

Via Electronic Submission

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Public Comments Processing
Attn: FWS-HQ-IA-2021-0008
U.S. Fish and Wildlife Service Headquarters
MS: PRB (JAO/3W)
5275 Leesburg Pike
Falls Church, VA
22041-3803

RE: Comments Regarding Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES); Nineteenth Regular Meeting: Species Proposals for Consideration and Request for Information and Recommendations on Resolutions, Decisions, and Agenda Items for Consideration (Docket No. FWS-HQ-IA-2021-0008)

Dear Dr. Gnam and Ms. Scruggs,

On behalf of the undersigned organizations and our millions of members and online activists, we make the following recommendations for amending Appendices I and II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) at the nineteenth regular meeting of the Conference of the Parties (CoP19).

We appreciate the opportunity to make recommendations on what the United States should do in the midst of the biodiversity and climate crises at CoP19 on critical trade issues impacting many of the world's plants, animals, and people. As detailed below, we recommend the United States to urgently seek to strengthen species protections at the upcoming CoP, including by broadly proposing Appendix I listing of species that are threatened with extinction for which the United States is a range state or a significant importer, which are or may be affected by trade.

Several of our groups will also be submitting additional, individual comments but we write jointly to encourage the United States to be ambitious in strongly advocating for species needing stricter CITES protection at the upcoming meeting.

I. Biodiversity and Climate Crises

The world is beset by two interrelated crises: climate change and ecosystem collapse. The research documenting the impacts the climate crisis is having on the natural world is alarming.¹

¹ IPCC, 2019: *IPCC Special Report on the Ocean and Cryosphere in a Changing Climate*. H.-O. Pörtner, D.C. Roberts, V. Masson-Delmotte, P. Zhai, M. Tignor, E. Poloczanska, K. Mintenbeck, A. Alegría, M. Nicolai, A. Okem, J. Petzold, B. Rama, N.M. Weyer (eds.); USGCRP, 2018: *Impacts, Risks, and Adaptation in the United*

In equal measure, research detailing the extent and rate of the biodiversity crisis is also alarming.² Globally, natural ecosystems have experienced a net deterioration in their extent and physical condition since 1970.³ Terrestrial hotspots of endemic species are in worse shape and are experiencing steeper declines than other terrestrial regions.⁴ Deforestation continues on an upward trajectory and has gone beyond various “safe limits” identified by researchers as needed to preserve ecosystem integrity and diversity.⁵

As detailed by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES), the global rate of species extinction is accelerating and has already reached a rate at least tens to hundreds of times higher than the average rate over the past 10 million years.⁶ One out of every four species across a wide range of animal and plant taxonomic groups is threatened with extinction. Several regional and national assessments show that more than 40% of insect pollinators are threatened at a national scale. IPBES concluded that around 500,000 terrestrial animal and plant species are “dead species walking.” That is, they have insufficient habitat for long term survival. Rapid decline in the geographic distribution and population size of animals on land reflects widespread reductions in populations.

There is no way to credibly downplay the dangers to wildlife or humanity from the ongoing loss of biological diversity and the climate crisis. For wildlife, a million species are threatened with extinction, many within decades. For humans, these crises separately and together jeopardize the natural life support systems we depend on for our health, food security, and quality of life. We need look no further than the current COVID pandemic for an example of the threat posed by our current relationship with nature.

II. Direct Exploitation of Wildlife Is a Major Driver of the Biodiversity Crisis

Direct exploitation of wild animals and plants is the leading driver of the biodiversity crisis in marine ecosystems and the second leading driver in terrestrial ecosystems.⁷ Ninety-seven percent of marine fish stocks are fully- or over-exploited or depleted. Increasing demands for bushmeat, traditional medicine, souvenirs, pets, and luxury goods threatens biodiversity from both illegal

States: Fourth National Climate Assessment, Volume II. Reidmiller, D.R., C.W. Avery, D.R. Easterling, K.E. Kunkel, K.L.M. Lewis, T.K. Maycock, and B.C. Stewart (eds.).

² IPBES (2019): Global assessment report on biodiversity and ecosystem services of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services. E. S. Brondizio, J. Settele, S. Díaz, and H. T. Ngo (editors). IPBES secretariat, Bonn, Germany. XXX pages.

