



# FACE VOTING RECOMMENDATIONS

## The 18th Conference of the Parties to CITES



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### PROPOSAL 1: Heptner's or Bukharan markhor (*Capra falconeri heptneri*)

#### Transfer the population of Tajikistan from Appendix I to Appendix II

Voting recommendation: **SUPPORT**

**Argument:** Pursuant Res. Conf. 9.24, Tajikistan's markhor no longer meet the criteria for an Appendix I listing. Tajikistan's growing markhor population substantially contributed to the positive global trend reflected in the 2015 IUCN Red List status change from Endangered" to "Near Threatened" for all markhor. Population surveys conducted regularly since 2012 show that Tajikistan's markhor population has increased each year, with the most recent 2017 IUCN survey confirming continued growth. In some areas, markhor are approaching their ecological carrying capacity based on current habitat conditions and no major population declines have been recorded since the early 2000s.

Regulated hunting has played a key role in improving the species' conservation status. Hunting programs for this subspecies in Tajikistan have been highly beneficial to active conservation and supportive of local communities. Additionally, no demand for international trade is known outside of the limited number of hunting trophies traded annually. Annual offtake since 2014 has been  $\leq 12$  individuals (all males  $\geq 8$  years old), or  $< 1\%$  of the known minimum population. Transferring Tajikistan's markhor from Appendix I to Appendix II should not have any direct negative impact on management of markhor in Tajikistan. FACE recognises the success of Tajikistan's community-based sustainable use model, recommend that these programs continue as currently implemented, possibly with the establishment of new hunting quotas, and fully support the local communities.



### PROPOSAL 2: Saiga antelope (*Saiga tatarica*)

#### Transfer from Appendix II to Appendix I

Voting recommendation: **REJECT** and instead adopt the draft Decisions in Doc. 86

**Argument:** The Secretariat comments that the Appendix II listing adequately protects saiga antelope from trade impacts and the conservation benefits of an Appendix I listing are unclear. The populations of saiga that are primarily in Kazakhstan and Russia —*Saiga tatarica* according to CITES nomenclature—are not small nor do they have a restricted area of distribution. According to the IUCN, current levels of illegal and legal harvest are not a significant threat to *S. tatarica* populations. The major threats to saiga are massive die-offs from disease, habitat alteration, encroaching agriculture and competition with livestock grazing. The species' conservation status is improving with populations in Kazakhstan exhibiting a strong recovery since the 2015 mass die-off. Biological criteria for an Appendix I listing may be met for the population in Mongolia—*S. borealis* in CITES nomenclature. The Parties should reject the current proposal, pending resolution of the recognised nomenclature issues; however, *S. borealis* in Mongolia may qualify for an Appendix I listing. If the proposal is accordingly amended, and has range states support, Parties should consider transferring *S. borealis* to Appendix I while recognising possible enforcement issues due to a split-listing.



## PROPOSAL 5: Giraffe (*Giraffa camelopardalis*) Include in Appendix II

Voting recommendation: **REJECT**

**Argument:** Globally, giraffes do not meet either criterion found in Res. Conf. 9.24, Appendix 2a for inclusion in Appendix II. According to the IUCN assessment on *Giraffa camelopardalis*, legal offtake and international trade are not among the primary threats to giraffe populations. Legal hunting of giraffes primarily takes place in Namibia, South Africa and Zimbabwe.

According to the 2016 IUCN Status Report on giraffes, two giraffe subspecies inhabit Namibia, South Africa and Zimbabwe. The Angolan giraffe (*G. c. angolensis*) has increased from approximately 15,000 to over 30,000 individuals since the 1970s and 1980s, while the South African subspecies (*G.c. giraffa*) has increased from 8,000 to over 21,000 individuals in the same time frame.

Recent dramatic declines have occurred in subspecies that inhabit east Africa (Kenya, Ethiopia, and Somalia) where legal hunting is not permitted. The Nubian subspecies (*G. c. camelopardalis*) has declined from over 20,000 around 1980 to less than 1,000 in 2015; Masai giraffe (*G. c. tippelskirchi*) declined from over 65,000 to 30,000; and the reticulated subspecies (*G. c. reticulata*) has declined from approximately 40,000 in 1990 to 8,600 in 2016. Giraffe populations in central and west Africa are generally small (<2,500 individuals combined).

The proposal states that “*Giraffes are in decline due to habitat loss and conversion, legal and illegal offtake, and use in trade*” but the data do not support the claims addressing legal offtake and trade. The IUCN status report lists major threats to giraffes as habitat loss, civil conflict, poaching, and ecological changes; it does not mention legal offtake or trade as threats. The report also notes that giraffe populations are increasing in those countries where hunting of giraffes is legal. Between 2006 and 2015, approximately 300 giraffes per year were imported into the United States, representing <0.4% of the global population at the time.

The proposal also references trade information in giraffe parts available online but does not include meaningful information about the impacts of trade in giraffes and their parts on giraffe populations. The data were not verified to ensure quality (if they are true giraffe parts), uniqueness (objects could be counted multiple times by different surveyors), or derivation (they could originate from antique specimens or captive individuals). All available data suggest that legal trade does not have an impact on giraffe populations; in fact, capacity building and habitat conservation related to legal hunting (e.g., anti-poaching efforts) likely contributed to population growth in range states with stable or increasing populations. Although some range states are proponents of the proposal, range states that have giraffe hunting programs and resulting increasing or stable giraffe populations strongly oppose the proposal.



