



NOTIFICATION TO THE PARTIES

No. 2018/088

Geneva, 8 November 2018

CONCERNING:

Consultation on listing proposal

1. This Notification is being published at the request of Israel.
2. Israel and Kenya (and perhaps other co-sponsors) are interested in receiving comments on a potential listing proposal for mammoths, and have requested the Secretariat to issue this Notification on this matter. The proposal to be considered is to list in Appendix II either the genus *Mammuthus*, or perhaps just the species *Mammuthus primigenius* (Woolly mammoth).

Brief background information about mammoths

3. The genus *Mammuthus* includes five extinct species in the family Elephantidae. This family also includes all the living relatives of the mammoths, the elephants. *Mammuthus* first lived in Africa as tropical animals about 55 million years ago; about 10 million years after the last dinosaurs. They spread to Europe as forest-living species about three million years ago, apparently via the Middle East and Turkey. From there, mammoths spread to northern and eastern Asia and to North America around 1.5 million years ago. They spread throughout North America into Mexico, and in Asia throughout Siberia, into Mongolia, China, Japan and India. They never reached South America nor went back to Africa.
4. The cold-adapted species, the Woolly mammoth (*M. primigenius*) from which most (but not all) mammoth ivory is in trade today, was the smallest of all mammoth species and emerged around 500,000 years ago in Europe. By the start of the last ice age around 100,000 years ago, they occurred throughout Europe, Siberia, and most of North America. Most populations went extinct after the last ice age, around 10 to 40 thousand years ago, yet remnant populations were still living until about 5,600 years ago on St. Paul Island in Alaska and even more recently, until 3,600 years ago, on Wrangle Island in the East Siberian Sea.

Trade in mammoth ivory

5. Trade in mammoth ivory has been known since ancient times and it is well known as a trade commodity from Russia since the 18th century. Demand for mammoth ivory and its trade has increased greatly over the past few decades, especially since the moratorium on elephant ivory trade began in the 1980s. Since mammoth ivory trade is not illegal in any country today (except India), and since mammoths are not listed in the CITES Appendices, the data on trade in mammoth ivory is grossly inaccurate and incomplete. This situation has also created a window of opportunity allowing for illegal "laundering" of elephant ivory.

Mammoth specimens and CITES

6. It is important to note that mammoth ivory is not fossilized (as fossils are not covered by CITES). Legal experts agree that there is nothing in the CITES Convention nor in the Resolutions against listing extinct species in Appendix II. On the contrary, the so-called "look-alike provision" in Article II, paragraph 2 (b) of the Convention supports it.

7. Listing mammoths in Appendix II is not intended to stop trade in mammoth ivory, but rather to allow a way to document the trade in order to better understand it and its implications as look-alike specimens, and also to prevent "laundering" by illegal elephant ivory trafficking.

Identification

8. Differentiating mammoth ivory from elephant ivory can be usually done readily with the aid of any standard copying machine. Photocopies of the ivory will almost always show the "Schreger lines" which show which species the specimen is from. Other, more-complicated, methods also exist.

Consultation

9. The co-sponsors of this potential listing proposal wish to consult with all range states of *Mammuthus* in accordance with Resolution Conf. 8.21 (Rev. CoP16) on *Consultation with range States on proposals to amend Appendices I and II*.
10. Based on the background information above, it is apparent that all countries in North America and Europe as well as many countries in Africa and Asia may be considered as range states for this genus. Due to the uncertainty of the distribution of mammoth specimens, we have taken the unusual step to request the Secretariat to issue a Notification to all Parties. At this time, we would like to express our sincere thanks to the Secretariat for their cooperation.
11. We would appreciate comments on our proposal, and if possible, specifically on these questions, please:
 - a) Do you know if your country is a range state for the genus *Mammuthus* or for the species *Mammuthus primigenius*?
 - b) Do you think an Appendix II listing will contribute to data collection from your country on trade in mammoth specimens?
 - c) How do you think the listing proposal will affect the conservation of living elephants?
 - d) Do you think the proposal should be to list just Woolly mammoths (*M. primigenius*) or the whole genus *Mammuthus*?
 - e) Would your country be interested in being a co-sponsor of the proposal?
 - f) Any other comments.

Responding to this consultation

12. All Parties are invited to send their responses to this Notification **by 30 November 2018**, directly to Israel's CITES Scientific Authority (not to the Secretariat), by e-mail or by fax, to:

Dr. Simon Nemtzov
Israel's CITES Scientific Authority

E-mail: simon@npa.org.il or snemtsov@gmail.com
Fax: +972-2-5006281