



EIA BRIEFING REPORT: 16TH MEETING OF THE CONFERENCE OF PARTIES (COP16) TO THE U. N. CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA (CITES) (BANGKOK, MARCH 2013)

EIA's comments on specific CoP16 Proposals are as follows:

PROPOSALS FOR AMENDMENT OF APPENDICES I AND II

Rosewood, genus *Dalbergia*, and ebony, genus *Diospyros*, were formerly widespread and abundant. However, high and increasing demand for all species of rosewood and ebony is occurring and poses a risk to species in the wild. Habitat loss due to deforestation, as well as unsustainable and illegal logging, has resulted in such a drop in populations that four separate proposals have been filed for Appendix II listing of five separate species of rosewood, and one proposal for species of *Diospyros*. These proposals represent meaningful attempts by range states to better manage their natural resources and should be supported by the international community.

The listing proposals will restrict only the species specified and will not impact other states with other species of *Dalbergia* and *Diospyros*. All of the proponent countries recognize the need for coordinated research to allow the identification of the species proposed for listing. However, these listings cannot wait the development of identification protocols as legal and illegal trade have rapidly and dramatically increased in 2011 and 2012, making immediate protection of these species critical at the 16th Conference of the Parties (CoP16).

For nearly 300 years, rosewood and ebony have been the species of choice for makers of stringed instruments. Music aficionados consider their unique, vibrant colors and densities to be the optimal materials for endowing guitars and violins with a clear tone and stunning appearance. Traditionally, rosewood is used for the backs and sides of guitars and the bodies of violins, while ebony provides fingerboards and piano keys with their deep black color. For even longer, Chinese emperors and noblemen have sought rosewood and other precious woods for the manufacture of lustrous writing tables, chairs, and beds to adorn their palaces. Modern China's economic boom has created a burgeoning upper class eager to demonstrate its wealth, spurring an industry of reproduction Ming and Qing dynasty furniture made from precious woods. This growth, and to a lesser extent the growth in the international musical instrument industry, has put incredible pressure on stocks of precious woods around the world, driving rampant unsustainable harvesting throughout range states.

In order to protect its domestic precious woods manufacturing industry against widespread use of fakes made with less-valuable woods, the Chinese government's Redwood Furniture Manufacturer's Association in 2008 developed an official list of 33 species which fall into the category of *hongmu* (红木, literally, "red wood"). These species are notable both for their endangered status and their distribution across many countries with low levels of forest governance and correspondingly high rates of illegal and unsustainable harvesting.

Given this particular status and importance of *hongmu*, Chinese customs officials have designated a specific 8-digit international Harmonized System (HS) import code for this bundle of species, 44039930. Official Chinese import statistics clearly show the exponential rate of increase in imports of *hongmu* species over the past three years from nearly all range states (See Table 1).

