

# Towards CoP15 of CITES

(Doha, Qatar 13 - 25 March 2010)

IWMC Recommendations on Draft Resolutions and Decisions

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Documents CoP15 Doc. 7.2.1 and Doc. 7.3.1

Subjects Reports of the Chairmen of the Animals and Plants Committees

Proponents Chairmen of the Animals and Plants Committees

#### **RECOMMENDATION – ADOPTION but...**

IWMC welcomes the reports of the Chairmen of the Animals and Plants Committees. It wishes to thank and congratulate them for the quality of the reports and of the work done by the respective Committees. These reports do not include recommendations, which appear in other documents, but a draft decision from the Secretariat to amend the Rules of procedure of the Committees, which was rejected by the Committees. IWMC agrees with the Committees. Therefore, IWMC recommends to the Conference of the Parties to adopt the reports but to reject the draft decision submitted by the Secretariat.

- 1. IWMC was pleased to be able to participate in both meetings of the Animals Committee an in one of the Plants Committee held between CoP14 and CoP15, as well as in their joint meeting. It wants therefore to thank their Chairmen for having invited it to attend these meetings as an observer.
- 2. The reports properly reflect the heavy work accomplished by the Committees. IWMC welcomes them and congratulate their authors. It must nevertheless observe again that in its opinion, in particular in the Animals Committee, too much time and efforts are spent about species that are not listed in the CITES Appendices.
- 3. The reports do not include recommendations from the Committees, all those being included in other working documents submitted to CoP15. The recommendations of IWMC will therefore be made with regards to these documents.
- 4. However, in its comments, the Secretariat proposes a draft decision, aiming to amend the Rules of procedure of the Committees in case a member has a conflict of financial or political interests. The proposed amendment, already submitted to both Committees, was rejected by them, as they considered that such an issue was more appropriate to a code of conduct rather than to rules of procedure. IWMC tends to agree with the Committees.
- 5. In conclusion, IWMC recommends to the Parties to adopt the reports of the Chairmen of the Animals and Plants Committees but to reject the draft decision submitted by the Secretariat.
- 6. The mandate of both Chairmen will end at CoP15 and it appears that they will not be candidate for re-election. Therefore, IWMC wishes to congratulate and thank them for the excellent work they have accomplished during many years and for the excellent relationship established with them during than time. IWMC wishes them the best for the continuation of their life and activities.

Document CoP15 Doc. 9

Subject Review of the scientific committees

Proponent Secretariat on behalf of the Standing Committee

#### **RECOMMENDATION - ADOPTION**

IWMC recommends to the Conference of the Parties to adopt the draft amendment to Resolution Conf. 11.1 (Rev. CoP14) on the Establishment of committees. Considering the tasks to be accomplished by the chairmen of scientific committees, it appears appropriate to relieve them from that of regional representatives.

- 1. IWMC, after having participated in many meetings of the Animals and Plants Committees, is convinced that it would be beneficial to the work of the Committees to relieve their chairman of the tasks devoted to regional representatives. This should facilitate their work without penalizing their region.
- 2. This was abundantly discussed within the committees and all necessary argument in favour of such a suggestion may be found in their reports. IWMC is pleased that the Standing Committee is now sharing the same views and has directed the Secretariat to submit a formal proposal for approval by the Conference.
- 3. IWMC therefore recommends to the Conference of the Parties to adopt the amendment to Resolution Conf. 11.1 (Rev. CoP14) on the Establishment of committees as proposed by the Standing Committee in the Secretariat document.

Document CoP15 Doc. 10.1

Subject Synergy with biodiversity-related international initiatives

Proponent Secretariat

#### **RECOMMENDATION - ADOPTION?**

IWMC recommends to the Conference of the Parties to take note of the document submitted by the Secretariat but is a bit reluctant to recommend it to adopt the draft decisions proposed by the Secretariat, in particular those concerning the climate change, which appear at least premature. IWMC believes that CITES, with its limited resources, should rather focus its activities on those entrusted to it by the Convention and leave to other treaties more general issues as those covered by the document.

- 1. While the need of synergy between CITES and other treaties is recognized, IWMC believes that it should be focused on issues directly related to the purposes of the Convention, i.e. the regulation and control of international trade. Other aspects are covered by other treaties or initiatives to which the same States are belonging. Yet, most of the initiatives and activities described in the Secretariat's document are not directly relevant to CITES.
- 2. In these circumstances, IWMC recommends to the Parties to take note of the report of the Secretariat but to consider seriously whether it would be actually beneficial for CITES to devote time and resources to the activities suggested in the proposed draft decisions. Some of these initiatives have not yet been put in concrete forms (IPBES) and it is therefore premature for CITES to be actively involved and to invest its limited resources in them. IWMC is in particular concerned by the activities related to the climate change, which appear at least premature and not directly relevant to the CITES objectives.

Documents CoP15 Doc. 12 and Doc. 35

Subjects Harmonization of nomenclature and taxonomy with other Multilateral Environment

Agreements and standard nomenclature

Proponents Secretariat and nomenclature specialists of the Animals and Plants Committees

#### **RECOMMENDATION – partial ADOPTION**

IWMC recommends to the Conference of the Parties to take note of the documents submitted respectively by the Secretariat and the nomenclature specialists. As the Secretariat in its comments on document Doc. 35, IWMC is concerned with the continuing and numerous changes proposed to the Appendices and taxonomic references, considering the purposes of the Convention and the training of the implementation and enforcement officers. It agrees also with the Secretariat regarding the change proposed for *Scleropages formosus*. Therefore, IWMC recommends to the Parties to reject at least the latter change and to consider carefully others and the proposed draft decisions before adopting them.

- 1. IWMC has no problem with the harmonization with other treaties of the nomenclature and taxonomy of species listed in the CITES Appendices and may recommend to the Parties to adopt the proposed amendments to Resolution Conf. 12.11 (Rev. CoP. 14) in document Doc. 12. Nevertheless, it must note that the change proposed for the sperm whale is at least the third one affecting that species.
- 2. On the other side, IWMC has serious concerns with the numerous changes proposed, for animals, at each meeting of the Parties. We understand that taxonomy is in constant evolution but to constantly follow that evolution is creating serious difficulties to those who have to implement and enforce CITES and may not always have the necessary scientific background to understand why such changes are of actual use. This may also facilitate activities contrary to the purposes of CITES.
- 3. The proposed change for the listing of *Scleropages formosus* is an excellent example of useless complication. Indeed, the trade in this Appendix-I species is exclusively in captive-bred specimens from a large number of operations that, most likely, have been established with fishes from more than one of the proposed three new species, if not hybrids. This means that the specimens in trade are essentially hybrids whose parents would be of unknown and various species if the change is accepted. Therefore, to keep the *status quo* would be the only pertinent decision.
- 4. In conclusion, IWMC recommends to the Parties to reject at least the proposed change for *Scleropages formosus* and to consider the others carefully, in keeping in mind the purposes of CITES and the practical aspect of the implementation and enforcement of the Convention. With respect to the draft decisions, IWMC agrees with their purposes but has sympathy with some of the comments from the Secretariat.

