

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



Eighteenth meeting of the Conference of the Parties
Colombo (Sri Lanka), 23 May – 3 June 2019

Interpretation and implementation matters

General compliance and enforcement

WILDLIFE CRIME ENFORCEMENT SUPPORT
IN WEST AND CENTRAL AFRICA

1. This document has been prepared by the Secretariat in consultation with the Chair of the Standing Committee.
2. At its 17th meeting (CoP17, Johannesburg, 2016), the Conference of the Parties adopted Decisions 17.97 to 17.100 on *Wildlife crime enforcement support in West and Central Africa*, as follows:

17.97 Directed to the Secretariat

The Secretariat shall, subject to external funding,

- a) *in collaboration with the United Nations Office on Drugs and Crime (UNODC) and with the support of the International Consortium on Combating Wildlife Crime (ICWC) and relevant stakeholders, commission a threat assessment report on illegal wildlife trade in West and Central Africa, to identify and collate information regarding trade routes, techniques and trends relating to wildlife trafficking in the two subregions, including recommendations on priority measures necessary to address and significantly reduce wildlife crime in the two subregions;*
- b) *produce the report in the working languages of CITES and make it available to Parties; and*
- c) *assist Parties, upon request, with the implementation of the recommendations and priority measures identified in the threat assessment report.*

17.98 Directed to Standing Committee

The Standing Committee shall review findings and recommendations emanating from the implementation of Decision 17.97 and make recommendations for further action to the 18th meeting of the Conference of the Parties.

17.99 Directed to Parties

Parties are urged to support the activities to be conducted in compliance with Decision 17.97 through the provision of information on legal and illegal trade, as may be requested.

17.100 Directed to Parties

Parties, governmental, intergovernmental and non-governmental organizations and other entities are invited to provide financial or technical assistance to ensure the effective implementation of the priority enforcement recommendations identified in the threat assessment report commissioned in accordance with the provisions of Decision 17.97.

Background

3. To implement Decision 17.97, paragraph a), the Secretariat commissioned the United Nations Office on Drugs and Crime (UNODC) to develop the threat assessment report on illegal wildlife trade in West and Central Africa. This activity was implemented under the ICCWC Strategic Programme 2016-2020,¹ through co-funding made available to ICCWC by the European Union, the Principality of Monaco and the United Kingdom of Great Britain and Northern Ireland. The Secretariat would like to thank these Parties for the funding provided.
4. At the 70th meeting of the Standing Committee (SC70, Sochi, October 2018), the Secretariat informed the Committee that the threat assessment was regrettably, due to circumstances beyond the control of the Secretariat and UNODC, not ready for review as required by Decision 17.98 and was expected to be completed in late 2018. The Committee as a result requested the Secretariat to, in consultation with the Chair of the Standing Committee, review the findings and recommendations emanating from the threat assessment, as anticipated by Decision 17.98, and prepare recommendations for consideration by the Conference of the Parties at the present meeting.
5. The Committee further requested the Secretariat to take into consideration the contents of document [SC70 Doc. 30.4](#), the *Strategic Areas of Intervention and Priority Recommendations to Develop a Counter Wildlife Trafficking Response in West Africa* (document [SC70 Inf. 2](#)), and the *Abuja Recommendations on the Development of a Coordinated Counter Wildlife Trafficking Response in West Africa* (document [SC70 Inf. 3](#)), in the development of recommendations for the subregion.
6. The Secretariat is pleased to inform the Conference of the Parties that the threat assessment was completed as planned. The full report is available in Annex 4 to the present document. It is available in English, French and Spanish as required by Decision 17.97, paragraph b).
7. The threat assessment was conducted in accordance with the list of geographic regions for West and Middle Africa, as presented in the composition of geographical regions used by the United Nations Statistics Division,² and include the following Parties:

Central (Middle) Africa: Angola, Cameroon, the Central African Republic, Chad, Congo, the Democratic Republic of the Congo (DRC), Equatorial Guinea, Gabon, and Sao Tome and Principe.

West Africa: Benin, Burkina Faso, Cabo Verde, Côte d'Ivoire, the Gambia, Ghana, Guinea, Guinea-Bissau, Liberia, Mali, Mauritania, Niger, Nigeria, Senegal, Sierra Leone, and Togo.

