



IWMC World Conservation Trust



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## PROPOSAL No. 21

Inclusion of the family *Coralliidae* in Appendix II

# Ten reasons to reject the proposal

By Marco Pani-IWMC



For the second consecutive time a proposal to list in Appendix II of CITES the species of genera *Corallium* and *Paracorallium*, included in the family *Coralliidae*, is submitted to the Conference of the Parties to CITES.

This time also the proposal is mainly an anecdotic summary without real scientific evidence that these species are threatened with extinction by international trade.

FAO, which is requested by the text of the CITES Convention to evaluate the proposals concerning marine species, concluded again that these species are not meeting the listing criteria and IUCN, a leading conservation organization, reached the same conclusion in its analysis.

This is not surprising for people familiar with the biology of and trade in these species because, despite a long history of exploitation, they are still very common in their range, both in the Mediterranean Sea and in the Pacific Ocean.

As a matter of fact and without taking into account scientific evidences the proposal arose from some NGOs, which started campaigns some years ago against the use of these precious corals with the essential aim to raise money for their own interest rather than the interests of the conservation of the species. Interestingly, the main donor of these NGOs is a renowned jewellery company that seems to be contributing to a large extent to the devastation of the sea bottom in west and southern Africa through underwater dredging for diamonds.

It is our views that under no circumstances could or should CITES replace a sound management regime for fisheries. Control of international trade, as CITES implies, must not be considered as more than an additional measure that could be valid in specific conditions. CITES will not correct bad fisheries management. Conversely, good fisheries management does not need, in most cases, trade controls as those provided by CITES.

One of the main misconceptions that people has is that CITES is a management tool for species. This is wrong. CITES is a trade regulating treaty that imposes specific prescriptions on the trade.

The best solution to achieve proper conservation of precious corals and the continuation of their sustainable trade should be the improvement of local management regimes and associated legislations and not the imposition of trade regulations that would be counterproductive.

These are ten reasons to reject the proposal:

## The species are not threatened with extinction

There is no basis for describing the populations of the species belonging to the family *Coralliidae* as threatened with extinction, and there is no reason for CITES to consider taking action to supplement or replace current management measures.

No species belonging to the family *Coralliidae* are currently listed on the IUCN Red List of Threatened Animals.

This is an important fact as the indicators for objectives contained In the CITES Strategic Vision: 2008-2013 state for objective 1.4 that The Appendices correctly reflect the conservation needs of species and as indicator 1.4.2 that "The number of unlisted species subject to significant levels of international trade, for which the trade and biological information is evaluated via a transparent mechanism including IUCN Red List and other data to identify species that would benefit from inclusion in the Appendices and the number of such species subsequently included in the Appendices."

<http://www.cites.org/eng/news/E-SV-indicators.pdf>

This is in line with the Intergovernmental Platform on Biodiversity and Ecosystem Services (ipBes) carried on by UNEP, which have highlighted also the necessity of independent evaluations.

In particular the proposal fails to give a realistic view of the situation concerning the red coral (*Corallium rubrum*), a species that is still very common in the Mediterranean Sea and is not endangered, threatened or vulnerable to extinction due to international trade.

## The species are harvested selectively

The harvest of *Corallium* in the Mediterranean is exclusively done with selective methods. In the Pacific harvest do not exceed 130-140 meters. National legislations in place in several countries strictly regulate harvesting and impose severe fines to illegal activities, which are very limited.

## The Biological criteria of Resolution Conf. 9.24 (Rev. CoP14) are not met

The populations are not small, they have not a restricted distribution and no decline is evident in the last 10 years. Moreover, the harvest in all areas in the Mediterranean has been stable or slightly increasing in recent years; so a decline cannot be demonstrated for a listing, even when applying the decline criterion for Appendix-II listing, i.e. regulation of trade being necessary to prevent the species becoming eligible for inclusion in Appendix I in the near future. The species is extremely common and found in a range varying from the 10 to nearly 800 ms of depth! As the selective harvest by scuba is limited to a maximum of 120 ms of depth, the species has nearly 700 ms of refugia where no harvest has ever taken place.

The proposal tries to demonstrate a decline in citing the reduction of the number of polyps in colonies in the Mediterranean. This is not acceptable and refused by renowned *Corallium* scientists in the Mediterranean, and we wonder how the Parties could adopt such a proposal when it could be easily



argued that wild populations of the species of this family are represented by several billions of polyps across their range.

## No over-harvesting or over-exploitation has taken place in recent years

The dredging for coral in the Mediterranean ended in the middle 1990's and since then the harvest is sustainable.

It is clear for us that if there is a problem in a very limited part of the Mediterranean (Spanish Costa Brava) that could be ascribed to a lack of enforcement of fisheries regulation that in no circumstances CITES can resolve.

## The Parties should adhere to FAO recommendations

The Report of the FAO ad hoc Advisory Panel recommends to not support the proposal.

The assessment of FAO is extremely important in the CITES context, also because a Memorandum of Understanding has been signed between the two organizations, requesting CITES to respect, to the greatest extent possible, the results of the FAO scientific and technical review of proposals to amend the Appendices.

