



## INTERNATIONAL TROPICAL TIMBER ORGANIZATION

29 June 2016  
Ref. L. 16-0075

Dear Mr. Scanlon,

Thank you for your letter of 12 May 2016 regarding several proposed listings of tree species in the CITES Appendices to be considered at the upcoming 17th CITES COP from 24 September to 5 October 2016 in Johannesburg, South Africa.

I am pleased to note that 3 of the countries that have submitted these proposals have complied with ITTC Decision 3 (XVI) and consulted with ITTO prior to submitting the proposals. As you may recall, Decision 3 (XVI) requests members to consult on the status of internationally traded tropical timber species at ITTO, preferably before such species are formally proposed for listing in the Appendices of CITES, and to inform the ITTO at the earliest opportunity of any proposal to list internationally traded tropical timber species in the Appendices of CITES, providing the basis and information regarding the proposal. While there has not been an opportunity to consult with ITTO's membership (our next Council session is not until November 2016), the ITTO Secretariat has already received and commented on the proposals for listing the entire genus of *Dalbergia* in Appendix II (Guatemala), for listing *Pterocarpus erinaceus* in Appendix II (Senegal), and for amending the annotation of *Dalbergia cochinchinensis* in Appendix II (Thailand). The ITTO Secretariat's comments and position on these listing proposals are attached; we have received no additional information from any of the proponents or elsewhere that would cause us to change our assessments of these proposals. We are pleased to see that the proposal on *Pterocarpus erinaceus* is now co-sponsored by seven other range states which addresses the concern we expressed in our initial comments. We also agree that the proposal to have no annotation (thus implying all products are covered) is probably preferable to using Annotation 4, which includes a number of exemptions which are obviously not relevant to this species (e.g. "cut flowers of artificially propagated specimens"); this comment may also apply to Thailand's proposal to replace Annotation 5 with Annotation 4 for *D. cochinchinensis* and other listing proposals discussed below (or perhaps there is a need for a new annotation covering all parts/derivatives with appropriate exemptions for tree/timber species). With regard to the Guatemalan proposal for listing all *Dalbergia* species not already in Appendix I in Appendix II, unfortunately our concern about an apparent lack of consultation does not seem to have been addressed yet (in fact section 10 of the proposal on "Consultations" remains empty). We believe it will be difficult for such a wide-ranging proposal to be adopted and effectively implemented without the necessary consultations with/support of other range states.

/ ...

Mr. John Scanlon  
Secretary-General  
CITES  
International Environment House  
Chemin des Anémones  
CH-1219 Châtelaine, Geneva  
Switzerland

The remainder of the proposals were received by ITTO for the first time together with your letter. We would appreciate if you could assist us in reminding countries submitting proposals for tropical timber/tree species listings of the provisions of ITTC Decision 3(XVI) noted above. Our comments on these proposals are as follows:

1. Mexico's proposal to list 13 Mexican/Central American *Dalbergia* species in Appendix II: In principle the ITTO Secretariat supports this proposal which appears to have been developed through a process of wide consultation in the region. We note that 4 of the proposed species are already included in Appendix III of CITES (*D. calycina*, *D. cubilquitzensis*, *D. glomerata* and *D. tucurensis*) by Guatemala and (for the last) Nicaragua. It is unfortunate that Nicaragua could not participate in the follow-up teleconference to Mexico's initial consultations that included participation of CITES authorities from Guatemala, El Salvador and Honduras. It is also unclear whether Panama, which has listed *D. darienensis* in Appendix III, supports the Mexican proposal as this species is not covered by Mexico's proposal. The ITTO Secretariat believes that if there is wide regional support for this regional proposal, it will have a better chance of being adopted and effectively implemented than the global *Dalbergia* proposal from Guatemala. However, we suggest Mexico should continue to consult with Nicaragua, Panama and other countries to ensure its proposal has the broadest possible support prior to the COP.
2. Gabon's proposal to list 3 species of *Guibourtia* in Appendix II: We note that following a 2012 workshop convened under the ITTO-CITES Programme, four range states expressed interest in listing both bubinga and wenge in CITES Appendix III; however none of these countries followed up and neither species has until now officially been proposed for listing in any CITES Appendix. It is not clear to us why the other range States (Cameroon, DRC, Republic of Congo) did not follow through with a bubinga listing proposal and why they are not co-sponsors of this proposal. In principle the ITTO Secretariat supports the listing of bubinga in Appendix II as proposed by Gabon, but we feel it is essential that the other African range states of the species actively support the listing proposal in order to ensure its effective implementation. In this regard, further efforts should be made by Gabon to receive responses on (and hopefully support for) the proposal from the other range States listed in the Consultations section (Cameroon, DRC, Equatorial Guinea, Republic of Congo) prior to the COP.
3. Madagascar's proposal to list *Adansonia grandidieri* in Appendix II with the listing limited to seeds, fruits, oils and live plants: The ITTO Secretariat supports this listing proposal but cautions that based on experience with other tree species listings, Madagascar may require significant external assistance to effectively implement the listing if it is approved.
4. Algeria's proposal to list *Abies numidica* in Appendix II: This tree grows in mountainous areas in northern Algeria which are well outside the tropics; therefore the listing proposal is not within ITTO's mandate or expertise to comment on.
5. The USA's proposals to amend the annotations of agarwood producing species and *Bulnesia sarmientoi* in Appendix II: The ITTO Secretariat supports the proposal to exclude wood chips packaged as a final product from the exemptions included in the agarwood annotation since it is clear that such products are being traded and may therefore be exempted from current CITES controls in some countries/regions. ITTO also supports the proposal to exclude finished products containing extracts from the *Bulnesia* annotation/listing to ensure that CITES controls cover those commodities that first appear in international trade as exports from range States and include those commodities that dominate the trade and the demand for the wild resource. The proposed revision will also harmonize the *Bulnesia* annotation with that of *Aniba roseodora* for which trade is likewise primarily in the form of extracts.

However we note that the report of the Standing Committee Annotations Working Group requested its members which were also on the Plants Committee to consult with the range States (Argentina, Brazil and Paraguay) on this matter; it is not clear from the proposal whether this consultation with range States has taken place and if not, ITTO would recommend that it does occur before the COP.

I attach relevant trade statistics from ITTO's statistical database for the past five years for some of the species proposed for listing; for several we have no data indicating that volumes of timber in trade are small or non-existent in recent years (note that many ITTO members report statistics only on "major" species in trade). In fact, only *Dalbergia cochinchinensis* and *Pterocarpus* species show significant volumes in trade in our database. Note that the low unit values associated with some of these trade flows (i.e. less than \$100/m<sup>3</sup>) probably indicate errors in reporting volumes, values or both.

I hope these comments/inputs are useful and look forward to meeting you in Johannesburg in September.

Best regards,

A handwritten signature in dark ink, appearing to read 'Steve Johnson', with a large, stylized flourish at the end.

Steve Johnson  
Officer-in-Charge, ITTO

## Kanako ISHII

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**From:** Steven JOHNSON  
**Sent:** Monday, April 25, 2016 5:47 PM  
**To:** Cesar Augusto Belteton  
**Cc:** Kanako ISHII; 'Schmidt Milena'  
**Subject:** RE: Proposal of inclusion the genus Dalbergia to the CITES Appendix II

Cesar,

Thanks for sharing this proposal with ITTO. Certainly the rapid growth in the trade of Dalbergia species and the listing of several species in the genus have already caught the international community's attention. However ITTO is hesitant to support this genus level proposal for the following reasons:

1. It is unclear what the advantages of a genus level listing are over individual countries listing all relevant species (including non-Dalbergia rosewoods) from their own country or region, much as Madagascar has already done. This would probably require joint (or multiple) sponsorship of listings when species occur in multiple neighboring range states but it would be easier to get agreement amongst a few range states than all of them.
2. Several "rosewood" species in trade (eg Pterocarpus) are not Dalbergias and would not be covered by such a genus level listing.
3. It is not clear whether the many range states of Dalbergia throughout the tropics have been consulted about this proposal; it would be particularly important to have the support of countries that may have Dalbergia species that are not threatened or endangered for such a proposal. If you have written support of such countries for a genus-level listing let me know and we can reconsider.

