

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

Thirteenth meeting of the Conference of the Parties  
Bangkok (Thailand), 2-14 October 2004

Interpretation and implementation of the Convention

Regular and special reports

TRANSPORT OF LIVE SPECIMENS

1. This document has been submitted by the Secretariat.
2. In Resolution Conf. 10.21 on Transport of live animals, under the third DIRECTS, the Secretariat is directed "in consultation with the Animals and Standing Committees, to monitor the implementation of these recommendations and of other aspects of this Resolution and report its findings and recommendations at each meeting of the Conference of the Parties". The present report also includes information on the implementation of Decisions 12.85 and 12.86 on Transport of live animals. It is largely based on the activities of the Animals Committee and its transport working group (TWG), which, as has been the practice for the past few years, took the lead on matters related to the implementation of Resolution Conf. 10.21. The Secretariat is grateful to the Animals Committee, and particularly the TWG, for their contributions.

CITES Guidelines for transport and preparation for shipment of live wild animals and plants and the International Air Transport Association (IATA) Live Animals Regulations

3. According to Resolution Conf. 10.21, under RECOMMENDS, paragraph a), Parties should adopt measures to implement the *CITES Guidelines for Transport and Preparation for Shipment of Live Wild Animals and Plants*. However these Guidelines, published in 1980 and available on the CITES Website, are widely recognized as being out of date. Paragraphs d) and e) of the Resolution therefore provide that the annually updated and readily available IATA Live Animals Regulations are deemed to meet the CITES Guidelines for live animal transport by air, and are to be used as a reference for carriage by other means of transport. The Animals Committee thus decided to focus on supporting the further development and updating of the IATA Live Animals Regulations and on providing relevant advice to Parties wishing to export live animals. It was directed to do this at the 12th meeting of the Conference of the Parties (CoP12, Santiago, 2002) in Decision 12.85 as follows:

*The Animals Committee, in collaboration with interested non-governmental organizations and the Secretariat, should:*

- a) *develop recommendations regarding transport of live animals by road, rail or ship to supplement, where necessary, the IATA Live Animals Regulations;*
- b) *investigate cost-effective options for containers and packing materials that could be recommended for adoption in the IATA Live Animals Regulations;*
- c) *assist in identifying model practices concerning the transport and preparation for shipment of live wild animals, and develop recommendations to the Parties regarding the proper handling and transportation of live animals, particularly in exporting countries; and*
- d) *report at the 13th meeting of the Conference of the Parties on progress with the implementation of paragraphs a) to c) above.*

4. Regarding paragraph a) of Decision 12.85, the Animals Committee has acknowledged that no single world-wide standard exists for transport of live animals other than by air, and that the IATA Live Animals Regulations are sometimes not adequate to deal with such transport. The development of recommendations to complement the IATA Live Animals Regulation would require an analysis of relevant information, and specialist expertise to be sought outside the Committee. The TWG has considered some species-specific studies (marine mammals; circus elephants), and relevant transport standards and legislation in the European Union and New Zealand. Furthermore, it has received information from the the Animal Transport Association (AATA) and the European Association of Zoos and Aquaria (EAZA), on crate construction and container requirements for transport of live animals other than by air, as well as from the Whale and Dolphin Conservation Society and the World Society for the Protection of Animals. It started to collect data on road transportation. However, insufficient information was collected and analysed for the Animals Committee to develop recommendations regarding transport of live animals by road, rail or ship. The TWG also experienced difficulties in involving or finding experts willing to advice on particular aspects of transport by road, rail or ship. So far, a German transport company specializing in the transport of wild animals has expressed its willingness to provide expertise, and International Environmental Resources, an NGO, has offered expertise on road and rail transport of circus animals.
5. Regarding paragraphs b) and c) of Decision 12.85, the Animals Committee has agreed to identify best practices for the transport, preparation and handling of shipments of live wild animals, particularly in exporting countries, and for cost-effective packaging. Acknowledging that the IATA Live Animals Regulations are generally considered the best standard, the Animals Committee is aiming to develop practical advice and models of how exporters should prepare wild live animals for transport.
6. The Animals Committee has noted that its previous attempts to collect information on best transport practices were not very successful, and possibly were hampered by the unwillingness of shippers to report on inadequate transport methods. The Committee has nevertheless agreed that it would be useful to consult reliable animal exporters with experience in preparing wild animals for shipment. The representative of the United Republic of Tanzania in the TWG has offered to collect information from some reliable African animal exporting companies, and other members of the working group have been encouraged to gather similar information. However, at the time of writing this report, the Animals Committee had been unsuccessful in obtaining this information.
7. As indicated in paragraphs 4 to 6 above, the Animals Committee has made little progress in implementing Decision 12.85. This is mainly because of a lack of input from experts and the transport industry, and the limited time that was available to collate available information and undertake external consultations. The information submitted by EAZA and AATA, and some of the other sources and materials mentioned above could provide a basis for formulating the recommendations called for in the Decision. Regarding paragraphs a) and b), the Animals Committee has agreed to propose specific addenda to the IATA Live Animals Regulations, containing recommendations for the transport of live animals by road, rail and ship, and including cost-effective options for containers and packing materials for all means of transportation. It has committed itself to prepare a draft version of an addendum (on container requirements for transport of live animals other than by air) for discussion at its 21st meeting. The Animals Committee has furthermore concluded that the reporting called for in paragraph c) should continue. The Secretariat concurs with the suggestions of the Animals Committee.

