

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES  
OF WILD FAUNA AND FLORA

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National Reports

UNITED STATES OF AMERICA

Report of imports of *Swietenia macrophylla* into the United States

**Introduction**

This report was prepared by the CITES Management Authority of the United States. The United States is the world's largest importer of *Swietenia macrophylla* (bigleaf mahogany) (Robbins 2000). The report is presented in six sections. The first section describes the U.S. national regulations for trade control in *S. macrophylla*. The second section provides a summary in tabular form, of volumes of *S. macrophylla* imported into the United States during 1997-1999, based on U.S. CITES Annual Report data. The third section provides information on problems with the use of CITES documentation accompanying *S. macrophylla* imports into the United States. This section also provides actions that the United States has taken to resolve these problems. The fourth section contains information, as far as is known by the United States, on illegal trade in *S. macrophylla*. The fifth section lists general steps taken by the United States to improve CITES implementation for *S. macrophylla*. The sixth section suggests other measures to improve CITES implementation for *S. macrophylla*.

**I. National regulations for trade control in *Swietenia macrophylla***

CITES is implemented in the United States under the Endangered Species Act (ESA). The regulations that implement CITES under the ESA are in Title 50, Part 23, of the U.S. Code of Federal Regulations (50 CFR 23).

The U.S. Fish and Wildlife Service (USFWS) is the primary agency designated under the ESA for implementing CITES in the United States. The USFWS Division of Management Authority (DMA), the U.S. CITES Management Authority, is the office responsible for the issuance of U.S. CITES permits/certificates, including CITES documentation for exports/re-exports of *S. macrophylla* from the United States. DMA is also responsible for compiling the U.S. CITES Annual Report, which includes all U.S. import, export, and re-export data regarding *S. macrophylla*.

The U.S. Department of Agriculture's Animal and Plant Health Inspection Service (APHIS) is the agency in the United States responsible for the inspection and clearance of shipments of CITES-listed plant material (including *S. macrophylla*) imported into, and exported/re-exported from the United States. Upon arrival in the United States, each shipment of timber commodities is first inspected by the U.S. Customs Service. If upon inspection Customs determines that a particular timber shipment contains *S. macrophylla* or another CITES-listed timber species, Customs directs that shipment to APHIS for CITES inspection and clearance.

## II. Volumes of *Swietenia macrophylla* imported into the United States during 1997-1999

The following tables summarize U.S. imports of *S. macrophylla* recorded by DMA during 1997, 1998, and 1999. The information was compiled from U.S. CITES Annual Report data. Shipments listed on foreign CITES export documents in board feet were converted to cubic meters in our Annual Report database and, therefore, in these summary tables (using the conversion factor of: 1 board foot = 0.00236 cubic meters):

### U.S. imports of *Swietenia macrophylla* during 1997, by country of origin

Country of origin	Country of export	Quantity	Unit	Type of specimen	Purpose	Source	Status	No. of shipments
Belize	None	233	m <sup>3</sup>	Sawn Wood	Commercial	Wild	Cleared	13
Belize	Mexico	73	m <sup>3</sup>	Sawn Wood	Commercial	Wild	Cleared	2
Bolivia	None	21,334	m <sup>3</sup>	Sawn Wood	Commercial	Wild	Cleared	167
Brazil	None	27,229	m <sup>3</sup>	Sawn Wood	Commercial	Wild	Cleared	589
Brazil	None	17,000	m <sup>3</sup>	Veneer	Commercial	Wild	Cleared	51
Guatemala	None	1,629	m <sup>3</sup>	Sawn Wood	Commercial	Wild	Cleared	59
Guatemala	None	42,687	kg	Sawn Wood	Commercial	Wild	Cleared	1
Mexico	None	188	m <sup>3</sup>	Sawn Wood	Commercial	Wild	Cleared	6
Nicaragua	None	4,929	m <sup>3</sup>	Sawn Wood	Commercial	Wild	Cleared	61
Nicaragua	None	52,065	kg	Sawn Wood	Commercial	Wild	Cleared	2
Peru	None	10,553			Commercial	Wild	Cleared	80
1997 IMPORT TOTALS		66,168	m <sup>3</sup>	Sawn Wood				977
		17,000	m <sup>3</sup>	Veneer				51
		94,752	kg	Sawn Wood				3

