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March 14, 2019

**Re:** 18th Conference of the Parties (CoP) of the Convention on International Trade in Endangered Species (CITES)

Thank you for this opportunity to provide input ahead of the 18<sup>th</sup> CoP of CITES in Sri Lanka. The importance of CITES, and its multilateral nature, cannot be overstated as endangered species are further threatened by our changing climate. As shifts and losses in biodiversity are exacerbated by anthropogenic climate change, we must do all we can to halt the illicit trade of endangered species worldwide.<sup>1</sup>

After reviewing the list of species proposals for CoP18 with experts, I would like to offer the following suggestions and comments:

- Canada should support any proposal to list species in Appendix II. Listing species in Appendix II does not stop trade, but allows for regulation and monitoring – without this mandate to collect information on trade, species that are unlisted are further threatened. Appendix II listing is essential to protect species from overexploitation and allow for sustainable trade opportunities.<sup>2</sup>
- *Achillides chikae hermeli*: it is a positive step to see invertebrates included in CITES. Canada should support this proposal.
- *Aonyx cinereus* and *Lutrogale perspicillata*: Canada should support both proposals to list these species of otters on Appendix I instead of Appendix II – while they are listed under

<sup>1</sup> Chen, James Ming. "The Fragile Menagerie: Biodiversity Loss, Climate Change, and the Law." *Ind. LJ* 93 (2018): 303.

<sup>2</sup> Janssen, J., & Shepherd, C. R. (2018). Challenges in documenting trade in non CITES-listed species: A case study on crocodile skins (*Tribolonotus* spp.). *Journal of Asia-Pacific Biodiversity*, 11(4), 476-481.



Appendix II there are still trade loopholes that do not help their endangered status.

- *Calotes nigrilabris*, *Calotes pethiyagodai*, *Ceratophora*, *Cophotis ceylanica*, *Cophotis dumbara*, and *Lyriocephalus scutatus*: Canada should support all of these proposals from Sri Lanka. While other parties may call for these lizards to be listed on Appendix II first, there is no reason for them to not immediately be listed under Appendix I since they are a species endemic to Sri Lanka.
- *Ceratotherium simum simum* (populations of Eswatini and Namibia): There is a lack of information surrounding the impacts of downlisting these populations of rhinoceros. Downlisting them could potentially open trade loopholes; there needs to be more conversation around this proposal. For now, Canada should not support these proposals.
- *Ctenosaura*: There will likely be lobbying from the pet trade against this proposal, but Canada should support it.
- *Cuora bourreti* and *Cuora picturata*: Canada should support the listing of both of these turtle species to Appendix I; their wild populations are very small.
- *Echinotriton chinhaiensis* and *Newt Echinotriton maxiquadratus*: There is very little research on these specific species, but the pet trade is a known threat to many newt species in Asia.<sup>3</sup> Canada should support these proposals.
- *Gekko gekko*: These geckos are traded in the millions each year<sup>4</sup>; often declared as pets but they are sought after for medicinal reasons. Canada should support this one.
- *Geochelone elegans*: This proposal will likely be met with much resistance since there is a lot of captive breeding outside of the range states. Canada should support this proposal.
- *Giraffa camelopardalis*: Poaching and trophy hunting are increasing, Canada should support this proposal.
- *Glaucostegus*: Canada should support this proposal.
- *Gonatodes daudini*: This species is only found in its habitat of approximately one square kilometre; Canada should support this proposal.
- *Goniurosaurus*: Canada should support this proposal.
- *Isurus oxyrinchus* and *Isurus paucus*: Canada should support both of these proposals.

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<sup>3</sup> Rowley, J. J., Shepherd, C. R., Stuart, B. L., Nguyen, T. Q., Hoang, H. D., Cutajar, T. P., ... & Phimmachak, S. (2016). Estimating the global trade in Southeast Asian newts. *Biological Conservation*, 199, 96-100.

<sup>4</sup> Nijman, V., Shepherd, C. R., & Sanders, K. L. (2012). Over-exploitation and illegal trade of reptiles in Indonesia. *The Herpetological Journal*, 22(2), 83-89.



- *Loxodonta africana* (populations of Botswana, Namibia, South Africa and Zimbabwe): Elephants are still being poached at an alarming rate and the ivory trade is still contributing to the decline of this species. Putting these populations on Appendix II would open up the possibilities of loopholes in the trade regulations; Canada should oppose downlisting proposals. If there are concerns about the legal trade of narwhal and walrus ivory, we should note that they are distinguishable from elephant ivory -- this should not prevent us from attempting to protect a species in danger.
- *Mammuthus primigenius*: Canada should support this proposal. As long as it is legal to trade woolly mammoth ivory, there are concerns that its trade will hurt elephant populations, as smugglers trade elephant ivory but purposely mislabel it as that from woolly mammoths.<sup>5</sup>

In addition to the points above with regards to the species proposals, Canada should be supportive of the agenda item put forward by the United States and co-sponsored by Sri Lanka on the conservation of and international trade in songbirds.<sup>6</sup> In Southeast Asia, it is estimated that millions of songbirds, representing close to 400 different species are traded annually.<sup>7</sup> The US is recommending that the CITES Animal Committee establish a working to group to consider this issue ahead of CoP19.

I would also like to support the position statement and recommendations submitted by the Wildlife Conservation Society. Their expertise and commitment to conservation is valuable, and I am glad to know that they will have representatives in Sri Lanka for this conference.

Thank you again for the opportunity to submit comments, and for your work in preparing for CoP18.

Sincerely,



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Member of Parliament  
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Leader of the Green Party of Canada

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<sup>5</sup> Actman, J. (2016). Woolly mammoth ivory is legal, and that's a problem for elephants. <https://news.nationalgeographic.com/2016/08/wildlife-woolly-mammoth-ivory-trade-legal-china-african-elephant-poaching/> [Retrieved: March 11, 2019]

<sup>6</sup> US Fish and Wildlife Service (2019). Species specific matters: Songbird Trade and Conservation Management. <https://www.fws.gov/international/cites/cop18/pdfs/cop18-songbird-trade.pdf> [Retrieved: March 11, 2019]

<sup>7</sup> Chng, S. & Lee, J. & Shepherd, C. (2016). The conservation status, legal protection and assessment of the trade in Straw-headed Bulbuls *Pycnonotus zeylanicus* in Singapore. *TRAFFIC Bulletin*. Vol. 28. 49-52.

