups. The

most recent national census was undertaken in 2014, but the results are not yet available (A. Littlewood, UK CITES Scientific Authority, in litt. to A. Reuter, March 24, 2015).

III. North America

Canada The measures associated with national legislation and management of trade are considered effective and there are no challenges. Although illegal trade or poaching may exist, the overall threat is considered low and localized. Captive breeding operations are subject to requirements for record-keeping, banding and reporting to ensure that no illegal take or laundering of wild birds takes place.

Canada has conducted national-level surveys of populations every five years, beginning in 1970. Several provinces and territories also have conducted their own surveys more frequently in selected areas. Under the *Species at Risk Act*, a national-level management plan is required and has been developed for two of the subspecies occurring in Canada; the management plan for the third subspecies is pending.

United States of America All specimens maintained in registered breeding facilities are required to be marked with a uniquely coded band issued by the U.S. Fish and Wildlife Service. Seamless metal bands are issued for progeny and specimens of wild origin are issued flexible plastic bands. Inspections of falconer and raptor propagator facilities and records by the U.S. Fish and Wildlife Service's Office of Law Enforcement help to find violators of the MBTA regulations and/or permit provisions. The Office of Law Enforcement has no indication at the present time that peregrine falcons are being laundered through registered captive-breeding operations or found in illegal trade. There are no challenges with effective implementation of the CITES listing of peregrine falcon.

The American peregrine falcon was originally listed as endangered under the *Endangered Species Conservation Act* (the precursor to the U.S. *Endangered Species Act*) in 1970. Critical Habitat was designated for the species in 1977. The species was removed from the List of Threatened and Endangered Species in 1999, as it was considered to be recovered. A Monitoring Plan was developed for the species in 2003.

Since delisting, peregrine populations in some areas are still being monitored by State authorities. Monitoring efforts are much reduced from what they were before the federal delisting, but there are several research projects underway by NGOs. There is no longer an active Recovery Team leader for the American peregrine falcon because the species is considered recovered. The Monitoring Plan for the peregrine falcon (*Falco peregrinus anatum*) is available at: <http://www.fws.gov/endangered/esa-library/pdf/Peregrineplan2003.pdf> (R. Gnam, U. S. Fish and Wildlife Service, in litt. to A. Reuter, May 11, 2015).

E. **Consultations**

I. Key traders

Information received from key traders was used in CoP17 Prop. 17, and this Information Document. The key traders included the following countries: Austria (information document only), Bahrain, Belgium, Canada, China, Czech Republic, Denmark, Finland, Germany, Greenland (Denmark), Iran, Kuwait, Mongolia, the Netherlands, Pakistan, Qatar, Saudi Arabia, Spain, Tunisia, United Arab Emirates, United Kingdom, and the United States of America.

II. Other range states

One hundred-fifty other countries identified as range states in Species+ were sent consultation letters dated January 22, 2016 requesting their views, especially on the following: how might a change in CITES controls increase the risk of wild birds being caught and/or illegally exported? How does the current Appendix I listing of the species prevent illegally-caught wild falcons from being traded as legal captive-bred birds? Responses by April 21, 2016 are summarized below:

Australia has strict controls in place that would likely mitigate the impact of any change in CITES listing on wild peregrine populations in Australia. Populations of peregrine falcons in all parts of Australia are stable and secure and are not subject to demand from international trade. Australia's national environment legislation, the Environment Protection and Biodiversity Act 1999 prohibits the export of live

wild native wildlife except in limited circumstances such as a long-term personal pet or to an approved zoo. Commercial export of native birds is prohibited. Australian native raptors are also afforded domestic protection under state and territory legislation.

Barbados has no objection to a proposal to transfer the peregrine falcon from Appendix I to Appendix II but suggests that there be a zero quota for wild-caught birds. Barbados records a very low number of peregrine falcons which are seen primarily during the northern winter months. As a result the species is only protected under their CITES Act, not under their Wild Birds Protection Act.

Bosnia and Herzegovina does not support the proposal as they do not have sufficient data on their population to estimate category of endangerment of species, and because most population estimates available for Europe were conducted prior to 2014 and are of low quality. The family Falconidae is permanently protected by law under their hunting legislation.

Cape Verde notes that peregrine falcon is not in the existing list of species in their country and therefore they do not have enough data available to assess the proposal in a more consistent manner. However, they are a transition area for many species and peregrine falcon may occur there in the future. At this time, they consider a transfer of peregrine falcon from Appendix I to Appendix II to be appropriate.