### U.S. imports of *Swietenia macrophylla* during 1998, by country of origin

Country of origin	Country of export	Quantity	Unit	Type of specimen	Purpose	Source	Status	No. of shipments
Belize	None	93	m <sup>3</sup>	Sawn Wood	Commercial	Wild	Cleared	2
Bolivia	None	19,251	m <sup>3</sup>	Sawn Wood	Commercial	Wild	Cleared	171
Brazil	None	31,454	m <sup>3</sup>	Sawn Wood	Commercial	Wild	Cleared	405
Brazil	None	1	ship.	Sawn Wood	Commercial	Wild	Cleared	1
Brazil	None	2,546	m <sup>3</sup>	Veneer	Commercial	Wild	Cleared	64
Brazil	Canada	22	m <sup>3</sup>	Sawn Wood	Commercial	Wild	Cleared	2
Brazil	Canada	22	m <sup>3</sup>	Veneer	Commercial	Wild	Cleared	1
Brazil	Canada	2,409	m <sup>2</sup>	Veneer	Commercial	Wild	Cleared	1
Guatemala	None	1,098	m <sup>3</sup>	Sawn Wood	Commercial	Wild	Cleared	30
Honduras	None	28	m <sup>3</sup>	Sawn Wood	Commercial	Wild	Cleared	2
Nicaragua	None	723	m <sup>3</sup>	Sawn Wood	Commercial	Wild	Cleared	12
Panama	None	71	m <sup>3</sup>	Sawn Wood	Commercial	Wild	Cleared	2
Peru	None	20,270	m <sup>3</sup>	Sawn Wood	Commercial	Wild	Cleared	118
1998 IMPORT TOTALS		73,010	m <sup>3</sup>	Sawn Wood				744
		1	ship.	Sawn Wood				1
		2,568	m <sup>3</sup>	Veneer				65
		2,409	m <sup>2</sup>	Veneer				1

### U.S. imports of *Swietenia macrophylla* during 1999, by country of origin

Country of origin	Country of export	Quantity	Unit	Type of specimen	Purpose	Source	Status	No. of shipments
Belize	None	1,409	m <sup>3</sup>	Sawn Wood	Commercial	Wild	Cleared	45
Belize	None	1	ship.	Sawn Wood	Commercial	Wild	Cleared	1
Bolivia	None	6,663	m <sup>3</sup>	Sawn Wood	Commercial	Wild	Cleared	50
Bolivia	Sweden	14	m <sup>3</sup>	Sawn Wood	Commercial	Wild	Cleared	1
Brazil	None	29,305	m <sup>3</sup>	Sawn Wood	Commercial	Wild	Cleared	233
Brazil	None	1	m <sup>3</sup>	Sawn Wood	Commercial	Wild	Cleared	1
Brazil	None	2,773	m <sup>3</sup>	Veneer	Commercial	Wild	Cleared	94
Brazil	Canada	426	m <sup>3</sup>	Veneer	Commercial	Wild	Cleared	88
Brazil	Canada	115,665	m <sup>2</sup>	Veneer	Commercial	Wild	Cleared	39
Guatemala	None	406	m <sup>3</sup>	Sawn Wood	Commercial	Wild	Cleared	12
Nicaragua	None	1,390	m <sup>3</sup>	Sawn Wood	Commercial	Wild	Cleared	10
Panama	None	23	m <sup>3</sup>	Sawn Wood	Commercial	Wild	Cleared	1
Peru	None	34,561	m <sup>3</sup>	Sawn Wood	Commercial	Wild	Cleared	253
Peru	None	28,853	kg	Sawn Wood	Commercial	Wild	Cleared	1
1999 IMPORT TOTALS		73,772	m <sup>3</sup>	Sawn Wood				606
		28,853	kg	Sawn Wood				1
		1	ship.	Sawn Wood				1
		3,199	m <sup>3</sup>	Veneer				182
		115,665	m <sup>2</sup>	Veneer				39

*Analysis of above tables:* Over the three years 1997-1999, there was a relatively constant overall volume of *S. macrophylla* imported into the United States. About 95% of these imports were from South America (Brazil - 47%, Peru - 28%, and Bolivia - 20%), with only about 5% coming in from Central America (Nicaragua - 3%, Guatemala - 1%, and Belize, Honduras, Mexico, Panama - 1% combined). From 1997 to 1999, imports from Brazil remained fairly constant; imports from Bolivia decreased substantially; and imports from Peru increased substantially. The data suggest that the source of a substantial proportion of U.S. imports shifted from Bolivia to Peru during this period.