Document CoP15 Doc. 14

Subject CITES and livelihoods

Proponent Chairman of the Standing Committee Working Group on CITES and Livelihoods

#### **RECOMMENDATION - ADOPTION**

IWMC welcome the document on this important issue but regrets that not all regions have been able yet, after a rather long delay, to designate their representatives on the Working Group. The efforts of the latter and its chairman are nevertheless commendable and deserve to be continued. IWMC recommends to the Parties to adopt the draft decisions for that purpose and also the draft resolution, although it understand that further work on it would still be required. IWMC is nevertheless concerned by the fact that Parties, in particular those that are not range States of the species in question, are not urged one way or another to better take into consideration the livelihoods of the poor, and of those who might become poor, when submitting a listing proposal.

- 1. Although not all regions have been able yet, in about three years time, to designate their representatives to the Working Group on CITES and livelihoods, IWMC is pleased to note that progress have been made on this important issue by the current members and the chairman. They have to be congratulated for that. The work of the Group must continue and IWMC recommends to the Parties to adopt the draft decisions proposed for that purpose.
- Regarding the proposed draft resolution, it appears as rather ambitious and would certainly need
  further work after CoP15. It should nevertheless be adopted, possibly with changes that could be
  proposed by the Working Group if it is allowed to work during the meeting. This is also
  recommended by IWMC.
- 3. In spite of what is said above, and considering the significance of certain listings, including listings proposed at CoP15, IWMC regrets that nothing is made to urge Parties, in particular those that are not range States of the species in question, to better take into consideration the livelihoods of the poor, and of those who might become poor, who might not be only harvesters, when submitting a listing proposal. When the proponents do not take this aspect into consideration, the Conference of the Parties should act as appropriate to correct that failure.

Document CoP15 Doc. 18 and its annexes

Subject Review of Resolutions

Proponent Secretariat

#### **RECOMMENDATION – ADOPTION with amendments**

IWMC recommends to the Conference of the Parties to adopt the amendments proposed by the Secretariat, except those subject to comments below. It recommends as well the adoption of the proposed draft decision related to Resolution Conf. 10.10 (Rev. CoP14), on the condition that the revision would be limited to the elements provided in the supporting statement.

- 1. Resolution Conf. 7.12 (Rev.): to ensure full coherence between the preamble and the operative part of the Resolution, IWMC recommends that the last three paragraphs of the preamble be replaced by a single paragraph reading as follows: "CONSIDERING that specimens of taxa included in Appendix I subject to captive breeding or ranching must be tagged or otherwise marked to facilitate controls, and that any marking system must be practical and readily implementable by all Parties;".
- 2. Resolution Conf. 9.5 (Rev. CoP14): the problem faced by the Secretariat is well understood and IWMC recommends that the changes proposed in the paragraph under INSTRUCT be accepted. However, the new wording in paragraph b) under RECOMMENDS that, if adopted, would allow Parties to accept shipments from non-Parties without any time limit in the provision of information on the competent authorities and scientific institutions from these States if the Secretariat simply confirms that it has no information less than two years old. For IWMC, in case of lack of recent information, the validity of the available information should be subject to verification.
- 3. Resolution Conf. 9.7 (Rev. CoP13): regarding the issue of transit going beyond the period of validity of export permits or re-export certificates, which may be shorter than six months, IWMC believes that it should rather be dealt with by the countries of (re-)export and import than by the country of transit or transhipment.
- 4. Resolution Conf. 9.10 (Rev. CoP14): in the new paragraph g), which is a recommendation, IWMC believes that the use of 'shall seek' is not pertinent and should be replaced with <u>should seek</u> or <u>may seek</u>.
- 5. Resolution Conf. 10.10 (Rev. CoP14): IWMC recommends to the Conference of the Parties to adopt the proposed draft decision, for the reasons presented by the Secretariat. However, to avoid the risk that the proposed revision be used to change the purpose of the current Resolution, clear terms of reference should be included in the decision, on the basis of the Secretariat's supporting statement.
- 6. Resolution Conf. 12.2: IWMC recommends to the Conference to accept the repealing of this Resolution and to adopt the draft decision proposed by the Secretariat in Annex 10 b).
- 7. Resolution Conf. 12.3 (Rev. CoP14): a) regarding the definition of 'hunting trophy', IWMC wonders whether, instead of including it in the Resolution, it would not be preferable to include it under 'hunting trophy' in the list of parts and derivatives provided by the Secretariat through Notifications to the Parties on Annual Reports and updated from time to time. In addition, the list

provided should include 'feet' or end with 'etc.' The view of IWMC is also that worked items should or might be covered by the definition when issuing from a legally hunted animal, as such items are often manufactured in the country where the hunt took place; b) regarding the definitions of source codes D and F, IWMC agrees that both Resolutions Conf. 12.3 (Rev. CoP14) and Conf. 12.10 (Rev. CoP14) should coincide. Taking into account that the Convention does not refer to commercial or non-commercial 'operations' but to 'specimens' bred in captivity for commercial purposes, IWMC wonders what is the best way to treat the case of non-commercial operations, such as zoos, trading in a few specimens of Appendix-I specimens? In its view, they should be allowed to use a certificate of captive breeding with source code C rather than to have to use code F as proposed. This is what IWMC is recommending; c) regarding permits and certificates for coral specimens, IWMC agrees with the proposed amendment but believes that as the paragraph is worded it should appear under 'AGREES that' rather than under 'RECOMMEND' that'.

Document CoP15 Doc. 21

Subject National Reports

Proponent Secretariat

#### **RECOMMENDATION - ADOPTION with an amendment**

IWMC recommends to the Conference of the Parties to take note of the document and adopt the draft revised Decisions 14.37 and 14.38, as proposed by the Secretariat but with an amendment.