8. The threat assessment report was developed with a particular focus on elephant ivory, pangolins, parrots and rosewood, selected because these specimens appear prominently in global seizure data related to West and Central Africa and also illustrate several of the crosscutting matters affecting other species in the two subregions. The four species-specific case studies in the threat assessment report and its findings are elaborated upon in paragraphs 23 to 63 of the present document.
9. The threat assessment report is based on both qualitative and quantitative data, compiled from a variety of sources as described in the report. A review of the data compiled facilitated the identification of key countries throughout West and Central Africa most affected by wildlife crime. To collate information regarding wildlife trafficking routes, techniques and trends relating to West and Central Africa, fieldwork was also conducted in a number of countries in these two subregions (Cameroon, DRC, Gabon, Gambia, Guinea-Bissau, Nigeria and Senegal). Interviews were undertaken with a variety of audiences, including senior officials in relevant Ministries and departments, front-line law enforcement officers, park wardens, traders, academic institutions, non-governmental organizations, as well as arrested poachers and smugglers. Decision 17.99 urged Parties to support the implementation of Decision 17.97, and the Secretariat is thankful to the Parties concerned for the information provided and support to fieldwork.
10. The Secretariat believes that the threat assessment report and associated decisions and recommendations would make an important contribution to the development and further strengthening of national and regional strategies and measures in West and Central Africa, and the mobilization of activities and resources to

¹ https://cites.org/sites/default/files/eng/prog/iccwc/ICCWC_Strategic_Programme_2016-2020_final.pdf

² <https://unstats.un.org/unsd/methodology/m49/>

address wildlife crime and strengthen CITES implementation. The information contained in the report would assist the Parties concerned, the donor community, intergovernmental and non-governmental organizations, and others, in directing limited resources to those areas where it is most needed, addressing key issues as identified in the report.

11. As requested by the Standing Committee, the Secretariat took into consideration the matters outlined in paragraph 5 above and worked in consultation with the Chair of the Committee to review the findings and recommendations emanating from the threat assessment. The Secretariat further worked in consultation with the Chair of the Standing Committee to prepare the present document, including recommendations and draft decisions for consideration by the Conference of the Parties. The draft decisions are presented in Annex 1 to the present document as draft decisions 18.AA to 18.FF. The need to develop a separate set of recommendations intended to serve as guidelines to Parties in West and Central Africa was identified since a number of Parties in West and Central Africa have already undertaken measures to strengthen CITES implementation and enforcement, while others are yet to do so. Further, the measures implemented by the Parties concerned differ in nature and comprehensiveness. In light of this, it was considered that a rigid set of decisions to be implemented by all Parties in West and Central Africa would not be feasible, but that draft decision 18.AA directed to all Parties in West and Central Africa should be complemented by recommendations that could be considered by the Parties concerned, each taking into account its own unique domestic situation. The recommendations presented in Annex 2 to the present document are therefore proposed as guidelines to Parties in West and Central Africa, on matters that should be addressed if not yet done so.

Threat assessment on illegal wildlife trade in West and Central Africa

12. The threat assessment report shows that there are a number of challenging matters confronting Parties in West and Central Africa, some of which go well beyond CITES. These include matters related to governance, regional instability, poverty, corruption, and limited capacity and resources. In the context of CITES implementation, the report shows that the challenges faced by Parties in the two subregions relate to numerous matters, including legislative, scientific and enforcement matters; for example the need for adoption of adequate legislation, lack of enforcement of existing legislation, corruption, illegal trade in specimens of CITES-listed species – not only from the two subregions but also within – fraudulent permits or lack of issuance and use of permits, lack of monitoring regarding significant levels of trade, the absence of non-detriment findings and others. Parties in West and Central Africa collectively have been subject to more CITES trade suspensions than any other subregions in the world, comprising just under half of the countries with current valid suspensions.
13. However, the report also states that despite the significant challenges confronting some of the Parties in West and Central Africa, there are notable successes. For example, authorities in Cameroon arrested an average of 80 wildlife traffickers per year for the last five years, in the Republic of Congo about 72 per year since 2008, and in Guinea around 20 annually since 2012. Between them, these cases have resulted in numerous convictions. The report however also highlights the need for support to detect and arrest offenders and prepare cases for court, noting that what the high conviction rate in Francophone countries have in common, is the support provided by some non-governmental organizations in the investigation of cases. The Secretariat notes that while such support is invaluable, there is a critical need to ensure that any initiatives actively contribute to building longer term governmental and institutional capacity, allowing government agencies to effectively and independently perform their duties mandated in national legislation.
14. Examples where authorities in Côte d'Ivoire and the DRC were successful are highlighted in document SC70 Doc. 30.1. This involved actions undertaken by the CITES Management Authority (MA) in Côte d'Ivoire resulting in the arrest of two offenders who attempted to bribe MA officials to issue CITES export permits for three live Appendix I listed West African manatees (*Trichechus senegalensis*) and activities undertaken by the Lusaka Agreement Task Force in collaboration with authorities in the DRC to investigate suspected fraudulent CITES permits, which resulted in the arrest of a staff member from the CITES MA. These commendable actions can act as a deterrent and Parties are encouraged to publicize such results to raise awareness. The authorities should also be recognized and rewarded.
15. At SC70, the Standing Committee requested the Secretariat to distribute the questionnaire in the Annex to document SC70 Doc. 30.4 and the *Strategic Areas of Intervention and Priority Recommendations to Develop a Counter Wildlife Trafficking Response in West Africa* to Parties and other stakeholders, through a Notification to the Parties. The purpose of the questionnaire was to support the West Africa Strategy on Combating Wildlife Crime Steering Committee in developing the *West Africa Strategy on Combating Wildlife Crime (WASCWC)*, and its associated implementing mechanisms. As requested by the Standing Committee, these documents were made available to Parties and other stakeholders as Annexes to Notification to the