Best regards and thanks once again for the chance to comment on this proposal,

Steve Johnson  
Officer-in-charge  
ITTO

**From:** Cesar Augusto Belteton [mailto:presidenciagrupocaoba@gmail.com]  
**Sent:** Saturday, April 16, 2016 6:56 AM  
**To:** Steven JOHNSON  
**Subject:** Fwd: Proposal of inclusion the genus Dalbergia to the CITES Appendix II

----- Forwarded message -----

**From:** Cesar Augusto Belteton <presidenciagrupocaoba@gmail.com>  
**Date:** 2016-04-15 15:53 GMT-06:00  
**Subject:** Proposal of inclusion the genus Dalbergia to the CITES Appendix II  
**To:** Steve Johnson <Johnson@itto.int>

Dear Steve Johnson  
ITTO

In preparation for the seventeenth meeting of the Conference of the Parties (CoP17) to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), the CITES Management Authority of Guatemala has the intention of presenting a proposal to include in Appendix II the genus Dalbergia spp "Rosewood" in accordance with Article II, paragraph 2 (b), of the Convention and Resolution Conf. 9.24 (Rev. CoP15) Annex 2 (b), Paragraph A.

At the CoP 16, dozens of Dalbergia species were included on Appendix II but since then, many other Dalbergia species have been detected on international trade. The enforcement authorities from many countries around the world, have been challenged to make identification at species level for all rosewood shipments, which has proven very difficult for non-expert officers.

While some identification guides for a few Dalbergia species exist, distinction between and identification of individual species is very difficult for non-professionals and sometimes even for experts, making it a problem for enforcement and customs officers to comply correctly with inspection and identification of CITES listed Dalbergia tree and product shipments. Dalbergia species at genus level can be distinguished from other timber genus.

Including the whole genus in Appendix II would be essential for the control of international trade by eliminating the arduous task of enforcement and customs officers of differentiating between the hundreds of Dalbergia species listed and not listed in CITES. The inclusion will help ensure that legal trade does not become a direct cause of the extinction of these highly threatened species and will help curb illegal trade.

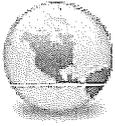
This issue was addressed at the PC 22 meeting in Tbilisi, Georgia in October 2015, and during that meeting, suggestions on the convenience to list the entire genus on Appendix II were presented in order to facilitate the work of the enforcement authorities and to achieve the compliance of the current listings. Consequently, a drafting team was formed with the participation of 7 countries. The proposal that will be presented to the CoP 17 is the result of this coordinated effort.

Since this genus is distributed all around the world, we are now consulting with all the range States. We would be grateful for comments as well as any recent information on population trends of these species, data on trade, as well as other legal information concerning the regulation and management of the forestry and/or special protection status of these species. The data will be useful to finalize the listing proposal.

Recognizing your great leadership in the area of the conservation of timber species, we would appreciate receiving your comments to this request no later than April 20th 2016 to the following e-mail address: [direccionforestal@conap.gob.gt](mailto:direccionforestal@conap.gob.gt) or [presidenciagrupoacaoba@gmail.com](mailto:presidenciagrupoacaoba@gmail.com)

Sincerely,

Cesar Belteton Chacon  
CITES Scientific Authority of Guatemala



**RE: ITTO consultations on COp17 proposals on timber species**

Kanako ISHII to: Steven JOHNSON, Elena KWITSINSKAIA

22/07/2016 03:01

Cc: Milena SOSA SCHMIDT

5 attachments



ITTO response to Mr. Scanlon.pdf Response to Guatemala.pdf Response to Senegal.pdf



Response to Thai proposal for amendment of the annotation.pdf Trade stats of species proposed for listing.pdf

Dear Elena,

I hereto attach our correspondence to Mr. Scanlon's letter dated 12 May 2016.

Please note that subsequent to the ITTO Secretariat submitting these comments, Guatemala undertook consultations on its proposal to list all *Dalbergia* species in Appendix II (with the exception of those species already listed in Appendix I). This proposal is now co-sponsored by Argentina, Brazil and Kenya and the ITTO Secretariat's reservations about this proposal have been addressed given that it is now supported by several important range States.