- 1. The document reports on the activities that have taken place between CoP14 and CoP15 and this has to be noted by the Conference of the Parties.
- 2. The Secretariat recommends that the work be continued and this is reflected in the proposed draft revised Decisions 14.37 and 14.38. IWMC agrees that this would be useful, although it has to be recognized that CITES annual reports are rather different than most, if not all, reports to be submitted under other treaties.
- 3. However, IWMC believes that a paragraph as the following should be added to the draft revised Decision 14.37: "[The Standing Committee shall]: determine the elements essential to the enforcement of CITES that should appear in the biennial reports and that are not found in any other reports under other treaties."
- 4. IWMC, therefore, recommends that the Parties take note of the document and adopt the draft revised Decisions 14.37 and 14.38, as proposed by the Secretariat but with the amendment proposed above by IWMC.

Document CoP15 Doc. 22

Subject Reporting on trade in artificially propagated plants

Proponent Secretariat on behalf of the Standing Committee

#### **RECOMMENDATION - ADOPTION**

IWMC regrets that the work on this issue was not undertaken between CoP14 and CoP15 and recommends therefore to the Conference of the Parties to adopt the draft revised Decisions 14.39 to 14.41, as proposed by the Standing Committee.

- 1. Considering the significance of the tasks directed to the Secretariat, and then the Plants Committee and the Standing Committee in Decisions 14.39 to 14.41, IWMC regrets that, due to lack of funding, the Secretariat was unable to undertake the expected survey and to report on its findings between CoP14 and CoP15. This has to be noted by the Conference of the Parties.
- 2. As the Standing Committee, IWMC believes that this work should be accomplished as soon as possible and hopes that the necessary funds would be made available soon.
- 3. IWMC, therefore, recommends to the Parties to adopt the draft revised Decisions 14.39 to 14.41, as proposed by the Standing Committee.

Documents a) CoP15 Doc. 24

b) CoP15 Doc. 25

Subjects a) Enforcement matters

b) Proposed amendment of Resolution Conf. 11.3 (Rev. CoP14) on Compliance and

enforcement

Proponents a) Secretariat

b) Sweden on behalf of the European Community Member States

#### **RECOMMENDATION - ADOPTION plus...**

Enforcement and compliance are fundamental aspects of the Convention. They should be granted a high degree of priority. Although these documents do not provide much new suggestions or suggestions of significant importance, IWMC supports their contents and recommends the adoption of the draft decisions proposed by the Secretariat and the amendments proposed by the EU Members States, as amended by the Secretariat or not. In addition, IWMC recommends to the Parties to direct the Secretariat to find a solution to the identification of enforcement officers in all Parties, even through other agencies such as Interpol or the World Customs Organizations.

- 1. The documents submitted by the Secretariat and Sweden, although not providing much new suggestions or suggestions of significant importance, deals with issues that are fundamental and should benefit of a high degree of priority within CITES. Enforcement matters, as well as compliance, should be at the heart of a treaty like CITES and, considering the limited resources available, they should be directed first to activities aiming to combat illegal trade, instead of trying to expand the scope of the Convention.
- 2. The Secretariat's document nevertheless underlines the significant role of other international enforcement agencies and this should be noticed. Regarding the recommendations in Annex 2, the report of the Enforcement Expert Group, although similar to recommendations already made at several CoPs, they have to be supported.
- 3. Even if the potential impact of the proposed amendments to Resolution Conf. 11.3 (Rev. CoP14) may be considered as negligible, they should be adopted, as amended by the Secretariat or not, because we can not being opposed to virtue.
- 4. However, IWMC believe that more should be done to identify enforcement officers in all Parties and recommends therefore to the Parties to direct the Secretariat to find a solution to that effect, even through other agencies such as Interpol or the World Customs Organizations.
- 5. In conclusion, IWMC recommends to the Conference to take note of the report of the Secretariat, to adopt the draft decisions it is proposing, to adopt the draft amendments to Resolution Conf. 11.3 (Rev. CoP14) proposed by the EU Member States, with or without amendments, and to adopt an additional decision directed to the Secretariat, as proposed above under paragraph 4.

Document CoP15 Doc. 26 (Rev. 1)

Subject Review of significant trade in specimens of Appendix-II plant species

Proponent Chairman of the Plants Committee on behalf of the Committee

# **RECOMMENDATION – ADOPTION with the amendments of the** Secretariat

IWMC recommends to the Parties to take note of the document submitted by the Chairman of the Plants Committee and to adopt the proposed draft decisions but as amended by the Secretariat for the purpose of clarity.

- 1. The document submitted by the Chairman of the Plants Committee is the result of serious discussions within the Committee after the Asian medicinal plant species in question were subject to significant trade reviews, as well as of Decision 14.20 of the Conference of the Parties.
- 2. As the actions requested by that decision have not been completed, it should be maintained. However, as new measures are suggested by the Plants Committee to improve the management of these species and to combat illegal trade in them, new decisions should replace Decision 14.20.
- 3. It has to be recognized, as does the Secretariat, that the draft decisions as proposed by the Plants Committee are not very clear and some rewording would therefore be desirable. That proposed by the Secretariat appears as convenient.
- 4. Consequently, IWMC recommends to the Conference of the Parties to adopt the proposed draft decisions, as amended by the Secretariat, and express the wish that funding would be made available.

Document CoP15 Doc. 27

Subject Introduction from the sea

Proponent Secretariat

#### **RECOMMENDATION – ADOPTION with amendments**

IWMC recommends to the Conference of the Parties to adopt the draft resolution without square brackets, i.e. after having decided that the State of introduction is either the port State or the flag State depending of the circumstances and upon agreement between both. It recommends also the adoption of the draft decisions.

