

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
<b>PREAMBLE</b>					
1	<p>RECALLING that the Conference of the Parties at its eighth meeting, held in Kyoto, Japan, in March 1992, was convinced that the criteria adopted at the first meeting of the Conference of the Parties (Bern, 1976) (Resolutions Conf. 1.1 and Conf. 1.2) did not provide an adequate basis for amending the Appendices, and directed the Standing Committee to undertake, with the assistance of the Secretariat, a revision of the criteria for amending the Appendices (Resolution Conf. 8.20);</p> <p>NOTING that this review was carried out in consultation with the Parties and on the basis of initial technical work carried out by IUCN in collaboration with other experts;</p> <p>NOTING further that all aspects of this review were addressed by a joint meeting of the Plants and Animals Committees, in association with the Standing Committee, held in Brussels in September 1993;</p>	No changes	None	<p>Proposed to delete these paragraphs and replace them with:</p> <p>RECALLING that Resolution Conf. 9.24, adopted by the Conference of the Parties at its ninth meeting (Fort Lauderdale, 1994) recommended that the text and the annexes of that Resolution be fully reviewed before the 12<sup>th</sup> meeting of the Conference of the Parties;</p> <p>RECALLING that the Conference of the Parties at its 11<sup>th</sup> meeting, (Gigiri, 2000), approved procedures for this review, laid down in Decision 11.2;</p>	<p>The proposed text of the second paragraph should <b>quote the language in Res. Conf. RC 9.24</b> in order to set out the precise justification for the review. SSN suggests:</p> <p>“RECALLING that Resolution Conf. 9.24, adopted by the Conference of the Parties at its ninth meeting (Fort Lauderdale, 1994) recommended ‘that the text and the Annexes of this Resolution be fully reviewed before the twelfth meeting of the Conference of the Parties with regard to the scientific validity of the criteria, definitions, notes and guidelines and their applicability to different groups of organisms’;”</p> <p><b>This change was not proposed by the CWG, or by any Party.</b></p>

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
2	<p>CONSIDERING the fundamental principles in paragraphs 1 and 2 of Article II of the Convention, which specify the species to be included in Appendices I and II;</p> <p>RECOGNIZING that to qualify for inclusion in Appendix I a species must meet biological and trade criteria;</p> <p>RECALLING that Article II, paragraph 2 (a), provides for the inclusion of species which may become threatened with extinction in Appendix II, in order to avoid utilization incompatible with their survival;</p> <p>RECOGNIZING that for the proper implementation of this provision it is necessary to adopt appropriate criteria, considering both biological and trade factors;</p> <p>RECALLING that paragraph 2 (b) of Article II provides only for the inclusion in Appendix II of species which must be subject to regulation in order that trade in specimens of certain species included in Appendix II in accordance with Article II, paragraph 2 (a), may be brought under effective control;</p> <p>CONSIDERING, however, that this provision should also apply where there is a need to bring under effective control trade in specimens of species included in Appendix I;</p> <p>RECOGNIZING that the range States of a species subject to an amendment proposal should be consulted following the procedures recommended by the Conference of the Parties, and that the intergovernmental bodies having a function in relation to that species</p>	No changes	None	No changes	

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
3	EMPHASIZING the importance of Resolution Conf. 3.4, adopted at the third meeting of the Conference of the Parties (New Delhi, 1981), regarding the need to provide to developing countries technical assistance in matters relating to the Convention	No changes	None	Delete paragraph	SSN has no objection to this change.
4	RECOGNIZING that by virtue of the precautionary principle, in cases of uncertainty, the Parties shall act in the best interest of the conservation of species when considering proposals for amendment of Appendices I and II	No changes	ZA: “replace the words ‘species when considering proposals for amendment of Appendices I and II’ with the words “and enact measures which are proportionate to the anticipated risk to the species”	Incorporated comments of ZA by eliminating the last paragraph of the preamble and incorporating ZA’s comment into the first RESOLVES, which also addresses the use of the precautionary principle (see below)	<b>SSN recommends that the original paragraph be retained.</b> The proposed change removes all reference to the precautionary principle in the preamble. See comments under the first RESOLVES below.
OPERATIONAL PARAGRAPHS					

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
5	<p>THE CONFERENCE OF THE PARTIES TO THE CONVENTION</p> <p>ADOPTS the following Annexes as an integral part of this Resolution:</p> <p>Annex 1: Biological criteria for Appendix I;</p> <p>Annex 2 a: Criteria for the inclusion of species in Appendix II in accordance with Article II, paragraph 2 (a);</p> <p>Annex 2 b: Criteria for the inclusion of species in Appendix II in accordance with Article II, paragraph 2 (b);</p> <p>Annex 3: Special cases;</p> <p>Annex 4: Precautionary measures;</p> <p>Annex 5: Definitions, notes and guidelines; and</p> <p>Annex 6: Format for proposals to amend the Appendices;</p>	No changes	None	No changes	

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
6	RESOLVES that when considering any proposal to amend Appendix I or II the Parties shall apply the precautionary principle so that scientific uncertainty should not be used as a reason for failing to act in the best interest of the conservation of the species	No changes	See ZA's comment on the last paragraph of the preamble, above	<p>Incorporated ZA's comments:</p> <p>RESOLVES that when considering a proposal to amend Appendix I or II, the Parties shall act in the best interest of the species concerned and of its conservation, and adopt measures that are proportionate to the anticipated risks to the species.</p> <p><i>* CHAIRS' COMMENT 1: proposed change makes "a stronger and more direct reference to the precautionary principle"</i></p>	<p><b>SSN strongly recommends that the original paragraph be retained.</b></p> <p>The revised paragraph, unlike the original, makes no reference to scientific uncertainty, which is the key condition triggering the application of the precautionary principle as it is understood in international law. Because the degree of risk facing a species cannot be anticipated accurately, a genuine precautionary approach, based on uncertainty, must be retained in the Criteria. Despite the comments of the Chairs [<i>Chairs' Comment 1</i>], the new language is not a restatement of the precautionary principle.</p> <p>The new language referring to "measures that are proportionate to the anticipated risks to the species" is self-evident, unnecessary and has nothing to do with using precaution in cases of scientific uncertainty.</p>
7	<p>RESOLVES that, when considering proposals to amend Appendices I and II, the following applies:</p> <p>a) any species that is or may be affected by trade should be included in Appendix I if it meets at least one of the biological criteria listed in Annex 1</p>	No changes	None	In paragraph (a), add "in accordance with Article II, paragraph 1," after "Appendix I"	<p><b>The added language is unnecessary</b>, because Article II, paragraph 1 provides the only way to add species to Appendix I.</p> <p><b>This change was not proposed by the CWG, or by any Party.</b></p>

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
8	<p>b) a species "is or may be affected by trade" if:</p> <p>i) it is known to be in trade; or</p> <p>ii) it is probably in trade, but conclusive evidence is lacking; or</p> <p>iii) there is potential international demand for specimens; or</p> <p>iv) it would probably enter trade were it not subject to Appendix-I controls;</p>	<p>Proposed:</p> <p>i) it is known to be in international trade, and that trade has a detrimental impact on the status of the species; or</p> <p>ii) it is probably in international trade, although conclusive evidence is lacking, and that trade has a detrimental impact on the status of the species; or</p> <p>iii) there is potential international demand, and any international trade would have a detrimental impact on the status of the species; or</p> <p>iv) it would probably enter international trade, with a detrimental impact on the status of species, were it not subject to Appendix I controls;</p>	<p>AU: "it is very difficult, if not impossible, to conclusively prove that trade has a detrimental impact on the status of a species"</p> <p>DE: for Appendix I species, "any commercial trade has to be regarded as detrimental, especially with regard to the precautionary principle"</p> <p>IL: "the proposed change concerning when a species is 'affected by trade' seems to put a much larger burden of proof that the trade is in fact detrimental to the species, in order to list it"</p> <p>US: "the word 'affect' does not refer only to negative impacts. Restricting the meaning of the term, as proposed, places an onus, not present in the treaty itself, on Parties seeking to include a species in the Appendices"</p> <p>GB: "if, in b)ii), conclusive evidence is lacking about whether a species is in trade or not then it is equally unlikely that evidence about the impact of such trade will be available"</p> <p>NO: "paragraph ii) thus seems redundant and we propose to delete it"</p>	<p>Paragraph (b) has been deleted from the operative section, and "a species 'is or may be affected by trade' if" is defined in Annex 5 as:</p> <p>i) it is known to be in trade, and that trade has a detrimental impact on the status of the species; or</p> <p>ii) it is suspected to be in trade, or there is potential international demand for the species that may be detrimental to the survival in the wild</p> <p><i>* CHAIRS' COMMENT 2: in response to Party suggestions to soften the term "detrimental" by stating "may be detrimental", "the Chairs are of the opinion that if trade is known to exist it must be demonstrated that this trade has a detrimental impact"</i></p>	<p><b>SSN recommends that the original language be retained as part of the operative section of the resolution.</b> This is not a definition, but a condition for listing (especially subparagraph (iv), which should be retained).</p> <p>The opinion of the Chairs [<i>Chairs' Comment 2</i>] is much narrower than the language of the treaty. CITES does not require that trade be proven to be detrimental before a species can be listed on Appendix I, only that the species "is or may be affected" by trade. The precautionary principle requires that trade should a matter of concern for any species "threatened with extinction", even if the precise effect of this trade is not known.</p> <p>It is often difficult, if not impossible, to prove that trade has had a detrimental impact on a species; this raises the burden of proof on the proponent.</p>

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
9	c) any species that meets the criteria for inclusion in Appendix II listed in Annex 2 a should be included in Appendix II in accordance with Article II, paragraph 2 (a)	No changes	None	Replace paragraph (c) with: b) <u>species should be included in Appendix II under the provisions of Article II, paragraph 2 (a), if they satisfy the criteria listed in Annex 2a</u>	<p><b>SSN recommends the original language be retained.</b> Removing the word “any” from this criterion shifts its meaning away from encouraging the listing of all appropriate species. As the chair’s explanation of the change is that it was intended only to “clarify” the paragraph, rather than change its meaning, and as the treaty text makes clear that Article II(2)(a) should apply to “all” species that meet the specified criteria, the original wording should be retained.</p> <p><b>This change was not proposed by the CWG, or by any Party.</b></p>
10	<p>d) species should be included in Appendix II under the provisions of Article II, paragraph 2 (b), if they satisfy the criteria listed in Annex 2 b;</p> <p>e) species should be included in more than one Appendix at the same time, and higher taxa should be included in the Appendices, only if the species or higher taxa concerned satisfy the relevant criteria listed in Annex 3</p>	No changes	None	No changes, except that paragraph (d) becomes (c), and (d) becomes (e)	SSN has no objection to this change.
11	f) species of which all specimens in trade have been bred in captivity or artificially propagated should not be included in the Appendices if there is no probability of trade taking place in specimens of wild origin	No changes	None	Replace paragraph (f) with: e) species of which all specimens in trade have been bred in captivity or artificially propagated should not be included in the Appendices if there is <u>negligible</u> probability of trade taking place in specimens of wild origin	<p><b>SSN recommends the original language be retained.</b></p> <p>Even a small amount of trade may be detrimental for some species. The words “negligible probability” are too vague to be useful. They could mean either that trade is unlikely to happen, or that the volume of trade will be very small. The proposed change is therefore less clear than the original.</p> <p><b>This change was not proposed by the CWG, or by any Party</b></p>

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
12	<p>g) any species included in Appendix I for which sufficient data are available to demonstrate that it does not meet the criteria listed in Annex 1 should be transferred to Appendix II only in accordance with the relevant precautionary measures listed in Annex 4;</p> <p>h) any species included in Appendix II in accordance with Article II, paragraph 2 (a), that does not meet the criteria listed in Annex 2 a should be deleted only in accordance with the relevant precautionary measures listed in Annex 4; and species included in accordance with Article II, paragraph 2 (b), because they look like the species subject to the deletion, or for a related reason, should also be deleted only in accordance with the relevant precautionary measures; and</p> <p>i) the views, if any, of intergovernmental organizations with competence for the management of the species concerned should be taken into account</p>	No changes	None	No changes except that paragraph (g) becomes (f), (h) becomes (g), and (i) becomes (h)	SSN has no objection to this change.
13	RESOLVES that proposals to amend Appendices I and II should be based on the best information available and presented in the format in Annex 6, unless otherwise justified	No changes	None	Remove “unless otherwise justified” from the end of the paragraph	<p><b>SSN recommends the original language be retained.</b> The proposed new language increases the burden on Parties.</p> <p><b>This change was not proposed by the CWG, or by any Party</b></p>

