

WCS Position Statement:
73rd meeting of the CITES Standing Committee (SC73)
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Please contact Dr. Susan Lieberman (slieberman@wcs.org), WCS Vice President for International Policy, with any questions.

8. Reports of the Committees

8.1 [Report of the Animals Committee](#)

WCS External Statement: WCS welcomes this report from the Chair of the Animals Committee, and the ongoing efforts of AC members to work through the challenges presented by COVID-19. WCS regularly attends meetings of the Animals Committee, as an Observer, and we appreciated the opportunity to virtually join intersessional working groups on sharks and rays, African lions, precious corals, identification materials and the definition of appropriate and acceptable destinations.

We note with concern that informal work undertaken with respect to other agenda items has not been detailed on the CITES website, even where documents for AC31 proposed an intersessional working group that would be open to expressions of interest from observer organizations, particularly those with extensive expertise on the issue being discussed. Recognizing the exceptional circumstances of AC31, we urge that this **not** set a precedent for intersessional work, and that the AC strives to achieve the highest level of transparency possible, particularly in accordance with long-standing CITES practice. We stand ready to share our scientific and technical expertise with Parties in an open, transparent, participatory manner.

12. [Cooperation with other biodiversity-related Conventions: CITES input to the post-2020 Global Biodiversity Framework](#)

WCS External Statement: WCS welcomes this report from the Secretariat, and the active participation of the CITES Secretariat during the negotiation of the CBD post-2020 global biodiversity framework, and at the Bern meetings (WCS was pleased to have been invited to attend the 2019 Bern meeting). WCS has been actively engaging the CBD negotiations through consultations with our government partners, and the provision of detailed scientific and technical information (www.wcs.org/cbd). We agree that the current draft Target 4 is currently the most relevant for CITES, and agree that implementation of CITES should be one of several important tools in achieving it. However, we do have significant concerns about the current formulation of Target 4, as well as the indicators proposed to monitor against it.

Furthermore, we consider paragraphs 12-13 highly irregular and we recommend the Standing Committee not adopt the recommendation. All of the 183 CITES Parties but one are Parties to the CBD, and it seems unusual to ask the representatives of 6 of those Parties to represent the views of 182 CITES Parties. Rather, we suggest that the Standing Committee strongly recommend that all CITES Parties liaise closely with their CBD focal points and negotiators, and provide clear input from a CITES implementation perspective going into the 24th meeting of the CBD Subsidiary Body on Scientific, Technical, and

Technological Advice (SBSTTA-24) and the third meeting of the Open-Ended Working Group on the post-2020 Global Biodiversity Framework (which are happening too soon for an intersessional working group of the SC). However, the SC may want to set up an intersessional working group between SC73 and SC74 to provide guidance ahead of CBD CoP15.

15. Implications of the COVID - 19 pandemic on the implementation of the Convention

SC2021 Doc. 1 - Implications of the COVID-19 pandemic on the implementation of the Convention: preparing for the unexpected (28/01/2021)

WCS External Statement: WCS appreciates the work of the Parties, Standing Committee, Animals and Plants Committee, and the Secretariat to continue the vital work of implementation of CITES during this difficult period. We agree that it is essential to update and modernize the rules of procedure to allow for online or hybrid meetings in truly exceptional circumstances. However, we do also recognize the limitations presented by online or hybrid meetings, and the lack of robust examples of virtual negotiations that are available thus far. We therefore urge Parties to continue prioritizing in-person meetings, particularly for any negotiations, while improving contingency planning and building the capacity of CITES to use virtual or digital tools for communication and implementation. We submitted a response on this issue jointly with WWF International. Our key points included: 1) the need to provide considerable support to Parties from developing countries in order to ensure that they can participate fully and equitably, receive and download documents, and that their views are heard and given adequate consideration; and 2) any online decision-making has to allow the same level of access to approved, accredited observer organizations (NGOs and IGOs) as physical meetings have done. Such observers bring varied perspectives, represent broad expertise in CITES-related issues, and bring important concerns and knowledge to any CITES meeting. Throughout CITES' history, input from observer organizations has provided valuable information and practical experience to many discussions.

19. Purpose codes on CITES permits and certificates: Report of the working group

WCS External Statement: WCS is pleased to have participated in the working group on purpose codes on CITES permits and certificates, and we appreciate the hard work of the members, and the leadership of the Chair (Australia). Two priorities of the working group were identified: 1) to determine if there was a need to delete or add new codes to the current twelve codes in use; and 2) to provide clear definitions of the codes. We support the decision of the working group not to add or delete codes, but rather to focus on clear definitions of the existing codes, to assist with consistent interpretation and designation by Management Authorities on permits and certificates. WCS is pleased to have participated in the working group, and we support the draft definitions in Annex 1 of the document, and the draft amendments to Resolution Conf. 12.3 (Rev. CoP18) in Annex 2. We look forward to participating in further work of this working group.

