

The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES COP19) – ZSL’s policy positions and recommendations on agenda items.

The Nineteenth meeting of the Conference of the Parties for the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) will meet in Panama City from the 14 - 25 November 2022.

Unsustainable and illegal international wildlife trade continues to pose a threat to both flora and fauna globally. ZSL has been engaging with the Convention for over twenty years with a view to ensure that a science and evidence-led approach underpins its implementation. We are working in a range of geographies on interventions that focus on a number of species impacted by trade and with the communities that rely on them. We believe one of ZSL’s strengths is the holistic approach it takes to conservation, and that understanding the impact of wildlife trade in the context of broader threats, as well as on local communities, is essential.

The position statements below reflect the expertise of ZSL as a science-lead conservation organisation that oversees two zoos. We have made comment on a number of species-specific matters, including listing proposals, in line with our science, policy and *in-* and *ex-situ* conservation activities. Additionally, we have taken positions on cross-cutting agenda items where our species expertise provides useful case studies and/or our biological and social science is relevant.

It is clear from the documents, and the analysis presented by the chair of Standing Committee in CoP19 Doc. 09.01.01, that the issues relating to wildlife trade for CITES to consider are growing rapidly, and arguably at a greater rate than the resources made available to address them. This is obviously of concern and is reflected in our positions. It is also clear that there is an increasing polarity to discussions on matters relating to trade and exploitation. We have therefore strived to take precautionary yet pragmatic positions.

ZSL policy recommendations:

CITES COP19 Agenda item	ZSL Position	Statement of support
4.2 Rules of Procedure of the Conference of the Parties - Proposed amendment to Rule 26 (submitted by Botswana and Zimbabwe) https://cites.org/sites/default/files/documents/COP/19/agenda/E-CoP19-04-02.pdf	Oppose	ZSL recognises that listings, Decisions and Resolutions adopted at CITES will have varying impact on Parties dependent on the species, and that where possible, support should be provided on those that have limited capacity and resources to implement. However, the proposal to amend Rule 26 to assign a number of votes per Party proportionate to the population of the species under discussion, would be hugely complex, cause conflict, be challenging to implement e.g. marine species, and ultimately in conflict with the procedure of other UN MEAs.
15. Participatory mechanisms for rural communities in CITES (submitted by Eswatini, Namibia and Zimbabwe) https://cites.org/sites/default/files/documents/COP/19/agenda/E-CoP19-15.pdf	Oppose	ZSL recognises the need for, and fully supports, the engagement of rural communities in the context of CITES. However, this is an issue for Parties and other relevant organisations to address at the national level and represent these groups accordingly. Creating new mechanisms within the Convention would be resource-heavy, complex and time-consuming. Parties and other stakeholders' energies would be far better spent developing national mechanisms to ensure representation.
17.4 Joint CITES-CMS African Carnivores Initiative https://cites.org/sites/default/files/documents/COP/19/agenda/E-CoP19-17-04.pdf	Support	Africa's large carnivores have been subject to steep declines due to multiple threats. ZSL recognises the need for a coordinated approach to address these threats, and welcomes the joint CITES-CMS initiatives, building on synergies between the conventions, in this regard. ZSL fully supports the Joint CITES-CMS African Carnivores Initiative.
20. CITES Tree species programme https://cites.org/sites/default/files/documents/COP/19/agenda/E-CoP19-20.pdf	Support	ZSL supports continued capacity building efforts and knowledge sharing as part of the CITES tree species programme.
21. Review of the ETIS programme https://cites.org/sites/default/files/documents/COP/19/agenda/E-CoP19-21.pdf	Oppose	ZSL is a strong supporter of the ETIS programme and welcomes any review that would improve the effectiveness, accuracy, and timeliness of the ETIS analyses. ZSL is therefore concerned that the changes proposed by the Secretariat to the reporting form and deadline will introduce unnecessary delays into the process and reduce the quality of the data collected thus reducing the utility of the ETIS reports to the Parties, Standing Committee, and Secretariat. ZSL strongly suggests seeking further discussion including by the MIKE-ETIS Technical Advisory Group.