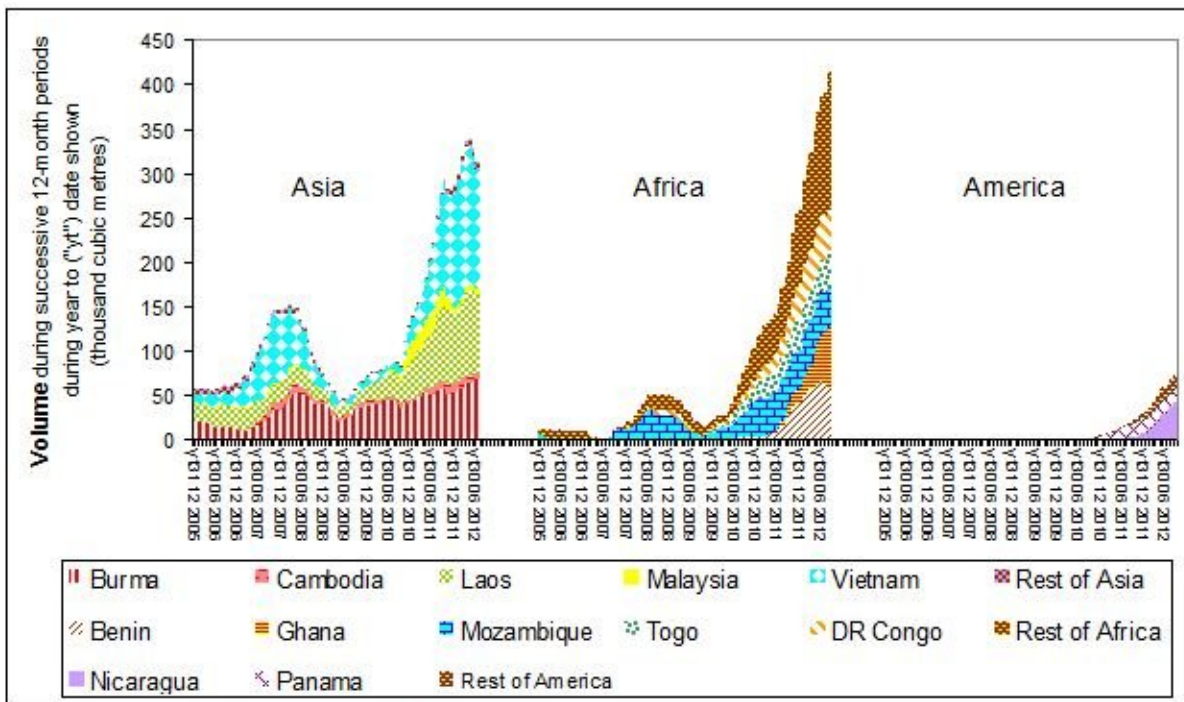


Table 1: Chinese imports of *hongmu* (precious “red woods”), by volume (1,000 m³).¹

1. CoP16 Prop. 58, *Diospyros spp.* (Malagasy ebony) - Inclusion of the populations of Madagascar in Appendix II, and limited to logs, sawn wood and veneer sheets by an annotation (Proponent: Madagascar)

The genus *Diospyros* spp. has 550 species worldwide, however, the proposal for Appendix II listing covers only 83 of the 84 species endemic to Madagascar. *D. ferrea* is the only species of *Diospyros* found in Madagascar that is not endemic, and therefore is not covered by this listing proposal. This proposal is an attempt by Madagascar to gain international support to control the unsustainable harvesting of its endemic ebony species and is not intended to adversely impact other range states with other species of ebony.

Approximately 40% of the species of *Diospyros* in this proposal are tall commercial trees, which can reach 15 meters high. However, some of the species are shrubs of only 2-4 meters. Found in various types of forests in Madagascar, all of these species are known for their hard, dense, long lasting, resistance to heat and cold, and highly valued timber. The heart of the trees of each of these species has a high economic value due to its black color. The timber can be black or carry black veins, which is the distinctive feature of all of the species of *Diospyros*. These trees are used for different purposes according to their height. The tall trees are used in woodworking and, the short trees are used for sculptures, carvings and musical instruments. Madagascar ebony brings very high prices in international trade, \$100 USD per board foot or higher. Madagascar ebony is considered to be the blackest of the *Diospyros* species; even more coveted than other African ebony species². As a result, there is substantial pressure on these species.

22 of the species are heavily traded internationally. More than 90% of the exports are of logs and sawn wood which are targeted by the proposed listing but the reduction in the number of large trees has led to the exploitation of younger and smaller trees (e.g., *D. squamosa* and *D. aculeata*) for the manufacture of artisanal objects (such as musical instruments) indicating a potential shift in trade. Illegal trade serving export markets in China, the US and Europe is well documented and on the rise³. The habitat of these species is facing diverse pressures and threats causing at the same time the extinction of many species. The

¹ Source: Based on General Administration of the People’s Republic of China (“China Customs”), as compiled by James Hewitt.

² See <http://www.woodshopnews.com/news/wood-markets/499331-wherever-you-are-ebony-will-cost-you-perhaps-100bf>.

Accessed 1/8/13.

³ EIA, Investigation into the Global Trade in Malagasy Precious Woods: Rosewood, Ebony and Pallisander (2010).

main pressures are registered clearing, bush fires, expansion of crops and agriculture, and abusive over-harvesting in the form of both legal and illegal logging especially for local and international trade. Natural vegetation cover in Madagascar where these species of *Diospyros* occur has been reduced to 9.9% of historic levels. Some of these species grow in forests that have been highly fragmented.

An assessment of the status of the populations of the species in this genus has shown that the majority of the specimens of *Diospyros* do not currently have a commercially exploitable size. The population structure of the species covered by this listing proposal has been deeply disturbed. This has resulted in an absence of certain diametric classes in the whole range. The regeneration rate is also very weak and these taxa need at least 80 years to reach the adult commercial size. It is possible to find some exploitable specimens but only on the natural protected areas, they have become inexistent in most of the 'production areas'. Logging in protected natural areas is illegal although the continued and increasing international demand on these products drives the abusive and illegal logging of target trees that, in the case of the tree seeds, is resulting in the scarcity of bigger diameter classes. Some species such as *D. baroniana*, *D. filipes*, *D. implexicalyx*, *D. nidiformis*, *D. perglauca*, *D. subfalciformis*, *D. tampinensis*, *D. tetraceros* and *D. thoursii* only grow outside protected areas, increasing the likelihood of their over-exploitation.