³ *Id.*

⁴ IPBES (2019): Summary for policymakers of the global assessment report on biodiversity and ecosystem services of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services. S. Díaz, J. Settele, E. S. Brondizio E.S., H. T. Ngo, M. Guèze, J. Agard, A. Arneth, P. Balvanera, K. A. Brauman, S. H. M. Butchart, K. M. A. Chan, L. A. Garibaldi, K. Ichii, J. Liu, S. M. Subramanian, G. F. Midgley, P. Miloslavich, Z. Molnár, D. Obura, A. Pfaff, S. Polasky, A. Purvis, J. Razaque, B. Reyers, R. Roy Chowdhury, Y. J. Shin, I. J. Visseren-Hamakers, K. J. Willis, and C. N. Zayas (eds.). IPBES secretariat, Bonn, Germany. 56 pages. Page 24.

⁵ IPBES (2019): Global assessment report.

⁶ *Id.*

⁷ *Id.*

and legal harvest. For example, the rate of wildlife extraction from hunting in tropical forests is unsustainable, making up a part of the at least 6 million tons of large to medium size mammals, birds and reptiles that are harvested annually in the tropics. About a third of this harvest is for commercial purposes. And, of course, direct exploitation is not limited to fauna. Between 1990 and 2015, global forest areas decreased by more than one million square miles, a portion attributable to raw timber harvest, which has increased by 45 percent since 1970. Furthermore, in spite of the economic impacts of the COVID pandemic, global tree cover loss increased by 12 percent from 2019 to 2020.⁸ Significant evidence also exists that the direct exploitation of wild animals and plants is a factor in the emergence of a range of diseases, especially where trade is poorly regulated and includes mammals or birds. And even legal regulated trade in wildlife has led to the spread of diseases.⁹

III. United States Leadership in Global Wildlife Conservation

There is still time to reverse the drivers of the biodiversity and climate crises and thereby limit the suffering of hundreds of millions of people and save hundreds of thousands of species from extinction. The U.S. Fish and Wildlife Service (FWS) has a significant role to play. It can help reduce the direct-exploitation-of-organisms driver of the biodiversity crisis by utilizing CITES to its full potential. By doing so, it will also help minimize a non-climate stressor, which is essential for increasing species' future resilience to climate change. And it will reduce the threat of a future pandemic to the extent trade controls apply to high-risk species.

As a key proponent of CITES from its inception, the United States has a history of advancing a bold global conservation agenda. It should do so again. The United States must have a CITES agenda that responds to our current crises, one that meets the scale and scope of the challenges before us. As a starting point, the United States should be doing all it can to ensure that all species threatened with extinction that are or may be affected by trade are listed on Appendix I. Thus, at CoP19, the United States should at a bare minimum propose for listing on Appendix I all critically endangered, endangered, and qualifying vulnerable species for which it is a range state that are or may be affected by trade. The United States should also propose for listing on Appendix I all critically endangered, endangered, and applicable vulnerable species that are or may be affected by trade for which the United States is a major importer.

⁸ World Resources Institute (2021), Primary Rainforest Destruction Increased 12% from 2019 to 2020, <https://research.wri.org/gfr/forest-pulse>.

⁹ Significant evidence also exists that the direct exploitation of wild animals and plants is a factor in the emergence of a range of diseases, especially where trade is poorly regulated and includes mammals or birds. And even legal regulated trade in wildlife has led to the spread of diseases. See IPBES (2020): Workshop Report on Biodiversity and Pandemics of the Intergovernmental Platform on Biodiversity and Ecosystem Services. Daszak, P., Amuasi, J., das Neves, C. G., Hayman, D., Kuiken, T., Roche, B., Zambrana-Torrel, C., Buss, P., Dundarova, H., Feferholtz, Y., Földvári, G., Igbino, E., Junglen, S., Liu, Q., Suzan, G., Uhart, M., Wannous, C., Woolaston, K., Mosig Reidl, P., O'Brien, K., Pascual, U., Stoett, P., Li, H., Ngo, H. T., IPBES secretariat, Bonn, Germany.