### III. Problems with the use of CITES documentation accompanying *Swietenia macrophylla* imports into the United States, and actions taken by the United States to resolve these problems

- Problem: Preparing for the initial Appendix-III listing by Costa Rica:* Costa Rica was the first Party to list *S. macrophylla*, on November 16, 1995. From November 1995 until April 1996, the United States faced some significant problems in implementing the listing. U.S. Customs and APHIS officials had insufficient time to coordinate and develop a nation-wide system for Customs to direct *S. macrophylla* shipments to APHIS for CITES inspection and clearance. The U.S. Government had not had sufficient time to obtain and distribute to APHIS ports of import sample copies of valid CITES certificates of origin from range countries (other than Costa Rica), and so were unable to determine if documents accompanying shipments of *S. macrophylla* from range countries were valid CITES certificates of origin. The U.S. Government did not have time to compile a mailing list of potentially affected timber importers so that they could be informed of the Appendix-III listing and of the new CITES requirements for importing lumber of this species into the United States.

*Action taken:* The United States resolved these problems to a great degree by April 1996. Customs and APHIS coordinated and worked out a nation-wide system for directing shipments of *S. macrophylla* to APHIS for CITES inspection and clearance. This system has been improving over the past several years (see section V below regarding changes to the computer software of the U.S. Customs Service to automatically alert U.S. inspection officials of mahogany shipments). DMA contacted the CITES Management Authorities of the range countries of the species and obtained from them sample copies of valid CITES certificates of origin. DMA provided these sample copies to APHIS inspectors at ports of import. Between November 1995 and April 1996, DMA and APHIS, complemented by the effort of some NGOs, informed the U.S. lumber importers of the Appendix-III listing of *S. macrophylla* and apprised them of the CITES requirements for importing lumber of this species into the United States.

- *Problem: Preparing for subsequent Appendix-III listings by Bolivia, Brazil, Mexico, and Peru:* Over the past several years, Bolivia, Brazil, Mexico, and Peru have also listed *S. macrophylla* in Appendix III. As each of these Parties listed the species, the United States had some problems preparing to implement the revised listings by the effective dates. With only 90 days notification prior to the effective listing dates to gear up for each listing, the United States had trouble in accomplishing the following prior to the effective listing dates: 1) obtaining sample copies of valid CITES *S. macrophylla* export permits from the listing Parties; and 2) informing U.S. timber importers of each new Appendix-III listing of the species.

*Action taken:* By using as a model the process it followed for the initial listing of *S. macrophylla* in Appendix III by Costa Rica, the United States has been able to react more quickly to subsequent listings of the species. In each case, the United States has been able to obtain copies of valid CITES export permits from the listing Party and provide copies to its timber port inspection stations in a more timely fashion. The United States has also been able to use more effective means to inform U.S. lumber importers of each new Appendix-III listing of the species; for example the USFWS's CITES Website.

- *Problem: Discrepancies between U.S. Customs data and U.S. CITES Annual Report data:* According to a technical study (Blundell and Rodan, 2001), during 1997-1999, there were some inconsistencies between U.S. import data collected by DMA for *S. macrophylla* and the import data collected by the U.S. Customs Service on this species. These inconsistencies were mostly due to differences in reporting protocols and priorities between DMA and Customs. However, some of the inconsistencies, particularly in the earlier years of the Appendix-III listing, appear to have been due to instances where some *S. macrophylla* shipments were cleared through Customs, but Customs did not direct the shipments to APHIS for CITES inspection and clearance.

*Action taken:* According to the study, the consistency of *S. macrophylla* data recorded by DMA and Customs improved between 1997 and 1999. This can be attributed to increased coordination between Customs and APHIS, particularly at ports of import, to work out a system for shipments of this species to be directed to APHIS for CITES inspection and clearance. This system has been improving over the past several years (see section V below regarding the changes to the computer software of the U.S. Customs Service to automatically alert U.S. inspection officials of mahogany shipments).

- *Problem: Confusion over required documents for early imports of S. macrophylla:* Following the initial Appendix-III listing in 1995, U.S. importers as well as APHIS port inspectors were unclear on what documents were required for the import of *S. macrophylla* lumber, since they had never previously dealt with these documents. Under the international customs Generalized System of Preferences (GSP), many developing countries are permitted duty-free importation into the United States of a wide range of products that

would otherwise be subject to customs duty. These shipments must be accompanied by a GSP certificate of origin. In some instances in the earlier years of the listing, the GSP document was confused with the CITES certificate of origin and shipments of *S. macrophylla* into the United States were accompanied by the GSP certificate of origin instead of the CITES certificate of origin.