Madagascar is seeking to have these species of *Diospyros* listed on Appendix II in part because weaknesses at the institutional level make it currently impossible for the Government to control the harvesting of these species. Although some national forestry legislation exists, there are no laws or regulations that target the management of the genus *Diospyros* specifically. The Appendix II listing and accompanying documentation requirements will greatly aid Madagascar to strengthen implementation of its national laws and to seek the assistance of other CITES Parties (and in particular of consumer countries) to stop illegal trade and protect these rapidly disappearing species. Madagascar has stated that in the medium and long term, this listing is part of a broader organization and consolidation of the ebony sector in Madagascar. This action would include the development of management rules based on a better knowledge of these species, to ensure consistency with the legal texts and technical assessments of the operations, ecological restoration initiatives, in addition to appropriate approaches of the administrative procedures that would ensure a sustainable management and rational use of the populations of *Diospyros* in the forest of Madagascar.

The Madagascar proposal to list these species of *Diospyros* meets the criteria for Appendix II (RC 9.24 (Rev. CoP14), Annex 2 a) and Annex 2 b): a) these species are internationally traded; b) the wild populations of these species are rapidly declining; c) these species have extremely low regeneration rates, to the point that many species no longer have any identifiable fully mature specimens; d) there is poor national management of these species due to lack of laws, regulations and infrastructure and the CITES listing will greatly assist Madagascar in getting control of the massive legal and illegal logging of these species; e) there is a high global demand with Madagascar ebony being the most desired of all ebony species and; f) some species are Endangered and listing of the 83 species that are endemic to Madagascar is justified because of look-alike concerns.

EIA recommends that the Parties support the Madagascar proposal to list its 83 endemic *Diospyros* species in Appendix II.

2. CoP16 Prop. 60, Proposal for the inclusion of *Dalbergia cochinchinensis* in Appendix II, and limited to logs, sawn wood and veneer sheets by an annotation (Proponents: Thailand and Vietnam)

Thailand and Vietnam have jointly proposed *Dalbergia cochinchinensis*, Thailand rosewood, for listing in Appendix II. The proposal is made in accordance with Res. Conf. 9.24 (Rev. CoP15) Annex 2 (a) Paragraph A on the grounds that “*regulation of trade in the species is necessary to avoid it becoming eligible for inclusion in Appendix I in the near future*”.

EIA strongly supports this proposal as a necessary measure to support legislation across range states that is being undermined by the persistent cross-border trade in this species. The trafficking of Thailand rosewood

across the borders of several countries in the region, and ultimately into markets in China, poses a serious threat to the viability of the species in spite of a raft of national legislative measures.

No legal source of Thailand rosewood exists in Thailand due to the imposition of a logging ban in natural forests. Vietnamese law recognizes that the species is in danger of extinction and prohibits its exploitation. Additionally, the Cambodian Forestry Law restricts harvesting. In Laos Prime Minister Orders ban both the harvesting of all *Dalbergia* species and *Dalbergia cochinchinensis* specifically. Nonetheless EIA has found the species to be readily available and offered by traders in Thailand, Laos and Vietnam.

A concerted enforcement effort in Thailand has resulted in seizures of timber with an estimated market value of US\$3 billion over the past six years. This has not, however, led to a reduction in seizures. With an increasingly valuable market for the species in China over the same period, the number of seizures in Thailand doubled each year between 2009 and 2011.

The principal market for Thailand rosewood is the high-value replica antique furniture, or *hongmu*, market in China. Prices of raw materials have boomed in recent years, particularly after 2008 in the wake of a failed attempt by Thailand to list rosewood in CITES Appendices. There is anecdotal evidence that the price has been further inflated by speculation in China, where a cubic meter of unprocessed Thailand rosewood can attract up to \$50,000.

The unsustainable demand this has generated for an already dwindling and slow-growing species is driving it towards extinction. Anecdotal evidence from traders EIA has met indicates that it is becoming scarcer across range states. The habitat is highly fragmented within Thailand and concentrated in a few protected areas that are subject to encroachment. While population size has not been systematically surveyed, it has been estimated that approximately 63,500 cubic meters remained in forests in 2011. Similarly, no comprehensive survey of the Vietnamese population exists but numbers have been declining sharply.