IV. FWS Should Propose Species Listings at CoP19 to Protect Range Species and Species for which the U.S. is a Major Importer

CITES, the only international treaty specifically designed to address the direct exploitation of species in international trade, has a vital role to play in bringing about the transformational change called for by IPBES to confront the global biodiversity crisis. Yet CITES is falling far short of its objective to protect “wild fauna and flora against over-exploitation.”¹⁰ Wildlife trade has increased 10-fold since 1975 and legal, unsustainable trade poses a major threat to global biodiversity.¹¹ Also, scientists point out that the Convention is decades behind in providing meaningful protections to hundreds of species facing extinction – CITES listing most often comes a decade or more after species in international trade are classified as “facing a high risk of extinction” on the IUCN Red List of Threatened Species, if at all.¹²

A review of species assessed as threatened with extinction pursuant to International Union for Conservation of Nature’s Red List of Threatened Species (IUCN Red List), indicates that hundreds of species for which the United States is a range state are threatened with extinction (assessed as vulnerable, endangered, or critically endangered) and are or may be in international trade. Because the IUCN Red List guidelines for assessing these species closely reflect the CITES criteria for amending Appendix I (*see, e.g.*, Res. Conf. 9.24 (Rev. CoP17)), the United States can help fulfill the treaty’s mandate (“Appendix I *shall* include *all* species threatened with extinction which are or may be affected by trade”) by proposing qualifying species for listing on Appendix I at CoP19.

In addition, FWS should examine U.S. import data to determine if the United States is a significant importer of species threatened with extinction for which it is not a range state. If so, FWS should similarly propose to list all such species on Appendix I at CoP19. The U.S. wildlife import data has not been released to the public since 2015, and data on timber and timber product imports has never been made generally available to the public. We urge the United States to publish this data which is necessary to assess species or taxa requiring stricter CITES protection for which the U.S. is a major consumer.

For those species for which the United States is a range state or significant importer and that are assessed by the IUCN Red List as vulnerable that do not meet the CITES listing criteria for Appendix I, FWS should assess whether listing on Appendix II is warranted.¹³ If so, it should propose to list such species on Appendix II at CoP19.

¹⁰ <https://cites.org/eng/disc/text.php>

¹¹ IPBES (2019): Chapter 3 of the Global assessment report on biodiversity and ecosystem services of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services. E. S. Brondizio, J. Settele, S. Díaz, and H. T. Ngo (editors). IPBES secretariat, Bonn, Germany. Page 156.

¹² Frank, E. G., & Wilcove, D. S. (2019). Long delays in banning trade in threatened species. *Science*, 363(6428), 686-688. <https://science.sciencemag.org/content/363/6428/686>

¹³ Appendix II includes “all species which although not necessarily now threatened with extinction may become so unless trade in specimens of such species is subject to strict regulation in order to avoid utilization incompatible with their survival.”

We understand that this approach is more ambitious than the FWS's approach to CITES listings in the past. But the science is clear that business-as-usual will only maintain the ongoing biodiversity crisis and continue to reduce species' resilience to climate change. Nothing short of transformative change – a fundamental, system-wide reorganization across technological, economic and social factors, including paradigms, goals and values – will suffice to disrupt the biodiversity crisis. CITES has an essential role to play in drawing down species loss due to exploitation but that will only happen if Parties to CITES demand real change. The U.S. should be bold and ambitious at CoP19, ensuring that the treaty fully fulfils its mandate to ensure species threatened with extinction are fully protected against detrimental international trade and ensure wildlife and plants are not lost due to human exploitation.

Thank you for the opportunity to provide these comments and recommendations. We look forward to working with the U.S. Government in preparing for and carrying out CoP19.

Sincerely,



Zak Smith
International Wildlife Conservation Director
Natural Resources Defense Council (NRDC)

Christina Scaringe
General Counsel
Animal Defenders International

Johanna Hamburger
Director and Senior Staff Attorney, Terrestrial Wildlife Program
Animal Welfare Institute

Sally Jewell Cox
President
Bonobo Conservation Initiative (BCI)

Angela Grimes
Chief Executive Officer
Born Free USA

Sarah Uhlemann
International Program Director and Senior Attorney
Center for Biological Diversity

Melissa Blue Sky
Senior Attorney, People, Land & Resource Program
Center for International Environmental Law (CIEL)

Alejandra Goyenechea
Senior International Counsel
Defenders of Wildlife

Tara Thornton
Deputy Director
Endangered Species Coalition

Erica Jayne Lyman
Clinical Professor of Law & Director
Global Law Alliance for Animals and the Environment

Teresa M. Telecky, Ph.D.
Vice President, Wildlife
Humane Society International

Gillian Lyons
Senior Regulatory Specialist, Federal Affairs
Humane Society Legislative Fund

Jennifer Hillman
Vice President, Wildlife Protection
Humane Society of the United States

Courtney S. Vail
Campaigns Director
Oceanic Preservation Society

Will Travers
President
Species Survival Network