Kind regards,

Kanako ISHII  
ITTO

## Kanako ISHII

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**From:** Steven JOHNSON  
**Sent:** Monday, April 25, 2016 5:21 PM  
**To:** doudou sow; abbasonko@hotmail.com  
**Cc:** Kanako ISHII; Lagarde Betti; 'Schmidt Milena'  
**Subject:** RE: consultation pour transfert Pterocarpus erinaceus à l'annexe II CITES

Colleagues,

Thank you for sending ITTO your proposal for listing *Pterocarpus erinaceus* in CITES Appendix II. Given the increasing volumes of this species entering the Chinese hongmu trade, ITTO believes the listing proposal will assist in promoting sustainable management of the species. We believe that support from the other range states mentioned in the proposal will be essential for the listing to succeed. Efforts should continue to seek co-sponsors for the proposal from amongst the other range states.

I apologize for writing in English but the deadline for comments is tomorrow.

Yours sincerely,  
Steve Johnson  
Officer-in-charge  
ITTO

**From:** doudou sow [<mailto:aime.sala@gmail.com>]  
**Sent:** Friday, April 15, 2016 3:22 AM  
**To:** Steven JOHNSON  
**Cc:** Kanako ISHII  
**Subject:** consultation pour transfert Pterocarpus erinaceus à l'annexe II CITES

Bonjour, au nom du Directeur des eaux et Forêts du Sénégal, je vous envoie :

- une lettre de consultation
- un draft de projet de PROPOSITION

Je vous en souhaite bonne réception.

Cordialement

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Doudou SOW  
Master 2 Foresterie et gestion des ressources naturelles  
Spécialiste de la Faune  
Tél / 00221 70 988 26 31 Skype : doualadji  
**" Jamais mentir, jamais trahir "**



## INTERNATIONAL TROPICAL TIMBER ORGANIZATION

15 April 2016  
Ref. L.16-0051

Dear Ms. Duangduen Sripotar,

We acknowledge with many thanks the receipt of your letter No. AC 0904/1819 dated 22 March 2016, requesting ITTO's input on Thailand's proposal for amendment of the annotation to the CITES Appendix II listing of *Dalbergia cochinchinensis*.

Through this letter, ITTO confirms its support to your proposal. When there are significant amounts of products in trade that fall outside the annotations for CITES listed species, our advice has always been to expand the annotation to cover all relevant products. Implementing expanded annotations is often politically and/or logistically difficult, but the alternative is to effectively open a loophole in the CITES listing allowing significant quantities of products of listed species to enter international trade without the protections and safeguards that the CITES listing was supposed to provide.

We apologize for a delayed response to your letter and hope our input will be useful.

With regards,

Yours sincerely,

Steven E. Johnson  
Officer-in-Charge

Ms. Duangduen Sripotar  
Plant Varieties Protection Division  
Department of Agriculture  
Chatuchak, Bangkok 10900  
Thailand  
[E-mail: duangduen\_sripotar@yahoo.com]

Products	Country	Year	Latin Name or HS Code	Pilot Name/Local Name	Volume 1000 m <sup>3</sup>	Avg. Price \$/m <sup>3</sup>
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### Import

Ind. roundwood	Benin	2012	Pterocarpus erinaceus	vène	0.283	306
Ind. roundwood	Benin	2013	Pterocarpus erinaceus	vène	3.744	379
Sawnwood	Mali	2012	Pterocarpus erinaceus	vène	0.163	62
Sawnwood	Mali	2013	Pterocarpus erinaceus	vène	0.075	94
Sawnwood	Mali	2014	Pterocarpus erinaceus	vène	0.055	82
Sawnwood	Thailand	2012	Pterocarpus erinaceus	rosewood	0.062	384
Sawnwood	Thailand	2013	Pterocarpus erinaceus	rosewood	0.261	299
Veneer	Mali	2012	Pterocarpus erinaceus	vène	1.455	488
Veneer	Mali	2013	Pterocarpus erinaceus	vène	0.027	602
Veneer	Japan	2009	Pterocarpus spp.	padok	0.010	7,514
Veneer	Japan	2010	Pterocarpus spp.	padok	0.002	8,950
Veneer	Japan	2011	Pterocarpus spp.	padok	0.040	10,507
Sawnwood	Malta	2010	Dalbergia spruceana	palissandre de Rio	0.058	1,087
Sawnwood	Malta	2011	Dalbergia spruceana	palissandre de Rio	0.001	324
Sawnwood	Malta	2013	Dalbergia spruceana	palissandre de Rio	0.008	731
Sawnwood	Malta	2014	Dalbergia spruceana	palissandre de Rio	0.020	226
Sawnwood	Thailand	2013	Dalbergia cochinchinensis	siamese sal/burmese sal	46.180	320
Sawnwood	Thailand	2014	Dalbergia cochinchinensis	siamese sal/burmese sal	15.610	376