The high price raw materials attract has prompted Cambodian loggers to enter Thai territory to extract wood Thailand rosewood from its border areas. The response of the Thai authorities to this encroachment has led to a high number of occasionally fatal shootings. The Thai government has disputed numbers reported in media, but has acknowledged that 13 loggers were killed in the border area in the first six months of 2012.

In a statement the Thai government has admitted that the solution lies in preventing villagers being “lured into these activities” and increasing cooperation and measures that reduce cross-border logging. EIA holds the view that listing Thailand rosewood in CITES Appendix II would assist these efforts.

The proposal highlights the similarity of *Dalbergia oliveri* to *Dalbergia cochinchinensis* and the characteristics by which they can be differentiated. Without passing comment on the decision not to list *Dalbergia oliveri* in addition to *cochinchinensis* - the species are subject largely to the same controls and threats – authorities in both Vietnam and Thailand have exhibited an ability to differentiate between the two species.

In a case last year, Vietnamese customs authorities, working together with Vietnam’s CITES Scientific Authority, identified *Dalbergia cochinchinensis* falsely declared as another species while being trafficked for onward sale to China. Timber seized within Thailand is consistently identified by authorities as Thailand rosewood.

EIA recommends that the Parties support the proposal to list *Dalbergia cochinchinensis* in Appendix II.

3. CoP16 Prop. 61: Black rosewood (*Dalbergia retusa*) and Granadillo rosewood (*Dalbergia granadillo*) (Proponent: Belize)

Belize has proposed inclusion of *Dalbergia retusa* in Appendix II in accordance with Article II, paragraph 2(a) of the Convention and Resolution Conf. 9.24 (Rev. CoP15), Annex 2(a), Paragraph B, and inclusion of

Dalbergia granadillo in Appendix II for look-alike reason in accordance with Article II, paragraph 2(b) of the Convention and Res. Conf. 9.24 (Rev. CoP15), Annex 2(b), Paragraph A.

D. retusa is a hardwood leguminous tree, found from Mexico to Panama in dry tropical forests and that has, as many of the other species in the genus, been overharvested for its dense and durable wood, which is prized for a wide range of uses (e.g. carvings, tourist trade as personal items, musical and scientific instruments, pen-blanks, gun handles, etc). There is a high wastage of wood as the sapwood is of low value and there is a premium on the most highly patterned heartwood pieces. Lustrous in color, the heartwood varies from yellow to dark reddish-brown, with a figuring of darker irregular markings. The wood has a natural cold feel like marble and because of the oil content; it is easy to work and polish and is highly durable. *D. retusa* is exceptionally good for marine use. The timber secretes compounds toxic to bacteria, fungi, algae, termites, mosquito larvae, confused flour beetles and marine borers. The wood of *D. granadillo* is indistinguishable from *D. retusa*, necessitating the CITES listing of both species.

D. retusa was described by the United States National Academy of Sciences as scarce in 1979 with all accessible stands having long since been logged out. The IUCN classifies *D. retusa* as Vulnerable; it is considered Endangered in Panama; vulnerable in El Salvador and Honduras; threatened in Guatemala; some areas where *D. retusa* was once widespread now contain populations that are nearly completely exhausted; it is considered to be threatened in Costa Rica with a high risk of becoming endangered due to significant decline in its populations and habitat; reported difficulties in sourcing the wood indicate that *D. retusa* may be commercially extinct in some areas.

Although little information is available on current abundance in the wild, it is presumed that the distribution of the species has been highly fragmented due to the extent of habitat loss. Reported difficulties in sourcing the wood suggest that it may already be commercially extinct in some wild areas. Conversion of tropical dry forest where *D. retusa* and *D. granadillo* occur to agriculture and pasture for cattle is occurring at alarming rates, and the species occur in an area that is considered to be the most endangered major tropical ecosystem, with less than 2% of the area remaining intact. Overall deforestation rates between 1990 and 2000 in tropical dry forest in range states vary from 7,000 hectares in El Salvador to 631,000 hectares in Mexico. Both legal and illegal logging cause the removal of reproducing individuals which results in corresponding reduction in population size and density, impairing the ability of *D. retusa* to regenerate.

Both *D. retusa* and *D. granadillo* are often traded under the name 'cocobolo.' International trade of these species is mainly in sawn wood and manufactured items. *D. retusa* is so rare in the wild that very little of it reaches the world market. Some plantations exist and it is mainly harvested from private lands. The increase in the imports of timber generally referred to as 'redwood' by China from the range States, especially in 2011 and 2012, has raised serious concerns within the region. There are substantial discrepancies in the trade data, which may mean that these species are being harvested at even a faster rate than officially acknowledged. For instance, Belize reports that a total of 1,377.87 cubic meters were exported to China from February to July 2012, despite the imposition of a moratorium on harvest and export in March of 2012. However, according to the General Administration of Customs of the People's Republic of China, China imported 3,400 cubic meters of rosewood from Belize in the same period of time, more than twice the amount stated by Belize.