Parties [No. 2018/087](#) of 7 November 2018. Undertakings such as the identification of strategic areas of intervention and the ongoing development of the regional strategy already represent a significant step in the right direction and demonstrate the strong desire and commitment of the Parties concerned to step up their efforts in the fight against wildlife crime and to address the associated challenges. Such work should be supported to the fullest extent possible.

Matters affecting West and Central Africa making it vulnerable to wildlife crime

16. As mentioned above, West and Central Africa are affected by a number of challenging matters, which makes the two subregions vulnerable to wildlife crime.
17. The threat assessment report notes that, taken as a whole, West and Central Africa is arguably the poorest area of the world. Of the 26 Parties included in the threat assessment, 19 are on the United Nations Development Programme's list of low development countries and 16 appear on the United Nations list of Least Developed Countries. The report further highlights the fact that poverty and political instability have made it difficult for civil services in many of the countries concerned to retain and equip sufficient numbers of trained staff to control and regulate the harvest and use of wildlife specimens. As a result, capacity in many countries concerned are greatly supplemented by direct assistance from foreign governments and international non-governmental organizations. It further notes that, without such assistance and support, national authorities would be hard pressed to provide protection to wildlife, and that it is likely that most Parties in West and Central Africa will remain dependent on such external assistance for some time still.
18. The report notes substantial uncertainty about wildlife populations and range among some Parties in the two subregions, and that in most of the countries concerned, very little funding is made available to maintain and protect conservation areas. The information provided in the threat assessment report suggest that, between all the Parties concerned, no Party spent more than US\$10 per hectare of protected area in the most recent year for which data were available.
19. The report identifies that a key driver of economic development in West and Central Africa is trade, particularly with Asia, and mainly comprised of the export of natural resources, including minerals, fauna and flora, and the import of manufactured goods. The report states that trade in fauna and flora from West and Central Africa to Asia seems to result from the overexploitation of many species in Asia, causing suppliers to increasingly look to Africa for similar species. It also states that this seems to have created a situation where demand for some wildlife specimens in West and Central Africa emerged faster than national authorities could devise and implement regulatory mechanisms, and this caused the trade chains to be vulnerable to the introduction of wildlife specimens illegally harvested and traded. It would seem, therefore, that importing Parties could play an important role in supporting Parties in West and Central Africa to implement measures that will address wildlife crime and support legal trade that is limited to sustainable levels. This could be done through supporting scientific studies to facilitate the making of non-detriment findings for those species most frequently traded, and closely scrutinizing consignments imported from West and Central Africa to ensure that illegal specimens are not laundered into legal trade. In this regard, draft decision 18.CC as presented in Annex 1 to the present document is proposed.
20. The report also demonstrates the regional nature of wildlife crime, noting that in addition to rapid cross-border movements within the Economic Community of West African States (ECOWAS) free trade area, species flows examined show large volumes of illicit trade between Parties in Central and West Africa. This is also demonstrated by the species-specific case studies elaborated upon in paragraphs 23 to 63 of the present document.
21. In addition, the report highlights that widespread corruption poses a significant challenge in West and Central Africa, and that corruption often seems to be the lynchpin for wildlife crime in these two subregions. The report importantly notes that, no matter how advanced any strategy or competent the authority is, all efforts to address wildlife crime can be undone by corruption. This is also emphasized in Resolution Conf. 17.6 on *Prohibiting, preventing, detecting and countering corruption, which facilitates activities conducted in violation of the Convention*, which states that failure to prohibit, prevent, and counter corruption which relates to the implementation or enforcement of CITES greatly undermines the effectiveness of the Convention. Parties in West and Central Africa could benefit from paying special attention to this matter, and therefore recommendations j), k) and l) as presented in paragraph 3 of Annex 2 to the present document are proposed.