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
14	None	[New 1] RESOLVES that Parties should avoid the inclusion in Appendix II of species that are in international trade, but managed in a manner that there is a negligible risk that, in the near future, the species will qualify for inclusion in Appendix II under the provisions of Annex 2a to this Resolution	<p>AU: “we strongly believe these [first three new RESOLVES] should be the subject of separate debate at the CoP, and ultimately the subject of separate resolutions as all are major policy decisions not directly related to the criteria for listing a species”</p> <p>DE: “this paragraph is superfluous”</p> <p>JP: “this paragraph should be strongly supported”</p> <p>US: “we cannot support requiring such a ‘risk analysis’ ... this is a scare argument (that somehow there is a risk of including a species in the Appendices)”</p>	CWG’s proposed paragraph not included	<b>SSN agrees with the deletion of the paragraph proposed by the CWG.</b>
15	None	[New 2] RESOLVES /RECOMMENDS that a species should normally not be included in Appendices I or II when the risk of a detrimental increase in trade as a result of the listing is considered to outweigh the benefit of the listing	<p>DE: “by adding this text a hidden criterion enters the preamble ... that is not covered by the convention”</p> <p>GB: “we support the wording”</p> <p>US: “we do not understand why it is necessary to suggest language to deal with a problem that ... has never been proven to exist”</p>	RECOMMENDS that a species should normally not be included in Appendix I when the risk of the listing is considered to outweigh the conservation benefit of the listing.	<p><b>SSN strongly opposes the inclusion of this new paragraph.</b> It is not precautionary, and places a very difficult burden of proof on proponents.</p> <p>There is little evidence that the problem this paragraph purports to address has ever occurred. If it ever does arise, Parties can consider that risk without special language.</p>

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
16	None	<p>[New 3] RESOLVES that species subject to review under the provisions of Resolution Conf. 8.9 (Rev.) should not normally be transferred to Appendix I, or be subjected to a zero quota established by the Conference of the Parties:</p> <p>a) until the completion of the review process has demonstrated that there is a need to do so; or</p> <p>b) unless the proponent demonstrates why the procedures outlined in Resolution Conf. 8.9 (Rev.) are not sufficient and an Appendix I listing is warranted</p>	<p>DE: “this paragraph may easily be misused in order to prevent or unjustifiably postpone Appendix I listing or the establishment of a zero quota ... the significant trade process cannot be implemented by many CITES Parties”</p> <p>GB: “we support the wording proposed”</p> <p>IL: “this seems to put a difficult burden on getting a species uplisted by proposing awaiting completion of the review process”</p> <p>US: “the mere fact that a species is under review does not preclude a Party, particularly range states, from proposing its transfer from Appendix II to I ... such a prohibition violates Article XV ... of the CITES treaty”</p>	<p>RESOLVES that Parties should not normally approve the transfer to Appendix I of species subject to review under the provisions of Resolution Conf. 8.9 (Rev.), or establish zero export quota for such species unless the proponent, following consultations with the Animals and Plants Committee, demonstrates why the procedures outlined in Resolution Conf. 8.9 (Rev.) are not sufficient</p> <p><i>* CHAIRS’ COMMENT 3: “the intent of this amendment is to strengthen the recognition of Resolution Conf. 8.9 as an alternative for an Appendix I listing”</i></p>	<p><b>SSN opposes the inclusion of this new paragraph.</b> As all Appendix II species are potentially subject to review, the language could apply to all listed species. Resolution Conf. 8.9 is not a legal alternative to Appendix I [<i>Chairs’ Comment 3</i>], and the Parties did not give either the CWG or the Chairs a mandate to convert it into one. A Resolution cannot be an alternative to a procedure mandated by the Convention. Instead, 8.9 addresses problems with the implementation of Article IV that could, if unsolved, place a species in need of Appendix I protection. The Significant Trade Review may take years to complete, and a transfer to Appendix I should always be a possible alternative if the review is not working effectively.</p>
17		<p>[New 4] RESOLVES that annotations to proposals to amend Appendix I or Appendix II should be made in accordance with the applicable Resolutions of the Conference of the Parties</p>	<p>DE: “it is self-evident that proposals for amendment of the appendices of the convention should be in line with the provision of the convention”</p> <p>JP: “we must ensure that any annotations involving quotas be based on best scientific advice”</p>	<p>RESOLVES that annotations to proposals to amend Appendix I or Appendix II should be made in accordance with the applicable Resolutions of the Conference of the Parties <u>and on the basis of the best scientific evidence</u></p>	<p><b>SSN opposes the inclusion of this new paragraph.</b> We particularly oppose the addition of the words “on the basis of the best scientific evidence”. “Best scientific evidence” is not defined, and the third RESOLVES already states that “proposals...should be based on the best information available.” This information should include not only scientific evidence, but also data on trade, enforcement, and related issues.</p>
18	None	<p>[New 5] ENCOURAGES Parties, when sufficient and relevant biological data are available, to include a discussion of appropriate quantitative analysis in the supporting statement of an amendment proposal</p>	<p>US: “it should be made clear that there are actually very few species for which the data required for such analyses are available”</p>	<p>ENCOURAGES Parties, when sufficient and relevant biological data are available, to include a quantitative evaluation in the supporting statement of an amendment proposal</p>	<p><b>SSN opposes the inclusion of this new paragraph.</b> The new language places an additional burden on Parties, and it may well be difficult to gather the data this paragraph requires.</p>

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
19	<p>RESOLVES that, to monitor the effectiveness of protection offered by the Convention, the status of species included in Appendices I and II should be regularly reviewed by the range States and proponents, in collaboration with the Animals Committee or the Plants Committee, subject to the availability of funds;</p> <p>URGES Parties and cooperating organizations to provide financial and technical assistance, when requested, in the preparation of proposals to amend the Appendices, the development of management programmes, and the review of the effectiveness of the inclusion of species in the Appendices. Parties should be open to using other available international mechanisms and instruments for these purposes in the broader context of biodiversity;</p>	No changes	None	No changes	
20	RECOMMENDS that the text and the Annexes of this Resolution be fully reviewed before the twelfth meeting of the Conference of the Parties with regard to the scientific validity of the criteria, definitions, notes and guidelines and their applicability to different groups of organisms; and	Delete paragraph	None	Delete paragraph	SSN has no objection to this change.

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
21	<p>REPEALS the Resolutions listed hereunder: (a) Resolution Conf. 1.1 (Bern, 1976) - Criteria for the Addition of Species and Other Taxa to Appendices I and II and for the Transfer of Species and Other Taxa from Appendix II to Appendix I; (b) Resolution Conf. 1.2 (Bern, 1976) - Criteria for the Deletion of Species and Other Taxa from Appendices I and II; (c) Resolution Conf. 2.17 (San José, 1979) - Format for Proposals to Amend Appendix I or II; (d) Resolution Conf. 2.19 (San José, 1979) - Criteria for Addition of Extremely Rare Species to Appendix I; (e) Resolution Conf. 2.20 (San José, 1979) - The Use of the Subspecies as a Taxonomic Unit in the Appendices; (f) Resolution Conf. 2.21 (San José, 1979) - Species Thought to Be Extinct; (g) Resolution Conf. 2.22 (San José, 1979) - Trade in Feral Species; (h) Resolution Conf. 2.23 (San José, 1979) - Special Criteria for the Deletion of Species and Other Taxa Included in Appendix I or II without Application of the Bern Criteria for Addition; (i) Resolution Conf. 3.20 (New Delhi, 1981) - Ten-year Review of the Appendices; (j) Resolution Conf. 4.26 (Gaborone, 1983) - Ten-year Review of the Appendices; (k) Resolution Conf. 7.14 (Lausanne, 1989) - Special Criteria for the Transfer of Taxa from Appendix I to Appendix II; and (l) Resolution Conf. 8.20 (Kyoto, 1992) - Development of New Criteria for Amendment of the Appendices</p>	No changes	None	<p>Replace paragraph with:  REPEALS Resolution Conf. 9.24 (Fort Lauderdale, 1994) – Criteria for Amendment of Appendices I and II</p>	SSN has no objection to this change.
ANNEX 1: BIOLOGICAL CRITERIA FOR APPENDIX I					

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
22	<p>The following criteria must be read in conjunction with the definitions, notes and guidelines listed in Annex 5.</p> <p>A species is considered to be threatened with extinction if it meets, or is likely to meet, <u>at least one</u> of the following criteria.</p>	No changes	None	The underlining has been removed from under “at least one”	SSN has no objection to this change.
23	<p>A. The wild population is small, and is characterized by <u>at least one</u> of the following: i) an observed, inferred or projected decline in the number of individuals or the area and quality of habitat; or ii) each sub-population being very small; or iii) a majority of individuals, during one or more life-history phases, being concentrated in one sub-population; or iv) large short-term fluctuations in the number of individuals; or v) a high vulnerability due to the species' biology or behaviour (including migration)</p>	<p>CWG recommended reversing the order of paragraph (A) and (B). Subparagraph (i) would be deleted</p> <p>The paragraph would read (underlined text is new):</p> <p>B. The wild population is small, and is characterized by at least one of the following: i) each sub-population being very small; or ii) a majority of <u>mature</u> individuals, during one or more life-history phases, being concentrated in one sub-population; or iii) large short-term fluctuations in the number of <u>mature</u> individuals; or iv) a high vulnerability due to the species' biology or behaviour (including migration)</p>	<p>GB: “we have reservations about the proposal to remove the decline sub-criterion”; “we strongly support the proposal to change any reference to the ‘number of individuals’ to the ‘number of mature individuals’”</p> <p>US: “we do not feel that subcriterion i) of the current criterion A is redundant and should be deleted”; “addition of the word ‘mature’ results in a reduction in the flexibility of the criteria and impedes consider of a particular species when other evidence indicates that listing of the species should be a priority”; terms such as ‘large short term’ need definition (in Annex 5)”</p> <p>NO: “we propose to clarify the subparagraph by replacing ‘short term fluctuations’ with ‘decrease’”</p>	<p>The paragraph has been re-lettered as (B), and one change is suggested (underlined text below):</p> <p>B. The wild population is small, and is characterized by at least one of the following: i) an observed, inferred or projected decline in the number of individuals or the area and quality of habitat; or ii) each sub-population being very small; or iii) a majority of individuals, during one or more life-history phases, being concentrated in one sub-population; or iv) large short-term fluctuations in the number of <u>individuals in those life history stages that are of critical importance for the continued survival of the species</u>; or v) a high vulnerability due to the species' biology or behaviour (including migration)</p> <p><i>* CHAIRS' COMMENT 4: The underlined language is the result of the FAO consultation</i></p>	<p><b>SSN supports the restoration of criterion B (i) in the most recent draft.</b></p> <p><b>We oppose, however, the new language in Criterion B (iv), which is unclear and unnecessary.</b> All life history stages are of critical importance to the survival of a species. As this criterion already applies only to small populations, any large short-term fluctuation will increase that species' vulnerability, regardless of the life history stage at which it occurs. <b>The original wording should be retained.</b></p> <p>Though the new language, developed in consultation with FAO [<i>Chairs' Comment 4</i>], may have relevance to some fishes, it is not appropriate for most terrestrial species or for many marine species, including corals and cetaceans.</p>

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
24	<p>B. The wild population has a restricted area of distribution and is characterized by <u>at least one</u> of the following: (i) fragmentation or occurrence at very few locations; or (ii) large fluctuations in the area of distribution or the number of sub-populations; or (iii) a high vulnerability due to the species' biology or behaviour (including migration); or (iv) an observed, inferred or projected decrease in any one of the following: the area of distribution; or the number of sub-populations; or the number of individuals; or the area or quality of habitat; or reproductive potential</p>	<p>CWG recommended reversing the order of paragraph (A) and (B)            CWG proposed to include “or recruitment / reproductive success or reproductive potential” at the end</p>	<p>NO: “we propose to include ...the word ‘major’ as follows: ‘iv) an observed, inferred or projected major decrease in any one of the following’            JP: “it should be qualified to required that any such projections are based on valid assumptions otherwise anything can be ‘projected’”            DE: “what is the difference between: a) reproductive potential; and b) recruitment / reproductive success or reproductive potential?”            US: “instead of ‘recruitment / reproductive success or reproductive potential’, we recommend ‘recruitment into reproductive age classes and subsequent reproductive success’, or ‘recruitment or reproductive success’”</p>	<p>The paragraph is re-lettered as (A)            “reproductive potential” is replaced with “recruitment”, and “the area or quality of habitat” has been split into “the area of habitat” and “the quality of habitat”            The proposed revision reads:            A. The wild population has a restricted area of distribution and is characterized by at least one of the following: (i) fragmentation or occurrence at very few locations; or (ii) large fluctuations in the area of distribution or the number of sub-populations; or (iii) a high vulnerability due to the species' biology or behaviour (including migration); or (iv) an observed, inferred or projected decrease in any one of the following: the area of distribution; or the area of habitat; or the number of sub-populations; or the number of individuals; or the quality of habitat; or recruitment</p>	<p>SSN has no objection to this change.</p>

