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The Federation of Associations for Hunting and Conservation of the EU (FACE) is an international non-profit making, non-governmental organisation.

The Members of FACE are the national hunters' organisations in 35 European countries, including all 28 EU Member States, representing over 7 million European hunters.

This makes FACE the largest democratically representative body for hunters in the world.

FACE upholds the principle of sustainable use of natural resources as a tool for rural development and conservation of wild animals and their habitats.

FACE has been an active member of the International Union for Conservation of Nature (IUCN) since 1987.

WOOD BISON

(Bison Bison athabascae)

PROPOSAL 1: Deletion from Appendix II Proponent: Canada

FACE recommends rejection of this Proposal.

- The population has increased in recent years and the harvest management continues to be strong.
- · Trade is not a concern for the survival of the species.
- The IUCN/TRAFFIC analysis concludes that the subspecies does not satisfy the criteria for listing on Appendix II: The population does not have a restricted range, the population is increasing, and harvest for international trade has a negligible impact on the subspecies.
- The CITES Secretariat recommends that this proposal be adopted.

TUR

(Capra Caucasica)

PROPOSAL 2: Inclusion in Appendix II, with a zero quota for wild-taken specimens of the Western (Kuban) Tur (C. caucasica caucasica) exported for commercial purposes or as hunting trophies
Proponent: The European Union and Georgia

FACE recommends rejection of this Proposal. In case the range states support the proposal, the zero quota for hunting trophies should be removed.

- The title of the proposal refers to the "Western" Tur (C. caucasica caucasica) but it should be noted that the Eastern Tur (C. c. cylindricornis) has been included in the subject matter of the proposal.
- The IUCN/TRAFFIC analysis concludes that the criteria for inclusion of Capra caucasica in Appendix II appear not to be met: The species has an extensive range, a relatively large and increasing population and is subject to negligible international trade.
- Regarding the proposal for a zero quota for wild-taken C. c. caucasica exported for commercial purposes or as hunting trophies, the IUCN/TRAFFIC note that its impact would be similar to that of an Appendix-I listing, and the Appendix I listing criteria are not met.
- · The CITES Secretariat recommends that this proposal be rejected.
- · Legal hunting is not a risk to the species, but on the contrary constitutes an important conservation tool.
- Consequently, in case the proposal is supported by other range states, it should be amended to delete the zero quota for hunting trophies.

FLORIDA PUMA & EASTERN PUMA

(Puma concolor coryi - Puma concolor cougua)

PROPOSAL 5: Transfer from Appendix I to Appendix II Proponent: Canada

FACE recommends support of this Proposal.

- This is a recommendation of the Animals Committee, following the Periodic Review for Felidae.
- There appears to be no demand in international trade for these species, or reason to expect their transfer would stimulate such demand.
- With this proposal, all cougars in North America will be listed in Appendix II under Felidae spp., and will conform to the guidance on split-listing, which advises against having subspecies listed on separate Appendices.

MOUNTAIN ZEBRA

(Equus zebra zebra)

PROPOSAL 6: Transfer from Appendix I to Appendix II
Proponent: South Africa

FACE recommends support of this Proposal.

- The IUCN/TRAFFIC Analysis concludes that the Cape mountain zebra does not appear to meet the biological criteria for inclusion in Appendix I: The species does not have a restricted distribution; the wild population is increasing, and has done so at 8-9 % per year since the early 1990s, and is not regarded as under threat.
- Conditional to the transfer of Cape mountain zebra from Appendix I to Appendix I
 South Africa proposes to implement a combination of active adaptive harvest
 management and management strategy evaluation to set a hunting quota for the
 Cape mountain zebra.
- The introduction of a hunting quota will satisfy the Precautionary Measures and have a beneficial effect by providing incentives for private owners to invest in the Cape mountain zebra, increasing the possibility that new subpopulations will be established. Responses from the private sector indicate that this is the case.
- Today 70% of the population are on state land. Future population growth depends on expansion onto private land. Such growth through sustainable use could mitigate the lack of genetic diversity, which has been noted as a potential threat.
- · The CITES Secretariat recommends that the proposal be adopted



AFRICAN ELEPHANT

(Loxodonta africana)

PROPOSAL 14: Delete the annotation to the listing of the Namibian African elephant population in Appendix II by deleting any reference to Namibia in that annotation Proponent: Namibia

FACE recommends support of this Proposal.