#### Collaboration with IATA and the AATA

8. In Resolution Conf. 10.21, under RECOMMENDS, paragraph c), the Conference of the Parties recommends that the regular communication of the CITES Secretariat and the Standing Committee with the Live Animals and Perishables Board of IATA be continued and that a relationship with AATA be developed. This communication has been ensured mainly through the Chairman of the TWG.
9. Since CoP12, the Chairman of the TWG has regularly liaised with the IATA Live Animals and Perishables Board. He attended the 14th Board meeting (Montreal, October 2003), where a number of amendments to the IATA Live Animals Regulations, submitted by the transport working group, were adopted.

10. The Chairman of the TWG has also maintained contacts with AATA, and options for further collaboration have been discussed with a representative of the AATA Committee (Europe). He attended the AATA annual conference (Washington D.C., April 2003), and will be representing Austria on the AATA board for the coming three years. He was invited to moderate a session at the AATA annual conference in Vienna, in April 2004, on international cooperation between different conventions and agencies, including CITES, IATA, the World Association of Zoos and Aquariums (WAZA), AATA and the *Office International des Epizooties* (OIE).

#### Monitoring of mortalities during transport

11. Resolution Conf. 10.21 urges all Parties "to maintain records of the number of live specimens per shipment and of mortalities in transport of species listed in the Appendices", and to submit these data along with their annual reports. It further directs the Animals Committee, in consultation with the Secretariat, to analyse the data and other information on transport-related mortality, and to formulate recommendations to Parties. Non-submission of data by Parties should be noted in a report from the Secretariat to the Standing Committee.
12. As reported by the Secretariat at CoP12, an analysis of the information that was collected through mortality reporting forms between 1999 and 2001 indicated that for animals of selected CITES-listed species that are shipped by air, overall transport-related mortality is low to very low. Other studies on this topic have showed similar results, suggesting that dead-on-arrival rates for animals transported by air are generally low, with the exception of a few isolated and occasionally high-profile cases. The Animals Committee concurred with the conclusions of the Secretariat that rather than undertaking further analysis of mortality data, the focus after CoP12 should be on other aspects of Resolution Conf. 10.21. The Secretariat notes that very few Parties continued to submit mortality reporting forms with their annual reports after CoP12.