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
25	<p>C. A decline in the number of individuals in the wild, which has been <u>either</u>: (i) observed as ongoing or as having occurred in the past (but with a potential to resume); or (ii) inferred or projected on the basis of any one of the following: a decrease in area or quality of habitat; or levels or patterns of exploitation; or threats from extrinsic factors such as the effects of pathogens, competitors, parasites, predators, hybridization, introduced species and the effects of toxins and pollutants; or decreasing reproductive potential</p>	<p>CWG proposed to add the term “marked” before “decline”                      CWG proposed to add “or decreasing recruitment / reproductive success or reproductive potential” to the end of paragraph (C)</p>	<p>AU: “we would support the Working Groups’ suggestion that the term ‘marked’ be included in Criteria C”                      DE: “delete the term ‘marked’”                      GB: “we agree with the proposed use of the term ‘marked decline’”                      IL: “without a new definition of ‘decline’ it is not clear to us how ‘marked decline’ improves the paragraph”                      US: “we recommend further evaluation in Annex 5 of what is meant by ‘marked decline’”</p>	<p>Retained “marked” decline                      Changed “a decrease in area or quality of habitat” to “a decrease in area of habitat” and “a decrease in quality of habitat”                      Changed “decreasing reproductive potential” to “decreasing recruitment”                      New paragraph (C) reads (new text underlined):                      C. A <u>marked</u> decline in the number of individuals in the wild, which has been either: (i) observed as ongoing or as having occurred in the past (but with a potential to resume); or (ii) inferred or projected on the basis of any one of the following: a decrease in area of habitat; a decrease in quality of habitat; levels or patterns of exploitation; threats from extrinsic factors such as the effects of pathogens, competitors, parasites, predators, hybridization, introduced species and the effects of toxins and pollutants; <u>decreasing recruitment</u></p>	<p><b>SSN opposes the use of the term “marked decline”</b>. Its meaning is unclear, and it has not been defined in Annex 5. For species with small populations, any decline, no matter how small, may pose a serious risk. A decline that may be small with respect to the total population could include high numbers of age- or sex-specific individuals, such as breeding females or herd matriarchs, whose loss could be critical to the population. The new language ignores this possibility.</p> <p>The terms “decreasing reproductive potential” and “decreasing recruitment” have different meanings. Both terms should be retained and clearly defined.</p>
26	<p>D. The status of the species is such that if the species is not included in Appendix I, it is likely to satisfy one or more of the above criteria within a period of five years</p>	<p>CWG suggested deleting paragraph (D) and incorporate it into criterion A in Annex 2a</p>	<p>DE: “with regard to the precautionary principle this paragraph must not be deleted”                      US: “it should not be deleted ... Criterion D of Resolution Conf. 9.24, Annex 1 is a precautionary measure designed to avoid downlisting species that may have to be returned to Appendix I in the near future”; “we do not agree with the statement that inclusion in Appendix II with a trade prohibition or restriction is a preferable option”</p>	<p>Delete paragraph (D) and incorporate it into criterion A in Annex 2a (see below)</p> <p><i>* CHAIRS’ COMMENT 5: “in circumstances when this criterion would apply i.e. substantial illegal trade in a species that requires to be strictly regulated, it would be more appropriate and practical to opt for inclusion in Appendix II with trade restrictions.”</i></p>	<p><b>SSN opposes the deletion of original paragraph (D)</b>. D is a precautionary criterion, designed to avoid premature down-listing of Appendix I species that might otherwise have to be returned to Appendix I in the near future.</p> <p>Despite the comments by the Chairs [Chairs’ Comment 5], App. I provides more protection against illegal trade than App. II. Penalties may be stricter, and there may be fewer opportunities for laundering of illegal specimens.</p>
ANNEX 2: CRITERIA FOR INCLUSION OF SPECIES IN APPENDIX II IN ACCORDANCE WITH ARTICLE II, PARAGRAPH 2a					

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
27	<p>The following criteria must be read in conjunction with the definitions, notes and guidelines listed in Annex 5.</p> <p>A species should be included in Appendix II when either of the following criteria is met.</p> <p>A. It is known, inferred or projected that unless trade in the species is subject to strict regulation, it will meet at least one of the criteria listed in Annex 1 in the near future.</p> <p>B. It is known, inferred or projected that the harvesting of specimens from the wild for international trade has, or may have, a detrimental impact on the species by <u>either</u>: (i) exceeding, over an extended period, the level that can be continued in perpetuity; <u>or</u> (ii) reducing it to a population level at which its survival would be threatened by other influences</p>	<p>CWG recommended extensive changes, including deleting the term “inferred” wherever it occurred, and adding “international” before “trade”</p> <p>CWG recommended this Annex read (underlined words are new):</p> <p>The following criteria must be read in conjunction with the definitions, explanations and guidelines listed in Annex 5.</p> <p>A species should be included in Appendix II when, on the basis of available <u>information on the status and trends of the wild population(s)</u>, any of the following criteria is met:</p> <p>A .It is known or can be projected that unless the <u>international</u> trade in the species is subject to strict regulation, it is <u>likely to satisfy one or more of the biological criteria for inclusion in Appendix I</u> in the near future; or</p> <p>B. It is known or can be projected that <u>strict regulation of international trade is required to ensure that harvests of specimens from the wild for international trade do not negatively influence the status of wild populations to such a degree that criterion A above would apply</u>; or</p> <p>C. <u>An Appendix II listing will enable any Party, in particular range States of the species, to limit use of the species to a level that can be maintained in perpetuity, and for which international co-operation is necessary.</u></p>	<p>AU: “we do not support inclusion of the proposed wording that would seek a risk analysis of listing”; “we consider the issue of up-listing during a significant trade review should be subject of separate debate and not part of the debate on criteria”; “if Criteria C is more broadly interpreted, it remains the only criteria that can be used to regulate a species that is being significantly overused, but is some reasonable distance away from being endangered. Criteria C, under those circumstances, has a significant number of failings ... The deletion of the previous criteria B in these circumstances is highly inappropriate”</p> <p>US: “the rewording of the criteria in this Annex appears to go beyond the language of Article II of the treaty, which only requires the possibility that a species may become ‘threatened with extinction’”; “we feel that the original language was much simpler and easier to follow”</p> <p>DE: “the new wording in criteria A and B of Annex 2a by using the terms ‘it is known or can be projected’ is far more restrictive than what the term ‘may become’ in Article II of the Convention”; paragraph C is “a criterion for Appendix III listing”</p> <p>ZA: “insert at the beginning of the paragraph [A]: ‘If the status of the species is such as to e close to satisfying the criteria for Appendix I’”; amend last part of sentence [paragraph B] as follows: ‘... criterion A above would likely apply in the near future’”</p> <p>IL: paragraph C “is not clearly worded, and creates needless ambiguity” 16</p> <p>GB: paragraph C “reads much more as a criterion for Appendix III</p>	<p>The term “inferred”, which the CWG proposed be deleted, is retained</p> <p>The term “international”, proposed by the CWG, is removed</p> <p>CWG’s proposed paragraph (C) is removed</p> <p>The new Annex reads (underlined words are new):</p> <p>The following criteria must be read in conjunction with the definitions, explanations and guidelines listed in Annex 5.</p> <p>A species should be included in Appendix II when, <u>on the basis of available information on the status and trends of the wild population(s)</u>, <u>one</u> of the following criteria is met:</p> <p>A .It is known, <u>or can be</u> inferred or projected that <u>the regulation</u> of trade in the species is <u>necessary to avoid that it becomes eligible for inclusion in Appendix I</u> in the near future; or</p> <p>B. It is known, <u>or can be</u> inferred or projected that <u>regulation of trade in the species is required to ensure that the harvest of specimens from the wild is not detrimental to the species concerned</u></p> <p>* <i>CHAIRS’ COMMENT 6: Criterion (A) incorporates former biological criterion (D) from Annex 1 and “provides a mechanism to include in Appendix II species that require trade controls in order to avoid a situation that necessitates listing the taxon directly in Appendix I in the near future.”</i></p>	<p><b>SSN supports the retention of the original Paragraph (A).</b></p> <p>SSN supports the retention of the term “inferred”, the deletion of the term “international”, and the deletion of the CWG’s proposed Criterion C.</p> <p>The added words “on the basis of available information on the status and trends of the wild population(s)” limit the type of information that may be considered, and should be deleted.</p> <p><b>SSN disagrees with the Chair that the new paragraph (A) incorporates former criterion (D) from Annex 1 [Chairs’ Comment 6].</b></p> <p>D is a precautionary criterion, to avoid premature down-listing of Appendix I species, and should be retained in Annex 1 (see above). The paragraph as worded is not precautionary.</p> <p><b>The original paragraph (B) should be retained.</b> The new Paragraph B ignores the effect of harvests for reasons other than trade, and removes language on the potential detrimental impact of trade that should be retained.</p>

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
<b>ANNEX 2: CRITERIA FOR INCLUSION OF SPECIES IN APPENDIX II IN ACCORDANCE WITH ARTICLE II, PARAGRAPH 2b</b>					
28	<p>Species should be included in Appendix II in accordance with Article II, paragraph 2 (b), if they satisfy <u>one</u> of the following criteria.</p> <p>A. The specimens resemble specimens of a species included in Appendix II under the provisions of Article II, paragraph 2 (a), or in Appendix I, such that a non-expert, with reasonable effort, is unlikely to be able to distinguish between them.</p> <p>B. The species is a member of a taxon of which most of the species are included in Appendix II under the provisions of Article II, paragraph 2 (a), or in Appendix I, and the remaining species must be included to bring trade in specimens of the others under effective control</p>	<p>CWG offered a complete revision of Annex 2, as follows (new language underlined):</p> <p>Species should be included in Appendix II in accordance with Article II, paragraph 2 (b), if they satisfy the following criterion.</p> <p>A. The specimens <u>of the species in the form in which they are traded resemble specimens of a species included in Appendix II under the provisions of Article II, paragraph 2(a), or in Appendix I, for which the proponent has demonstrated that a non-expert using basic identification materials, is unlikely to be able to distinguish between them.</u></p>	<p>ZA: “recommended to replace ‘should’ with ‘may’ in the first sentence</p> <p>DE: “point B should be maintained”</p> <p>IL: “we support maintaining Criterion B”</p> <p>US: “we do not understand the elimination of criterion (B)”; there is nothing in CITES suggesting that cost should be included as a factor in listing decisions”</p> <p>GB: “we feel the original wording still has much to offer ... at the very least, retention of the phrase ‘and with reasonable effort’ from the original version”</p> <p>IL: requiring ‘demonstration’ puts undue burden on the proponent”</p>	<p>Most of the changes recommended by the CWG are retained</p> <p>The word “should” in the first line is replaced with “may”</p> <p>The new proposed Annex 2 reads (underlined words are new):</p> <p>Species <u>may</u> be included in Appendix II in accordance with Article II, paragraph 2 (b), if <u>one of the following criteria is met</u>:</p> <p>A. The specimens <u>of the species in the form in which they are traded resemble specimens of a species included in Appendix II under the provisions of Article II, paragraph 2(a), or in Appendix I, for which the proponent has demonstrated that a non-expert, using basic identification materials and with reasonable effort, is unlikely to be able to distinguish between them; or</u></p> <p><u>B. There are compelling reasons other than A above to ensure that effective control of trade in currently listed species is achieved</u></p>	<p><b>SSN opposes the requirement in Criterion A that a “proponent has demonstrated”</b> that non-experts cannot distinguish between species. This places a burden on proponents, with no guidance provided on what a “non-expert” is , what “basic identification materials” are, how they might be reliably made available to non-experts, or what needs to be proven to show that the specimens are unlikely to be distinguished.</p> <p><b>SSN opposes the removal of the original paragraph B</b> from RC 9.24. The original language provides a clear justification for listing decisions; the replacement paragraph is meaningless and is likely to increase confusion.</p>
<b>ANNEX 3: SPECIAL CASES</b>					

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
29	<p><u>Split-listing</u></p> <p>Listing of a species in more than one Appendix should be avoided in general in view of the enforcement problems it creates. When split-listing does occur, this should generally be on the basis of national or continental populations, rather than subspecies. Split-listings that place some populations of a species in the Appendices, and the rest outside the Appendices, should normally not be permitted.</p> <p>For species outside the jurisdiction of any State, listing in the Appendices should use the terms used in other relevant international agreements, if any, to define the population. If no such international agreement exists, then the Appendices should define the population by region or by geographic coordinates.</p> <p>Taxonomic names below the species level should not be used in the Appendices unless the taxon in question is highly distinctive and the use of the name would not give rise to enforcement problems</p>	<p>CWG recommended replacing the first two paragraphs with (new language underlined):</p> <p>Listing of a species in more than one Appendix should be <u>avoided unless it relates to the down-listing of a population from Appendix I to Appendix II in accordance with the precautionary measures contained in paragraph A of Annex 4 of this Resolution</u></p> <p>When split-listing does occur, this should generally be on the basis of national or continental populations, <u>and should not result in some populations being outside the Appendices.</u></p> <p>CWG did not suggest changes to the last two paragraphs</p>	<p>DE: “the previous text should ... be maintained”</p> <p>GB: “we recognize the value of split-listings ... and support the proposals to amend Annex 3 as described”; “some thought may be given as to whether oceanic populations might also be appropriate for split-listings or whether split-listing of marine species is practical”</p> <p>US: “modifications are an improvement ...however, removing language referring to enforcement problems deletes the main reason for avoiding split listings in the first place ... we object to this change”; “further, the reference to Annex 4 in this case makes it appear that a split listing is acceptable if it will facilitate trade, but not acceptable otherwise ... there is no justification for such a distinction”; we suggest expanding the last sentence of this [second new] paragraph by adding, ‘or in individuals of some populations of migratory species being in more than one Appendix’”</p>	<p>Most of the CWG’s proposed changes are included</p> <p>In the first paragraph, “down-listing” was changed to “transfer”; in the second paragraph, “continental” was changed to “regional”; and enforcement problems are re-inserted</p> <p>The new proposed language reads (underlined words are new):</p> <p>Listing of a species in more than one Appendix should be <u>avoided unless it relates to the transfer of a population from Appendix I to Appendix II in accordance with the precautionary measures contained in paragraph A of Annex 4 of this Resolution</u></p> <p>When split-listing does occur, this should generally be on the basis of national or regional populations, <u>and should not result in some populations being excluded from the Appendices if enforcement problems are created by doing so.</u></p> <p>There were no suggested changes to the last two paragraphs</p>	<p><b>SSN supports retention of the original wording.</b></p> <p>The original first sentence and last clause of the original first paragraph refer to concepts not addressed in the new language. The first sentence makes a much stronger statement about enforcement problems caused by split-listing than does the revision. The last clause of the first paragraph recommends not split-listing species so that some populations are on the Appendices and some are off. The new text says this is only undesirable when it creates enforcement problems.</p> <p>SSN agrees with the comment of the US that “the reference to Annex 4 inappropriately makes it appear that split-listing is acceptable only when it facilitates trade.” In fact transferring part of an Appendix I species to Appendix II may increase the probability of illegal trade in the remaining Appendix I populations, and should be avoided.</p>
30	<p><u>Higher taxa</u></p> <p>If all species of a higher taxon are included in Appendix I or II, they should be included under the name of the higher taxon. If some species in a higher taxon are included in Appendix I or II and all the rest in the other Appendix, the latter species should be included under the name of the higher taxon, with an appropriate annotation</p>	<p>No changes</p>	<p>None</p>	<p>No changes</p>	