### Export

Ind. roundwood	Cameroon	2010	Pterocarpus soyauxil	padouk	18.445	166
Ind. roundwood	Congo	2009	Pterocarpus soyauxil	padouk	15.000	187
Ind. roundwood	Congo	2010	Pterocarpus soyauxil	padouk	30.000	101
Ind. roundwood	Congo	2011	Pterocarpus soyauxil	padouk	25.000	108
Ind. roundwood	Congo	2013	Pterocarpus soyauxil	padouk	27.000	102
Ind. roundwood	Congo	2014	Pterocarpus soyauxil	padouk	30.000	102

Ind. roundwood	Gabon	2009	Pterocarpus soyauxii	padouk	15.156	130
Ind. roundwood	Myanmar	2011	Pterocarpus spp.	padouk	15.000	3,006
Ind. roundwood	Benin	2011	Pterocarpus erinaceus	vène	34.372	252
Ind. roundwood	Benin	2012	Pterocarpus erinaceus	vène	64.894	450
Ind. roundwood	Thailand	2013	Pterocarpus erinaceus	rosewood or tamalin	0.005	79
Sawnwood	Benin	2013	Pterocarpus erinaceus	vène	10.493	567
Sawnwood	Ghana	2010	Pterocarpus erinaceus	rosewood	1.848	429
Sawnwood	Ghana	2011	Pterocarpus erinaceus	rosewood	3.881	471
Sawnwood	Ghana	2012	Pterocarpus erinaceus	rosewood	8.857	533
Sawnwood	Ghana	2013	Pterocarpus erinaceus	rosewood	40.998	664
Sawnwood	Ghana	2014	Pterocarpus erinaceus	rosewood	20.805	338
Sawnwood	Mali	2013	Pterocarpus erinaceus	vène	0.278	563
Ind. roundwood	Dem. Rep. of Congo	2011	Guibourtia spp.	bubinga	0.191	201
Ind. roundwood	Dem. Rep. of Congo	2012	Guibourtia spp.	bubinga	1.061	143
Sawnwood	Thailand	2013	Dalbergia cochinchinensis	siamese sal/burmese sal	0.734	539
Sawnwood	Thailand	2014	Dalbergia cochinchinensis	siamese sal/burmese sal	6.049	458
Sawnwood	Guatemala	2012	Dalbergia spp.	rosul	0.189	2,639
Sawnwood	Guatemala	2013	Dalbergia spp.	rosul	0.063	2,778
Sawnwood	Guatemala	2014	Dalbergia spp.	rosul	0.095	2,030
Sawnwood	Panama	2011	Dalbergia retusa	cocobolo	0.400	43
Sawnwood	Panama	2012	Dalbergia retusa	cocobolo	0.500	406
Sawnwood	Panama	2013	Dalbergia retusa	cocobolo	1.059	N/A

Abies numidica	N/A
Adansonia grandidieri	N/A
Aniba roseadora	N/A
Bulnesia	N/A
Bulnesia sarmientoi	N/A



## INTERNATIONAL TROPICAL TIMBER COUNCIL

Distr.  
GENERAL

ITTC(LII)/ xx  
xx July 2016

Original: ENGLISH

FIFTY-SECOND SESSION  
7 – 12 November 2016  
Yokohama, Japan

### **Listing of Internationally Traded Tropical Tree Species in the Appendices of the Convention on International Trade In Endangered Species of Wild Fauna and Flora (CITES)**

Consistent with ITTC Decision 3(XVI), the ITTO Secretariat is requested to notify Members of any proposal to list internationally traded tropical timber species in the Appendices of CITES, to provide all available relevant information regarding the proposal and species concerned to Members, and to arrange for consultation on the matter at the subsequent Council Session.