*Action taken:* Import requirements were clarified in the APHIS mahogany manual distributed in 1999 to the designated ports of entry for CITES timber species (see Section V below).

- *Problem: Inconsistencies with units of measure used on export documents:* Since the initial Appendix-III listing of *S. macrophylla* in November 1995, DMA, in compiling the U.S. CITES import data on this species, has come across the problem of a variety of units of measure being used on certificates of origin for sawn wood and/or veneer. DMA has observed sawn wood recorded in cubic meters, board feet, and kilograms, and veneer recorded in cubic meters, square meters, and kilograms. In order for Parties to produce accurate *S. macrophylla* trade data in their CITES Annual Reports, it is essential that the units of measure used on CITES documents be consistent.

*Action taken:* CITES Notification to the Parties No. 1999/85 provided revised "Guidelines for the preparation and submission of CITES annual reports". These revised Guidelines recommend that Parties record sawn wood in cubic meters, rotary veneer in cubic meters, and sliced veneer in square meters. The United States has, whenever possible, followed these recommendations in recording units of measure both on its re-export certificates for *S. macrophylla* and in its CITES Annual Report trade data for this species. In recording its Annual Report import data, for instances when exporting countries have recorded *S. macrophylla* sawn wood and/or veneer in board feet on their certificates of origin, DMA has converted these units to cubic meters. Over the past several years, the United States has observed a marked increase in the consistency of units of measure used on certificates of origin for this species. In recording Annual Report import data from certificates of origin, DMA has noticed that, recently more exporting countries have been using the units of measure recommended in the Annual Report Guidelines. The United States believes that the ability of Parties to cross-check *S. macrophylla* Annual Report quantity data would be improved if standard conversion factors were adopted to allow Parties to convert the various units of measure used for this species to cubic meters.

- *Problem: Foreign consignees on CITES documents for U.S. imports:* On the CITES export documents accompanying several shipments of *S. macrophylla* lumber being imported into the United States, the consignee box listed a non-U.S. company. In these instances, the U.S. importer was a subsidiary of a foreign company. The United States questioned the validity of these export permits since CITES Resolution Conf. 10.2 recommends that an export permit not be accepted for import into a country other than the one for which it was issued.

*Action taken:* DMA has contacted the relevant Management Authorities in the exporting countries and requested that, in cases where the parent company of the importer is in a country other than the United States, the permit include in the consignee block the name of the parent company and "care of" the U.S. based subsidiary, with the address of the subsidiary. After taking this action, the incidence of this problem appears to have decreased.

- *Problem: Unendorsed export documents:* The United States has observed that a number of export documents accompanying shipments of *S. macrophylla* into the United States are not endorsed by the export inspection officials in the countries of export.

*Action taken:* The United States has observed that unendorsed export documents is a problem not only with shipments of *S. macrophylla*, but other CITES plant and wildlife shipments as well. Many CITES shipments enter the United States accompanied by export documents that are not endorsed by the inspection authorities of the exporting countries. Because this problem occurs so often, the United States has been unable to in all cases contact the Management Authorities of exporting countries to verify the validity of these unendorsed documents. However, when it receives specific requests of APHIS (usually because APHIS has some doubt about document validity), DMA has contacted the Management Authorities in countries of export to verify the validity of unendorsed CITES documents, including several for *S. macrophylla*.

- *Problem: Issuance of retrospective export documents:* With regard to exports of *S. macrophylla* lumber to the United States, there has been at least one instance where a shipment entered the United States without a CITES export document and then the country of export issued a retrospective export document without first consulting with the U.S. Management Authority. CITES Resolution Conf. 10.2, Section VIII, recommends that a Management Authority of an exporting or re-exporting country not issue CITES documents retrospectively unless it first consults with the Management Authority of the importing country. Generally, the United States does not accept a retrospective CITES document for a commercial shipment unless it meets the requirements of Conf. 10.2.

*Action taken:* In each case, DMA consulted with the Management Authority that issued the retrospective export document after the fact. As the United States has observed that this kind of retrospective document issuance for CITES-listed plant species has been a recurrent problem, DMA contacted the CITES Secretariat in 2000, and asked it to issue a Notification to remind the Parties of the recommendations in Conf. 10.2 regarding issuance of retrospective CITES documents. As a result, the Secretariat issued Notification No. 2000/067 on December 14, 2000, reminding the Parties of such.