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
<b>ANNEX 4: PRECAUTIONARY MEASURES</b>					
31	A. When considering proposals to amend the Appendices, the Parties shall, in the case of uncertainty, either as regards the status of a species or as regards the impact of trade on the conservation of a species, act in the best interest of the conservation of the species.	CWG proposed to delete paragraph (A)	<p>AU: “to delete paragraph A appears to be entirely contrary to what Annex 4 is about and therefore is not supported”</p> <p>DE: “the original text must be maintained”</p> <p>GB: “we agree that a third use of this precautionary phrase is redundant and should be deleted”</p> <p>IL: “this paragraph states in a clear and unequivocal way exactly what the precautionary principle is, and should therefore not be deleted”</p> <p>US: “this is central to the precautionary approach, and certainly belongs at the head of any Annex dealing with precautionary measures”</p> <p>ZA: “the proposed deletion of this paragraph is supported”; “the following definition is suggested: Precautionary Principle: where there is a threat of significant reduction or loss of a species but inadequate or inconclusive scientific evidence to prove this, action should be considered to avoid or minimize threats”</p>	<p>Deleted</p> <p><i>* CHAIRS’ COMMENT 7: This paragraph is deleted because it is covered by the “stronger wording” in the operational part under RESOLVES</i></p>	<p><b>SSN strongly opposes deletion of this paragraph.</b> The revision eliminates all reference to uncertainty, the basis of the precautionary principle. SSN disagrees that the wording in the RESOLVES paragraph is stronger [Chairs’ Comment 7] (see comments in the operational section above).</p> <p>At the Joint Meeting, no Party supported this deletion.</p>
32	B.1. No species listed in Appendix I shall be removed from the Appendices unless it has been first transferred to Appendix II, with monitoring of any impact of trade on the species for at least two intervals between meetings of the Conference of the Parties	No change except that the paragraph would now be paragraph A instead of (1)	None	No change except that the paragraph would now be paragraph A instead of B(1)	SSN has no objection to this change.

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
33	<p>2. Species included in Appendix I should only be considered for transfer to Appendix II if they do not satisfy the relevant criteria in Annex 1. Even if such species do not satisfy the relevant criteria in Annex 1, they should be retained in Appendix I unless they satisfy one of the following criteria:</p> <p>a) the species is not in demand for international trade, nor is its transfer to Appendix II likely to stimulate trade in, or cause enforcement problems for, any other species included in Appendix I; or</p> <p>b) the species is likely to be in demand for trade, but its management is such that the Conference of the Parties is satisfied with: i) implementation by the range States of the requirements of the Convention, in particular Article IV; and ii) appropriate enforcement controls and compliance with the requirements of the Convention; or</p> <p>c) an integral part of the amendment proposal is an export quota approved by the Conference of the Parties, based on management measures described in the supporting statement of the amendment proposal, provided that effective enforcement controls are in place; or d) an integral part of the amendment proposal is an export quota approved by the Conference of the Parties for a specified period of time, based on management measures described in the supporting statement of the amendment proposal, provided that effective enforcement controls are in place; or e) a ranching proposal is submitted consistent with the applicable Resolutions of the Conference of the Parties and is approved.</p>	<p>CWG proposed no changes to paragraph (2)</p>	<p>GB: "it may be appropriate to consider the practical implications of how these precautionary measures might apply to the taking of marine species in international waters if down-listing is proposed or successful"</p>	<p>Paragraph 2 would be changed as follows (new language is underlined):</p> <p>2. Species included in Appendix I should <u>normally be transferred</u> to Appendix II if they do not satisfy the relevant criteria in Annex 1, <u>and when one of the following precautionary safeguards is met:</u></p> <p>Paragraph 2(a) and 2(b) would not be changed</p> <p>Paragraph 2(c) would be deleted</p> <p>Paragraphs 2(d) and 2(e) would be re-lettered (c) and (d), respectively</p> <p><i>* CHAIRS' COMMENT 8: The new language in paragraph 2 reinforces the precautionary approach to counteract the deletion of old paragraph A</i></p> <p><i>* CHAIRS' COMMENT 9: Paragraph (c) is unnecessary because the topic is covered under old paragraph (d) (now new paragraph (c)). The new (c) reinforces the precautionary approach to transfers from Appendix I to II by only providing for such transfers when an export quota has been approved by the CoP for a specified period of time thereby requiring the range State to re-submit a proposal for any continuation of trade beyond the period specified.</i></p>	<p><b>SSN strongly objects to the proposed new wording. The new language is not precautionary, and completely reverses the onus of the original.</b></p> <p>While the original resolution says species should be retained on Appendix I unless they fail to satisfy Appendix I criteria, the new language insists that they must be downlisted if they do so. Though the Chairs have commented that this reinforces the precautionary approach [<i>Chairs' Comments 8, 9</i>], it in fact does the opposite.</p> <p>The deletion of Paragraph (c) would require that all quotas under this Annex be time-limited, with no guidance on what happens when these quotas expire.</p> <p><b>This change was not proposed by the CWG, or by any Party.</b></p>

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
34	3. No proposal for transfer of a species from Appendix I to Appendix II with an export quota shall be considered from a Party that has entered a reservation for the species in question, unless that Party agrees to remove the reservation within 90 days of the adoption of the amendment	CWG proposed to delete the words “with an export quota” so that text reads: 3. No proposal for transfer of a species from Appendix I to Appendix II shall be considered from a Party that has entered a reservation for the species in question, unless that Party agrees to remove the reservation within 90 days of the adoption of the amendment	US: “we agree”	Adopted CWG recommendation Delete the words “with an export quota” so that text reads: 3. No proposal for transfer of a species from Appendix I to Appendix II shall be considered from a Party that has entered a reservation for the species in question, unless that Party agrees to remove the reservation within 90 days of the adoption of the amendment	<b>SSN supports this change.</b>
35	4. No species should be deleted from Appendix II if such deletion would be likely to result in it qualifying for inclusion in the Appendices in the near future	CWG recommended replacing paragraph (4) with: A species should be deleted from Appendix II when it no longer qualifies under the provisions of Annexes 2a and 2b of this Resolution and therefore implementation of the provisions of Article IV of the Convention is no longer relevant	DE: “this is no precautionary measure ... it should be deleted ... every Party has the possibility to introduce a proposal to delist species from Appendix II”	Replace paragraph with (new language underlined): 4. No species should be deleted from Appendix II if, <u>within the last two intervals between meetings of the Conference of the Parties, it has been subject to a Recommendation under the provisions of Resolution Conf. 8.9 (Rev.) concerning its conservation status</u>	<b>SSN agrees with the new language, but opposes the deletion of the original Paragraph 4</b> , which deals with a quite different matter. Both paragraphs should be used. Not all species traded in unsustainable levels have been reviewed under Resolution Conf. 8.9.

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
36	<p>C. The following review procedures shall apply when a species is transferred to Appendix II pursuant to paragraphs B 2 c) and B 2 d) above.</p> <p>1. Where the Plants Committee, the Animals Committee or a Party becomes aware of problems in compliance with the management measures and export quotas of another Party, the Secretariat shall be informed and, if the Secretariat fails to resolve the matter satisfactorily, it shall inform the Standing Committee which may, after consultation with the Party concerned, recommend to all Parties that they suspend trade with that Party in specimens of CITES-listed species, and/or request the Depositary Government to prepare a proposal to transfer the population back to Appendix I.</p> <p>2. If, on review of a quota and its supporting management measures, the Animals or Plants Committee encounters any problems with compliance or potential detriment to a species, the relevant Committee shall request the Depositary Government to prepare a proposal for appropriate remedial action</p>	Change (C) to (B) and the reference to B 2c) and B2d) to A2c) and A2d), respectively	None	Change (C) to (B) and the reference to B 2c) and B2d) to A2c) and A2d), respectively	SSN has no objection to this change.

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
37	D. If the proponent Party wishes to renew, amend or delete a quota established pursuant to paragraph B 2 d) above, it shall submit an appropriate proposal for consideration at the next meeting of the Conference of the Parties. In anticipation of there being no such proposal submitted, the Depositary Government shall submit a proposal for consideration at the next meeting of the Conference of the Parties to impose a zero quota.	Change (D) to (C) and the reference to B2d) to A2d)	None	Change (D) to (C) and the reference to B2d) to A2d)	SSN has no objection to this change.
38	E. Species that are regarded as possibly extinct should not be deleted from Appendix I if they may be affected by trade in the event of their rediscovery; these species should be annotated in the Appendices as 'p.e.' (i.e. possibly extinct).	Change (E) to (D)	None	Change (E) to (D)	SSN has no objection to this change.
ANNEX 5: DEFINITIONS, EXPLANATIONS AND GUIDELINES					

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
39	None	No changes	None	<p><u>Species</u>            In Article I of the Convention the term species is defined as “any species, subspecies or geographically separate population thereof”. Species and subspecies refer to the biological concept of species, and do not require any further definition. The two terms also cover varieties, populations, sub-populations and fisheries stocks. “Geographically separate population” refers to parts of a species or a subspecies within particular geographical boundaries. This can also refer to populations or sub-populations, or to the “stocks” traditionally used in fisheries. Until now the Conference of the Parties has interpreted “geographically separate populations” to be populations delimited by political boundaries, whereas they have not yet used the other option of geographical boundaries.</p>	<p><b>SSN does not believe that marine species proposed for listing or delisting should be split according to stock.</b> We are concerned that the term “stock” has been included under “geographically separate population” rather than being separately defined. Stocks are non-biologically based management units, not biological populations, and specimens from different stocks may interbreed and/or be indistinguishable from one another. Further, stock boundaries may be changed under other international agreements for non-scientific reasons, thereby altering the geographical scope of listings on the CITES Appendices without input from the Parties.</p>

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
40	<p>From second RESOLVES of the operative section:</p> <p>b) a species "is or may be affected by trade" if:</p> <p>i) it is known to be in trade; or</p> <p>ii) it is probably in trade, but conclusive evidence is lacking; or</p> <p>iii) there is potential international demand for specimens; or</p> <p>iv) it would probably enter trade were it not subject to Appendix-I controls</p>	<p>Proposed:</p> <p>i) it is known to be in <u>international trade, and that trade has a detrimental impact on the status of the species</u>; or</p> <p>ii) it is probably in <u>international trade, although conclusive evidence is lacking, and that trade has a detrimental impact on the status of the species</u>; or</p> <p>iii) there is potential international demand, and any <u>international trade would have a detrimental impact on the status of the species</u>; or</p> <p>iv) it would probably enter <u>international trade, with a detrimental impact on the status of species</u>, were it not subject to Appendix I controls;</p>	<p>AU: "it is very difficult, if not impossible, to conclusively prove that trade has a detrimental impact on the status of a species"</p> <p>DE: for Appendix I species, "any commercial trade has to be regarded as detrimental, especially with regard to the precautionary principle"</p> <p>IL: "the proposed change concerning when a species is 'affected by trade' seems to put a much larger burden of proof that the trade is in fact detrimental to the species, in order to list it"</p> <p>US: "the word 'affect' does not refer only to negative impacts. Restricting the meaning of the term, as proposed, places an onus, not present in the treaty itself, on Parties seeking to include a species in the Appendices"</p> <p>GB: "if, in b)ii), conclusive evidence is lacking about whether a species is in trade or not then it is equally unlikely that evidence about the impact of such trade will be available"</p> <p>NO: "paragraph ii) thus seems redundant and we propose to delete it"</p>	<p>Delete paragraph (b) from the operative section, and instead have this definition in Annex 5:</p> <p><u>Affected by Trade</u></p> <p>A species <u>is or may be affected by trade</u>" if:</p> <p>i) it is known to be in trade, and that trade has a detrimental impact on the status of the species; or</p> <p>ii) it is suspected to be in trade, or there is potential international demand for the species that may be detrimental to the survival in the wild</p> <p><i>* CHAIRS' COMMENT 10: In response to Party suggestions to soften the term "detrimental" by stating "may be detrimental", "the Chairs are of the opinion that if trade is known to exist it must be demonstrated that this trade has a detrimental impact"</i></p>	<p><b>SSN supports the retention of the original language as part of the operative text</b> (see comments above). <b>We strongly object to the new wording.</b></p> <p><b>The proposed language is more restrictive than the treaty itself.</b> There is no requirement in the Convention that trade must be proven to be detrimental before a species can be listed on Appendix I (the phrase "affected by trade" only applies to listing on Appendix I, under Article II.1), despite the view of the Chairs [<i>Chairs' Comment 10</i>]. Under the proposed language an endangered species known to be in trade, but for which the effect of trade is not fully understood, could not be listed on Appendix I; this violates the precautionary principle.</p> <p><b>We further oppose the removal of original subparagraph (iv).</b> It has been deleted on the grounds that it is "a listing criterion" and not properly part of the definition of "is or may be affected by trade." However, the language has not been reinserted anywhere else in the text; thus, this precautionary measure has been completely removed from the resolution. <b>This change was not proposed by the CWG, or by any Party.</b></p>