The table on the following page contains tropical tree species proposed to be considered for listing in the CITES Appendices (or for which changes to existing listings are proposed for consideration) at the Seventeenth Meeting of the Conference of Parties (CoP17) of CITES to be held in Johannesburg, South Africa from 24 September to 5 October 2016. As per CITES Resolution Conf. 9.24 (Rev. CoP13), ITTO was consulted by the CITES Secretariat on all of these proposals while three of the listing proponents consulted ITTO as per the provisions of Decision 3 (XVI).

Complete documentation is available for all of the proposed listings on [www.cites.org](http://www.cites.org). The ITTO Secretariat's comments to the proponents and the CITES Secretariat on these listing proposals are appended. Note that subsequent to the Secretariat submitting these comments, Guatemala undertook consultations on its proposal to list all *Dalbergia* species in Appendix II (with the exception of those species already listed in Appendix I). This proposal is now co-sponsored by Argentina, Brazil and Kenya and the ITTO Secretariat's reservations about this proposal have been addressed given that it is now supported by several important range States.

**Tropical tree species proposed for listing at CITES CoP 17**

<b>Species scientific name</b>	<b>Proponent(s)</b>	<b>Appendix</b>	<b>Annotation</b>
<i>Dalbergia cochinchinensis</i> (Siamese rosewood)	Thailand	Already in Appendix II	Delete current annotation #5 (Logs, sawn wood and veneer sheets); replace it with annotation #4 covering all wood products
<i>Dalbergia calderonii</i> <i>Dalbergia calycina</i> <i>Dalbergia congestiflora</i> <i>Dalbergia cubilquitzensis</i> <i>Dalbergia glomerata</i> <i>Dalbergia longepedunculata</i> <i>Dalbergia luteola</i> <i>Dalbergia melanocardium</i> <i>Dalbergia modesta</i> <i>Dalbergia palo-escrito</i> <i>Dalbergia rhachiflexa</i> <i>Dalbergia ruddae</i> <i>Dalbergia tucurensis</i> (Rosewoods)	Mexico	Include all 13 species in Appendix II ( <i>D. calycina</i> , <i>D. cubilquitzensis</i> , <i>D. glomerata</i> and <i>D. tucurensis</i> are currently listed in Appendix III)	No annotation (covers all products)
<i>Dalbergia</i> spp. (Rosewoods, Palisanders)	Guatemala, Argentina, Brazil, and Kenya	Include genus <i>Dalbergia</i> in Appendix II with exception of species already in Appendix I	No annotation (covers all products)
<i>Guibourtia demeusei</i> <i>Guibourtia pellegriniana</i> <i>Guibourtia tessmannii</i> (Bubinga)	Gabon and European Union	Include in Appendix II	Annotation #4 covering all wood products
<i>Pterocarpus erinaceus</i> (African rosewood, Kosso)	Benin, Burkina Faso, Chad, Côte d'Ivoire, European Union, Guinea, Guinea-Bissau, Mali, Nigeria, Senegal and Togo	Include in Appendix II	No annotation (covers all products)
<i>Adansonia grandidieri</i> (Grandidier's baobab)	Madagascar	Include in Appendix II	Listing to cover only seeds, fruits, oil and live plants
<i>Aquilaria</i> spp., <i>Gyrinops</i> spp. (Agarwood)	U.S.A.	Already listed in Appendix II	Amend annotation #14 to exclude wood chips from the finished products exempted from the listing (i.e. wood chips are to be explicitly covered by the listing)
<i>Bulnesia sarmientoi</i> (Holy wood)	U.S.A.	Already listed in Appendix II	Amend annotation #11 to include the underlined text: Logs, sawn wood, veneer sheets, plywood, powder and extracts. <u>Finished products containing such extracts as ingredients, including fragrances, are not considered to be covered by this annotation.</u>