- 1. IWMC had the privilege of participating in the Working group on introduction from the sea issues, which met in Geneva in late 2005 and in 2009. The meetings were of great interest, although they were unable to decide which of the port State and the flag State should be considered as the 'State of introduction', i.e. the State in charge of issuing the certificate of introduction and to undertake the associate non-detriment finding. The views of the participants were either in favour of the flag State or of the port State, when not in favour of either of them, depending of the circumstances. This is reflected in the draft revised Resolution Conf. 14.6, which includes square brackets.
- 2. As in any case, the specimens taken in the high seas will have to be landed, it is obvious that the port State has a role to play because it has always the possibility to refuse the landing on its own territory. However, it might be difficult for it, if not impossible, for various reasons, to make non-detriment findings and thus to issue certificates of introduction from the sea. In such circumstances, it would be preferable that the flag State be considered as the State of introduction, keeping in mind that it would have to issue export permits to be allowed to land its specimens on the territory of the port State, if theses States are different. An agreement between them, therefore, would be indispensable.
- 3. Considering the complexity of the issue, although the introduction from the sea is the only trade, as defined by CITES, involving one State only, IWMC believes that, depending of the circumstances, either the port State or the flag State may be designated as the State of introduction and that this must be decided on the basis of an agreement between them. It appears that this would be the only way to reach a two-third majority at CoP15.
- 4. In conclusion, IWMC recommends to the Conference of the Parties to adopt the draft revised Resolution Conf. 14.6 in taking into account what is suggested in paragraph 3. above and the draft decisions proposed to continue and complete the work directed to the working group.

Document CoP15 Doc. 28

Subject Ranching and trade in ranched specimens

Proponent Secretariat

#### **RECOMMENDATION – ADOPTION**

IWMC recommends to the Conference of the Parties to adopt the draft decisions proposed by the Secretariat on the basis of discussions in the Animals Committee et the minor changes to Resolution Conf. 11.16 (Rev. CoP14).

- 1. With the adoption of new criteria for listing of species in the CITES appendices, the resolutions on ranching adopted by the Conference of the Parties have lost the essential of their purposes. To prepare their repealing, the steps suggested in the draft decisions proposed by the Secretariat, on the basis of discussions within the Animals Committee, are therefore acceptable.
- 2. The minor change to Resolution Conf. 11.16 (Rev. CoP14) proposed by the Secretariat is also acceptable, although it would have in practice no actual effect.
- 3. IWMC recommends therefore to the Conference of the Parties to adopt the draft decisions and the minor changes to Resolution Conf. 11.16 (Rev. CoP14) proposed by the Secretariat.

Document CoP15 Doc. 29

Subject Production systems for specimens of CITES-listed species

Proponents Animals and Plants Committees

#### **RECOMMENDATION - ADOPTION**

IWMC recommends to the Conference of the Parties to accept in general the recommendations of the Animals and Plants Committees and to adopt the amendments to Resolutions Conf. 11.16 (Rev. CoP14) and Conf. 12.3 (Rev. CoP14) proposed by the Secretariat to translate the recommendations into decisions. IWMC agrees also with the Secretariat that no additional funds should be devoted to this issue.

- 1. After long, repeated and laborious discussions within the Animals Committee and then the Plants Committee also, it is regrettable to have to note that CITES has been unable to make more constructive suggestions regarding the significant issue of production systems.
- 2. Indeed, the only result of all these discussions is a better definition of ranching, the decision to use the code R only for specimens of species transferred from Appendix I to Appendix II in accordance with Resolution Conf. 11.16 (Rev. CoP14) or Conf. 9.20 (Rev.), the repealing of which is envisaged, and the logic decision not to use that code for plants.
- 3. Nevertheless, this result has to be taken into account and, therefore, the amendments to Resolutions Conf. 11.16 (Rev. CoP14) and Conf. 12.3 (Rev. CoP14) proposed by the Secretariat to translate the recommendations of the Animals Committee into decisions are acceptable, as is the Secretariat's suggestion that no more resources should be devoted to this issue.
- 4. IWMC recommends therefore to simply adopt the amendments to Resolutions Conf. 11.16 (Rev. CoP14) and Conf. 12.3 (Rev. CoP14) proposed by the Secretariat.

Documents CoP15 Doc. 30.1, 30.1T and 30.2

Subject Electronic permitting

Proponents Secretariat and Sweden on behalf of the Member States of the European Community

#### RECOMMENDATION – ADOPTION

IWMC congratulates all those who have been involved in the development of the electronic permitting system presented in the documents and recommends to the Conference of the Parties to adopt the proposed draft decisions and amendments to Resolution Conf. 12.3 (Rev. CoP14).

- 1. The development of an electronic permitting system is a significant step forward for CITES and all those who have contributed to the work presented in the documents submitted to CoP15 have to be congratulated. This development is of particular importance for Parties issuing a large number of permits and certificates because it can not be expected that all Parties would be able to implement it. Therefore, to maintain the use of paper documentation would remain unavoidable for a long time. This is what is reflected in the proposed amendments to Resolution Conf. 12.3 (Rev. CoP14).
- 2. In these circumstances, IWMC recommends to the Conference of the Parties to adopt the proposed draft decisions in document CoP15 Doc. 30.1 and draft amendments to Resolution Conf. 12.3 (Rev. CoP14) in document CoP15 Doc. 30.2.

Document CoP15 Doc. 32

Subject E-commerce of specimens of CITES-listed species

Proponent Secretariat

#### **RECOMMENDATION – ADOPTION**

IWMC, taking into account the increasing e-commerce of CITES specimens, recommends to the Conference of the Parties to adopt the proposed draft decisions and amendments to Resolution Conf. 11.3 (Rev. CoP14). It nevertheless regrets the lack of proposals for specific actions.

- 1. It is globally recognized that illegal activities, voluntary or not, are increasing through the net and this also with respect to specimens of species covered by CITES.
- 2. IWMC was pleased to be able to actively participate in the workshop organized by the Secretariat on this question, held in Vancouver in 2009, and so to contribute to the preparation of the draft decisions and amendments proposed in the document. Nevertheless, IWMC regrets that the whole document is excessively idealistic and lacking of proposals for specific actions that would allow a global evolution of the situation.
- 3. IWMC nevertheless recommends to the Conference of the Parties to adopt the proposed draft decisions and draft amendments to Resolution Conf. 11.3 (Rev. CoP14).

Document CoP15 Doc. 34

Subjects Review of the universal tagging system and trade in small crocodilian leather goods

Proponent Secretariat

#### **RECOMMENDATION – ADOPTION**

Although it must regret that it appeared impossible to exclude very small crocodilian leather items from CITES controls, IWMC recommends to the Parties to adopt the amendments to Resolutions Conf. 11.12 and Conf. 12.3 (Rev. CoP14) proposed in the document, and urge Parties importing such items not to impose on them stricter domestic measures.