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
41	<p><u>Area of distribution:</u> Area of distribution is defined as the area contained within the shortest continuous imaginary boundary which can be drawn to encompass all the known, inferred or projected sites of occurrence, excluding cases of vagrancy (though inferring and projecting area of occurrence should be undertaken carefully, and in a precautionary manner). The area within the imaginary boundary should, however, exclude significant areas where the species does not occur, and so in defining area of distribution, account should be taken of discontinuities or disjunctions in the spatial distribution of species. For migratory species, the area of distribution is the smallest area essential at any stage for the survival of that species (e.g. colonial nesting sites, feeding sites, etc.). For some species in trade where data exist to make an estimate, a figure of less than 10,000 km<sup>2</sup> has been found to be an appropriate guideline (not a threshold) of what constitutes a restricted area of distribution. However, this figure is presented only as an example, since it is impossible to give numerical values that are applicable to all taxa. There will be many cases where this numerical guideline does not apply</p>	No changes	None	<p>Minor changes as follows (new language underlined): <u>Area of distribution:</u> Area of distribution <u>of a species</u> is defined as the area contained within the shortest continuous imaginary boundary which can be drawn to encompass all the known, inferred or projected sites of occurrence, excluding cases of vagrancy <u>and introductions outside its natural range</u> (though inferring and projecting area of occurrence should be undertaken carefully, and in a precautionary manner). The area within the imaginary boundary should, however, exclude significant areas where the species does not occur, and so in defining area of distribution, account should be taken of discontinuities or disjunctions in the spatial distribution of species. For migratory species, the area of distribution is the smallest area essential at any stage for the survival of that species (e.g. colonial nesting sites, feeding sites, etc.). For some species <u>for which</u> data <u>are available</u> to make an estimate, a figure of less than 10,000 km<sup>2</sup> has been found to be an appropriate guideline (not a threshold) of what constitutes a restricted area of distribution. However, this figure is presented only as an example, since it is impossible to give numerical values that are applicable to all taxa. There will be many cases where this numerical guideline does not apply</p>	SSN has no objection to this change.

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
42	<p><u>Decline:</u> A decline is a reduction in the number of individuals, or a decrease of the area of distribution, the causes of which are either not known or not adequately controlled. It need not necessarily still be continuing. Natural fluctuations will not normally count as part of a decline, but an observed decline should not be considered part of a natural fluctuation unless there is evidence for this. A decline that is the result of a harvesting programme that reduces the population to a planned level, not detrimental to the survival of the species, is not covered by the term 'decline'. For some species in trade where data exist to make an estimate, a decrease of 50% or more in total within 5 years or two generations, whichever is the longer, has been found to be an appropriate guideline (not a threshold) of what constitutes a decline. A guideline (not a threshold) of what constitutes a decline in a small wild population could be 20% or more in total within ten years or three generations, whichever is the longer. However, both these figures are presented only as examples, since it is impossible to give numerical values that are applicable to all taxa. There will be many cases where these numerical guidelines do not apply</p>	No changes	JP: "replace the words 'the survival of the species' with 'the persistence of the population'"	<p>Delete and replace with: <u>Decline:</u> A decline is a reduction in the abundance or area of distribution of a species. Decline can be expressed in two different ways: (i) the overall long-term extent of decline or (ii) the recent rate of decline. The long-term extent of decline is the total estimated or inferred percentage reduction from a baseline level of abundance or area of distribution. The recent rate of decline is the percentage change in abundance or area of distribution over a recent time period. The estimated or inferred baseline for extent of decline should extend as far back into history as possible.</p> <p>A general guideline for a marked historical extent of decline is a percentage decline of 5%-30% of the baseline, depending on the biology of the species. The extremes of 5% and 30% will be applicable to only a relatively small number of species, but some species may even fall outside of these extremes.</p> <p>A general guideline for a marked recent rate of decline is a percentage decline of 50% or more in the last 10 years; if the population is small, a percentage decline of 20% or more in the last 10 years may be more appropriate. The percentage used should also depend on the biology of the species.</p> <p>The historical extent of decline and the recent rate of decline should be considered in conjunction with one another. A given rate of decline is of greater concern the higher the historical extent of decline.</p>	<p><b>SSN supports the recognition of long-term decline, but has difficulties with other proposed changes to this definition.</b></p> <p>The proposed language eliminates the concept of generation time, a factor of critical importance in judging a species' decline. The IUCN criteria for endangerment, for example, rely heavily on generation time. We recommend that the words "over a time frame appropriate to the species' life cycle and life form", already used in the definition of "possibly extinct" (see below) be substituted for the words "over a recent time period" in the first paragraph.</p> <p>No source is given for the threshold of 50% in ten years for "marked recent decline"; it is wholly inappropriate for whales, sea turtles and other long-lived species. No basis is given for the guidelines suggested in the new language.</p> <p>Numerical guidelines in the original text were clearly labeled "not a threshold" as a unanimous compromise after lengthy negotiations among the Parties. No Party has asked that this clarifying language be abandoned, and it is used in other proposed definitions in this Annex. The cautionary language ["However, both these figures are presented only as examples, since it is impossible to give numerical values that are applicable to all taxa. There will be many cases where these numerical guidelines do not apply"] is necessary and should be retained.</p>

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
43	<p><u>Extended period:</u> The meaning of the term extended period will vary according to the biological characteristics of the species. Selection of the period will depend upon the observed pattern of natural fluctuations in the abundance of the species and on whether the number of specimens removed from the wild is consistent with a sustainable harvesting programme that is based on these natural fluctuations</p>	No changes	None	No changes	
44	<p><u>Fragmentation:</u> Fragmentation refers to the case where most individuals within a taxon are found in small and relatively isolated sub-populations, which increases the probability that these small sub-populations will become extinct and the opportunities for re-establishment are limited. For some species in trade where data exist to make an estimate, an area of distribution of 500 km<sup>2</sup> or less for each sub-population has been found to be an appropriate guideline (not a threshold) of what constitutes fragmentation. However, this figure is presented only as an example, since it is impossible to give numerical values that are applicable to all taxa. There will be many cases where this numerical guideline does not apply</p>	No changes	None	No changes	
45	<p><u>Generation:</u> Generation is measured as the average age of parents in the population; except in the case of species that breed only once a lifetime, this will always be longer than the age at maturity</p>	No changes	None	Delete  <i>* CHAIRS' COMMENT 11: This term is no longer used in the criteria</i>	The term is still used in the definition of "Vulnerability" and should be used elsewhere.

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
46	<p><u>Large fluctuations:</u> Large fluctuations occur in a number of species where the population size or area of distribution varies widely, rapidly and frequently, with a variation greater than one order of magnitude. For some species in trade where data exist to make an estimate, a figure of two years or less has been found to be an appropriate guideline (not a threshold) of what constitutes a short-term fluctuation. However, this figure is presented only as an example, since it is impossible to give numerical values that are applicable to all taxa. There will be many cases where this numerical guideline does not apply</p>	No changes	None	<p>Replace with the following (new language underlined): <u>Fluctuations:</u> Fluctuations in population size or area of distribution are considered large when they vary widely, <u>rapidly or frequently</u>. <u>Where data exist to make an estimate, one order of magnitude has been found to be an appropriate guideline (not a threshold) for population size. Similarly, fluctuations can be considered “short term” if the period of fluctuation is about two years.</u> However, this figure is presented only as an example, since it is impossible to give numerical values that are applicable to all taxa. There will be many cases where this numerical guideline does not apply</p>	<p><b>Although the guidelines of “two years” and “one order of magnitude” are carried over from the original resolution, SSN believes they should be re-examined.</b> Neither the original nor the revised language considers generation time. However, biological fluctuations cannot be properly interpreted without knowing about the generation time and recruitment rate of the species involved.</p>
47	None	No changes	None	<p><u>Near Future</u> Refers to a time period in which it can be projected or inferred that a species would satisfy one (or more) of the criteria in Annex 1 unless it is included in Appendix II. Clearly this period will be taxon and case specific, however 5-10 years is considered an appropriate time period</p>	<p><b>SSN does not see a need to define this term</b>, particularly in numerical terms. The 5-10 year period appears to have been chosen arbitrarily.</p> <p>If the term must be defined, it should be on the basis of the biological characteristics of the species involved, including life span, time to maturity and recruitment rate, the nature of the threats the species faces. However, because these will vary on a case-by-case basis, a formal general definition of the term is unnecessary.</p>

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
48	<p><u>Population:</u> Population is measured as the total number of individuals of the species (as defined in Article I of the Convention). In the case of species biologically dependent on other species for all or part of their life cycles, biologically appropriate values for the host species should be chosen. For some species in trade where data exist to make an estimate, a figure of less than 5,000 individuals has been found to be an appropriate guideline (not a threshold) of what constitutes a small wild population. However, this figure is presented only as an example, since it is impossible to give numerical values that are applicable to all taxa. There will be many cases where this numerical guideline does not apply</p>	No changes	None	<p>Delete and replace with: <u>Population Issues</u></p> <p><u>Population</u> Population refers to the total number of individuals of the species (as species is defined in Article 1 of the Convention)</p> <p><u>Sub-population</u> Sub-populations are defined as geographically or otherwise distinct groups in the population between which there is limited genetic exchange</p> <p><u>Population size</u> When providing details on the size of a population or sub-population, it should be made clear whether the information presented relates to the effective population size or not. When estimating the effective population size, the following points should be born in mind. Where the population is characterized by natural fluctuations use the lower estimate. In most cases this will be much less than the mean Individuals that cannot produce recruits should not be counted (e.g. densities are too low for fertilization) This measure is intended to count individuals capable of reproduction and should therefore exclude individuals that are environmentally and behaviourally or otherwise reproductively suppressed in the wild For the number of individuals in populations with biased adult or breeding sex ratios it is appropriate to use lower estimates which take this into account (e.g. estimate effective population size) Reproducing units within a clone should be counted as individuals,</p>	<p><b>SSN does not, in general, see the need for the “population size” section, or the need to define <u>Small subpopulation</u> or <u>Very small subpopulation</u> in general terms.</b> The individual characteristics of species should, instead, be taken into account on a case-by-case basis when considering population matters.</p> <p><u>Sub-population:</u> Defining a subpopulation as is done here ignores mixtures of non-breeding individuals on the feeding grounds, such as happens with sea turtles.</p> <p><u>Population Size:</u> SSN believes that introducing the concept of “effective population size” will add considerably to the burden on Parties.</p> <p>For most species, it is difficult enough to determine the number of animals in a population, let alone determining the number capable of reproduction, or those who are actually adding recruits to the population. Even if it is possible for ongoing or future studies to estimate the number of reproductive members, baseline studies done in the past will probably not have done so. Therefore there will be no way to compare effective population sizes over time.</p> <p>Excluding individuals reproductively suppressed may ignore key animals like elderly elephant matriarchs.</p> <p>SSN also notes that this section ignores the direction of the Parties in Resolution Conf. 9.24 to review definitions “and their applicability to different groups of organisms”;</p>

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
49	<p><u>Possibly extinct:</u> A species is presumed extinct when exhaustive surveys in known and/or suspected habitat, and at appropriate times (diurnal, seasonal, annual), throughout its historic range have failed to record an individual. Before a species can be declared possibly extinct, surveys should take place over a time frame appropriate to the species' life cycle and life form</p>	No changes	None	<p>Replace “presumed” with “possibly” so that the text reads (new word underlined): <u>Possibly extinct:</u> A species is <u>possibly</u> extinct when exhaustive surveys in known and/or suspected habitat, and at appropriate times (diurnal, seasonal, annual), throughout its historic range have failed to record an individual. Before a species can be declared possibly extinct, surveys should take place over a time frame appropriate to the species' life cycle and life form</p>	The words “over a time frame appropriate to the species' life cycle and life form” – a clear reference to generation time and recruitment rate – should occur elsewhere, in definitions of terms like “decline”.
50	None	No changes	None	<p><u>Recruitment</u> Recruitment is the total number of individuals added to a given demographic class of a population by either sexual or asexual reproduction</p>	SSN has no objection to this change.
51	<p><u>Sub-populations:</u> Sub-populations are defined as geographically or otherwise distinct groups in the population between which there is little exchange. For some species in trade where data exist to make an estimate, a figure of less than 500 individuals has been found to be an appropriate guideline (not a threshold) of what constitutes a very small sub-population. However, this figure is presented only as an example, since it is impossible to give numerical values that are applicable to all taxa. There will be many cases where this numerical guideline does not apply</p>	No changes	None	Incorporated into “Population Issues”, above	SSN has no objection to this change.

