



Preliminary Comments on SC54 Doc. 6.1, The CITES Strategic Plan: 2008-2013, Report of the Strategic Plan Working Group

SC54 Doc. 6.1, The CITES Strategic Plan: 2008-2013, Report of the Strategic Plan Working Group, was submitted well after the deadline for documents to be considered by this meeting of the Standing Committee. SSN feels that this important document requires full review and consideration. Had the document been distributed in time, SSN would have provided detailed comments on many fine points in its text. Under the circumstances we can, at this time, offer only some preliminary observations expressing our serious concerns about certain aspects of the proposed plan.

SSN supports the UN Millennium Development Goals, and recognises the importance of promoting poverty alleviation, human development and community participation. However, CITES has a very specific, unique and highly restricted mandate. Its objective, as published by the CITES Secretariat, is “to prevent international trade in specimens of wild animals and plants from threatening their survival.” SSN believes that CITES makes its greatest contribution to human development by concentrating on this, its core function, as mandated by the text of the Convention itself.

We are therefore disturbed by language in the new strategic plan that appears designed to move CITES away from this core function towards broader development goals it is neither intended nor equipped to address. CITES is, as its preamble clearly indicates, a conservation treaty. It is not as a development initiative, of which there are many... The conservation paradigm should come first; sustainable development should be a result of this.

In accordance with the conservation goals of CITES, SSN believes that the often-misused word “sustainable” should be modified, in the Strategic Plan, to read “ecologically sustainable”, a term carefully selected for inclusion in the recent Kinshasa Declaration as part of GRASP.

Mission Statement

The proposed new mission statement reads: “to conserve biodiversity and promote human development through sustainable and regulated international wildlife trade”.

We question whether CITES requires a new mission statement at all. Its mission is already set out in the Convention Preamble. Except insofar as it fulfills that mission, CITES cannot and should not give human development the same level of importance as the conservation of biodiversity. Furthermore, the implication of the proposed new mission statement is that CITES will actively promote trade. The explanatory text of the proposed plan repeatedly reflects a shift in emphasis from preventing unsustainable trade to promoting so-called “sustainable” trade.

CITES was designed to regulate trade; it has no language requiring its Parties to promote it. We are in favour of retaining the purpose in the Strategic Vision through 2005 which reads “to ensure that no species of wild fauna or flora becomes or remains subject to unsustainable exploitation because of international trade”. This wording was extensively debated and carefully formulated to reflect the core objective of CITES – which remains unchanged.

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**CITES is the Convention on International Trade in Endangered Species of Wild Fauna and Flora*



Strategic Goals and Objectives

In general, SSN supports goals 1, 2 and 4, but has serious concerns about Goal 3: “adopt balanced wildlife trade policies compatible with human well-being, livelihoods and cultural integrity.” We are not sure what “balanced” means here. Fulfilling the three conditions may be incompatible with the regulation of wildlife trade that CITES requires. We propose, *at the very least*, modifying this goal by adding the words: “provided that these policies are also compatible with the survival of wild species.”

SSN objects to the second indicator for Objective 3.1, which reads: “Stricter domestic measures are not adopted in cases where the problems they are intended to solve can be addressed through existing multilateral CITES processes”. This represents an unwarranted interference in the sovereign right of parties to adopt stricter domestic measures, a right recognised in Article XIV. It has no place in a CITES Strategic Plan.

Objective 3.2 , “the financial returns from international trade in wildlife contribute to poverty alleviation and livelihoods of local communities and indigenous peoples,” is a national development policy objective well beyond the mandate of CITES. It is, however, acceptable at the national level when it is the direct result of CITES core activities such as the reduction of illegal trade.

Objective 3.3, “CITES contribution to sustainable development is strengthened,” also represents a development policy objective. Further, it is far too broad and ambiguous to be a useful or measurable objective for CITES planning.

SC54 Doc. 6.2 Costed programme of work

SSN believes that CITES can best conserve its limited funds by concentrating on its core objectives. We suggest that the Secretariat looks into ways and means to make use of the User Pays Principle. This could be an instrument to both regulate trade to make it more ecologically sustainable as well as to finance the work of the Secretariat and/or CITES Parties.