<p>22. MIKE and ETIS programmes https://cites.org/sites/default/files/documents/CO/19/agenda/E-CoP19-22.pdf</p>	Support	<p>ZSL is a strong supporter of the MIKE and ETIS programmes and so welcomes and supports the draft Decisions directed to the Parties and Secretariat to encourage all Parties, governmental, intergovernmental, non-governmental organizations, donors, and other entities to support elephant range States and the Secretariat in their efforts to implement the MIKE and ETIS programmes as mandated in Resolution Conf. 10.10 (Rev. CoP18) on Trade in elephant specimens.</p>
<p>23. Role of CITES in reducing risk of future zoonotic disease emergence associated with international wildlife trade</p> <p>23.1. Report of the Standing Committee https://cites.org/sites/default/files/documents/CO/19/agenda/E-CoP19-23-01.pdf</p> <p>23.2. One Health and CITES: Human and animal health risks from wildlife trade (Submitted by Côte d'Ivoire, Gabon, The Gambia, Liberia, Nigeria and Senegal). https://cites.org/sites/default/files/documents/CO/19/agenda/E-CoP19-23-02.pdf</p>	<p>Support</p> <p>Support</p> <p>Support</p>	<p>ZSL is encouraged that the impact of zoonoses is being recognised in the context of CITES and Decisions drafted to address this. The on-going engagement with WOH (formerly OIE) and proposed joint programme of work will build on existing mechanisms. However, we believe that it would be possible to develop a Resolution on integrating the One Health approach in parallel with this, and indeed they would be mutually supportive.</p>
<p>25. Action plan on gender-related matters (Submitted by Panama). https://cites.org/sites/default/files/documents/CO/19/agenda/E-CoP19-25.pdf</p>	Support	<p>ZSL welcomes this document and recognises that dimensions related to gender in wildlife trade are poorly studied and understood. As an organisation, we have implemented projects that have identified gendered roles within the chain of custody of exploited and traded species. We believe that the proposed Decisions and associated 'CITES and Gender Action Plan' will be important steps towards addressing these fundamental knowledge gaps and progress towards enabling more equitable exploitation and trade of CITES-listed species.</p>
<p>35. Task Force on illegal trade in specimens of</p>	Support	<p>ZSL supports stepping up action to strengthen regional and international cooperation to tackle illegal timber flows through CITES, especially for the</p>

<p>CITES-listed tree species https://cites.org/sites/default/files/documents/CO/19/agenda/E-CoP19-35.pdf</p>		<p>implementation of traceability methods, origin verification and source risk assessments as well as tackling illicit financial flows and corruption which enable illegal trade in CITES-listed timber species.</p>
<p>42. Purpose codes on CITES permits and certificates https://cites.org/sites/default/files/documents/CO/19/agenda/E-CoP19-42.pdf</p>	Support	<p>As an organisation that oversees two zoos, as well as carries out conservation and veterinary research, and <i>ex situ</i> activities, ZSL welcomes the proposed definitions for purpose codes Z, M, E and N.</p>
<p>43. Non-detriment findings 43.2. Making non-detriment findings for specimens of Appendix-II species taken in the marine environment not under the jurisdiction of any State (Submitted by the UK). https://cites.org/sites/default/files/documents/CO/19/agenda/E-CoP19-43-02.pdf</p>	Support	<p>ZSL welcomes this document and the proposed Decisions. There are on-going issues around how straddling stocks are managed, and steps taken towards how Parties can be best informed on what sustainable catches of these species in the marine environment not under the jurisdiction of any State, in the context of CITES would be hugely valuable. We recognise and support efforts in progress to better align CITES and RFBs, but this specific issue is of particular concern as more migratory marine species are listed in the Appendices, particularly sharks.</p>
<p>44.2 Identification of timber and other wood products https://cites.org/sites/default/files/documents/CO/19/agenda/E-CoP19-44-02.pdf</p>	Support	<p>ZSL supports the increased focus on forensic testing to verify species and origin of CITES-listed timber species.</p>
<p>48. Definition of the term 'appropriate and acceptable destinations' https://cites.org/sites/default/files/documents/CO/19/agenda/E-CoP19-48.pdf https://cites.org/sites/default/files/eng/com/ac/3</p>	Support	<p>ZSL welcomes the development of the two non-binding guidance documents relating to appropriate and acceptable destinations. We encourage Parties to adopt these and the associated Decisions.</p>