- 1. While the universal tagging system for crocodilian skins has demonstrated its efficiency and usefulness to prevent illegal trade, Parties issuing considerable numbers of re-export certificates for very small items made from these legally acquired skins expected that it would be possible to exempt such items of CITES controls. This was considered at CoP14 and referred to a working group to be established by the Standing Committee.
- 2. IWMC was pleased to actively participate in the working group, which worked essentially through electronic exchanges. Regarding the universal tagging system, the group had no difficulties to recognize that it worked well and did not need significant changes. It nevertheless suggested some rather minor changes, which appear in the proposed amendments to Resolution Conf. 11.12 and certain of the amendments proposed to Resolution Conf. 12.3 (Rev. CoP14).
- 3. With respect to the trade in small crocodilian leather goods, it appeared quickly that an exemption of CITES controls would not be accepted by the group and then the Conference of the Parties. Therefore, the group was able to recommend only that this trade be facilitated as much as possible, in particular in asking Parties imposing stricter domestic measures at import to consider not to do so for such items. This was reflected in the other proposed amendments to Resolution Conf. 12.3 (Rev. CoP14).
- 4. Taking this into account, IWMC recommends to the Conference of the Parties to adopt the proposed amendments to Resolutions Conf. 11.12 and Conf. 12.3 (Rev. CoP14), and urges importing Parties that impose stricter domestic measures, especially the prior presentation of import permits, not imposing them to small crocodilian leather goods.

Document CoP15 Doc. 36

Subject Identification of CITES-listed corals in trade

Proponent United States of America

#### **RECOMMENDATION – ADOPTION with amendment**

IWMC welcomes the document submitted by the United States but agrees with the simplification of the procedure proposed by the Secretariat. Therefore, it recommends to the Parties to adopt the draft decisions proposed by the Secretariat but with an amendment to specify that the corals to which they refer are only hard corals, as it is clearly indicated at the end of paragraph 3. of the working document and in the draft decision directed to the Animals Committee proposed by the United States.

- 1. The United States is raising a significant issue in its document and is proposing new draft decisions to solve it. The Secretariat agrees that the issue exists and proposed a simpler solution with other draft decisions. In both cases, the Animals Committee would be directed to establish list of coral species the trade in which may be conducted at the genus level, list to be communicated to the Parties by the Secretariat. IWMC agrees with the Secretariat's suggestions and considers that the procedure it is proposing should be accepted.
- 2. However, and this is important, it should be clearly specified in the draft decisions proposed by the Secretariat that the coral species in question are exclusively species of hard corals, as it is indicated at the end of paragraph 3. of the working document and in the draft decision directed to the Animals Committee proposed by the United States.
- 3. Accordingly, IWMC recommends to the Conference of the Parties to adopt the draft decisions proposed by the Secretariat but only with the necessary amendment to clearly specify that they refer exclusively to species of hard corals.

Document CoP15 Doc. 37

Subject Identification of worked specimens of black coral (Antipatharia) and parts thereof in

trade

Proponent Sweden on behalf of the Member States of the European Community

#### **RECOMMENDATION - REJECTION but ...**

Considering that the purpose of CITES is the conservation of wild species, IWMC believes that its provisions should be applied at the species level, in the biological sense of the term. Therefore, as it is drafted, the amendment to Resolution Conf. 12.3 (Rev. CoP14) proposed is not acceptable, as it leaves to any Party the possibility to decide the level at which CITES trade documents may be issued. A procedure similar to that used for hard corals should be followed for black corals and initiated by the Animals Committee. IWMC therefore recommends that a decision for that purpose be directed to that Committee before any amendment be made to the Resolution.

- 1. IWMC understands that there are serious identification problems with black corals, in particular for worked items. These problems have never been considered so far and this is of serious concern because CITES is supposed to contribute to the conservation of wildlife and this must be at the species level, in the biological sense of the term.
- 2. The problems are similar to those CITES was confronted with regarding hard corals and were subject to considerable discussions within the Animals Committee to reach a solution. A similar procedure should be followed for black corals, because it may not be left to individual Parties to decide whether permits and certificates may be issued at a higher level than the species level. This would open the door to illegal activities detrimental to the survival of the most threatened species.
- 3. In these circumstances, IWMC recommends to the Conference of the Parties to draft and adopt a decision to direct the Animals Committee to consider the issues of identification of black corals in trade and to determine when and where CITES controls may be conducted at another level than the species level. Until this is done, Resolution Conf. 12.3 (Rev. CoP14) should not be amended as proposed by Sweden on behalf of the Member States of the European Community.

Document CoP15 Doc. 39

Subject Using the taxonomic serial number (TSN) in international wildlife trade data: a role

for CITES

Proponent Canada

#### **RECOMMENDATION - ADOPTION as a decision**

IWMC welcomes the document submitted by Canada and appreciates the advantages of the use of such a numbering system. It agrees also that the adoption of TSNs for CITES needs to be carefully considered first, e.g. by a working group, which could be established by the Conference. As suggested by the Secretariat, this is typically a decision that should be made through a decision instead of a resolution as proposed by Canada. IWMC therefore recommends to the Parties to adopt the proposal of Canada under the form of a decision and to establish the relevant working group which would have to report to the Standing Committee.

- 1. IWMC welcomes the document submitted by Canada and understands the advantages of a numbering system as that which is proposed. It understands also that before this particular system be adopted for CITES, it should be carefully considered and evaluated by competent peoples. The establishment of a working group by the Conference of the Parties is a pertinent suggestion as it would allow the group starting its work immediately, without having to wait the 61<sup>st</sup> meeting of the Standing Committee.
- 2. The establishment of a working group and of its terms of reference is typically a decision that CITES takes trough a decision of the Conference and not as a resolution as proposed by Canada. Therefore, IWMC agrees with the suggestions from the Secretariat.
- 3. In conclusion, IWMC recommends to the Conference of the Parties to establish a working group and adopt decisions providing its terms of reference and determining the roles of the Standing Committee and the Secretariat.

Documents a) CoP15 Doc. 41.1 and its Annexes

b) CoP15 Doc. 41.2 and its Annexes

c) CoP15 Doc 41.3, Doc. 41.4 and Doc. 41.5

Subject Applications to register operations that breed Appendix-I animal species in captivity

for commercial purposes

Proponents a) Secretariat

b) Philippines

c) United States of America

#### **RECOMMENDATION - ADOPTION**

IWMC recommends to the Conference of the Parties to accept the registration of the operation located in the Philippines and of those located in the United States. The Philippine operation is already registered for other species and the information provided meets the requirements of Resolution Conf. 12. 10 (Rev. CoP13), as does the information provided by the United States. Objections to the registration have been raised by a few Parties, most of them from countries that are not range States of the species in question.