Guatemala and Panama have listed their populations of *Dalbergia retusa* on CITES Appendix III, but these listings seem to be insufficient to control legal and illegal trade (See Tables 2 and 3 below). An Appendix II listing will require the regulation of international trade, which is currently unregulated. In addition, international protection will likely increase conservation efforts, including assessments of the status of the species in the wild, promulgation of national legislation to protect the species and its habitat, the establishment of population monitoring strategies and the creation of identification materials to be made available to other Parties and especially to Customs officials.

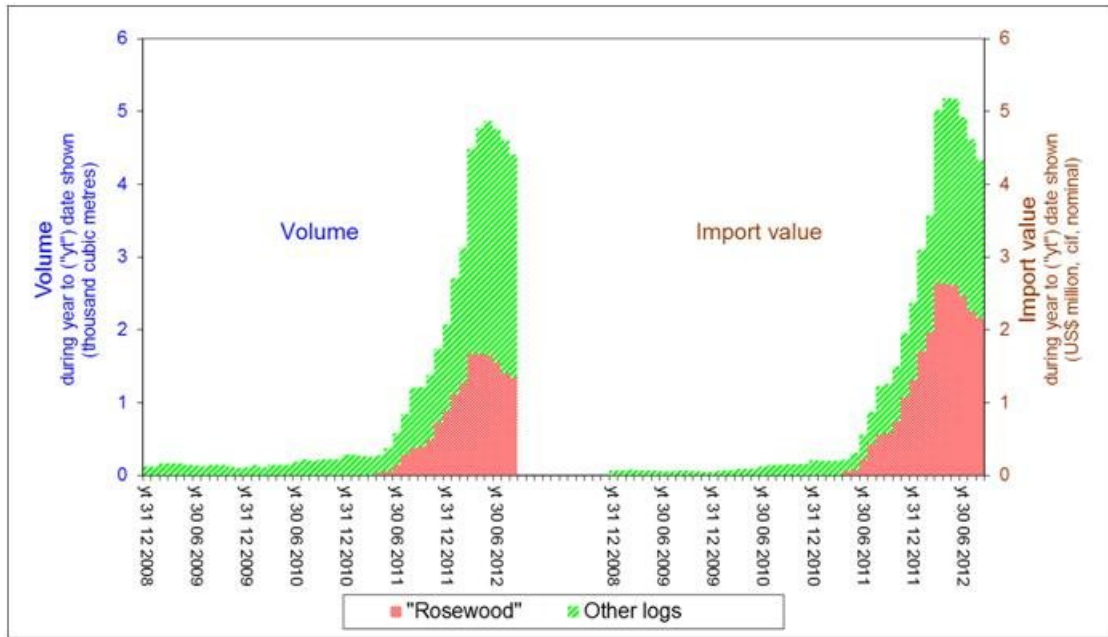


Table 2: Chinese imports of *hongmu* (precious “red woods”) from Guatemala, by volume (1,000 m³).⁴