Capacity in West and Central Africa to respond to wildlife crime

22. The report identifies a number of matters commonly faced by Parties across West and Central Africa, which influence wildlife trafficking as it affects the two subregions and make addressing it challenging.
- a) National agencies responsible for wildlife protection are often significantly underfunded and equipped, and there is a general lack of enforcement resources proportionate to the task. In addition, there is often a lack of coordination between different agencies at national level.
 - b) The legislation of many Parties in the two subregions are diffuse, complicated and outdated. The report states that matters related to forestry, fisheries, other wildlife, and protected areas are mostly addressed by different pieces of legislation and subject to different regulations, and sometimes promulgated by different ministries. Penalties that can be imposed are often not significant and unlikely to serve as a deterrent for serious wildlife crimes. Based on the legislation reviewed, wildlife offences in most of the countries surveyed would not meet the criteria for “serious crime” as set down in the United Nations Convention on Transnational Organized Crime.³ Only six Parties (23%),⁴ in the West and Central Africa regions have legislation placed in Category 1 under the CITES National Legislation Project, whilst the legislation of ten Parties is currently in Category 2,⁵ and ten Parties in Category 3.⁶
 - c) Harvesting and sale of protected species without appropriate approvals and/or licences is generally an offence under national law in West and Central African countries, but fieldwork indicated low awareness of this offence category among authorities, with few Parties having specialised investigators or agencies. The report states that in many of the countries concerned the responsibility for enforcement of wildlife legislation tends to fall on the rangers assigned to protected areas. Customs and police, responsible for a diverse range of matters, often do not consider wildlife crime as a priority matter for them to address.
 - d) Regulations are often subject to sudden change, for example by executive order. This in many of the countries concerned create a situation of high uncertainty among both traders and their international partners regarding the applicable rules and regulations. Similarly, this often causes uncertainty within and among national authorities regarding applicable legislation and regulations. The report notes that interviews conducted with senior officials within the same country often demonstrated substantial differences of opinion about the legislation and regulations to be applied.
 - e) Officials in many countries in West and Central Africa seem to have limited knowledge about the legislation, regulations and documentation used by their neighbouring countries. The report states that documentation that is not standardized poses a challenge and often causes uncertainty among officers about which documents are applicable or compulsory, creating opportunities for large-scale illegal movement of commodities.
 - f) Paperwork such as CITES permits and certificates that are not well secured creates opportunities for abuse or are very basic and can easily be forged.

Species-specific case studies: Wildlife trafficking trends, techniques and *modus operandi* as it affects West and Central Africa

23. As noted in paragraph 8 above, the threat assessment report was developed with a particular focus on elephant ivory, pangolins, parrots and rosewood. The four species-specific case studies highlight the challenges faced by Parties in West and Central Africa in protecting wildlife and addressing wildlife crime. The threat assessment report notes that though a number of other illegal wildlife markets could also have been discussed, these four illustrate several of the cross-cutting matters affecting the two subregions. The four species-specific case studies are elaborated upon below.

Elephant ivory

³ Under article 2b) of the United Nations Convention against Transnational Organized Crime a “serious crime” is defined as conduct constituting an offence punishable by a maximum deprivation of liberty of at least four years or a more serious penalty.

⁴ Cameroon, the Democratic Republic of the Congo, Equatorial Guinea, Guinea-Bissau, Nigeria and Senegal

⁵ Benin, Burkina Faso, Chad, Congo, Gabon, Gambia, Guinea, Mali and Togo

⁶ Angola, Cape Verde, CAR, Cote d’Ivoire, Ghana, Liberia, Mauritania, Niger, Sao Tome and Principe, and Sierra Leone.

24. The report indicates that elephant poaching and illegal trade in ivory affects both West and Central Africa and highlights that seven of the 26 Parties in the two subregions are currently included in the National Ivory Action Plan (NIAP) process,⁷ representing 41% of the countries in the process. Between the two subregions Central Africa is the most significantly affected by poaching, with an estimated 27% decline in elephant populations between 2006 and 2016.
25. The report states that seizure and forensic data show that the West and Central Africa subregions are both a source for illegal ivory and a transit area for ivory from elephants poached in other parts of Africa. It highlights that, as in other parts of Africa, both organized and opportunistic poaching occur, and that both feed into smuggling groups that would fit the United Nations definition of an organized criminal group.⁸ The report highlights that poachers are most often local people recruited by crime syndicates. Interviews with poachers as well as enforcement officials suggest that national middle-men (brokers between the poachers and the exporters) are often successful businesspeople, military officials, or others in positions of authority, who by virtue of their position are less likely to be questioned by law enforcement. Exporters are most often Asian nationals from the destination countries, who reside in the region. The report concludes that ivory trafficking as it affects West and Central Africa is reliant on the connections between three distinct social groupings: those who make their living from the land, the wealthy or powerful who can assure unimpeded transport of the ivory from the rural areas to the ports of export (in unstable areas, these may often be people with connections to the military), and the Asian expatriates who have the connections to direct the contraband to its final destination.
26. The report highlights that the largest consignments of tusks from the two subregions have been found in shipping containers, while air-freight has been used for smaller consignments. Of the 50 largest ivory seizures recorded in the World WISE database,⁹ (all over 200 kg in weight) for which origin was specified, 21% departed from West and Central Africa, with Nigeria and Togo in West Africa accounting for the bulk of the illegal exports. Field research and seizure data also indicate that ivory may be trafficked from Central Africa via Eastern Africa, in particular via Sudan and Uganda, with those transiting through Uganda leaving the country by air from Entebbe International Airport, or by land to Mombasa, Kenya.
27. Research suggests that a relatively small number of national middle-men and exporters may be responsible for a large share of the illegal ivory trade. DNA analysis has found ivory from the same elephants in separate major seizures, associating previously unconnected contraband shipments. The report highlights the need for international cooperation to support West and Central African states in identifying, investigating, arresting, and prosecuting these individuals managing and organizing the illegal trade.
28. The report also highlights the importance of engaging local communities in the conservation and protection of elephants.

