

CoP13 Prop. 50 (Indonesia) Inclusion in Appendix II of *Gonystylus* spp. with Annotation #1 (including all readily recognizable parts and derivatives, except: a) seeds, spore and pollen (including pollinia); and b) seedling or tissue cultures obtained in vitro, in solid or liquid media, transported in sterile containers)

SSN VIEW: Support Adoption of Proposal, Including Annotation #1

- Ramin, a tropical hardwood found in Southeast Asia, has declined dramatically and is commercially extinct throughout much of its former range, primarily due to overexploitation for international trade.
- High prices for ramin on international markets are fuelling illegal logging and trade that threatens the long-term survival of ramin and destroys vital habitat for other threatened species, including Critically Endangered orangutans (listed on Appendix I).
- Although the species' current listing on Appendix III has provided important enforcement benefits in a number of areas, these benefits are being undermined by illegal logging operations and laundering activities and thus do not afford adequate protection for the species.
- Ramin satisfies the biological and trade criteria for listing on CITES Appendix II and would benefit substantially from the greater regulatory protection afforded by Appendix II, including the possibility of examination under the Significant Trade Review.
- As ramin is traded primarily in processed form, the proposed annotation—including readily recognizable products and derivatives—is critical to the success of the Appendix II listing. The current Appendix III listing has shown that inclusion of parts and derivatives can be practically implemented and enforced.

BIOLOGICAL STATUS

Ramin (*Gonystylus* spp.) is a tropical hardwood tree found primarily in the peat-swamp forests of Indonesia and Malaysia. The genus *Gonystylus*, consisting of about 30 species, is distributed throughout the Malesian area (Indonesia, Malaysia, the Philippines, Papua New Guinea, Singapore and Brunei Darussalam) with the majority of species found in Borneo. Ramin has been heavily depleted throughout its range to supply international markets for ramin timber and processed wood products. Six species (*G. affinis*, *G. bancanus*, *G. forbesii*, *G. macrophyllus*, *G. maingayi* and *G. velutinus*) are known to be commercially valuable, of which *G. bancanus* is the most heavily traded. Fifteen species in the genus, including *G. bancanus*, are classified as vulnerable in the IUCN's Red List of Threatened Species due to observed, inferred or projected habitat loss and over-exploitation. Logging—both selective logging and clear-cutting—is recognized as the major threat to these species (IUCN 2004).

As a result of over-exploitation, ramin has become scarce throughout most of its original range. Excessive logging and destruction of peat swamps have led to commercial extinction in much of Peninsular Malaysia. Populations have also been reduced in Sarawak in Malaysian Borneo, as evidenced by declining timber production levels. Ramin production in Sarawak fell from 521,000 m³ in 1990 to 67,000 m³ in 2000. By the mid-1990s, most of Malaysia's peat forests had been logged at least once. Because ramin is naturally slow to regenerate, Malaysian populations have yet to recover. Populations throughout Indonesia have also declined due to over-exploitation (Soehartono and Mardiasuti 2002). This decline is evident in Indonesia's annual ramin production, which fell from more than 665,000 m³ in 1994 to just 131,000 m³ in 2000—a decline of more than 80% in 6 years. Even at these levels, Indonesia's ramin harvest in 2000 far exceeded the annual allowable cut of 24,000 m³ authorized by the Ministry of Forestry.

International trade largely drives the exploitation of ramin. Ramin wood is prized for its suitability to many products, its luxurious appearance and its workability. Ramin's versatility and scarcity make it the most valuable wood in the region—with market prices up to US\$1000 / m³. With the dramatic decline in Malaysian ramin populations, that country's timber industry has become dependent on consuming large quantities of ramin smuggled from Indonesia. Much of Indonesia's remaining ramin is found in national parks and protected areas that provide vital habitat for many other threatened species, including the orangutan and Sumatran tiger (both on Appendix I). Demand for this valuable wood has led to an international trade in ramin logged illegally in Indonesian protected areas. In fact, illegal wood now comprises up to 90% of Indonesia's timber production. As a result, Indonesia's tropical forest habitat is being destroyed at an unprecedented rate, substantially increasing extinction risk for orangutans and other species dependent on that habitat.

