

CITES Secretary General, Ms. Ivonne Higuero

CITES Secretariat
Palais des Nations
Avenue de la Paix 8-14
1211 Genève 10
Switzerland

Dear Madame Secretary General:

We at the Pet Industry Joint Advisory Council (PIJAC), International Wildlife Management Consortium – World Conservation Trust (IWMC), the European Pet Organization (EPO), Parrot Breeders of South Africa, Ornamental Fish International (OFI), Livelihood International, the Sustainable Use Coalition, the Fur Institute of Canada, the International Fur Federation, Americas Fur Resources Council, the Ivory Education Institute, the International Professional Hunters Association (IPHA), Deutsche Gesellschaft für Herpetologie und Terrarienkunde (DGHT) stand together in protest at the deficit of time and discussion being allotted for certain flora and fauna at this CITES meeting. It is alarmingly apparent that there are manifest discrepancies in which species are being appropriately deliberated, and which are not. The listing of a species in CITES is a substantial and impactful action that merits careful consideration, and the voices of stakeholder observers, regardless of their size or affluence, deserve to be heard.

For the second straight CoP, proponent groups for flora and charismatic megafauna were provided significant time to hold the floor regarding the proposed listing, up-listing or down-listing of species of concern to them, while the responsible committee limited debate and took no NGO comments on the proposed listing of less-charismatic species including reptiles and arachnids. The inescapable impression is that the concerns of wealthy NGOs are important, while those of smaller NGOs are not. Even more egregious is that these incomplete deliberations mean that multiple decisions have been made without consideration of the full data and facts, prioritizing spin over science.

Those observers for whom attendance at a CITES CoP consumes a substantial portion of their resources deserve to have their views considered equally with those observers who bring large delegations, sponsor side events or hand out stuffed animals. We do not advocate curtailing the comments from megafauna NGOs, but rather equitably allocating time to those concerned with other species, as well.

We assert that the CoP should determine the length of the meeting based on the number of species to be considered, rather than fitting all listing proposals into a specified time period. Alternatively, the CoP could decree that it will only consider a fixed number of proposals, to be selected from those submitted prior to a predetermined deadline. This would cause parties to prioritize the species that they offer and ensure that the Secretariat receives comprehensive listing proposals in a timely manner.

CITES was conceived in a spirit of international cooperation and respect, and this spirit should remain - without any doubt – the basis for all upcoming decision-making processes. We urge the Secretariat to ensure that equitable and thoughtful deliberation is allowed for all flora and fauna, so that CITES can succeed in ethically and impartially constructing practical solutions to the increasingly complex wildlife trade and conservation issues that face our world.

With respect,

Pet Industry Joint Advisory Council

International Wildlife Management Consortium – World Conservation Trust

European Pet Organization

Parrot Breeders of South Africa

Ornamental Fish International

Livelihood International

Sustainable Use Coalition

Fur Institute of Canada

The International Fur Federation

Americas Fur Resources Council

Ivory Education Institute

International Professional Hunters Association

Deutsche Gesellschaft für Herpetologie und Terrarienkunde