- The Namibian elephant population is secure and growing, and the availability of habitat for elephants is increasing. Namibia's conservation model has enabled the expansion of the elephant population from just over 7500 in 1995 to over 20,000 at present.
- The most effective strategy to continue this development is to integrate elephants into rural economies as assets and to demonstrate that elephants contribute to the welfare and development of people. In particular, controlled trade will help to ensure continued access to land outside protected areas by providing strong incentives to communities to protect elephants and their habitat.
- The establishment of a Decision Making Mechanism for a process of future trade in ivory was an integral part of the compromise which included the moratorium on proposals for trade.
- There has been no progress on the Decision Making Mechanism.
- Revenue from regulated trade will be managed through a trust fund and used exclusively for elephant conservation and community conservation and development programmes within the elephant range.
- This proposal should be considered in conjunction with Proposal 15 and CoP17 Doc. 84.3.

PROPOSAL 15: Amend the present Appendix II listing of the population of Zimbabwe of Loxodonta africana by removing the annotation in order to achieve an unqualified Appendix II listing
Proponent: Namibia and Zimbabwe

FACE recommends support of this Proposal.

- The Zimbabwean elephant population is growing and the availability of habitat for elephants is increasing.
- The most effective strategy to continue this development is to provide economic incentives for elephant conservation.
- The establishment of a Decision Making Mechanism for a process of future trade in ivory was an integral part of the compromise which included the moratorium on proposals for trade.
- · There has been no progress on the Decision Making Mechanism.
- The revenue from regulated trade will be used exclusively for elephant conservation and community development and conservation programmes.
- This proposal should be considered in conjunction with Proposal 14 and CoP17 Doc 843



AFRICAN ELEPHANT

(Loxodonta africana)

PROPOSAL 16: Include all populations of the African elephant in Appendix I through the transfer from Appendix II to Appendix I of the populations of Botswana, Namibia, South Africa and Zimbabwe

Proponent: Benin, Burkina Faso, Central African Republic, Chad, Ethiopia, Kenya, Liberia, Mali, Niger, Nigeria, Senegal, Sri Lanka and Uganda

FACE recommends rejection of this Proposal.

- The IUCN/TRAFFIC analysis concludes that the African elephant population of Botswana, Namibia, South Africa and Zimbabwe does not appear to meet the biological criteria for inclusion in Appendix I, as set out in Res. Conf. 9.24 (Rev. CoP16). It does not have a restricted range, nor is its population small or undergoing a marked decline.
- The proposal is disproportionate and would unjustifiably penalise African range states having been successful in their elephant management and some of which are now faced with management problems of how to sustain the increased populations. This situation is well reflected in the proposals 14 and 15 by range states that have been effective in increasing their elephant populations.
- Inclusion in Appendix I is likely to make it more difficult to ship elephant hunting trophies due to stricter domestic measures, thus threatening the revenues from trophy hunting, which provides funding for enforcement and elephant management.
- Poaching and wildlife trafficking need to be priorities in a more holistic and multidimensional approach, involving a greater number of actors in various fields who must act under a coordinated strategic guidance to effectively address this great threat to biodiversity and socio-economic development. This proposal risks leading to the direct opposite result by removing the important incentives and revenue provided by sustainable use.
- · IUCN published a guidance paper on trophy hunting in April 2016 noting an increase in unscientific attacks on trophy hunting and supporting the value of trophy hunting for wildlife conservation.
- The CITES Secretariat recommends that this proposal be rejected.



PEREGRINE FALCON

(Falco peregrinus)

PROPOSAL 17: Transfer from Appendix I to Appendix II Proponent: Canada

FACE recommends support of this Proposal.

- · According to the IUCN/TRAFFIC Analysis, the available information indicates that the Peregrine falcon does not meet the biological criteria for inclusion in Appendix I: The species has an extremely wide distribution and a large and stable population.
- The IUCN/TRAFFIC note that there is already a well-established captive-breeding trade which is able to largely satisfy current market demands.
- Existing international instruments and stakeholder engagement are effective in supporting regional and global efforts for conservation, sustainable management and trade of the Peregrine falcon. A transfer to Appendix II is a measure that is proportionate to the low risks to the species from international trade.
- · Appendix II listing of the Peregrine falcon is an appropriate response to the conservation success in restoration of this species.
- \cdot The CITES Secretariat recommends that the proposal be adopted.

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The social and economic benefits derived from sustainable use, including revenues from trophy hunting, provide sustainable incentives for local people to conserve wildlife



FACE is supported by the European Commission Directorate General Environment through LIFE NGO funding





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