

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES
OF WILD FAUNA AND FLORA



Joint sessions of the 31st meeting of the Animals Committee and
the 25th meeting of the Plants Committee
Online, 4 June 2021

Interpretation and implementation matters

Regulation of trade

Non-detriment findings

RESPONSE OF THE PEOPLE'S REPUBLIC OF CHINA REGARDING
DOCUMENT AC31 DOC. 14.1/PC25 DOC. 17

1. This document has been prepared by the Secretariat and is submitted in relation to document AC31 Doc. 14.1/PC25 Doc. 17 *Add on Non-detriment findings*.
2. On 21 May 2021, the Secretariat received a response to [Notification to the Parties No. 2021/007](#) and document [AC31 Doc. 14.1/PC25 Doc. 17 Add on Non-detriment findings](#) from China. This response is additional to previous comments on the NDF gap analysis by the PC Alternative Representative of Asia (in the framework of the Secretariat's consultations with the PC on document [AC31 Doc. 14.1 / PC25 Doc. 17](#)).
3. China has two substantive comments on the priorities proposed of document [AC31 Doc. 14.1 / PC25 Doc. 17 Add on Non-detriment findings](#):
 - i) Regarding 'low risk situations' [paragraph 7(1)]: China considers that the objective of the NDF is essentially a risk assessment to determine whether a proposed trade application has detrimental effects on the survival of the species. The NDF's primary assessment is the level of risk; in other words, low risk is an NDF finding, not its initial condition. Therefore, China recommends to remove *'low risk situations involving source code W'* from the first proposed gap.
 - ii) Regarding language challenges as an NDF priority: China emphasizes the challenges of the Parties of the Asian region in translating information and NDF materials. Devoting human resources to translating materials and guides is an additional burden to Scientific Authorities in many Asian Parties. Specific support mechanisms should be taken into account in planning and drafting Decisions, in particular when planning to share and monitor the use of the guidance, so that this critical work benefits more Parties and ultimately contributes to biodiversity conservation and sustainable use.