### **PROPOSAL 8: Southern white rhino (*Ceratotherium simum simum*)**

#### **Remove the existing annotation for the population of Eswatini (formerly Swaziland)**

Voting recommendation: **SUPPORT**

**Argument:** The proposal correctly argues that the CITES moratorium in rhino horn trade has made it more difficult for Eswatini to conserve the species without the full benefit of its sustainable use. Eswatini requests sovereignty in managing its white rhino population and horn stockpile. Rhino horn sales will be used to improve remuneration, equipment and conditions for anti-poaching rangers and also benefit community development in the areas surrounding rhino parks.

Eswatini's stockpiles have been legally collected from natural deaths or management actions. Sales will be conducted by Big Game Parks, the CITES Management Authority of Eswatini, and will be made directly to licensed retailers. All rhino horn will be documented, certificated, recorded in a DNA database and entered into national and CITES registries to eliminate chances of illegal trade. Removal of the annotation will benefit rather than hinder rhino conservation.

### **PROPOSAL 9: Southern white rhino (*Ceratotherium simum simum*)**

#### **Transfer of the population of Namibia from Appendix I to Appendix II with specific annotation**

Voting recommendation: **SUPPORT**

**Argument:** Namibia's white rhino population does not meet Appendix I criteria (is not small, declining or fragmented). Namibia's population has grown from 16 animals in 1975 to 1,037 individuals currently, the world's second largest behind South Africa, with an annual growth rate of 6.7%. From 2008 to 2018, 57 white rhinos were hunted, around 0.5% of the population. Namibia is successfully monitoring its white rhino population and has demonstrated commitment, achievement and ability in conservation. The split-listing of white rhino has had an adverse effect on Appendix I populations and limited Namibia's ability to generate revenue for conservation. Namibia's population of white rhinos should have the same status as South Africa's white rhinos.

### **PROPOSAL 10: African elephant (*Loxodonta africana*)**

#### **Transfer the population of Zambia from Appendix I to Appendix II**

Voting recommendation: **SUPPORT**

**Argument:** Zambia's population no longer meets the criteria for an Appendix I listing. The population is large and stable (>20,000 elephants). The transfer to Appendix II and accompanying annotation will satisfy the precautionary approach found in Res. Conf. 9.24, Annex 4.

Other southern African countries with elephant populations on Appendix II have proven that sustainable use conservation is beneficial for the species. This sustainable use is essential for economic incentive mechanisms, conservation and local community needs for co-existing with elephants. Zambia already has a successful Community-Based Natural Resources Management system, and transfer of its elephant population to Appendix II will strengthen that system.

### **PROPOSAL 11: African elephant (*Loxodonta africana*)**

#### **Amend annotation 2 pertaining to the elephant populations of Botswana, Namibia, South Africa and Zimbabwe**

Voting recommendation: **SUPPORT**

**Argument:** The Appendix II annotation should be amended as proposed. The annotation as currently written is no longer relevant or appropriate. Elephant populations in southern Africa, and specifically the four proponent countries, are secure (approximately 256,000 or 61.6% of all elephants in Africa) and, in many areas, expanding. Resources and incentives are urgently needed to support community conservation programs and mitigate human-wildlife conflict.

CITES has not recognised the achievements of countries with large elephant populations and has repeatedly discounted the importance of southern Africa's conservation needs, while undermining community programs. Ivory sales should be a critical source of revenue for elephant conservation and proceeds of allowed trade will be used exclusively for elephant conservation and community development programs, as limited by the annotation.





**PROPOSAL 12: African elephant (*Loxodonta africana*)**  
**Transfer the populations of Botswana, Namibia, South Africa and Zimbabwe from Appendix II to Appendix I**

Voting recommendation: **REJECT**

**Argument:** The elephant populations in countries in southern Africa, including the four with Appendix II populations, are either increasing or stable. In contrast, many populations in other parts of Africa (listed under Appendix I) are either very small in size or are experiencing significant declines. Furthermore, elephant populations in portions of the Appendix II countries are close to ecological carrying capacity and limits for social tolerance. High density elephant populations can cause significant changes to vegetation cover, with negative consequences to some wildlife species and overall biodiversity. Furthermore, human-elephant conflicts are increasing in frequency and severity in the Appendix II countries. Thus, shifting elephant populations in these countries to Appendix I makes little biological sense and will undermine local community support for elephant conservation. As detailed in the proposal, the range states at issue were consulted about the proposal; they all oppose the transfer for multiple reasons. A similar proposal has been debated and repeatedly rejected at previous CoPs. The Parties should likewise quickly reject it at CoP18 and move on to other more important and serious proposals.



**PROPOSAL 13: Woolly mammoth (*Mammuthus primigenius*)**  
**Include in Appendix II**

Voting recommendation: **REJECT**

**Argument:** According to Res. Conf. 9.24, Annex 3, “[e]xtinct species should not normally be proposed for inclusion in the Appendices.” At CoP17, the CITES Secretariat submitted comments that question the legality of the proposal and whether regulation of extinct species is within the legal scope of the Convention. Although somewhat similar in appearance, mammoth ivory is usually easily distinguishable from elephant ivory. The proposal should be rejected as it is outside the scope of the Convention and otherwise unnecessary for the regulation of trade in elephant ivory.



**PROPOSAL 18: Reeves's Pheasant (*Syrmaticus reevesii*)**  
**Inclusion in Appendix II**

Voting recommendation: **REJECT** but instead support Appendix III listing

**Argument:** FACE does not support the inclusion of Reeve's Pheasant in Appendix II. For the time being an Appendix III listing should be an appropriate solution and would be entirely in line with what had been discussed since CITES CoP 17 and had been put forward now for adoption at CoP 18 under agenda item 100 'Inclusion of species in Appendix III'.

There is some trade from the only native range state which is China. The species is already protected under Chinese legislation and any non-permitted hunting or export without government approval should already be illegal.