<p>1/Docs/E-AC31-18-01-Add2.pdf</p> <p>https://cites.org/sites/default/files/common/imp/Non-binding%20guidance%20on%20Notif2019070.pdf</p> <p>Dedicated CITES website -</p> <p>https://cites.org/eng/imp/appropriate_and_acceptable_destinations</p>		
<p>49. Introduction from the sea</p> <p>https://cites.org/sites/default/files/documents/COP19/agenda/E-CoP19-49.pdf</p> <p>https://cites.org/sites/default/files/eng/com/sc/74/E-SC74-51.pdf</p>	Support – with stronger actions.	<p>There is clearly an issue with how IFS is implemented, and in the guidance provided in Doc. 51 at SC74 in response to requests from Parties, a basic lack of understanding of this element of the Convention. This is likely responsible, at least to some extent, for the disparity between trade reported as IFS and the reality of the estimated catch of CITES listed species and associated volume of trade taking place.</p> <p>We would encourage Parties to address any knowledge gaps in relation IFS and ensure reporting is strengthened – see also Sharks and Rays. Further we would encourage the inclusion of Decisions that recognise the points raised in Doc. 43.2.</p>
<p>52. Transport of live specimens: improving implementation of the transport regulations (Submitted by Canada, Côte d'Ivoire, Kenya, Mexico, Nigeria, Senegal and the United States of America).</p> <p>https://cites.org/sites/default/files/documents/COP19/agenda/E-CoP19-52.pdf</p>	Support	<p>To ensure transport of live flora and fauna is of the highest standards, ZSL strongly supports the making of the IATA Live Animals Regulations and IATA Perishable Cargo Regulations accessible to all Parties.</p>
<p>59. Illegal trade in cheetahs (<i>Acinonyx jubatus</i>)</p> <p>https://cites.org/sites/default/files/documents/C</p>	Support	<p>ZSL welcomes the document submitted by Ethiopia that brings attention to the illegal trade in cheetahs and provides draft recommendations and decisions to address this trade. Recent peer reviewed scientific publications have demonstrated that this trade has a particularly strong impact on the small and highly threatened cheetah populations in the Horn of Africa and requires urgent action. These populations comprise of a rare and threatened</p>

OP/19/agenda/E-CoP19-59.pdf		<p>subspecies, <i>A. j. soemmeringii</i>. Less than 300 Cheetahs are estimated to remain in the Horn of Africa and its borderlands, with a further 355 cheetah in South Sudan and northern Kenya likely to become increasingly vulnerable to this trade as populations become extirpated. Ethiopia's cheetah populations are particularly affected by the trade and ZSL fully supports Ethiopia's proposed recommendations and decisions.</p>
<p>61. Eels (<i>Anguilla</i> spp.) https://cites.org/sites/default/files/documents/COPI9/OP/19/agenda/E-CoP19-61.pdf</p>	<p>Support with amendments.</p>	<p>ZSL welcomes the Decisions related to Eels (<i>Anguilla</i> spp.), however we believe there is clearly still a need to engage import countries and Range States of species other than the European eel.</p> <p>It's been clearly evidenced that the availability of one species of eel can result in changes in exploitation and trade of others – the Japanese eel (<i>A. japonica</i>) seeming to primarily drive these changes as the most favoured by farms. As a result of the zero-catch quota proposed by ICES in 2021, it is likely that the concurrent decrease in availability of the European eel, will mean that there will be increases in exploitation and trade of species such as <i>A. rostrata</i> from the Americas, and <i>A. bicolor</i> from Southeast Asia. Indeed, data from East Asian customs indicates that import of eel fry to the region was dominated by <i>A. rostrata</i> (50t) in 2021.</p> <p>In recognition of these complex trade interactions, at CoP 17 and CoP 18, Decisions were adopted that required engagement of Parties who were range States of non-listed species. However, in the draft Decisions relating to eels for CoP 19, these are no longer present. This feels premature, as it could give the impression that the challenges associated with the complex interactions of global eel trade have been addressed, when the document for SC75 relating to these species highlights many of these still exist.</p> <p>As such, an additional Decision directed to Range States, importing and re-exporting countries of other <i>Anguilla</i> spp. in international trade, to encourage continued engagement, strengthened co-ordination and support of implementation of listings would be very welcome. This is further relevant due to the Dominican Republic's intent to list <i>A. rostrata</i> in Appendix III of CITES, as raised on the floor at SC74.</p>
<p>65. Sharks and rays (Elasmobranchii spp.) https://cites.org/sites/default/files/documents/COPI9/OP/19/agenda/E-CoP19-65.pdf</p> <p>Missing sharks report - https://cites.org/sites/default/files/documents/COPI9/OP/19/agenda/E-CoP19-65.pdf</p>	<p>Support</p>	<p>ZSL supports the Decisions laid out in the present document. As with many species, there is a clear need for improved co-ordination between export, transit and import nations. A significant impact of this is that there are mismatches between the trade in products of CITES-listed sharks recorded in the database and what would be expected against the information available on catches of listed species. A step towards this would be improved reporting but strengthened co-ordination within and between relevant Parties is essential. As such, the work supported by the German government to strengthen collaboration between CITES stakeholders and RFMO is to be applauded.</p> <p>The work relating to sharks NDFs and LAFs and sharing of such documents and information is hugely helpful for these species, but for guiding efforts to assess the sustainability and legality of trade of aquatic fauna more broadly, and we fully support the continuing efforts. Furthermore, we encourage</p>