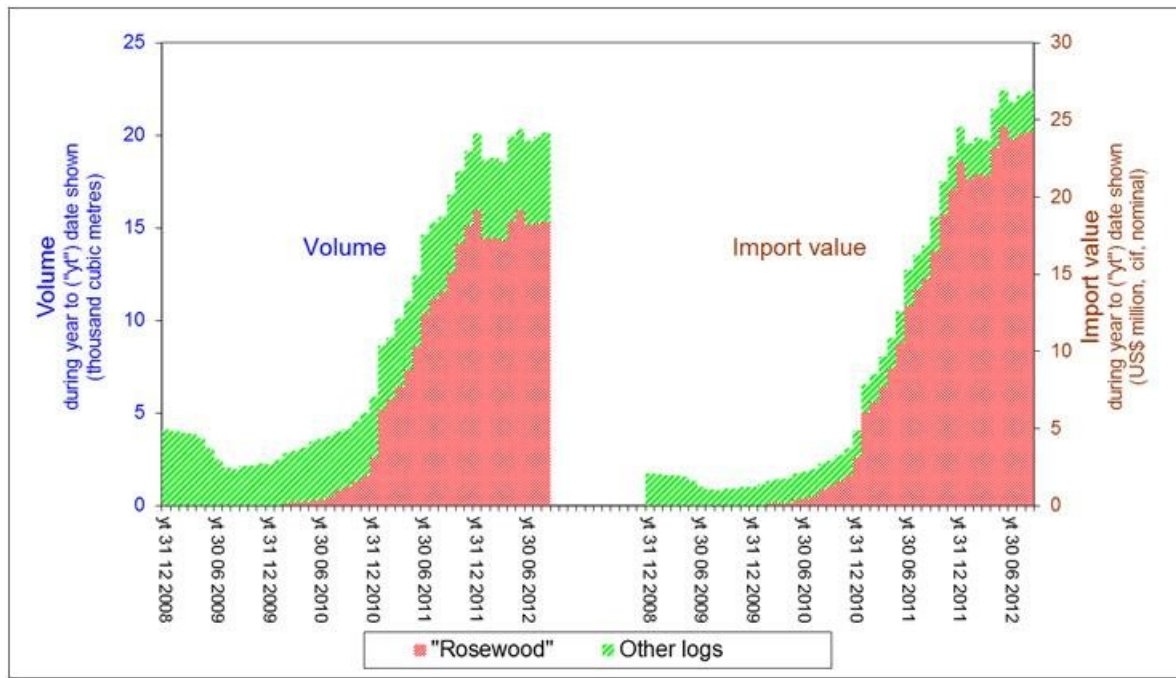


Table 3: Chinese imports of *hongmu* (precious “red woods”) from Panama, by volume (1,000 m³).⁵

D. retusa meets criteria for Appendix II (RC 9.24 (Rev. CoP15), Annex 2 a), paragraph B): a) it is internationally traded; b) given the current habitat loss and pressure from legal and illegal logging there is an inability to easily regenerate this species; c) wild populations are rapidly declining; d) *D. retusa* is a very slow-growing species; and e) habitat degradation and loss is up to 98% of *D. retusa*'s original range. *D. granadillo* satisfies Criterion A in Annex 2b of RC 9.24 (Rev. CoP14) for look-alike reasons. It should also be noted that this listing proposal is brought by a range state and that other range states support the Appendix II listing.

EIA recommends that the Parties support the proposal to list *Dalbergia retusa* and *Dalbergia granadillo* in Appendix II.

⁴ Source: Based on General Administration of the People's Republic of China (“China Customs”), as compiled by James Hewitt.

⁵ Source: Based on General Administration of the People's Republic of China (“China Customs”), as compiled by James Hewitt.

4. CoP16 Prop. 62: Honduras rosewood (*Dalbergia stevensonii*) (Proponent: Belize)

Belize has proposed inclusion of Honduras rosewood in Appendix II in accordance with Article II, paragraph 2(a) of the Convention and Res. Conf. 9.24 (Rev. CoP15), Annex 2(a), Paragraph B.

D. stevensonii is a medium sized tree with a height of 15-30 m. It has a distribution restricted to broadleaf evergreen swamp forests of southern Belize and nearby regions with a very small geographical range in Guatemala and Mexico. In Honduras and in Guatemala there are no data of potential area of distribution. Confined to small areas due to habitat specificity and considered to be rare; although found in large patches within its small range in southern Belize, all populations are believed to be declining. A high number of large, mature, seed-bearing trees have been removed. Together with problems associated with regeneration from seed, over-harvesting may well have already seriously impeded regeneration of the species in the wild and this in turn will have an effect on genetic diversity.

The wood is heavy and very durable, and its distinctive color makes it particularly valuable. The populations of the species are under high pressure due to high levels of legal and of illegal logging, agriculture, road construction slash-and-burn agriculture, genetic erosion, habitat loss, cattle ranching and, increasing deforestation in the region. Cross-border illegal logging has been reported in Belize, Mexico and Guatemala.

The range states where *D. stevensonii* occurs are experiencing high rates of deforestation. 70,000 hectares of forest are disappearing each year in Chiapas, Mexico; Izabal and Peten, Guatemala, have suffered from extensive deforestation; the species' habitat in Chiapas, Mexico, is experiencing one of the highest rates of deforestation in the world; in Belize, community lands have experienced extensive land use/land cover changes close to and within protected areas where *D. stevensonii* occurs. Additionally, Belize currently has the highest population growth rate in Central America and colonization of community lands and natural reserves threaten the species habitat. It was predicted that by 2010 only 2% of the forests would remain in the Petén, Guatemala where *D. stevensonii* is found.