Pangolins

29. The report highlights the significant scale of illegal trade in pangolins, and that most of the recent large pangolin scale seizures from Africa have been traced back to just three countries in the West and Central African region: Cameroon, the Democratic Republic of the Congo and Nigeria. The report notes that Nigeria is the most common source of pangolin specimens seized, followed by Cameroon. It also notes that an analysis done by the CITES Secretariat, as presented in document [SC70 Doc. 27.3.5](#), shows that the quantity of pangolin scales seized in Nigeria, or by other Parties after it left Nigeria, escalated significantly in recent years from approximately two metric tons in 2015, to just under eight metric tons in 2016 and 2017 respectively, and almost 24 metric tons in the first seven months of 2018.
30. Field studies were conducted in three countries in West and Central Africa (Cameroon, DRC and Gabon) as well as one outside the region (Uganda). Field research and criminal case studies suggest that the trafficked pangolin specimens are sourced from a broad range of countries, as follows:
 - a) Nigerian based traffickers are claimed to export pangolin scales sourced in Cameroon, the Central African Republic, Congo and Gabon;

⁷ <https://cites.org/eng/niaps>

⁸ Under article 2a) of the United Nations Convention against Transnational Organized Crime an "organized criminal group" is defined as a structured group of three or more persons that exists for a period of time, acts in concert with the aim of committing at least one serious crime, and to obtain, directly or indirectly, a financial or other material benefit.

⁹ https://www.unodc.org/documents/data-and-analysis/wildlife/WLC16_Chapter_2.pdf

- b) Ugandan based traffickers are claimed to source pangolins domestically, as well as from the north-eastern part of the Democratic Republic of the Congo and north-western Kenya; and
 - c) for recent large seizures made in the Côte d'Ivoire, case information suggests trafficking from Guinea and Liberia.
31. The report notes that most poachers interviewed claimed to focus on the acquisition of scales for export. Meat for local markets was mentioned as a source of demand, but only by the minority of those interviewed. The report also indicates that traffickers of other wildlife commodities seem to increasingly become involved in illegal pangolin trade, as a result of the demand and profits associated with pangolins.
 32. The field research in Cameroon, the Democratic Republic of the Congo and Uganda identified that illegal harvesting of pangolins is active and widespread. The report further notes that one recent estimate, based on observations in six countries, suggest that between 400,000 and 2,700,000 pangolins are hunted annually in Central African forests. The report notes that estimating the impact of harvesting is difficult, because little is known about pangolin population numbers, but that in all countries where fieldwork was conducted poachers and dealers interviewed indicated that locating pangolins is becoming more difficult, an observation which seems consistent with overharvesting.
 33. Worth noting is that the report states that poachers interviewed seem to be of the view that authorities consider crimes associated with pangolins as less serious than other forms of poaching, for example elephant poaching, and fear of enforcement action did not appear to play much of a role in their decision-making. In this regard, there seems to be significant room for improvement regarding the implementation of paragraph 1 b) of Resolution Conf. 17.10 on *Conservation of and trade in pangolins* and paragraph 2 a) i) of Resolution Conf. 11.3 (Rev. CoP17) on *Compliance and enforcement*. Recommendation a) as presented in paragraph 1 of Annex 2 to the present document is particularly relevant.
 34. Regarding *modus operandi*, information gathered during local arrests indicate that the scales are purchased at local level by middle men, who bridge the gap between the rural areas where pangolins are sourced and the urban areas where the international traffickers reside. The middle men are generally local people with money to pay for scales in cash and the means to transport it to cities. Once they accumulate in the tens of kilograms of scales, they transfer them to the major cities usually providing the transportation themselves although the use of couriers on inter-city transport (typically mini-bus taxis) was reportedly also mentioned during interviews. It is reported that international traffickers tend to be expatriates and that field research and case records indicate persons of three nationalities, often working together, are particularly active as international traffickers of pangolin specimens: nationals from China, Nigeria and to a lesser degree Viet Nam.
 35. The report highlights that pangolin scales are trafficked internationally by sea, air, and land. Large illegal consignments of pangolin scales in shipping containers are either misdeclared or concealed under cover loads such as plastic waste. International seizures have shown traffickers using the same techniques repeatedly, including regular air shipments of relatively small amounts of scales. For example, authorities in the Netherlands have repeatedly seized similarly packaged consignments of about 20 kg of scales from Nigeria in parcel post. Malaysia also seized a series of similarly packed shipments in air cargo from Ghana in 2017.
 36. The Secretariat notes that the issue of pangolins is dealt with in more detail in document CoP18 Doc. 75. Trade in stockpiles of pangolin specimens that were legally obtained in accordance with the provisions of the Convention prior to the transfer of the pangolin species to Appendix I at CoP17 was a matter of discussion at the regular meetings of the Standing Committee during the current intersessional period, and is due to be discussed under agenda item 49 on *Implications of the transfer of a species to Appendix I*.