<p>66.2.2. Establishing a fund accessible to range States upon non-commercial disposal of ivory stockpiles https://cites.org/sites/default/files/documents/CO/19/agenda/E-CoP19-66-02-02.pdf</p>	<p>Support</p>	<p>draft Decisions on reporting by Parties with domestic ivory markets to regular Standing Committee meetings.</p> <p>ZSL supports the proposal that trade in live African elephants taken from the wild be limited to <i>in situ</i> conservation programmes or secure areas in the wild, within the species' natural and historical range in Africa.</p> <p>ZSL supports the proposal that trade in live African elephants taken from the wild be limited to <i>in situ</i> conservation programmes or secure areas in the wild, within the species' natural and historical range in Africa. We would, however, like to see deletion of para c) of draft decision 19.AA, which would unnecessarily extend discussions on this topic to CoP20.</p> <p>ZSL appreciates the efforts that have gone into implementing the MIKE programme over the years and calls on the Secretariat, Parties, and civil society to continue to support the MIKE programme and to encourage continued reporting by MIKE sites, especially those with a history of poor reporting.</p>
<p>66.3. Implementing aspects of Resolution Conf. 10.10 (Rev. CoP18) on the closure of domestic ivory markets https://cites.org/sites/default/files/documents/CO/19/agenda/E-CoP19-66-03.pdf</p>	<p>Support with amendment</p>	<p>ZSL appreciates the effort that has gone into implementing ETIS over the years. ZSL also calls on (1) CoP19 to encourage Parties to report in a timely fashion to ETIS, (2) SC75 to support time-bound, Party-specific decisions including recommendations for improved enforcement to curb the illegal ivory trade by Category A Parties, and (3) for the Parties to direct the Secretariat to include an analysis of ivory seizures connected to Parties with legal domestic ivory markets in future ETIS reports, as raised by the EU at SC74.</p> <p>ZSL strongly supports the Proposed draft Decisions for the Secretariat, in consultation with the Standing Committee, to undertake a review of the NIAP process with a view to improving effectiveness and compliance.</p>
<p>66.4. Trade in live African elephants 66.4.1. International trade in live African elephant specimens: Proposed revision to Resolution Conf. 10.10 (Rev. CoP18) on Trade in elephant specimens</p>	<p>Note/call for continued effort</p>	

<p>https://cites.org/sites/default/files/documents/CO/19/agenda/E-CoP19-66-04-01.pdf</p>	<p>Note/call for continued effort</p>	
<p>66.4.2. Clarifying the framework: Proposal of the European Union https://cites.org/sites/default/files/documents/CO/19/agenda/E-CoP19-66-04-02.pdf</p>	<p>Support</p>	
<p>66.5. Report on Monitoring the Illegal Killing of Elephants (MIKE) https://cites.org/sites/default/files/documents/CO/19/agenda/E-CoP19-66-05.pdf</p>		
<p>66.6. Report on the Elephant Trade Information System (ETIS) https://cites.org/sites/default/files/documents/CO/19/agenda/E-CoP19-66-06.pdf</p>		
<p>66.7 Review of the National ivory action plans process</p>		