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
52	<p><u>Threatened with extinction:</u> Threatened with extinction is defined by Annex 1. The vulnerability of a species to threats of extinction depends on its population demographics, biological characteristics, such as body size, trophic level, life cycle, breeding structure or social structure requirements for successful reproduction, and vulnerability due to aggregating habits, natural fluctuations in population size (dimensions of time and magnitude), residency/migratory patterns. This makes it impossible to give numerical values for population size or area of distribution that are applicable to all taxa</p>	No changes	None	No changes	

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
53	None	No changes	None	<p><u>Vulnerability</u>  Vulnerability can be defined as the susceptibility of a species to extinction risk.</p> <p>There are a number of taxon- or case-specific biological and other factors that are likely to affect the extension risk associated with a given percentage decline, small population size or restricted area of distribution. This can be, but are not limited to, any of the following:</p> <ul style="list-style-type: none"> <li>Life history (e.g. low fecundity, slow growth rate, high age at first maturity, long generation time)</li> <li>Low absolute numbers or biomass or restricted area of distribution</li> <li>Population structure (age/size structure, sex ratio)</li> <li>Behavioral factors (e.g. social structure, migration)</li> <li>Density (for sessile or semi-sessile species)</li> <li>Specialized niche requirements (e.g. diet, habitat, endemism)</li> <li>Species associations such as symbiosis and other forms of co-dependency</li> <li>Fragmentation</li> <li>Reduced genetic diversity</li> <li>Severe habitat loss</li> <li>Threats from disease or invasive species</li> <li>Rapid environmental change (e.g. climate regime shifts)</li> <li>Selectivity of removals (that may compromise recruitment)</li> </ul>	SSN has no objection to this change.
ANNEX 6: FORMAT FOR PROPOSALS TO AMEND THE APPENDICES					

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
54	<p><u>Format for proposals to amend the Appendices</u></p> <p>The following provides information and instructions for the submission of a proposal to amend the Appendices and the appropriate supporting statement. Proponents should be guided by the need to provide to the Conference of the Parties sufficient information, of sufficient quality and in sufficient detail (to the extent available), to allow the Conference to judge the proposal against the criteria established for the proposed action. This means that the relevant published and unpublished sources of information should be used, but acknowledges that for some species the amount of scientific information will be limited. Furthermore, this means that it may not be possible to address all elements of the Proposal Format</p>	<p>CWG proposed new text (underlined):</p> <p><u>Format for proposals to amend the Appendices</u></p> <p>The following provides information and instructions for the submission of a proposal to amend the Appendices and the appropriate supporting statement. Proponents should be guided by the need to provide to the Conference of the Parties sufficient information, of sufficient quality and in sufficient detail, to allow it to judge the proposal against the criteria established for the proposed action. <u>Parties are reminded that proposals should normally be limited to 12 pages (exclusive of references cited).</u></p> <p>This means that the relevant published and unpublished sources of information should be used, <u>although</u> for some species the amount of scientific information will be limited. <u>Where research has been undertaken specifically to obtain information for the proposal, it should be presented in sufficient detail to be assessed by the Parties.</u></p> <p>Furthermore, this means that it may not be possible to address all elements of the proposal format</p>	<p>DE: “there are many cases in which such precise data are not available. Therefore it has to be made sure that in the various paragraphs the term ‘if available’ is added whenever it is said that certain information has to be presented”</p> <p>GB: “each proposal should have a short (not exceeding 1 page) executive summary that covers the proposal, the proponent, compliance with the criteria and a summary of the rationale and other relevant factors”</p>	Same text as suggested by CWG	SSN has no objection to this change.

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
55	<p>A. <u>Proposal</u></p> <p>The proponent should indicate the intent of the specific action being proposed and the relevant criteria against which the proposal is to be judged</p> <ul style="list-style-type: none"> <li>- Inclusion in Appendix I</li> <li>- Inclusion in Appendix II</li> <li>- in accordance with Article II 2(a)</li> <li>- in accordance with Article II 2(b)</li> <li>- for reasons of look-alike problems (in this case, the name of the similar species already included in the Appendices should be given in section C 7. Additional Remarks)</li> <li>- for other reasons (such as those referred to in Annex 3 to this Resolution)</li> <li>- Transfer from Appendix I to Appendix II in accordance with a precautionary measure specified in Annex 4 to this Resolution</li> <li>- Deletion from Appendix II</li> <li>- Other action (provide explanation)</li> </ul>	<p>CWG proposed changes (underlined):</p> <p>A. <u>Proposal</u></p> <p>The proponent should indicate the specific <u>amendment to the Appendices</u> being proposed and <u>any relevant annotations or qualifications proposed.</u></p> <ul style="list-style-type: none"> <li>- Inclusion in Appendix I. <u>Specify which of the criteria in Annex 1 of the Resolution are satisfied.</u></li> <li>- Inclusion in Appendix II. <u>Specify which of the criteria in Annex 2 of the Resolution are satisfied.</u></li> <li>- in accordance with Article II 2(a)</li> <li>- in accordance with Article II 2(b)</li> <li>- for reasons of look-alike problems (in this case, the name of the similar species already included in the Appendices should be given in section C 7. Additional Remarks)</li> <li>- for other reasons (such as those referred to in Annex 3 to this Resolution)</li> <li>- Transfer from Appendix I to Appendix II in accordance with a precautionary measure specified in Annex 4 to this Resolution. <u>Specify which of the criteria in Annex 2 of this Resolution are satisfied; specify why the criteria in Annex 1 of this Resolution are no longer satisfied; specify which of the criteria and factors in Annex 4 of this Resolution are satisfied or implemented</u></li> <li>- Deletion from Appendix II. <u>Specify why the criteria in Annex 2 of this Resolution are not satisfied</u></li> <li>- Other action (provide explanation)</li> </ul>	<p>DE: “the advantage / difference of the new wording is not comprehensible and needs explanation”</p>	<p>Same text as suggested by CWG</p>	<p>SSN has no objection to this change.</p>

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
56	None	<u>Annotations</u> If a specific substantive annotation to the listing in the Appendices is proposed, the proponent should address: Whether the proposed annotation is in compliance with Resolution Conf. 11.20; and The practical intent of the annotation.	None	Same text as suggested by CWG	SSN has no objection to this change.
57	<u>B. Proponent</u> The proponent may only be a Party to the Convention, in accordance with Article XV of the Convention.	No changes	None	No changes	

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
58	<p>C. <u>Supporting statement</u>  <u>Taxonomy</u>  The proponent should provide sufficient information to allow the Conference of the Parties to identify clearly the taxon that is the subject of the proposal.</p> <p>1.1 Class  1.2 Order  1.3 Family  1.4 Genus, species or subspecies, including author and year. If the species concerned is included in one of the standard lists of names or taxonomic references adopted by the Conference of the Parties, the name provided by that reference should be entered here. If the species concerned is not included in one of the adopted standard references, the proponent should provide references as to the source of the name used.</p> <p>1.5 Scientific synonyms  1.6 Common names.  The proponent should provide information on other scientific names or synonyms under which the species concerned may be known currently, especially if these names are used in the trade in the species.</p> <p>1.7 Code numbers  If the species concerned is already included in the Appendices, refer to the code numbers in the CITES Identification Manual</p>	No changes	None	No changes	

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
59	None	<p>2. <u>Rationale</u>                      2.1 Overview. Provide a brief overview of key elements of the proposal. Parties may wish to cite key sections of the supporting statement</p> <p>2.2 Compliance with the criteria. Provide a brief summary of the relevant criteria in this Resolution and how the taxon complies with those criteria. In the case of a transfer from Appendix I to II, the proponent should address both the Appendix II criteria satisfied and why the Appendix I criteria are no longer satisfied. Parties may wish to cite key sections of the supporting statement.</p>	<p>DE: “point 2.1 and 2.2 is in fact a summary and not a rationale. The title should be amended accordingly”</p>	<p>2. <u>Overview</u>                      Provide a brief overview of key elements of the proposal. Parties should cite key sections of the supporting statement. Also explain how the species complies with the criteria in this Resolution</p>	<p>SSN has no objection to this change.</p>
60	<p>2. <u>Biological parameters</u></p> <p>The information required in this section is a summary of the principal results of surveys, literature searches, and other studies. The references used must be listed in section 8 of the proposal. It is understood that the quality of information available will vary a lot. But these instructions indicate the type of information that is required.</p>	<p>CWG suggested many changes (underlined):</p> <p>3. <u>Species Overview</u>                      The information required in this section is a summary of surveys, literature searches, and <u>relevant</u> studies. The references used must be listed in section <u>12</u> of the proposal. It is understood that the quality of <u>the</u> information available will vary a lot but these instructions indicate the type of information that is required. <u>If the proposal relates to a geographically separate population or subspecies, it should consider the biological species in its entirety for appropriate context, as well as draw attention to any significant parameters relevant to the entity covered by the proposal.</u></p>	<p>AU: “this section should include information on where a species varies (genetically, morphologically or in habitat) across its range”</p> <p>DE: “the heading of this chapter would be better characterized by the words “Species Characteristics”</p> <p>US: “we support considering a species in its entirety. However, if a species has an extensive range and shows variation in population size and growth or decline in different areas, this needs to be presented in a proposal.”</p>	<p>Slightly shortened version proposed by CWG</p> <p>3. <u>Species Characteristics</u>                      The information required in this section is a summary of surveys, literature searches, and <u>relevant</u> studies. The references used must be listed in section <u>12</u> of the proposal. It is understood that the quality of <u>the</u> information available will vary a lot but these instructions indicate the type of information that is required. <u>If the proposal relates to a geographically separate population or subspecies, it should consider where relevant the biological species in its entirety for appropriate context.</u></p>	<p>SSN has no objection to this change.</p>

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
61	<p>2.1 <u>Distribution</u></p> <p>Give an estimate of the current range of the species, and specify the references used. Specify the types of habitats occupied and, if possible, the extent of each habitat type over the range of the species. If possible, provide information to indicate whether or not the distribution of the species is continuous and, if it is not, indicate to what degree it is fragmented.</p>	<p>3.1 <u>Distribution</u></p> <p><u>Specify</u> the current range of the species. If possible, provide information to indicate whether or not the distribution of the species is continuous and, if it is not, indicate to what degree it is fragmented.</p>	<p>FR: add the words '(its size or/and its fragmentation)' after the word 'Distribution'"</p> <p>DE: 'the extent of each habitat type over the range of the species' is an important aspect and seems to have got lost ... it should be included again at an appropriate place"</p>	<p>Same text proposed by the CWG</p>	<p><b>SSN prefers the original wording.</b> "Give an estimate of the current range ..." as there are not always sufficient data available to "specify" the current range.</p>
62	<p>2.2 <u>Habitat availability</u></p> <p>Give information on the nature, rate and extent of habitat loss and/or degradation, if possible with information from at least three points in time, and give the basis for future projections</p>	<p>CWG recommended replacing the text with:</p> <p>3.2 <u>Habitat</u></p> <p>Specify the types of habitat occupied by the species and, when relevant, the degree of habitat specificity</p>	<p>None</p>	<p>3.2 <u>Habitat</u></p> <p>Specify the types of habitat occupied by the species and, when relevant, the degree of habitat specificity and the extent of each habitat type over the range of the species.</p>	<p>SSN has no objection to this change.</p>
63	<p>None</p>	<p>3.3 <u>Biological Characteristics:</u></p> <p>Provide a summary of general biological and life history characteristics of the species, particularly those that are relevant to population dynamics or to this proposal (e.g., reproduction, recruitment, survival rate, immigration, emigration, sex ratio, regeneration, reproductive strategies)</p>	<p>DE: "an important aspect of the biology of a species is the question of migration and this term should be added"</p>	<p>3.3 <u>Biological Characteristics:</u></p> <p>Provide a summary of general biological and life history characteristics of the species (e.g., reproduction, recruitment, survival rate, migration, sex ratio, regeneration, reproductive strategies)</p>	<p>SSN has no objection to this change.</p>
64	<p>None</p>	<p>None</p>	<p>None</p>	<p>3.4 <u>Morphological Characteristics:</u></p> <p>Provide a general description of the morphological diagnostic characteristics of the species, including colour, and information on morphological features by which they species can be differentiated from taxonomically closely related species</p>	<p>SSN has no objection to this change.</p>

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
65	<p>2.6 <u>Role of the species in its ecosystem</u> Give information about the specific relationship that exists between this species and others living in the same ecosystem. Indicate the possible consequences of depletion of the population of the species proposed for listing, for those depending on or associated with it.</p>	<p>3.4 <u>Role of the species in its ecosystem</u> Give information about the role of this species in its ecosystem, and other relevant ecological information, as well as the potential impact of this proposal on that role.</p>	<p>DE: “we suggest to maintain the previous text” US: “in addition to the proposed text, we recommend adding: ‘Explain if the elimination of this role will have a secondary effect that may threaten the survival of the species itself’”</p>	<p>Same text proposed by CWG except “if available” added to front  3.5 <u>Role of the species in its ecosystem</u> If available, provide information about the role of this species in its ecosystem, and other relevant ecological information, as well as the potential impact of this proposal on that role.</p>	<p><b>SSN prefers the original wording.</b> The emphasis should be on the impact of depletion of the population, not the potential impact of the proposal. The former wording stresses the importance of the population (as opposed to the species), a more important unit when considering ecological role.</p>
66	None	<p>4. <u>Status and trends</u> This section includes qualitative and quantitative information that allow past and present trends to be evaluated pursuant to the criteria. The sources used must be referenced in section 12 of the proposal. It is understood that the quality of the information available will vary, but these instructions indicate the type of information that is required. If the proposal relates to a geographically separate population or subspecies, it should consider the biological species in its entirety for appropriate context, as well as draw attention to any significant parameters relevant to the entity covered by the proposal. If available, the proposal should include any relevant quantitative analyses, stock assessments, etc. When noting status and trends, the proposal should note whether conclusions are based on observations, inferences, or projections.</p>	<p>AU: “should include information on the number of different age classes, where known, reproductive status of the population, recruitment success and whether reproduction is limited to certain areas or populations (source / sink) or migratory” GB: “this section might more usefully reflect the structure of Annex A, e.g. dealing first with distribution and range, followed by discussion of population size and structure, followed then by a section on trends”</p>	<p>A modification of the CWG proposal. 4. <u>Status and trends</u> This section includes qualitative and quantitative information that allow past and present trends to be evaluated pursuant to the criteria. The sources used must be referenced in section 12 of the proposal. It is understood that the quality of the information available will vary, but these instructions indicate the type of information that is required. If the proposal relates to a geographically separate population or subspecies, it should consider, when relevant, the biological species in its entirety for appropriate context. If available, the proposal should include any relevant quantitative analyses, stock assessments, etc. The proposal should note whether conclusions are based on observations, inferences, or projections.</p>	<p>SSN believes that in the phrase “the type of information that is required” the word “required” should be replaced by “appropriate”. There is no mechanism in the Convention for rejecting a proposal, except by a vote of the Parties, merely because it fails to meet formal “requirements”.</p>