- 1. The registration system introduced by CITES for operations that breed Appendix-I animal species in captivity for commercial purposes has been subject to many discussions. The system currently in force was adopted at CoP13 and is less restrictive than it used to be.
- 2. The applications under consideration concerns an operation, located in the Philippines, which is well known throughout the world for its successes in breeding birds in captivity, in particular parrots. The operation is already registered for other species. The information provided through the Management Authority of the Philippines is complete and meet the requirements of Resolution Conf. 12.10 (Rev. CoP13). They demonstrate the competence of the operation.
- 3. The US operations are new ones and are also supported by the country in which they are located, i.e. the country that has the main responsibility in the recognition of the breeding operations. They also meet the requirements of the resolution.
- 4. Nevertheless, some Parties, including the United States regarding the Philippine applications and the Philippines regarding the US ones, have formulated objections against the registration of the species or operation in question. Most of the objections are from Parties which are not range States of the species in question, and concern the legality of the original breeding stocks. It does not appear that these objections are more justified than in the past for either other species of the same registered operation or operations similar to others registered in the United States.
- 5. Although the Animals Committee has not taken position on some of the proposals from the Philippines, the Committee Chairman has made comments that appear very appropriate and supportive. They are shared by others and supported by IWMC.
- 6. Consequently, IWMC recommends to the Conference of the Parties to instruct the Secretariat to register the Philippine and US operations for all species in question.

Document CoP15 Doc. 42

Subject Great apes

Proponent Secretariat

#### RECOMMENDATION – ADOPTION

IWMC recommends to the Parties to take note of the document submitted by the Secretariat and to adopt the proposed draft decisions. IWMC expresses the hope that the envisaged missions with representatives of Interpol and the WCO would assist improving enforcement from the origin of illegal activities.

- 1. Although CITES is asking for cooperation between both sides of trade transactions, combating illegal activities may not be fully effective if enforcement does not start as early as possible on the trade routes, i.e. first in the countries of origin of the traded animals or plants. Therefore, IWMC welcomes the suggestion by the Secretariat to organize missions in some gorilla home countries and in particular to conduct them with representatives of Interpol and the World Customs Organization. This type of activity is certainly, in IWMC views, one of the most important of those expected from the Secretariat.
- 2. IWMC recommends therefore to the Conference of the Parties to adopt the draft decisions proposed by the Secretariat and expresses the wish that the necessary funding, as it is unfortunately not covered by the core budget, would be found easily and that Interpol and WCO would agree to participate in the missions. IWMC hopes that the missions will be successful, not only for the gorillas, and if so, that similar missions would be organized in other countries and for other species.

Documents CoP15 Doc. 43.1 and 43.2

Subject Asian big cats

Proponents Secretariat and Sweden on behalf of the Member States of the European Community

#### **RECOMMENDATION – Think about a new strategy**

IWMC notes with concern that the report prepared by the Secretariat and the document submitted by Sweden, to propose many amendments to Resolution Conf. 12.5, indicate that the status of the tiger (the species actually aimed by the documents) is not improving, on the contrary, in spite of years of listing in Appendix I and of recommendations and measures to prevent illegal activities. As already said prior CoP14, it may be time to consider new strategies to conserve this species, and possibly others. IWMC recommends to the Conference of the Parties to note the report and document and to think seriously to the whole problematic of the conservation of tigers. This should be a priority.

- 1. In its recommendations for CoP14, IWMC simply asked readers to refer to the *Tiger-Special Edition-Apr.07* of the IWMC e-Newsletter available on the IWMC web site <a href="www.iwmc.org">www.iwmc.org</a>. This is still valid.
- 2. In addition, IWMC would like this time to express its agreement with several of the comments of the Secretariat about the amendments proposed by Sweden to Resolution Conf. 12.5 on Conservation of and trade in Asian big cats. It agrees in particular that some of the proposed amendments go far beyond the scope of CITES and covers issues, such as reporting, that have proved being failures, as actually recognized by the proponent.
- 3. In addition, Parties should not forget that resolutions of the Conference of the Parties, when directed to Parties, are nothing more than recommendations to which Parties have to comply only if they so wish and include them in their own legislation.
- 4. IWMC recommends therefore to the Conference of the Parties to take note of the report and document, and to think seriously to the whole problematic of the conservation of tigers, the species actually covered by the documents, before adopting new decisions.

Documents a) CoP15 Doc. 45.1 and its Annex

b) CoP15 Doc. 45.2

Subject Rhinoceroses

Proponents a) Secretariat

b) Kenya

#### **RECOMMENDATION - Take note**

IWMC welcomes the report from the Secretariat and that from IUCN/SSC Rhino Specialist Groups and TRAFFIC but regrets that Kenya, once again, is trying to convince the Conference to include in Resolution Conf. 9.14 (Rev. CoP14) measures that have already proved being inefficient. IWMC is largely in agreement with the Secretariat and its suggestion implied in its comments that a working group be established at CoP15 to consider which amendments to the resolution would be necessary. IWMC recommends therefore to the Conference of the Parties to establish such a working group at CoP15.

- 1. IWMC welcomes the report prepared by the Secretariat and that from the IUCN/SSC Rhino Specialist Groups but is concerned by the fact that range States and CITES are unable to prevent increased poaching of and illegal trade in rhinoceros. IWMC does not believe however that the amendments to Resolution Conf. 9.14 (Rev. CoP14) proposed by Kenya would be the solution to these serious issues. It appears that Kenya wishes mainly to introduce in the resolution measures that have already proved their inefficiency.
- 2. IWMC does hope that the measures taken by South Africa, which seems to have had already positive effects, would be continued and increased, and that Viet Nam would be active to prevent its citizens being deeply involved in illegal activities.
- 3. Regarding the comments from the Secretariat on the belief that rhino horn may prevent persons against cancer, IWMC does not think that this is something new. Many years ago, the Secretariat had discussions with WHO on how people in the Far East could be convinced that rhino horn does not have such properties. At that time, WHO representative stated that such attempts would never work. This was also discussed with Chinese practicians and new discussions might be appropriate. The non-commercial use of stocks of rhino horns in official hospitals or clinics could also be envisaged.
- 4. IWMC recommends to the Conference of the Parties to take note of the reports and to establish a working group at CoP15 to consider whether amendments to Resolution Conf. 9.14 (Rev. CoP14) are needed and if so agreed to draft them for adoption by the Conference.