The timber of *D. stevensonii* is very much sought after particularly as a tonewood for musical instruments, and increasingly by the Asian market for furniture and cabinet-making. The species is not available from plantations, and therefore must be sourced from wild populations. In spite of its rarity, there is a high level of wastage, up to 80%, as only logs of the straightest grain are used for most products.

All *D. stevensonii* timber is sourced from wild populations, which are rapidly declining. Despite the limited availability, trade in *D. stevensonii* has increased exponentially in the last few years, in large part to satisfy demand from Asian markets, especially China. Information from the CITES trade data base maintained by the WCMC shows exports from Guatemala totalled 411.009 cubic meters over the period 2008-2010, and 20.519 cubic meters from Belize in 2008. Belize reports a total export from 1999 to January 2012 of 25,704.55 cubic meters and of 1,377.87 cubic meters from February to July 2012 (CITES Trade Database).

This species is not protected under any international legal instruments and no international measures are in place to control movement of specimens across international borders. Listing in Appendix II will assist these countries to protect the species by regulating its trade and preventing its unsustainable and destructive harvest. It should also be noted that this listing proposal is brought by a range state and that other range states support the Appendix II listing.

D. stevensonii meets criteria for Appendix II (RC 9.24 (Rev. CoP15), Annex 2 a), paragraph B): a) it is internationally traded; b) all wild populations are declining; c) there is high demand for this timber but very limited availability of mature trees; and d) international trade is having a severely detrimental impact on wild populations.

EIA recommends that the Parties support the proposal to list *Dalbergia stevensonii* in Appendix II.

5. CoP16 Prop. 63: *Dalbergia* spp. (Malagasy rosewood) - Inclusion of the populations of Madagascar in Appendix II, limited to logs, sawn wood and veneer sheets by annotation (Proponent: Madagascar)

Madagascar has proposed to include all endemic species of *Dalbergia* in CITES Appendix II. If accepted, trade in logs, sawn wood and veneer sheets of these species would be regulated in accordance with the provisions of Article IV of the Convention.

The genus *Dalbergia* comprises 250 species worldwide. This proposal concerns only the 48 species of *Dalbergia* that are endemic of Madagascar. These species are found in various types of forests on the west and east parts of Madagascar and mature trees can range from 2 to 17 meters. The heart is surrounded by a white ring that is easy to differentiate; the color of the timber can vary from a light beige-grey to dark brown or bright violet red color that is not long lasting since it becomes ebony black when it is exposed to the light. This timber is hard, robust and it is resistant to termites. For this reason, it is used in construction, wood working, furniture and sculpture. Timber is the only source of energy for some forest dependant populations in Madagascar, and the timber of *Dalbergia* has a high calorific value that also has made these species specific targets of harvesting for firewood.

These species play an important role in the ecosystem since they improve the soil fertility due to the mycorrhizae and, provide food to several endemic species including some species of lemurs. The habitat of *Dalbergia* is being destroyed not only for the abusive over-extraction of the timber of these particular species but also for other anthropogenic activities like fires and agriculture. The commercially exploitable specimens of *Dalbergia* spp. that are currently left, are very rare. The population structure of these species has been deeply disturbed. This has resulted in an absence of certain diametric classes in the whole range. The regeneration rate is extremely slow with many species adding only 3 mm of tree width per year. Natural regeneration of these species has been severely disrupted by the exploitation of large trees for legal and illegal trade. Only 10-25% of the total population of *Dalbergia* spp. in Madagascar is found inside the natural protected areas which makes these species much more vulnerable to illegal exploitation.

Out of the 40 *Dalbergia* species found in Madagascar that have been assessed by IUCN, 10 were listed as Critically Endangered, 14 Endangered, 10 Vulnerable, five Lowest Concern and one Data Deficient. Field observations document a dramatic decrease in the number of commercially exploitable (i.e. large) specimens and, that wild populations are declining and increasingly affected by reduction and degradation of habitat. Species of *Dalbergia* that are listed as Critically Endangered and Endangered in the IUCN Red List cannot be distinguished from other *Dalbergia* species in trade, which justifies listing of the entire genus.

This timber is the main forest product of the country, in very high demand and with a high added value at the national as well at the international trade. It is used in diverse fine timber products. The international demand has increased to the extent that it has caused an overharvesting of the species that has put them in risk of extinction, while also destroying their habitat. Seven species are the most heavily traded internationally. More than 90% of the exports are of logs and sawn wood, although finished products, furniture and handicrafts are also exported. Madagascar rosewood brings very high prices on the international market, \$7690 USD per tonne or higher. Rosewood furniture prices range from a few thousand US dollars to almost a million US dollars for top-end products. Retail prices of rosewood furniture are reported to have tripled over the last 5–7 years making the species even more prone to over-harvesting and illegal logging.