#### Memorandum of Understanding between the CITES Secretariat, IATA and the World Association of Zoos and Aquariums (WAZA)

13. Under Resolution Conf. 10.21, it is noted that:

*in order to improve implementation of the IATA Live Animals Regulations by the Parties there is a need for greatly increased awareness of the Regulations through:*

- a) more effective methods of training of personnel of airlines and enforcement agencies; and*
- b) improved methods of liaison and information;*

In this context, Decision 12.86, directed to the CITES Secretariat, was adopted as follows:

*The Secretariat shall, in consultation with the Animals Committee, liaise with the International Air Transport Association (IATA) and the World Association of Zoos and Aquariums (WAZA) with a view to concluding a Memorandum of Understanding in order to:*

- a) strengthen further collaboration in order to improve transport conditions of live animals;*
- b) establish an official training programme on animal transport; and*
- c) facilitate the exchange of technical information relevant to animal transport, between the Secretariat, the IATA Live Animals and Perishables Boards and the WAZA Executive Office.*

14. The Secretariat organized a workshop in April 2003 to draft a Memorandum of Understanding (MoU), attended by representatives from WAZA and IATA, and the Chairmen of the Animals Committee and its transport working group. A draft MoU, to be signed by the Secretary-General of CITES, the Executive Director of IATA and the Executive Director of WAZA, was circulated to and discussed by the three organizations in the course of 2003. Although the CITES Secretariat and WAZA were supportive of the draft MoU, the IATA Live Animals and Perishables Board did not endorse it. This was conveyed by IATA to the Secretariat and WAZA in November 2003, and reiterated in a letter on

23 April 2004 (see Annex). In view of the response of IATA, the Secretariat proposes to delete Decision 12.86.

#### Other aspects of Resolution Conf. 10.21

15. The Secretariat is directed in Resolution Conf. 10.21 to report its findings and recommendations on other aspects of this Resolution, and to provide recommendations at each meeting of the Conference of the Parties.
16. As explained above, the Resolution contains reference to the *CITES Guidelines for Transport and Preparation for Shipment of Live Wild Animals and Plants*. The Secretariat would like to draw attention to the work of the Plants Committee regarding the development of CITES Guidelines for live plant shipments, adopted at its 12th meeting (Leiden, May 2002). These guidelines were subsequently communicated to IATA and incorporated in the IATA Perishable Cargo Manual, which is regularly updated and disseminated. The Plants Committee agreed to provide IATA with further advice regarding transport of live plants as necessary. This is a very similar process to that followed by the Animals Committee for formulating guidelines for transport of live animals, and providing continued input into the IATA Live Animals Regulation (see paragraph 3 above). At its 14th meeting (Windhoek, February 2004), the Plants Committee furthermore proposed a standardized form for communicating information between Management Authorities regarding plant shipments that do not comply with the guidelines. However, repeated attempts by the CITES community to develop such special reporting systems for live animal shipments since 1981 (through Resolution Conf. 4.21 adopted in 1983; Resolution Conf. 6.24 in 1987; Resolution Conf. 7.13 in 1989; and Resolution Conf. 9.23 in 1994) have proven to be ineffective and widely ignored, and were finally abandoned. In the opinion of the Secretariat, it is unlikely that separate reporting requirements for live plant shipments will achieve any greater success.
17. The Secretariat is of the opinion that it would be useful for the Animals and Plants Committees to exchange information on matters related to the transportation of live animals and plants, and that Resolution Conf. 10.21 should be broadened to include recommendations addressing both live animals and plants.
18. The Secretariat notes that Resolution Conf. 10.21, under RECOMMENDS, paragraphs f) to j) contains recommendations to Parties on domestic legislation and on national application and inspection procedures, controls and holding facilities. It is of the opinion that simplifying and shortening these recommendations may make them more likely to be implemented by Parties.