- *Problem: Differing interpretations of which parts and derivatives are listed:* The annotation to the Appendix-III listing for *S. macrophylla* states that logs, sawn wood, and veneer are included in the listing. CITES Resolution Conf. 10.13 defines what types of commodities fall under each of these three categories and also provides the four customs Harmonized Tariff Schedule Codes that apply to the three categories. However, in spite of the definitions provided in Conf. 10.13, the United States has still been involved in several incidents where the authorities in an exporting country had a different interpretation than the United States as to whether a particular part or derivative of *S. macrophylla* was listed or not. For example, in 1998, a shipment of rough cut wood planks was about to be exported to the United States. The planks were cut with a slight beveling along two edges. The U.S. importer checked with the U.S. authorities prior to the shipment being exported to determine if this commodity was listed or not. The interpretation of the U.S. authorities was that the commodity fit under the category of sawn wood and was therefore listed. The interpretation of the authorities in the exporting country was that the commodity had been processed to a degree and therefore did not fit under any of the listed categories and was therefore exempt from CITES requirements. The shipment was not exported to the United States because the United States would not clear it without a CITES document issued by the exporting country and the exporting country would not issue a CITES export document because it felt the shipment was non-CITES.

*Action taken:* Although the problem of confusion over which *S. macrophylla* commodities are listed in Appendix III has been alleviated to a large extent by the clarifications provided in Conf. 10.13, it still occurs occasionally. The United States suggests that clarifying the definitions even more, using more examples of types of commodities that fall under the listed categories, would alleviate the problem further.

- *Problem: Issuance of CITES certificates after a shipment has left a port of export.* Recently, APHIS port inspectors have observed that shipments of *S. macrophylla* are being exported from some range countries prior to issuance of the appropriate CITES export documents. In these instances, after the ship has left the port of export, the CITES export documents are apparently being issued and then sent to the import broker in the United States. As a result, the customs clearance documents from the country of export are dated earlier than the CITES documents.

*Action taken:* Although APHIS has not refused clearance of these shipments into the United States, we hereby ask each range country to ensure that CITES export documents accompany all exports of *S. macrophylla*.

#### IV. Illegal trade in *Swietenia macrophylla*

As with most CITES regulated wildlife and plant trade, it is possible that *S. macrophylla* may have entered the United States outside of the CITES enforcement regime. Non-compliance with CITES is often difficult to detect and even more difficult to quantify. The United States has not detected any cases where CITES documents have been improperly altered or fabricated, although this does not mean that it could not be occurring.

Provided below are general considerations of the United States on the issue of illegal trade and specific details concerning confiscation activities since 1996.

##### *General Considerations*

The United States believes the effectiveness of implementing Appendix III obligations for *S. macrophylla* would be enhanced by developing a closer working relationship among exporting and importing countries. The United States strives to verify the authenticity of export permits and certificates of origin that accompany shipments of *S. macrophylla*, and cooperates with range countries to correct problems as they arise.

The United States has undertaken analyses of its own data to determine if imports of *S. macrophylla* meet CITES requirements. The comparative data study (Blundell and Rodan, 2001) has shown that consistency between data collected by U.S. CITES implementing authorities and U.S. Customs is high and has been improving each year. Data discrepancies suggest areas where import trade in *S. macrophylla* may not be in compliance with CITES. The study suggests that, for a number of reasons, some shipments of *S. macrophylla* wood may be mis-classified by Customs category or mislabeled as wood of a non-listed species, and are therefore missed by CITES implementing authorities. Difficulties in identification and coding may be exploited by those engaged in illegal timber trade. The efforts of various U.S. Government agencies (discussed in section V) to ensure that all *S. macrophylla* shipments are properly identified and accompanied by the correct documentation support the efforts of range states to combat illegal trade in this species.

##### *U.S. confiscations of S. macrophylla during 1996-2001*

During 1996-2001 (as of August 17, 2001), the U.S. Government had three confiscations of *S. macrophylla*:

- In December 1999, a shipment of 6.049 cubic meters of *S. macrophylla* sawn wood was exported to the United States. The shipment was accompanied by a CITES export document which authorized the export of 5.774 cubic meters of sawn wood. As the shipment contained 0.2745 cubic meters more than what was authorized on the export document, these 0.2745 cubic meters of sawn wood were confiscated by APHIS.

- In August 2000, a shipment of 3.72 cubic meters of *S. macrophylla* sawn wood was re-exported to the United States. The shipment was seized since it lacked CITES re-export documentation.
- In July 2001, a shipment of 30.39 cubic meters of *S. macrophylla* sawn wood was exported to the United States. The shipment was accompanied by a CITES export permit for 24.3 cubic meters. APHIS seized the overage of 6.09 cubic meters of sawn wood.