Parrots

37. The report shows that most of the international trade in live wild-caught CITES listed parrots from West and Central Africa over the past decade has involved just three species: the African grey parrot (*Psittacus erithacus*), which has been listed on CITES Appendix I since 2017; and the Senegal parrot (*Poicephalus senegalus*) and the red-fronted parrot (*Poicephalus gulielmi*) both listed on CITES Appendix II.
38. Noting that the African grey parrot (*Psittacus erithacus*) has been included in CITES Appendix I since 2 January 2017, the report highlights that international trade in African grey parrots has over the years been

greatly influenced by regulatory actions, most notably the regulatory actions under CITES and the 1993 US and 2005 EU import bans for live birds of wild origin.

39. The report notes that data reported by importers in the CITES legal trade database shows that 103,547 wild sourced African grey parrots were legally traded in the period 2007 to 2016, and available seizure data shows that 7,875 parrots have been seized in the period between 2007 and mid-2018. The report highlights that according to official data more African grey parrots have been seized since late 2016 than in any other period in the past decade. These seizures involved approximately 3,000 birds in less than three years between late 2016 to mid-2018, compared to approximately 5,000 birds seized in almost 10 years from 2007 to late 2016. The report also notes that mortality associated with the overall trade can be as high as 66%, and therefore this data might reflect only a fraction of the birds taken from the wild.
40. The report explains that trade in parrots involves both domestic markets in West and Central Africa, and international markets. It states that typically, high value species, such as the three indicated above, are sold on international markets, while low value species are sold in the domestic markets. It further states that although domestic trade occurs in many range States, the volume appears to be at low to moderate levels, and negligible when compared to the volume of the international trade over the years.
41. The report notes that since the domestic harvest and trade of parrots is legal in many range States, the illegal parrot market typically involves many of the same players as the legal market. Trappers are at the beginning of the supply chain and are either part-time seasonal trappers or full-time professional trappers. The report notes that, unlike middlemen and exporters who know their actions are illegal, some trappers are likely unaware that the parrots they capture may be destined for illegal international trade. Captured parrots are reported to be placed in baskets or cages after trapping, before being transported to collection sites via road or boat. It is reported that the birds are then kept at these collection sites until local buyers come to purchase them. Alternatively, local buyers can place an order with trappers and provide them with a cash advance. The report notes that since it is difficult to transport parrots by sea, they are usually shipped to international destinations by air in large crates. Transportation routes are reported to be dependent on flight routes available and not necessarily strategic choices by the traffickers. It is also stated that smugglers are likely to use the shortest route possible, since parrot mortality increases with more time in transport.
42. The report further highlights that where international trade in parrots is prohibited, it is not necessarily prohibited in domestic trade. This results in a situation where sourcing from the wild can be done openly and everything seems legal. The intention to commit an offence only becomes evident when the attempt is made to export. This makes it challenging to address these crimes, since the illegality often only becomes known very late in the process, and shortly before the birds leave the country. While acknowledging these challenges, the report states that there are significant opportunities for law enforcement authorities to focus and target enforcement efforts on the limited number of exit points for live parrot exports (i.e. international airports).
43. Regarding African grey parrots, the report provides information on the use of falsified and fraudulent permits, trade during zero quota periods, exports exceeding quotas, voluntary export bans, suspensions on trade, and the recent CITES Appendix I listing, noting that all of these highlight the difficulties that have been associated with the trade in this species over the years. Considering that the African grey parrot was listed in Appendix I of CITES only in 2017, data that will enable an assessment of the effects of this listing is not yet available.
44. The report highlights the fact that three Parties took reservations regarding the Appendix I listing: one source country (the Democratic Republic of the Congo) and two destination markets (Saudi Arabia and the United Arab Emirates). As a result, these three Parties can legally trade African grey parrots as if the parrots were listed in Appendix II. For the Democratic Republic of the Congo however, a suspension on trade in African grey parrots remains in place (see Notification to the Parties No. [2018/081](#) of 1 November 2018). The Democratic Republic of the Congo has also voluntarily placed its reservation on hold and issued a moratorium on African grey parrot exports until it can conduct population surveys and produce a management plan for the species. The Secretariat notes that while Saudi Arabia declared its reservation to the Appendix I listing, the Party noted that it did not intend to trade in wild specimens of *Psittacus erithacus*¹⁰. The report further notes that no export permits for African grey parrots have been authorized by the Democratic Republic of the Congo since the Appendix I listing, and that export quotas have not yet been