RAMIN MEETS THE CRITERIA FOR LISTING UNDER CITES APPENDIX II

It is widely recognized that the current level of ramin exploitation is unsustainable and far exceeds a level that could be continued in perpetuity (Resolution conf. 9.24, Annex 2 (B)(i)). Indonesia's log harvest is thought to be up to ten times the authorized harvest, and far in excess of what is sustainable. Ramin's slow regeneration makes it highly vulnerable to such over-exploitation (Annex 1 (B) (iii)). The practice of extracting small trees to use in log transportation eliminates many immature trees before they can reproduce. Further, ramin grows in peat swamps that are particularly sensitive to disturbance from logging and land reclamation. Ongoing loss of ramin habitat due to peat swamp loss caused by logging activity, reclamation and land use change compounds the impacts of

direct exploitation (Annex 1 (B) (iv)). At the present pace, ramin could disappear from much of its remaining range within five to ten years. Unless trade in ramin is strictly regulated under Appendix II, the species is likely to meet the criteria for Appendix I listing in the near future.

APPENDIX II LISTING WOULD PROVIDE ADDITIONAL PROTECTION FOR RAMIN

The illegal trade in Indonesian ramin has continued despite that country's ban on ramin exports and the species' listing on Appendix III. The listing of ramin in Appendix III has facilitated enforcement efforts in the United States and EU, and encouraged stronger enforcement measures in key importing States, resulting in the seizure of many illegal shipments. However, large quantities of illegal Indonesian ramin continue to be smuggled across the borders into neighboring countries.

Malaysia, the only other major ramin exporter, has entered a partial reservation to the Appendix III listing and, consequently, only issues Certificates of Origin for logs and sawn timber. Malaysia's large export of ramin products and derivatives is not covered by any CITES documentation unless specifically requested by exporters or foreign buyers. This reservation reduces the effectiveness of the Appendix III listing by confusing traders and facilitating the laundering of Indonesian timber onto international markets. The environmental organizations Telepak and the Environmental Investigation Agency have documented large scale laundering of smuggled Indonesian ramin through Malaysia, accompanied by Malaysian export documents. Additionally, large quantities of ramin are being shipped to the United States and other markets without any CITES permits. This situation is compounded because a number of major ramin importing States do not fully implement Appendix III controls, or pay little attention to Appendix III enforcement.

Efforts to control the illegal and unsustainable trade in ramin would be substantially enhanced by an Appendix II listing. Ramin is already commercially extinct in many areas and the best available scientific information demonstrates that additional regulatory measures are needed to bring the present unsustainable exploitation under better control. Appendix II controls are more widely understood than Appendix III and more likely to be effectively implemented. More importantly, Appendix II listing will require exporting Parties to assess not only the legality of their ramin exports, but also the sustainability of the underlying harvests. Under Appendix II, Parties will be authorized to issue export permits only if the export will not be detrimental to the survival of the species. Because non-reserving importing Parties will be obliged to reject shipments not accompanied by an export permit, Appendix II listing will be effective even should an exporting Party take a reservation.

INCLUSION OF RAW LOGS AND PROCESSED PRODUCTS AND DERIVATIVES

In contrast to many other timber species, the great majority of ramin exports are in the form of processed wood. Ramin wood spoils quickly in raw form; consequently, there is little trade in ramin logs. Of ramin shipped to the United States and Europe, 95% is in the form of finished or semi-finished products. By contrast, raw timber exports to the United States comprise less than 1% of all ramin exports to that country. For this reason, the proposed Annotation #1—including readily recognizable products and derivatives of ramin—is critical to the success and effective implementation of the Appendix II listing. Without the annotation, an Appendix II listing will worsen, rather than improve, the management of ramin. Recent successful seizures of processed ramin products in the United States and United Kingdom demonstrate that CITES controls can be effectively implemented and enforced with respect to such products; and identification guides are now available to facilitate implementation efforts in CITES member States.

Ramin satisfies the biological and trade criteria for inclusion in CITES Appendix II. The increased protection provided by Appendix II is necessary to bring international trade in this species under control and ensure the long-term survival of ramin, and the many other species endangered by illegal ramin logging and trade. SSN urges all Parties to support the Indonesian proposal, including Annotation #1 covering ramin products and derivatives.