https://cites.org/sites/default/files/documents/CO/19/agenda/E-CoP19-66-07.pdf		
<p>67. CITES Big Cats Task Force (Felidae spp.)</p> https://cites.org/sites/default/files/documents/CO/19/agenda/E-CoP19-67.pdf	Support	ZSL supports the broadening of the scope of the Big Cats Task force to include more species and supports the Recommendations and Decisions. It is important that the Task Force has sufficient expertise, capacity and resources to address the varying drivers of demand between different species, different trafficking routes, and the diverse contexts of illegal hunting.
<p>68. Asian big cats (Felidae spp.)</p> https://cites.org/sites/default/files/documents/E-CoP19-68.pdf	Support	ZSL recommends adoption of the draft decisions on tigers but urges increased efforts in implementing Decision 14.69.
<p>69. Seahorses (<i>Hippocampus</i> spp.)</p> <p>69.1. Report of the Standing Committee</p> https://cites.org/sites/default/files/documents/CO/19/agenda/E-CoP19-69-01.pdf <p>69.2. Next steps towards the successful implementation of the Appendix-II listing for seahorses (Submitted by the Maldives, Monaco, Nigeria, Peru, Senegal, Sri Lanka, Togo, the United Kingdom of Great Britain and Northern Ireland and the United States of America).</p> https://cites.org/sites/default/files/documents/CO/19/agenda/E-CoP19-69-02.pdf	Support	As a partner in Project Seahorse, ZSL welcomes the Decisions proposed in Doc. 69.2. Seahorses are arguably the best researched marine taxa in the context of CITES and an excellent case study for many aspects of the Convention. While CITES Appendix II provisions are largely being met for live seahorses, action is needed to ensure the large volume of ongoing dried seahorse trade is both legal and sustainable. Similar to many other species in trade, there is a need for improved national and regional co-ordination of export, transit and import nations.

<p>the listing of sharks and rays.</p> <p>https://cites.org/sites/default/files/documents/E-CoP19-87-02.pdf</p>		
<p>Proposals to amend Appendices I and II -</p> <p>https://cites.org/eng/cop/19/amendment-proposals/provisional</p>		
<p>Requiem sharks (Bangladesh, Colombia, Dominican Republic, Ecuador, El Salvador, European Union, Gabon, Israel, Maldives, Panama, Senegal, Seychelles, Sri Lanka, Syrian Arab Republic, United Kingdom of Great Britain and Northern Ireland)</p> <p>https://cites.org/sites/default/files/eng/cop/19/proposal/as_received/E-Carcharhinidae_spp.pdf</p>	<p>Support with reservations.</p>	<p>ZSL recognises that a number of the Carcharhinidae family are threatened due to exploitation for international trade. However, evidence is variable across the taxa and in some cases absent. Regardless, taking into account IUU fisheries and trade, we believe there is merit in the listing, especially in the context of look-a-like issues for meat and some fins. This said, we do have concerns with regards to implementation and would urge Parties who are supportive of this listing to identify key, low-capacity supply and transit countries and work with them to ensure the processes and infra-structure are in place.</p>
<p>Rhinobatidae (Israel, Kenya, Panama and Senegal)</p> <p>https://cites.org/sites/default/files/eng/cop/19/proposal/as_received/E-Rhinobatidae_spp.pdf</p>	<p>Support</p>	<p>While evidence for trade in these species is sparse, they have been identified in markets in recent years, indicating that it may be increasing. Further, IUU fishing appears to be a major threat to the species and as such, supply chains difficult to characterise. Considering these points, and the similarity of these species' parts and derivatives to those of other listed taxa - Rhinidae, Glaucostegidae, and Pristidae – ZSL supports this listing.</p>
<p>Hammerheads ((Brazil, Colombia, Ecuador, the European Union, and Panama)</p> <p>https://cites.org/sites/default/files/eng/cop/19/pr</p>	<p>Support</p>	<p>In the context of previous listings of species in the family Sphyrnidae, and the status of those proposed, ZSL supports this listing.</p>

<p>Laos warty newt (<i>Laotriton laoensis</i>)</p> <p>https://cites.org/sites/default/files/eng/cop/19/prop/as_received/E-Laotriton_laoensis.pdf</p>		<p>Evidence of international trade is limited but there is demand. As such, ZSL supports this proposal.</p>
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