

CoP 13 Prop 50: Listing of ramin (*Gonystylus* spp.) on Appendix II

Additional Information on Annotation by the Republic of Indonesia

The Government of Indonesia has proposed that the tree species ramin (*Gonystylus* spp.) be listed on Appendix II of the Convention at this meeting. Experts from IUCN, the CITES Secretariat and TRAFFIC have confirmed that the species merits inclusion and that the proposal should be supported. A majority of range states support the proposal.

Indonesia's proposal has the annotation #1, indicating the inclusion of all readily recognisable parts and products. This is a broader annotation than that used for some other timber species listed on Appendix II, which include only raw forms of timber (annotation #5 and #6). This document is distributed to Parties to clarify the broad annotation currently used in the proposal. It is believed that any more limited annotation would fail to protect the species.

We hope this document will explain to Parties why Indonesia will not support any amendments to the annotation of the Appendix-II proposal.

Most ramin trade is in processed parts and products

Alternative annotations previously used for timber species listed under CITES include only logs, sawn woods, veneer sheets and plywood. But these products represent only a small percentage of international trade in ramin. Indonesia has already banned all export of logs, as has Peninsular Malaysia. Indonesia has also recently banned most sawntimber exports. Ramin is never sold as veneer or used in the manufacture of plywood.

In 2000, the last full year during which ramin was open for export from Indonesia, 90% of exports were of semi-processed wood, including such things as mouldings and dowels. Figures supplied by NGOs indicate that the US and Europe ultimately consume around two thirds of the world's ramin. Customs figures show that more than 95% of this wood arrives in processed forms or as products.

CITES rules are already being successfully implemented for processed ramin wood

In 2001 Indonesia placed ramin on Appendix III, also with the annotation #1. The inclusion of all readily recognizable parts and products in the Appendix III listing meant new challenges for identification and enforcement. But key ramin trading countries have now had more than three years to develop procedures to implement and enforce the listing for processed wood and products. Most have made great strides forward and are now implementing and enforcing the current listing successfully. There will not therefore be significant additional problems if the species is listed on Appendix II as proposed.

Implementation & enforcement is possible

Under the current Appendix III listing, a number of major seizures of processed ramin wood and ramin wood products have been made. Ramin cues, cribs, picture frames and other products without proper CITES permits have been intercepted, including in the US and UK. These seizures have shown that, provided simple identification materials are available and intelligent enforcement targeting is used, the Convention can be successfully applied to ramin products. Ramin is used in quite a limited range of wood products, and each of these products is typically made from only one or two different types of wood.

A number of timber identification guides and information on the kinds of have already been produced and distributed by Parties for the purpose. The Appendix III listing has also shown trade in non-ramin wood products has not been negatively impacted by the application of CITES controls.

No other annotation would be viable

Any new form of annotation which attempted to divide up types of semi-processed wood and wooden products (with CITES applying to some and not others) would be unworkable. The definitions of what was and was not included would have to be long and complicated and would confuse enforcement officials and traders. International customs code definitions for processed wood and wood products are unclear and often overlap. This confusion would provide a cover for illegal trade. The nature of the trade in ramin might also change over time, while any agreed definition would be very difficult and slow to change in response.