Several other shipments of *S. macrophylla* lumber during 1996-2001 were detained by APHIS upon import into the United States pending verification of the validity of the CITES export documentation. In these cases the validity of the documents was verified and APHIS ultimately released the shipments.

#### **V. General steps taken by the United States to improve CITES implementation for *Swietenia macrophylla***

- In 1999, APHIS distributed a manual on Appendix-III *S. macrophylla* to the designated ports of entry for CITES timber species. The manual provides these officers with accurate Appendix-III import procedures, sample export documents issued by range countries for *S. macrophylla*, and *S. macrophylla* identification materials. The manual may be obtained on the Internet at <http://www.aphis.usda.gov/ppq/manuals>.
- In 2000, the U.S. Customs Service modified its computer software to automatically provide a pop-up signal to alert U.S. inspection officials of mahogany shipments. When a shipment arrives in the United States and is reported in the Customs Harmonized Tariff Schedule (HTS) Code for mahogany, a message appears on the computer screen telling the Customs officer that the shipment includes mahogany, and to notify APHIS to collect the CITES Appendix-III documents.
- In 2000, the U.S. Department of Agriculture's Forest Service prepared a CITES timber brochure (in English, French, Spanish, and Portuguese), and the United States provided several hundred copies to each Party. The brochure is targeted at specific audiences such as timber producers, wholesalers, and consumers. It is designed to educate these entities on trade in CITES timber, including *S. macrophylla*, and to promote the message that a CITES Appendix-II or -III listing helps to ensure sustainability. The United States invited the Management Authority of each Party to distribute the brochures within the country as it deemed appropriate.
- The U.S. Government is currently reviewing the potential to identify other HTS Codes that may have been used in place of the appropriate HTS Codes for *Swietenia* spp. in order to prevent *S. macrophylla* from bypassing CITES controls.

#### **VI. Other suggested measures to improve CITES implementation for *Swietenia macrophylla***

The United States is considering the following options domestically to increase its ability to fulfill its obligations under CITES as an importer of *S. macrophylla*. The United States works to support the initiatives of range states, in addition to fulfilling the obligation to U.S. consumers to ensure that the wood they purchase has been obtained in compliance with CITES:

- Continue to train APHIS officers to identify the wood of CITES-listed tree species based on characteristics such as grain, color or density of the wood. It is currently difficult for APHIS officers to identify mislabeled or smuggled mahogany because the wood of tree species is often not readily distinguishable.

- Continue ongoing collaboration with the Canadian CITES authorities to produce a timber wood identification book for port inspectors.
- Ensure that U.S. CITES officials maintain their vigilance and knowledge regarding the use of different numerical systems in some *S. macrophylla* range countries for recording decimal points when listing quantities on export documents (i.e., using commas instead of points, or recording three spaces to the right of the decimal point instead of two).

Most of the existing worldwide *S. macrophylla* reporting problems might be expeditiously solved by more consistent reporting from all Party countries. Listed below are several options that the Mahogany Working Group might want to encourage countries to consider to strengthen implementation of Appendix III for *S. macrophylla*:

- Explore options for further national and regional capacity building among customs officials and other enforcement personnel to enhance CITES Appendix-III implementation, so that trade under CITES reliably occurs in conformance with domestic laws.
- Report actual trade, as recommended by CITES, rather than permits issued. This will increase accuracy and consistency of reporting. [According to the study (Blundell and Rodan, 2001), it appears that some Parties record *S. macrophylla* trade in their Annual Reports based on quantities authorized on the CITES documents rather than the quantities actually traded.]
- Explore the feasibility of developing additional HTS Codes for timber species easily confused with *S. macrophylla*.
- Submit detailed CITES Annual Reports that include permit numbers from the export permits/certificates-of-origin. These numbers have the potential to be important tools for cross-referencing trade data from exporting countries with trade data from importing countries.
- Maintain a cross-reference of CITES export permit numbers recorded by exporting Management Authorities with those recorded by importing Management Authorities to aid in the detection of CITES permits that have been falsified.

#### Literature cited

- Blundell, A. and B. Rodan. 2001. United States Mahogany Imports and the Efficacy of CITES Appendix III. A technical study by the National Center for Environmental Assessment, US Environmental Protection Agency.
- Robbins, C. 2000. Mahogany Matters: The U.S. Market for Big-leafed Mahogany and Its Implications for the Conservation of the Species. TRAFFIC North America.