Document CoP15 Doc. 46

Subject Tibetan antelope

Proponent Secretariat

#### **RECOMMENDATION – ADOPTION of other decisions**

As stated in its report, the Secretariat recommends since many years that greater focus be placed upon illegal manufacture that occurs in Jammul and Kashmir, recommendations that have always been withdrawn with the hope that India would act as promised. Apparently, no such action has taken place yet and it appears that it is now time for action by CITES towards India, of which Jammu and Kashmir, in spite of its status, is an integral part as far as CITES is concerned. Having doubts that the proposed mission would be really effective, IWMC wonders whether it would not be preferable to give India a deadline for action, in the absence of which the Standing Committee would have to recommend sanctions. This is what IWMC is recommending to the Conference.

- 1. The Tibetan antelope is becoming an old story within CITES and the reports of the Secretariat at each CoP provide similar concerning information. As it states, the Secretariat recommends since many years that greater focus be placed upon illegal manufacture that occurs in Jammul and Kashmir, recommendations that have always been withdrawn with the hope that India would act, as it has committed to do. IWMC is afraid that if no stronger measures than the proposed mission are taken now with respect to India, of which Jammu and Kashmir, in spite of its special status, is an integral part at least as far as CITES is concerned, the report of the Secretariat would provide again similar information at CoP16. IWMC believe that it is time for the Conference to deal with India as it did with many other Parties.
- 2. IWMC recommends therefore to the Conference of the Parties to adopt, instead of the proposed decisions, others that would give India a deadline to take the necessary measures to bring to an end the illegal manufacture of articles in Tibetan antelope wool in Jammu and Kashmir and direct the Standing Committee, passed that deadline and if no such measures have been taken, to recommend sanctions towards India.

Document CoP15 Doc. 48

Subject Snake trade and conservation management

Proponents China and the United States of America

#### **RECOMMENDATION - REJECTION but...**

IWMC recognizes that that trade in and conservation of snakes in Asia may pose problems but is concerned to see again a proposal asking CITES to act on species only a few of which are listed in its Appendices. With its limited resources, the Secretariat, even if external funding is available, should concentrate its efforts on listed species. IWMC recognizes also that the proposed workshop would useful but believe that it should not be organized by the Secretariat but by the proponent countries, possibly with the assistance of others and of relevant organizations. IWMC recommends therefore to the Conference of the Parties to reject the proposed draft decisions and urge the proponents and others to organize the workshop and to submit proposals to CITES afterwards, if so desirable.

- The Conference of the Parties should take note of the document submitted by China and the United States, which refer to issues to which many snake species, some of them being listed in the CITES Appendices, are confronted due, in part, to their international trade. IWMC recognizes that such issues exist and that a workshop would be useful to consider them.
- As explained in the document, there are other causes of concern than the international trade, which
  are not relevant to CITES, such as habitat degradation and domestic trade. In addition, captive
  breeding appears to be significant for a number of these species and the way it is conducted should
  be considered as well.
- 3. Considering the relative relevance for CITES of the reported issues, IWMC believes that it is not the role of the CITES Secretariat to organize a workshop as that proposed by China and the United States. Due to its limited resources, and even if external funding is provided, the Secretariat should concentrate its efforts on issues concerning listed species, as provided by the Convention. Nothing prevents the proponents, and other Parties or competent organizations, to convene the necessary workshop, which could then, if appropriate, make proposals in line with CITES purposes.
- 4. Consequently, IWMC recommends to the Conference of the Parties to reject the proposed draft decisions and urge the proponents and others to organize the workshop and submit proposals to CITES afterwards, if so desirable.

Document CoP15 Doc. 51

Subject Humphead wrasse: additional management measures needed to combat IUU fishing

Proponent Indonesia

#### **RECOMMENDATION - REJECTION but...**

While the trade in the humphead wrasse, when the species was listed in Appendix II, appeared to be the easiest one to control, it is of great concern to note, from the document submitted by Indonesia, that CITES is unable to control that trade. As observed by the Secretariat in its comments, it appears doubtful that the measures proposed in the draft resolution would be of real help to improve the situation and to combat IUU fishing. In these circumstances, we may wonder how CITES could solve the problems faced by other marine species such as those proposed for listing at CoP15. IWMC recommends to the Parties to reject the proposed draft resolution but to agree having further discussions at CoP15, as proposed by the Secretariat.

- When the humphead wrasse was proposed for listing in Appendix II, it appeared, considering the
  nature of the international trade in that species, mainly live specimens, that CITES would be useful
  to ensure the sustainability of that trade and the conservation of the species. It was why IWMC
  supported the inclusion.
- 2. It is therefore with great concern that IWMC heard, at the last meeting of the Standing Committee, about the problems encountered by the trading countries and took note of the document now submitted by Indonesia, in which the problems are described in detail and it is explained that they still exist in spite of some concerted efforts to solve them. In these circumstances, it is impossible to believe that CITES could be actually efficient to control the trade in marine species, as those proposed for listing at CoP15, subject to much more extensive and difficult to control fishing than that of the humphead wrasse, and to prevent IUU fishing of them.
- 3. As the Secretariat, IWMC has serious doubt about the potential efficiency of the measures proposed by Indonesia in the draft resolution contained in its document and that it would be of real help to solve the problems. It can however agree that further discussions at CoP15 might be useful.
- 4. Consequently, IWMC recommends to the Conference of the Parties to take note of the document from Indonesia and, before adopting any decision in an attempt to improve the situation, to agree to further discussions at CoP15, possibly within a working group.

Document CoP15 Doc. 52

Subject Atlantic bluefin tuna

Proponent Monaco

#### **RECOMMENDATION - REJECTION**

As IWMC is recommending the rejection of the proposal from Monaco to include the Atlantic bluefin tuna in Appendix I and, as indicated by Monaco, the draft resolution it is proposing should be considered by the Conference of the Parties in case of adoption of the Appendix-I listing, IWMC can only recommend to the Conference to also reject it.

- 1. This recommendation has to be read in conjunction with the recommendation made by IWMC on the proposed inclusion of the Atlantic bluefin tuna in Appendix I (CoP15 Prop. 19).
- 2. IWMC has recommended the rejection of the proposal from Monaco to include the Atlantic bluefin tuna in Appendix I. As indicated by Monaco, the draft resolution it is proposing should be considered by the Conference of the Parties in case of adoption of the Appendix-I listing. In these circumstances, IWMC can only recommend to the Conference to reject also the draft resolution.