21. Stocks and stockpiles

WCS External Statement: We were pleased to join the intersessional working group on stocks and stockpiles between SC69 and SC70, and believe that this broad concept covers many critical issues for the successful implementation and enforcement of CITES. In particular, better defining the term(s) and delineating the remit of CITES is critical. Recent misunderstandings, related to the implementation of the Convention involving various stocks and stockpiles of pangolins, Saiga antelope, sharks, and other taxa have created significant discussion among Parties. Effectively securing and managing stocks and stockpiles of CITES-listed species is critical to reducing opportunities for illegal trade. However, this is a

long term project that would benefit from greater clarity -- clarity that would be provided by intersessional work on parts b) and c) of the previous working group. As a result of these discussions, Resolution Conf. 17.8 on Disposal of illegally traded and confiscated specimens of CITES-listed species and many other species-specific resolutions can be appropriately updated, and further clarity on stockpile management can be discussed and potentially resolved before CoP20. We note that discussions on issues with this level of complication may not be productive in a virtual setting. We also caution against any hasty consolidation or change in existing species-specific resolutions that deal with stockpile issues (and risk unintended negative consequences that could undermine species conservation and CITES implementation). WCS hereby expresses our interest in joining any intersessional working group on this issue.

22. [Stocks and stockpiles \(elephant ivory\): Report of the working group](#)

SC2020 Inf. 10 - Ivory stockpiles: update on progress to the Standing Committee (20/11/2020)

WCS External Statement: WCS welcomes this report from the European Union, as Chair of the intersessional working group. WCS was pleased to engage actively in this working group, and these comments build on those previously expressed. First, we appreciate the need to keep guidance streamlined, but there is also a need to ensure that all key aspects of ivory stockpile management are (concisely) addressed, including chain of custody (establishment, tracking, etc.), reporting, regular auditing, and sampling and testing of ivory. This document should also address privately held stockpiles. We also agree with Parties and Observers on the working group that any commercialization of crushed ivory should be prohibited.

Finally, we believe that even more than this guidance document, additional, practical guidance for Parties such as templates for standard operating procedures, legislation and regulation around ivory stockpiles, would be very useful. We recommend that the SC direct further intersessional work on identifying what resources for this already exist, or could be developed from material that already exists, and collect these resources on the CITES web page dedicated to elephants and elephant ivory.

23. [CITES Big Cats Task Force: Report of the Secretariat](#)

SC2020 Inf. 12 - Illegal trade in Asian big cats (Felidae spp.): update on progress to the Standing Committee (20/11/2020)

WCS External Statement: WCS appreciates the proposed Terms of Reference for the CITES Big Cats Task Force. WCS works with governments and other partners across the globe, in Africa, Asia, Latin America, and North America, to conserve all species of big cats in the wild and their habitats, including tigers, snow leopards, leopards, lions, jaguars, cheetahs, clouded leopards, and pumas. We work to conserve multiple populations across the species' range, with long-term species-specific research and monitoring, and broad programs to reduce threats, protect habitat, combat poaching, and reduce human-wildlife conflict. We also have programs in multiple countries to address illegal trade in big cats and their parts, including work assisting relevant government agencies. We support the establishment of the Big Cats Task Force (BCTF), whilst also urging Parties to identify similarities and differences between big cat species in poaching, illegal trade, and consumption. With respect to the draft ToR, we recommend that Parties:

- Fully balance the membership, agenda and workload of the BCTF across all CITES-listed taxa from Africa, Asia and Latin America, and ensure that all key Parties are able to engage;

- Include representation from technically qualified NGOs with expertise in big cat field conservation and trade;
- Consider the connections between illegal and *legal* trade, where it exists, in big cat species, including Parties that are able to trade commercially and through mechanisms such as captive breeding, to fully understand the dynamics of the illegal trade in big cats and their derivatives;
- Ensure that the specific dynamics of illegal trade in the individual big cat species are fully recognized (with some trafficked as live animals and others trafficked as parts and products); and
- Align itself with ongoing law enforcement cooperation among implicated Parties and other CITES processes to maximize its additional impact without replicating ongoing work.

Furthermore, we draw the attention of Standing Committee members and Parties to paragraph 4a of the Annex of this document (the draft TOR), which as part of prioritization of which species of big cats are the most affected by illegal trade, it states, “a) big cat species most significantly affected by illegal trade, based on available illegal trade data (seizure data from annual illegal trade reports,)”. The list should include both species of clouded leopards, Mainland clouded leopard *Neofelis nebulosa* and Sunda clouded leopard, *Neofelis diardi*. We further note that whether or not a species is affected by illegal trade should not only consider seizure data from annual illegal trade reports, which may elicit a disproportionate prioritization based on volumes of seizures or numbers of animals. We recommend evaluation of observations of physical and online markets as well. Some species or subspecies may be so endangered or critically endangered, that removal of a very small number of animals from the wild causes a highly significant negative impact on the species’ population. We recommend in addition a paragraph that calls for input from the IUCN Cat Specialist Group, and other experts, on the degree to which different big cat species are threatened by illegal trade, in addition to other elements in the draft TOR. Furthermore, seizure data in CITES annual reports is only a subset (often a small subset) of actual seizures, and information from enforcement officials and others should be invited.