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
67	None	<p><u>4.5 Habitat Trends</u> Give information on the nature, rate and extent of habitat change (e.g. loss, degradation, or modification), noting when applicable the degree of fragmentation and discernable changes in the quality of habitat. Where appropriate, the relationship between habitat and population trends should be described.</p>	None	Same text proposed by CWG, except that it is number 4.1 instead of 4.5	The new wording has been taken from old paragraph 2.2, "Habitat availability". However, paragraph 2.2 also contained the words "give the basis for future projections". These words have been deleted. They should be retained here.
68	<p><u>2.3 Population status</u> Give an estimate of the total population or number of individuals with: i) date and nature of census; and ii) justification for any inferences made about total population size and/or number of individuals. Give the number of sub-populations, where possible their estimated size, and the date and method of census. Give an estimate of, or information on, the size of the population in captivity</p>	<p><u>4.1 Population size</u> Give an estimate of the current total population or number of individuals, or other indices of population abundance, based on the most recently available data. Where appropriate to the proposal of the criteria used, provide the number of sub-populations, and their estimated sizes.</p>	<p>AU: "should include information on where a species is being listed, and the inclusion of genetic variability" US: "the concept we are really concerned about is not just the number of individuals, but of effectively reproductive individuals, their success reproducing, and recruitment into that group. In the descriptions of a species' status, criteria should be included for how population size was determined ... habitat fragmentation can have drastic effects on population size, or the pool of interbreeding individuals in an area, and the criteria should provide for this; after 'population abundance', add: 'genetic variability'" GB: "should include specific reference to distinguishing numbers of mature individuals from juvenile or sub-adult individuals"</p>	<p><u>4.2 Population size</u> Give an estimate of the current total population or number of individuals differentiated by relevant age class where possible, or other indices of population abundance, based on the most recently available data. Where appropriate provide the number of sub-populations and their estimated sizes.</p>	The requirement to estimate numbers "differentiated by relevant age class" is often impossible to fulfill (though we note that this information is only to be given "where possible"). <b>SSN believes that the requirement to give "date and method of census" should be retained</b> so that the reported population sizes can be properly evaluated.
69	None	<p><u>4.3 Population structure</u> Provide basic information on the current structure of the population and any past or current changes over time in that structure (e.g. population demographics, proportion of mature individuals, sex ratio)</p>	DE: "an important aspect of the population structure of a species is the question of the social structure of the population. This term should be added"	<p><u>4.3 Population structure</u> Provide basic information on the current structure of the population and any past or current changes over time in that structure (e.g. social structure, population demographics, proportion of mature individuals, sex ratio)</p>	SSN has no objection to this change.

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
70	<p><u>2.4 Population trends</u> Basic, quantitative and referenced information should be provided on whether the population of the species is increasing, stable or declining. The period over which the trend, if any, has been measured should be indicated. If the species naturally undergoes marked fluctuations in population size, information should be provided to demonstrate that the trend transcends natural fluctuations. If generation-time has been used in estimating the trend, state how the generation-time has been estimated.</p>	<p><u>4.2 Population trends</u> Basic, quantitative information should be provided <u>on current trends in the species's abundance</u> whether the population of the species is increasing, stable or declining, <u>and past trends in the species's abundance, when available</u>. The period over which these trends, if any, have been measured should be indicated. If the species naturally undergoes marked fluctuations in population size, information should be provided to demonstrate that the trend transcends natural fluctuations. If generation-time has been used in estimating the trend, state how the generation-time has been estimated.</p>	<p>DE: "the term 'qualitative' must be added"</p>	<p><u>4.4 Population trends</u> Basic, quantitative <u>and qualitative</u> information, <u>when available</u>, should be provided <u>on current and past trends in the species' abundance</u>. The period over which these trends, if any, have been measured should be indicated. If the species naturally undergoes marked fluctuations in population size, information should be provided to demonstrate that the trend transcends natural fluctuations. If generation-time has been used in estimating the trend, state how the generation-time has been estimated.</p>	<p>SSN has no objection to this change.</p>
71	<p><u>2.5 Geographic trends</u> Give data on the nature, rate and extent of decrease in range area or number of sub-populations, if possible with information from at least three points in time. Give data on the degree and periodicity of fluctuations in range area or number of sub-populations, if possible with information from at least three points in time</p>	<p>Replace with: <u>4.4 Geographical Trends</u> Basic, quantitative information should be provided on current trends in the species' distribution [whether the species' area of distribution is increasing, stable or declining], and past trends in the species' area of distribution, when available. The period over which these trends, if any, have been measured should be indicated. If relevant, give data on the degree and periodicity of fluctuations in the area of distribution.</p>	<p>DE: "the term 'qualitative' must be added"</p>	<p><u>4.5 Geographical Trends</u> Provide information, when available on current and past trends in the species' distribution, indicating the period over which these trends, if any, have been measured. If relevant, give data on the degree and periodicity of fluctuations in the area of distribution.</p>	<p>SSN has no objection to this change.</p>

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
72	<p>2.6 <u>Role of the species in its ecosystem</u> Give information about the specific relationship that exists between this species and others living in the same ecosystem. Indicate the possible consequences of depletion of the population of the species proposed for listing, for those depending on or associated with it.</p>	<p>3.4 <u>Role of the species in its ecosystem</u> Give information about the role of this species in its ecosystem, and other relevant ecological information, as well as the potential impact of this proposal on that role.</p>	<p>DE: “we suggest to maintain the previous text” US: “in addition to the proposed text, we recommend adding: ‘Explain if the elimination of this role will have a secondary effect that may threaten the survival of the species itself’”</p>	<p>Same text proposed by CWG except “if available” added to front  3.5 <u>Role of the species in its ecosystem</u> If available, provide information about the role of this species in its ecosystem, and other relevant ecological information, as well as the potential impact of this proposal on that role.</p>	<p>SSN has no objection to this change.</p>
73	<p>2.7 <u>Threats</u> Specify the nature, intensity and extent of threats (e.g. habitat loss and/or degradation; exploitation; effects of introduced species, competitors, pathogens, parasites, predators, hybridization and the effects of toxins and pollutants; etc), if possible with information from at least three points in time, and give the basis for future projections</p>	<p>Replace with: 5. <u>Threats</u> Specify the nature, intensity and <u>relative importance</u> of threats (e.g. habitat loss and/or degradation; <del>over-</del>exploitation; effects of introduced species, competitors, pathogens, parasites, predators, hybridization, toxins and pollutants; etc). <u>Discuss in particular the relative importance of exploitation for international trade as a threat to the species in question.</u></p>	<p>DE: “it may be impossible to specify the relative importance of different threats. Therefore the term ‘if possible’ should be included before the word ‘relative importance’” IL: “the proposed changes imply that species can only be listed if trade is an important factor in their decline. The Convention should provide protection to threatened species even if trade is a minor cause of their threatened status”</p>	<p>Same text proposed by CWG</p>	<p>Assessing the “relative importance” of threats may be impossible and in any case is not relevant to the Convention, which only requires that a species be affected by trade. <b>The reference to “relative importance”, and the last sentence of the proposed language, should therefore be deleted.</b></p>

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
74	<p>3. <u>Utilization and trade</u></p> <p>3.1 <u>National utilization</u></p> <p>Give data on the level of exploitation, indicating trends if possible. Specify the purposes of exploitation. Provide details of harvest methods. Assess the importance of the offtake and the relationship between national and international trade. Provide details of any stockpiles known to exist, and the measures that might be taken to dispose of them. Where applicable, provide details of commercial captive-breeding or artificial propagation operations for the species in question, including the size of captive stock and the production, and the extent to which these operations are either contributing to a conservation programme or meeting a demand that would otherwise be met by specimens from the wild.</p>	<p>6. <u>Utilization and Trade</u></p> <p>1.6 <u>National Utilization</u></p> <p>Specify the types and extent of all uses of the species, indicating trends if possible. Provide details of harvest methods. Provide details of any stockpiles known to exist, and the measures that might be taken to dispose of them.</p>	None	Same text proposed by CWG	SSN has no objection to this change.

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
75	<p><u>3.2 Legal international trade</u> Quantify the level of international trade, identifying the source of statistics used (e.g. Customs statistics, CITES annual report data, FAO data, industry reports, etc.). Provide justification for inferences made about trade levels. Provide information about the nature of the trade (e.g. primarily for commercial purposes, primarily live specimens, primarily parts and derivatives, primarily of captive-bred or artificially propagated specimens, etc.) and about how the proposed amendment is expected to affect the nature of the trade</p>	<p>CWG proposed adding two sentences to the end (see underlined): <u>6.2 Legal trade</u> Quantify the level of international trade, identifying the source of statistics used (e.g. Customs statistics, CITES annual report data, FAO data, industry reports, etc.). Provide justification for inferences made about trade levels. Provide information about the nature of the trade (e.g. primarily for commercial purposes, primarily live specimens, primarily parts and derivatives, primarily of captive-bred or artificially propagated specimens, etc.) and about how the proposed amendment is expected to affect the nature of the trade. <u>Discuss which parts and derivatives are or will be primarily in trade. Assess the importance of the offtake and the relationship between national and international trades.</u></p>	None	Same text proposed by CWG	SSN has no objection to this change.
76	<p><u>3.3 Illegal trade</u> To the extent possible, quantify the level of illegal trade, including national and international trade, and provide details of the nature of this trade. Assess the relative importance of this trade as it relates to legal offtake for national use or legal international trade. Provide information on how the proposed amendment is expected to affect the nature of the trade.</p>	<p>CWG proposed minor modifications (underlined): <u>6.3 Illegal trade</u> To the extent possible, quantify the level of illegal trade, <u>nationally and internationally, and describe its nature.</u> Assess the relative importance of this trade as it relates to legal offtake for national use or legal international trade. Provide information on how the proposed amendment is expected to affect the nature of the trade.</p>	None	Same text proposed by CWG	SSN has no objection to this change.

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
77	<p>3.4 <u>Actual or potential trade impacts</u>            Comment on the actual or potential trade impacts of the proposed amendment on the species in question, and on the reason for believing that trade might become a threat to the survival of the species in question, or on whether trade may be beneficial to the survival of the species in question. Where applicable, include information on the actual or potential ecological impacts of the change in trade controls</p>	<p>6.4 <u>Actual or potential trade impacts of the proposal</u>            Comment on the actual or potential trade impacts of the proposed amendment on the species in question.</p>	None	Same text proposed by CWG	<p><b>The original last sentence referring to ecological impact should be retained</b>, as the text of the Convention emphasizes the ecological role of a species.</p>
78	<p>3.5 <u>Captive breeding or artificial propagation for commercial purposes (outside country of origin)</u>            To the extent possible, provide information on the extent of captive breeding or artificial propagation outside the country or countries of origin</p>	Move to 8.4	None	Move to 8.4	SSN has no objection to this change.