The Panel considered that the catch declines observed did not reflect biomass declines. The Panel considered that the trends in available data did not demonstrate an historical extent of decline in *Corallium spp.* to less than 20–30 percent of baseline. Moreover, FAO clearly shows several important shortcomings of the proposal and concludes that the proposed Appendix-II listing would not add substantial benefits to the conservation of the species, which should be carried out through an improvement of the management measures and of scientific research.

There is no possibility of difference of interpretations of the Criteria between FAO and the CITES Secretariat as mentioned by the latter in its Recommendations (CoP15 Doc.68 Annex 2).

## There are management measures in place

In the Mediterranean, several management measures are in place in countries where *Corallium rubrum* is harvested, ranging from size limits, harvesting seasons, reporting and more detailed management plans, including closed areas and quotas. Most of these measures were developed after the FAO-GFCM (General Fisheries Commission for the Mediterranean) Technical Consultations in the period 1983-1991, although, for example, Sardinia (Italy) has legislation in place since 1979. In Japan, harvesting is subject to permits and quotas. The Western Pacific Fishery Management Council's (WPFMC) Precious Corals Fisheries Management Plan (FMP) has regulated the harvest of *Corallium spp.* since 1983.

Of paramount importance for the conservation and sustainable utilization of red coral in the Mediterranean is the recent endorsement by the Scientific Committee of the GFCM of a working program, proposed by the Italian Government, to improve knowledge and assess the state of this important species, through, inter alia, scientific researches. This initiative also includes the holding of a meeting to review the available information on the biology, fishery, regulations and existing management plans for this coral.

This will really serve the conservation of the species better than any un-implementable CITES listing.

[http://151.1.154.86/GfcmWebSite/GFCM/34/GFCM34\\_2010\\_inf.9.pdf](http://151.1.154.86/GfcmWebSite/GFCM/34/GFCM34_2010_inf.9.pdf)

## Harvest has been managed by at least one Regional Fishery Management Organization

The proposal mentions the fact that species belonging to the genus *Corallium* are not managed by any existing regional fishery management organizations. This is not fully correct because GFCM has convened, since 1983, at least four Technical Consultations on Red Coral, resulting in a vast improvement of the management in the Mediterranean.

The future initiative recently approved by the Scientific Committee of GFCM will provide a new impetus to the conservation and sustainable fishery of the red coral in the Mediterranean.

## The implementation of a CITES listing, if accepted, is almost impossible

The administrative burden of issuing CITES trade documents and recording for the large number of individual specimens in trade that a listing would cause would be useless for the conservation of the species.

We share FAO's view that Government efforts would be better employed in enacting and enforcing appropriate local management regimes, rather than embarking in a very burdensome bureaucratic paperwork.

This is especially true in view of the huge stocks of *Coralliidae* specimens present in several countries and totaling possibly millions of pieces.

If the proposal would be adopted the Parties would spend the next 10 or more years issuing pre-Convention certificates which are useless in terms of conservation of the species.

Contrary to what is stated in the proposal, introduction from the sea (Article IV, paragraphs 6 and 7, of CITES) is a significant issue for *Coralliidae* in the Mediterranean Sea, the Atlantic Ocean and especially the Pacific.



The proponent fails to mention that the Mediterranean countries rely on the 12 miles national waters boundary and significant red coral beds are harvested beyond this limit, i.e. in waters outside the jurisdiction of any State.

The proposed 18-month delay for implementation would not resolve these problems.

The Parties have had more than two years to resolve these issues, which are still unresolved, and we are also concerned that this period could see an increase of the harvest.

## The key issues are management measures and scientific research

Instead of developing proper consultations on the management measures that are in place and how to improve them, the proposal seeks to impose trade regulations as the solution for a supposed decline of the species, a decline that does not exist.

The recent workshop on red coral science, management and trading in the Mediterranean held in Naples (Italy) from 23 to 26 September 2009, with financial support from the Italian Government, agreed on a series of management measures, while no consensus was reached on CITES issues. This workshop, contrary to a previous one organized in Hong Kong (SAR China) in March 2009, with financial support from NGOs, has shown a wide participation by scientists and representatives of the coral industry, as well as several NGOs.

The improvement of the current management measures is the key for the long-term conservation of *Coralliidae*.

## The livelihoods of thousand of people are at risk with an inclusion in CITES

If a CITES listing will occur the livelihoods of many artisan families will be disrupted due to the bureaucracy involved and because the customers will have the feeling that buying coral jewellery is not ecological friendly.

This has to be avoided because there is no risk of extinction for the precious corals that have always been used sustainably.

The determination to present again the proposal despite several voices of concern is probably deriving from the fact that some NGO's are running very lucrative campaigns against the use of precious corals.

The industry has always been fully committed to improve management and scientific research but not to use trade regulations that are inapplicable and will cause severe damages to the livelihoods of thousand of people that are making their living on these corals in a sustainable way.

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