Document CoP15 Doc. 53

Subject Conservation and management of sharks and stingrays

Proponent Animals Committee

#### **RECOMMENDATION – Take note**

Although it has to recognize that the work undertaken by the Animals Committee was consecutive to the adoption of Resolution Conf. 12.6 and decisions of the Conference of the Parties, IWMC remains concerned to see CITES devoting considerable efforts on species which, with a few exceptions, are not listed in the Appendices. This is of particular concern when CITES has to take measures to reduce its expenses and to limit its activities on listed species actually endangered or in need of measures falling directly under its responsibility. Therefore, in line with its recommendation to reject the proposals to include new shark species in Appendix II, IWMC recommends to the Conference of the Parties to simply note the report of the Animals Committee and so to reject any new activities regarding sharks and stingrays. It nevertheless recommends to range States to implement the recommendations of the Animals Committee directed to them.

- 1. Since many years now, CITES is devoting considerable time and efforts on shark species. This started even before any of these species were included in the CITES Appendices. At present, only three shark species are included in Appendix II but several more are proposed for inclusion in the same Appendix.
- 2. For the reasons explained in its comments, IWMC recommends to the Conference of the Parties to reject the proposed inclusions of new shark species in Appendix II. For the same reasons and because CITES has to take measures to reduce its expenses and to limit its activities on listed species actually endangered or in need of measures falling directly under its responsibility, IWMC may not support that more time, efforts and money be spent on marine species as sharks, to the detriment of other more urgent and needed activities.
- 3. Consequently, IWMC recommends to the Conference of the Parties to take note of the report of the Animals Committee but to reject the draft decisions providing for new activities regarding sharks and that Resolution Conf. 12.6 be amended accordingly, if not repealed. Concerning stingrays, IWMC recommends to the Conference of the Parties to take note of the report of the workshop and to range States to consider implementing the recommendations of the workshop and the Animals Committee.

Document CoP15 Doc. 54

Subject Conservation of and trade in Coralliidae species

Proponent United States of America

#### **RECOMMENDATION - REJECTION**

As IWMC is recommending the rejection of the proposal from the United States and Sweden, on behalf of the Member States of the European Community, to include all Corallidae species in Appendix II and as the draft resolution the United States is proposing would have sense only if the proposal is adopted, IWMC can only recommend to the Conference of the Parties to also reject it.

- 1. This recommendation has to be read in conjunction with the recommendation made by IWMC on the proposed inclusion of all Coralliidae species in Appendix II (CoP15 Prop. 21).
- 2. IWMC has recommended the rejection of the proposal from the United States and Sweden, on behalf of the Member States of the European Community, to include all Corallidae species in Appendix II. The draft resolution proposed by the United States would have sense only if the listing proposal is adopted. In these circumstances, IWMC can only recommend to the Conference of the Parties to reject also the draft resolution.

Document CoP15 Doc. 62

Subject Periodic review of the Appendices

Proponents Secretariat

#### RECOMMENDATION -ADOPTION, although...

As it appears clearly from the document presented by the Secretariat, the periodic review of the Appendices has not provided the results expected, except to some extent for plants. The new approach suggested by the Secretariat has its merits but we may doubt that it would be more successful to ensure that the species listed in the Appendices are listed adequately. IWMC recommends to the Conference of the Parties to adopt the draft decision and resolution proposed by the Secretariat, as an ultimate attempt to make the periodic review of the Appendices a more useful activity than it is from a number of years.

- 1. As recalled in the document submitted by the Secretariat, the undertaking of periodic reviews of species listed in the Appendices is a specific task of the Animals and Plants Committees provided for in Resolution Conf. 11.1 (Rev. CoP14). In spite of this, that exercise, after some successes, in particular for plants, revealed itself as rather complicated, discouraging and not providing the expected results, for various reasons. The Resolution adopted at CoP14 (Conf. 14.8) did not offered a better solution.
- 2. In these circumstances, we may doubt that the new approach suggested by the Secretariat, in spite of its merits, would be more successful. Therefore, that approach should be considered as an ultimate attempt to find a proper solution to a nevertheless rather significant issue for which emotional or political considerations should be excluded but were not.
- 3. Consequently and with these reservations, IWMC recommends to the Conference of the Parties to adopt the draft decision and resolution proposed by the Secretariat.

Document CoP15 Doc. 63

Subject Criteria for the inclusion of species in Appendices I and II

Proponents Secretariat

#### RECOMMENDATION -REJECTION, but...

As the Standing Committee judiciously recognized that it was not in a position to decide upon the divergence of views between the FAO and the CITES Secretariat on the interpretation of criterion B of Annex 2a to Resolution Conf. 9.24 (Rev. CoP14), the issue was referred to the Conference of the Parties. The Conference has to decide now which of these interpretations is correct. IWMC does not believe that this requires a complex and costly process, which is not suggested by the Standing Committee. IWMC therefore recommends to the Conference to reject the process and therefore the draft decisions suggested by the Secretariat and to decide merely how this criterion should be interpreted. In addition, IWMC recommends that the interpretation proposed by the FAO be recognized as the correct one.

- 1. As explained in the document from the Secretariat, there is a divergence of views on the interpretation of criterion B of Annex 2a of Resolution Conf. 9.24 (Rev. CoP14) between the FAO and the CITES Secretariat. After an exchange of correspondence between both institutions, this issue was subject to rather harsh discussions at the last meeting of the Standing Committee, which correctly decided that it has no power to interpret decisions of the Conference of the Parties. It therefore referred the issue to the Conference after having expressed its views on how to proceed in the meantime.
- 2. In the document under consideration, the Secretariat is proposing a complex and costly process and draft decisions that, if approved, would delay the adoption of a single interpretation of that significant criterion. This process was not envisaged by the Standing Committee and appears without actual justification.
- 3. As a number of Parties represented at the last meeting of the Standing Committee, IWMC is of the opinion that the correct interpretation is that proposed by the FAO and that, contrary to what the Secretariat tries to explain, the term reduction has no positive connotation in criterion B and may therefore be interpreted as a decline, as stated by the FAO.
- Consequently, IWMC recommends to the Conference of the Parties to reject the suggestions made
  by the Secretariat and the draft decisions it is proposing and to adopt the interpretation proposed by
  the FAO.