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
79	<p>4. <u>Conservation and management</u></p> <p>4.1 <u>Legal status</u></p> <p>4.1.1 <u>National</u></p> <p>Provide details of legislation relating to the conservation of the species, including its habitat, either specifically (such as endangered species legislation) or generally (such as legislation on wildlife and accompanying regulations). Indicate the nature of legal protection (i.e. is the species totally protected, or whether harvesting is regulated or controlled). Provide an assessment of the effectiveness of this legislation in ensuring the protection and/or wise management of the species. Provide similar information relating to legislation governing the management of trade in the species in question. Provide an assessment of the effectiveness of this legislation in controlling illegal trade in the species.</p>	<p>7. <u>Legal status</u></p> <p>7.1 <u>National</u></p> <p>Provide details of legislation relating to the conservation of the species, including its habitat, either specifically (such as endangered species legislation) or generally (such as legislation on wildlife and accompanying regulations). Indicate the nature of legal protection (i.e. is the species totally protected, or whether harvesting is regulated or controlled). Provide an assessment of the effectiveness of this legislation in ensuring the <u>conservation</u> of the species. Provide similar information relating to legislation governing the management of trade in the species in question. Provide an assessment of the effectiveness of this legislation in controlling illegal trade in the species</p>	<p>DE: “we suggest to add the term ‘Conservation’ in the heading”</p>	<p>Same text proposed by CWG except that “and/or management” is added after “conservation”:</p> <p>7. <u>Legal status</u></p> <p>7.1 <u>National</u></p> <p>Provide details of legislation relating to the conservation of the species, including its habitat, either specifically (such as endangered species legislation) or generally (such as legislation on wildlife and accompanying regulations). Indicate the nature of legal protection (i.e. is the species totally protected, or whether harvesting is regulated or controlled). Provide an assessment of the effectiveness of this legislation in ensuring the <u>conservation and/or management</u> of the species. Provide similar information relating to legislation governing the management of trade in the species in question. Provide an assessment of the effectiveness of this legislation in controlling illegal trade in the species</p>	<p>SSN has no objection to this change.</p>

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
80	<p>4.1.2 <u>International</u>                      In preparing proposals to amend the Appendices, consult in advance with the relevant competent intergovernmental organizations responsible for the conservation and management of the species, and take their views fully into account. Provide details of international instruments relating to the species in question, including the nature of the protection afforded by such instruments. Provide an assessment of the effectiveness of these instruments in ensuring the protection and/or wise management of the species. Provide similar information relating to international instruments relating to the management of trade in the species in question. Provide an assessment of the effectiveness of these instruments in controlling illegal trade in the species</p>	<p>7.2 <u>International</u>                      Provide details of international instruments relating to the species in question, including the nature of the protection afforded by such instruments. Provide an assessment of the effectiveness of these instruments in ensuring the <u>conservation</u> of the species. Provide similar information <u>on</u> international instruments relating to the management of trade in the species in question.</p>	<p>DE: “this is an important aspect and seems to have got lost in the process of reorganizing the format. It should be included again”</p>	<p>Same text proposed by CWG</p>	<p>SSN has no objection to this change.</p>
81	<p>4. <u>Species Management</u>                      4.2.1 <u>Population monitoring</u>                      Provide details of programmes in place in the range States to monitor the status of wild populations and the sustainability of offtake from the wild. Such programmes might be under the auspices of government or through non-governmental organizations or scientific institutions. Indicate the extent to which non-governmental monitoring programmes link to governmental decision-making</p>	<p>8. <u>Species Management</u>                      8.2 <u>Population monitoring</u>                      Provide details of programmes in place to monitor the status of wild populations and the sustainability of offtake from the wild.</p>	<p>None</p>	<p>Same text proposed by CWG</p>	<p><b>SSN believes that the original language referring to non-governmental organizations and scientific institutions should be restored.</b></p>

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
82	<p>4.2.2 <u>Habitat conservation</u> Provide details of programmes in place in the range States to protect the habitat of the species in question, both inside and outside protected areas. Provide details about the nature of the protection offered by the programmes in question</p>	<p>Move to 8.5</p>	<p>None</p>	<p>Move to 8.5</p>	<p>SSN has no objection to this change.</p>
83	<p>4.2.3 <u>Management measures</u> Provide details of programmes in place in the range States to manage populations of the species in question (e.g. controlled harvest from the wild, captive breeding or artificial propagation, reintroduction, ranching, quota systems, etc.). Include, where appropriate, details such as planned harvest rates, planned population sizes, mechanisms for ensuring that the advice of those responsible for management of the species is taken into account, mechanisms and criteria for the establishment of quotas, etc. Where applicable, provide details of any mechanisms used to ensure a return from utilization of the species in question to conservation and/or management programmes (e.g. pricing schemes, community ownership plans, export tariffs, etc.).</p>	<p>8.1 <u>Management measures</u> Provide details of programs in place in the range States to manage populations of the species in question (e.g. controlled harvest from the wild, captive breeding or artificial propagation, reintroduction, ranching, quota systems, etc.). Include, where appropriate, details such as planned harvest rates, planned population sizes, mechanisms and criteria for the establishment and implementation of quotas, etc. Where applicable, provide details of any mechanisms used to ensure a return from utilization of the species in question to conservation and/or management programmes (e.g. pricing schemes, community ownership plans, export tariffs, etc.)</p>	<p>AU: "should include information regarding any protected areas established within the range of the species, and any critical habitat determined and protected" DE: "the previous text of this paragraph included the following aspect as part of the management: mechanisms for ensuring that the advice of those responsible for management of the species is taken into account. This is necessary e.g. to make sure the quotas suggested by a Scientific Authority within a management plan are respected and not neglected by the Management Authority" US: "adding 'and habitats' after 'populations of the species', and 'protection of key habitat values, projected area of area habitat protected, and the effectiveness of these measures' after 'implementation of quotas'" IL: "the proposed paragraph suggests that appropriate pricing schemes and tariffs could be used to counterbalance over-exploitation of threatened species. This concept seems to imply that high prices or tariffs could atone for poor conservation of threatened species"</p>	<p>Same text proposed by CWG</p>	<p><b>The reference to "mechanisms for ensuring that the advice of those responsible for management of the species is taken into account" in the original text should be retained.</b></p>

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
84	<p>4.3 <u>Control measures</u></p> <p>4.3.1 <u>International trade</u> Provide information regarding measures in place, in addition to CITES, to control the movement of specimens of the species in question across international borders. Include information about marking schemes in place, if any</p> <p>4.3.2 <u>Domestic measures</u> Provide information regarding controls in the range States aimed at ensuring a sustainable harvest from the wild of the species in question. Include information on education, compliance and enforcement activities as appropriate and an assessment of the effectiveness of the programmes</p>	<p>Other than renumbering, CWG suggested only minor changes (underlined):</p> <p>8.3 <u>Control measures</u></p> <p>8.3.1 <u>International control measures</u> Provide information <u>on</u> measures in place, in addition to CITES, to control the movement of specimens of the species in question across international borders. Include information about marking schemes in place, if any.</p> <p>8.3.2 <u>Domestic control measures</u> Provide information regarding controls in the range States aimed at ensuring a sustainable harvest from the wild of the species in question. Include information on education, compliance and enforcement activities as appropriate and an assessment of the effectiveness of the programmes.</p>	None	<p>Text is same proposed by CWG except the titles of 8.3.1 and 8.3.2:</p> <p>8.3 <u>Control measures</u></p> <p>8.3.1 <u>International</u> Provide information <u>on</u> measures in place, in addition to CITES, to control the movement of specimens of the species in question across international borders. Include information about marking schemes in place, if any.</p> <p>8.3.2 <u>Domestic</u> Provide information regarding controls in the range States aimed at ensuring a sustainable harvest from the wild of the species in question. Include information on education, compliance and enforcement activities as appropriate and an assessment of the effectiveness of the programmes.</p>	SSN has no objection to this change.

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
85	<p><u>3.5 Captive breeding or artificial propagation for commercial purposes (outside country of origin)</u> To the extent possible, provide information on the extent of captive breeding or artificial propagation outside the country or countries of origin</p>	<p><u>8.4 Captive breeding</u> Where applicable, provide details of commercial captive breeding or artificial propagation operations for the species in question within the country in question, including the size of captive stocks and the production, and the extent to which these operations are either contributing to a conservation programme or meeting a demand that would otherwise be met by specimens from the wild. Discuss any management implications of captive breeding or artificial propagation programs. Also provide information on the extent of captive breeding or artificial propagation outside the country or countries of origin to the extent possible.</p>	<p>US: “add ‘including plantations’ after ‘artificial propagation operations’</p>	<p>Same text proposed by CWG except that “including plantations” was added after “artificial propagation operations”:</p> <p><u>8.4 Captive breeding</u> Where applicable, provide details of commercial captive breeding or artificial propagation operations, including plantations, for the species in question within the country in question, including the size of captive stocks and the production, and the extent to which these operations are either contributing to a conservation programme or meeting a demand that would otherwise be met by specimens from the wild. Discuss any management implications of captive breeding or artificial propagation programs. Also provide information on the extent of captive breeding or artificial propagation outside the country or countries of origin to the extent possible.</p>	<p>SSN has no objection to this change.</p>
86	<p><u>4.2.2 Habitat conservation</u> Provide details of programmes in place in the range States to protect the habitat of the species in question, both inside and outside protected areas. Provide details about the nature of the protection offered by the programmes in question</p>	<p><u>8.5 Habitat conservation</u> Provide details of programs in place in the range States to protect the habitat of the species in question, both inside and outside protected areas. Provide details about the nature of the protection offered by the programmes in question</p>	<p>US: “add ‘in the case of trees, assuring that harvesting practices are designed to protect the habitat that the trees themselves provide’</p>	<p>Complete re-wording:</p> <p><u>8.5 Habitat conservation</u> Provide information, where available, regarding the number, size and type of protected areas relevant to the habitat of the species, and on habitat conservation programmes outside protected areas.</p>	<p>SSN has no objection to this change.</p>

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
87	None	<p>8.6 <u>Safeguards</u>                      In the case of down-listing or delisting proposals, or of proposals involving substantive annotations, address any relevant safeguards.                      If the proposed amendment is likely to lead to an increase in trade in the species concerned, explain why this would not result in unsustainable trade in similar species.</p>	None	Same text proposed by CWG	SSN has no objection to this change.
88	<p>5. <u>Information on similar species</u>                      Give the names of species of which specimens in trade look very similar, state how they may be distinguished, and explain whether or not it is reasonable to expect an informed non-expert to be able to make a firm identification. Outline measures that would need to be taken to handle potential difficulties in distinguishing between specimens of this and similar species. If the proposed amendment would be likely to lead to an increase in trade in the species concerned, explain why this would not result in unsustainable trade in similar species</p>	<p>CWG suggested adding some text (underlined) and deleting the last sentence:                      9. <u>Information on similar species</u>                      Give the names of species of which specimens in trade look very similar, state how they may be distinguished, <u>based on the commodities or parts and derivatives most common in trade</u>, and explain whether or not it is reasonable to expect an informed non-expert to be able to make a firm identification. Outline measures that would need to be taken to handle potential difficulties in distinguishing between specimens of this and similar species</p>	None	<p>New text underlined:                      9. <u>Information on similar species</u>                      Give the names of species of which specimens in trade look very similar. <u>Provide details on</u> how they may be distinguished, <u>based on the commodities or parts and derivatives most common in trade</u>, and explain whether or not it is reasonable to expect an informed non-expert to be able to make a firm identification. <u>Provide details on how to resolve</u> potential difficulties in distinguishing specimens of this <u>from those of</u> similar species</p>	SSN has no objection to this change.

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

Row	Relevant Text of RC 9.24	CWG Proposed Language (Doc. ACPC 1.6, Annex 2)	Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)	Proposed Language in Notification 2001/037	SSN Comments
89	<p>6. <u>Other comments</u> Provide details of the consultation undertaken to secure comments on the proposal from the range States of the species, either through direct contact or via the CITES Secretariat. Comments received from each country should be provided. Where comments were sought but not received in sufficient time to enable their inclusion in the supporting statement, this should be noted, as well as the date of the request.</p> <p>In cases of consultation with Parties via the CITES Secretariat, information from range States and non-range States should be separated.</p> <p>In the case of species that are also managed through other international agreements or intergovernmental bodies, provide details of the consultations undertaken to obtain the comments of those organizations or bodies, and indicate how those comments have been addressed in the supporting statement. Where comments were sought but not received in sufficient time to enable their inclusion in the supporting statement, this should be noted, as well as the date of the request</p>	No changes	None	<p>Title change and new first sentence (underlined):</p> <p>10. <u>Consultations</u> <u>Provide details on the consultation undertaken to secure comments from the relevant competent intergovernmental organizations responsible for the conservation and management of the species, as required under the relevant Resolutions, and take their view fully into account.</u></p> <p>Provide details of the consultation undertaken to secure comments on the proposal from the range States of the species, either through direct contact or via the CITES Secretariat. Comments received from each country should be provided. Where comments were sought but not received in sufficient time to enable their inclusion in the supporting statement, this should be noted, as well as the date of the request.</p> <p>In cases of consultation with Parties via the CITES Secretariat, information from range States and non-range States should be separated.</p> <p>In the case of species that are also managed through other international agreements or intergovernmental bodies, provide details of the consultations undertaken to obtain the comments of those organizations or bodies, and indicate how those comments have been addressed in the supporting statement. Where comments were sought but not received in sufficient time to enable their inclusion in the supporting statement, this should be noted, as well as the date of the request</p>	<p><b>SSN objects to the new language.</b> The requirement that Proponents must take views of inter-governmental agencies into account in their proposals is much stronger wording than the original; however, it is not clear what “take their view fully into account” actually means. If it means that the views of such organizations are to supersede those of the Parties, the requirement violates both the Convention and state sovereignty. The original language, requiring only that such organizations be consulted, should be retained.</p>

Explanatory table sent to the Canadian Management Authority by the *International Wildlife Coalition* and the *Listing Criteria Working Group of the Species Survival Network* presenting their own comments on the CITES Criteria Draft resolution

<b>Row</b>	<b>Relevant Text of RC 9.24</b>	<b>CWG Proposed Language (Doc. ACPC 1.6, Annex 2)</b>	<b>Comments of Parties Recorded in Doc. ACPC 1.6, Annex 2)</b>	<b>Proposed Language in Notification 2001/037</b>	<b>SSN Comments</b>
90	7. <u>Additional remarks</u>	No changes	None	No changes except that it is now 11	SSN has no objection to this change.
91	8. <u>References</u>	No changes	None	No changes except that it is now 12	SSN has no objection to this change.