#### Recommendations

19. Through the implementation of Decision 12.85, the Animals Committee started to focus on those elements of Resolution Conf. 10.21 that are not directly related to mortality data and their analysis. The progress that was achieved in this regard was limited but indicates that this work is necessary and should continue. The Secretariat therefore recommends the adoption of the first draft decision in Annex 2.
20. The Secretariat is of the opinion that by the 14th meeting of the Conference of the Parties, Resolution Conf. 10.21 should be revised and updated by the Animals Committee, in consultation with the Plants Committee. This revision should particularly focus on the requirements regarding the collection, submission and analysis of data on mortality and injury or damage to health in transport of live animals; the reporting obligations; the various requirements for domestic measures directed to Parties; the need to incorporate references to the transport of live plants; and the mechanisms through which the *CITES Guidelines for Transport and Preparation for Shipment of Live Wild Animals and Plants* are to be replaced by IATA manuals and regulations. The Secretariat therefore recommends the adoption of the second draft decision in Annex 2.

April 23, 2004

Mr. W. Wijnstekers  
CITES Secretariat  
15, Chemin des Anémones  
CH-1219 Châtelaine-Geneva  
Switzerland  
cc: Mr. P. Linhart  
CITES transport working group

Dear Mr. Wijnstekers,

It has come to the attention of the IATA Live Animals and Perishables Board (LAPB) that a proposed Memorandum of Understanding between CITES, WAZA and the LAPB was further discussed at a recent CITES meeting in Johannesburg. In a communication (via email) between Mr. Raemdonck and Mr De Meulenaer, dated November 13<sup>th</sup> 2004, the unsuccessful outcome of the proposal had been communicated. Perhaps the choice of words did not convey this properly, a situation this letter seeks to remedy.

For over 20 years, the LAPB has enjoyed mutually beneficial relationships with CITES, OIE, the EU and other government and non-government organizations. Together, we have done much to improve the safety and welfare of animals transported by air. Our accomplishments have been achieved in a spirit of mutual respect and understanding, without legally burdensome MOUs or other formal agreements.

The LAPB has a long-standing process of seeking the best information available from a variety of sources. The fact that the *IATA Live Animals Regulations* has been incorporated into the national legislation of many countries is a testament to this successful process. After careful consideration, the LAPB has come to the conclusion that entering into a MOU or other formal agreement with CITES or any other organization would, by its very nature, be restrictive and would only impede our common goal of improving the safe and humane transport of animals by air. Therefore, it is the decision of the LAPB to not pursue or entertain a MOU or other formal agreement with any individual or organization.

In years past, CITES had agreed to review and update the lists of common and scientific names of animals, as shown in Chapter 6, Section 6.2.1 of the Live Animals Regulations. The LAPB Secretariat has relied upon CITES for such technical information and desires that the process be reinstated to ensure that the scientific and common names conform with CITES lists or other appropriate lists.

We look forward to continuing our relationship with CITES and other organizations in the future.

Sincerely,

E. Raemdonck

Manager Special Cargoes (Live Animals and Perishables)

DRAFT DECISIONS OF THE CONFERENCE OF THE PARTIES

Directed to the Animals Committee

- 13.xx The Animals Committee, in collaboration with interested non-governmental organizations and the Secretariat, shall:
- a) develop recommendations regarding transport of live animals by road, rail or ship, and regarding cost-effective options for containers and packing materials for all means of transport to supplement, where necessary, the IATA Live Animals Regulations;
  - b) assist in identifying model practices concerning the transport and preparation for shipment of live wild animals, and develop recommendations to the Parties regarding the proper handling and transportation of live animals, particularly in exporting countries; and
  - c) report at the 14th meeting of the Conference of the Parties the implementation of this Decision.
- 13.xx The Animals Committee, in consultation with the Plants Committee and the Secretariat, shall:
- a) undertake a review of Resolution Conf. 10.21 on Transport of live animals, in order to *inter alia*: revise requirements regarding the collection, submission and analysis of data on mortality and injury or damage to health in transport of live animals, domestic measures directed to Parties, and reporting obligations; incorporate references to the transport of live plants; and clarify how IATA manuals and regulations can be mechanisms through which up-to-date guidance on the transport of live CITES-listed animals and plants can be provided, replacing the *CITES Guidelines for Transport and Preparation for Shipment of Live Wild Animals and Plants*; and
  - b) report at the 14th meeting of the Conference of the Parties on the implementation of this Decision.