¹⁰ <https://cites.org/sites/default/files/eng/com/sc/69/sum/E-SC69-SR.pdf>

established by the Democratic Republic of the Congo because scientific population surveys have been hampered by financial and logistical constraints.

45. The report also highlights that since the Appendix I listing of the African grey parrot, only three Parties have registered captive breeding facilities with the Secretariat: the Philippines, Singapore and South Africa. No range States have registered such facilities with the Secretariat.
46. The report indicates that illegal trade between range States occurs, and this often makes it impossible to determine the exact origin of seized parrots. Information provided in the report shows, however, that some actions are taken by range States to address this illegal trade, and these and the seizures made are highlighted in the report.
47. The report also notes that CITES legal trade data show large discrepancies between exporter and importer reported data and suggest some irregularities. This includes for example that in the period 2007 to 2016 Congo reported the export of 62 African grey parrots (no source provided), while importers reported just over 20,000 wild-sourced African greys from Congo during this time. Some countries have also issued export permits for wild-sourced African grey parrots despite having few if any wild populations (e.g. Benin, Mali and Togo). The Secretariat notes that the tool developed by the United Nations Environment Programme – World Conservation Monitoring Centre (UNEP-WCMC) in close consultation with the Secretariat, to facilitate the Secretariat's role in monitoring compliance with the provisions of the Convention and as elaborated upon in document CoP18 Doc. 27, will assist the Secretariat in identifying and addressing such matters in a more timely manner, and to bring them to the attention of relevant Committee meetings or the Conference of the Parties, as may be needed.
48. The report highlights the fact that demand for illegally sourced parrots from West and Central Africa continues to exist, and therefore Parties must remain vigilant in their efforts to prevent and address such illegal trade. This need is also demonstrated by the escalation in African grey parrots' seizures since late 2016, as highlighted in paragraph 39 above. Parties should equally be vigilant in implementing measures that will prevent wild-sourced parrots from being laundered as captive-bred.
49. The report notes that the greatest weakness in the parrot trafficking chain is the reliance on flights from remote areas, and that increased monitoring of air traffic between the West and Central Africa subregions and known destination markets could present an efficient way of combatting this illegal trade. The Secretariat believes that regarding illegal trade in parrots, where this is not already happening, Parties in the subregions should be encouraged to initiate programmes and activities to ensure that officers working at international airports are aware of this illegal trade, and in particular of the Appendix I listing of the African grey parrot. The Secretariat further believes that overall, initiatives such as the *Reducing Opportunities for Unlawful Transport of Endangered Species (ROUTES) Partnership*,¹¹ and the *United for Wildlife Transport Taskforce*,¹² can play an important role in raising awareness among transport and logistics companies, government agencies, and others as relevant, about illegal trade in wildlife, including the illegal parrot trade, and how they can contribute to combatting it. Recommendations n), o), p) in paragraph 5 of Annex 2 to the present document are proposed.
50. The threat assessment report also notes the importance that professional organizations involved in the international exotic bird trade be encouraged to step up efforts to prevent the introduction of illegally sourced birds into their legal industry.

Rosewood (*Pterocarpus erinaceus*)

51. Concerning forests in general, the report notes that most Parties in the two subregions have seen a reduction in their forested area in the past 25 years, while it appears that forest cover is increasing in five Parties: Cabo Verde, Côte d'Ivoire, Gabon, the Gambia and Ghana (see Figure 1 in Annex 4).
52. *Pterocarpus erinaceus* is mainly found in West Africa and some northern parts of Central Africa and was included in CITES Appendix II at CoP17 (effective since 2 January 2017). For this species, international trade is illegal if not in accordance with CITES requirements and in violation of national law.
53. The threat assessment report highlights that an important characteristic of the illegal rosewood market is the significant amount of money involved. The report notes that the profits generated are far greater than in the

¹¹ <https://routespartnership.org/>

¹² <https://www.unitedforwildlife.org/what-is-the-transport-taskforce/>

case of most other illegal wildlife markets. It also states that with the increase in gains comes a greater tendency for illegal loggers and traders to use violence to protect their illegal industries. The report notes that forestry officials are generally unarmed, and that in some regions those interviewed indicated that enforcement in the field is often simply too dangerous for them to undertake.