One thousand and fourteen containers of timber of *Dalbergia* spp. with a value of \$217 800 000 USD were identified in 2009 as resulting from the illegal logging activities on the north-east part of Madagascar. The international NGO Global Witness estimated in 2009 that the value of the illegal traffic of this timber equals a value of 400,000 euros per day on international markets. An estimated 95% of these exports are destined for China. Chinese customs data shows imports of rosewood and other precious woods (primarily ebony and palissander) from Madagascar continuing despite a ban on harvest and export which has been in place since 2006, and a final end in March 2010 to all special “exceptional authorizations” for export (See Table 4).

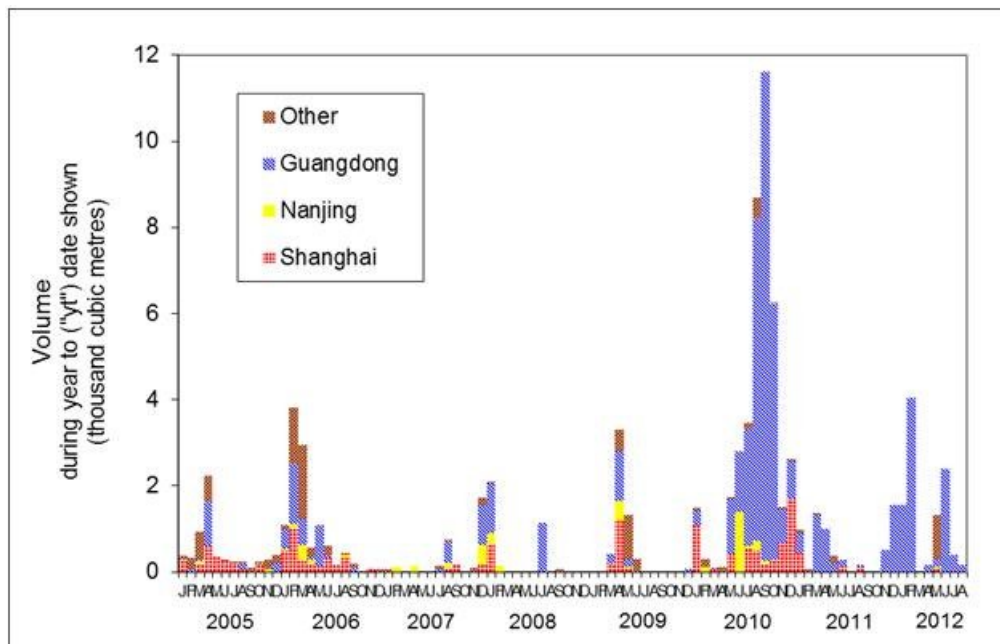


Table 4: Chinese imports of *hongmu* (precious “red woods”) from Madagascar, by customs district, by volume (1,000m³).⁶

Madagascar has had difficulty implementing its ban on rosewood export and harvest due to a lack of resources and weak infrastructure. Madagascar is seeking to list these endemic species in CITES Appendix II to allow strengthened implementation of its national laws and to seek the assistance of other CITES Parties, in particular of consumer countries, to stop illegal trade of these species of *Dalbergia*.

This proposal meets criteria for Appendix II (Res. Conf. 9.24 (Rev. CoP14), Annex 2 a) and Annex 2 b): a) Madagascar rosewood is internationally traded; b) wild populations of the species of *Dalbergia* in the listing are in rapid decline; c) these species have low regeneration rates and massive legal and illegal logging has further impeded these species ability to regenerate; d) a ban on trade in these species is not controlling trade due to a lack of resources for implementation and a lack of infrastructure; e) there is an extremely high global demand; and f) some species are Critically Endangered or Endangered and listing of the entire genus is justified because of look-alike concerns.

EIA *recommends* that the Parties support the proposal to list all of Madagascar’s endemic species of *Dalbergia* in CITES Appendix II.



Environmental Investigation Agency (UK)

62-63 Upper Street
London, N1 0NY
T: +44 (0)207 3547960
E: ukinfo@eia-international.org
<http://www.eia-international.org/>

Environmental Investigation Agency (US)

PO Box 53343
Washington, DC 20009
T: +1 202 4836621
E: info@eia-global.org
<http://www.eia-global.org/>

⁶ Source: Based on General Administration of the People’s Republic of China (“China Customs”), as compiled by James Hewitt.