Chile does not think the Appendices should be amended, using the precautionary principle. Although the species has a wide distribution in Chile, a main threat to the species in the past was wild capture and the species is still considered vulnerable. A change in listing could lead to an abuse in wild capture of the species, such as an incident in 2016 where eggs stolen from Chile were rescued in Brazil.

Colombia notes that based on IUCN assessment, the species is Least Concern and is distributed widely. Colombia indicated that the species occurs in their country as a resident and migrant. Falconry is not permitted except in certain situations (e.g., nuisance-bird control at airports). Colombia does not consider that the transfer to Appendix II will be detrimental to the species.

Georgia would prefer to keep the species in Appendix I but are ready for further discussions in case other range states support the transfer to Appendix II.

Greece does not support the proposal as Greece has a small population of 200-500 pairs with a stable population trend. A transfer could intensify trade and therefore adversely affect the population in the country.

Italy (via their Management Authority) indicated that the species is included in their National Law No 157/92 as a strictly protected species. This law prohibits the killing, take and disturbing of specimens or their habitats as well as the possession or commercial use of wild specimens. Derogations can be granted only for educational and scientific purposes. The species is also protected under the stricter measures of the EU. The Scientific Authority provided additional information on the species in Italy. The species is classified as least concern in the Italian Red List. There are two subspecies present in Italy with a third observed in winter. The breeding population was estimated at 1,100-1,400 breeding pairs in 2003-2006 and has showed increasing population trends in both the short and long term.

Jamaica indicated that a transfer of the species to Appendix II would not be detrimental to the survival of the species while it is in Jamaica as it is protected under the Wild Life Protection Act. It is considered an uncommon migrant to the island and the few individuals wintering there are not known to be affected by poaching. There is no indication that they are illegally hunted or traded.

Mozambique supports the proposal. The species occurs throughout the country. It is protected by Mozambique (Act No. 10/99, July 7) due to its role in natural ecosystems, and would remain protected in the event of a transfer of the species to Appendix II. The species has never been in demand for international trade.

Myanmar has no objection to the proposal. The species is categorized as a completely protected species under the Protection of Wildlife and Protected Areas Law in Myanmar, meaning that only capture and possession for scientific research is allowed. In this context, there is no trade and the species is not found in the record of illegal wildlife crime in Myanmar.

Norway does not in general support the proposal under the precautionary principle. In Norway, the species is still vulnerable due to its relatively low population of 714-1033 pairs based on a 2015 report, which is 50% of the former population. Norway does not allow falconry or captive breeding, and this has been

effective in reducing international demand in wild specimens, and illegal specimens cannot be easily traded under the current control regimes. Illegal trade is still occurring and there is potential for much more illegal trade. The species is regarded as vulnerable to the threats of illegal persecution and collection, as well as persistent pollutants. Control of the species will be more difficult under an Appendix II listing because domestic laws will not be at the same level as for Appendix I species. They also expressed concern about the introduction of North American subspecies into the Middle East or in other parts of the world.

South Africa could support the proposal as the peregrine falcon does not seem to fulfil the biological criteria for listing on Appendix I of CITES and is well regulated in South Africa. The species is listed as Least Concern nationally in the 2015 Eskom Red Data Book of Birds of South Africa, Lesotho and Swaziland. In southern Africa the subspecies *F. p. minor* is a scarce, but widely distributed breeding resident. Known areas of relatively high abundance of resident birds include parts of Zimbabwe, the Waterberg plateau in Namibia, the Transvaal escarpment, the southwestern Cape Province and the lower Orange River. There has been very little demand for the African peregrine (*F. p. minor*) in terms of international trade. There has been no interest from the Middle East as the African peregrine is far too small for their traditional quarry. Peregrine falcons are used for falconry purposes, but falconry is well regulated throughout South Africa. Restricted activities (including catching, possession, breeding, captive keeping and breeding, trade) involving this species are regulated in terms of the National Environmental Management: Biodiversity Act, 2004 and the Threatened or Protected Species Regulations; as well as through provincial legislation. The species breed well in captivity and several captive breeding operations exist in South Africa.

Thailand has no objection to the proposal, as it will not alter the full protection status for the species in Thailand. The peregrine falcon is listed as a protected species under the Wild Animal Reservation and Protection Act. It is prohibited by law to hunt, possess, breed or import and export except for non-commercial purposes where permission has been obtained. No seizures have been made in the last five years.

Turkey supports the proposal. No other information was provided.

Viet Nam indicated that peregrine falcon is widely distributed in their country. The species is fully protected according to their new penal code. There are no records of illegally imported or exported peregrine falcon in Viet Nam. The species is in the IUCN category of least concern. For these reasons, Viet Nam has no objection to transfer the species to Appendix II of CITES.