54. The report also highlights that due to resource constraints, very few countries in West and Central Africa have the capacity for making robust scientific-based non-detriment findings, which is a key underpinning of CITES to set sustainable (non-detrimental) levels of trade.
55. Rapid growth of the illegal trade in *Pterocarpus erinaceus* occurred in the context of declining exports of other rosewoods from Asia. It states that by 2017, West and Central Africa were the source of over 80% of the world's rosewood logs and that this figure could be even higher considering that *Pterocarpus erinaceus* might also purposefully be misdeclared as other woods, particularly after the Appendix II listing.
56. The three countries in the region responsible for the largest share of recorded exports of *Pterocarpus erinaceus* in 2017 are the Gambia, Ghana and Nigeria, collectively responsible for 85% of the volume traded. The report indicates that interviews with timber traders and enforcement officials in the region suggest that each of these Parties serve as a transit place for timber illegally sourced in other countries. The report states that as the leading exporter since 2014, Nigeria had substantial volumes of *Pterocarpus erinaceus*, but that interviews with Nigerian timber traders indicate that *Pterocarpus erinaceus* resources have been exhausted in many Nigerian states. It further notes that the growth of rosewood exports from Nigeria has been exponential, almost doubling in 2017, the year when the Appendix II listing came into force. This is a matter that has been discussed and addressed by the Standing Committee in the current intersessional period and is also the subject to an ongoing Article XIII process. On 1 November 2018, the Secretariat issued Notification to the Parties [No. 2018/084](#), informing Parties of the Standing Committee's recommendation that Parties suspend commercial trade in specimens of the species *Pterocarpus erinaceus* from Nigeria, as well as about other recommendations agreed by the Standing Committee regarding trade in this species from Nigeria.
57. The report highlights significant discrepancy between export data for *Pterocarpus erinaceus* reported by the Gambia, compared to data reported by importing countries. It states that data from the CITES MA of the Gambia shows the export of 486 cubic meters in 2016 and 456 cubic meters in 2017. In contrast, import data from other countries show importation of 161,000 cubic meters in 2016 and 184,000 cubic meters in 2017. The report notes that export permit data for 2017, provided by the CITES MA of the Gambia suggest that 99.7% of the timber exported and reported as received by importers, have been exported without any CITES export permit issued by the MA. The report states that the relevant Gambian authorities do not have access to distribution or population data of *Pterocarpus erinaceus* in the Gambia. Considering the last limited survey was reportedly conducted in 2010, it seems unlikely that it is at present possible for authorities in Gambia to make a scientific non-detriment finding for this species and determine sustainable levels of export. The report also notes that a log export ban was put in place in the Gambia in June 2017 but notes that discussions with senior officials indicated that this was not a firm cut off as a number of traders had already purchased wood and were allowed to export it until late 2017. The report also notes that importer-reported trade data reflects 13,000 cubic meters of *Pterocarpus erinaceus* imported from Gambia in 2018.
58. The report also notes that there are active log export bans in place in many countries in the region, including the Gambia and Nigeria, therefore rendering the exports of rosewood logs from such Parties in West and Central Africa illegal on a number of fronts. The Secretariat notes that there is an opportunity for Parties with domestic legislation in place prohibiting the export of timber and timber products, including from *Pterocarpus erinaceus*, to consider establishing voluntary 'zero export quotas' in accordance with Resolution Conf. 14.7 (Rev. CoP15) on *Management of nationally established export quotas*. Establishing zero export quotas may assist Parties in strengthening the controls on export of *Pterocarpus erinaceus*, particularly for Parties that have already placed this resource under strict domestic control. In this regard, recommendation q) as presented in paragraph 6 of Annex 2 to the present document is proposed.
59. The report states that interviews with traders suggested that rosewood from Cameroon supplement the local supply in Nigeria, and that similarly, in the Gambia, senior officials interviewed estimated that nearly all the rosewood it exports was illegally sourced from the Casamance area of Senegal, while exports from Ghana appear to be supplemented by illegal imports from Burkina Faso and Côte d'Ivoire, despite the fact that all these countries have log export bans in place.
60. In the case of Mali, the report notes that the harvesting of rosewood has been prohibited since 1995, but that rosewood traffickers appear to have targeted the Party since at least 2003. The report notes that Mali is not a likely transit country for rosewood sourced from other regions, yet in 2017 it was cited in import trade

data as the source of over 68,000 cubic meters of rosewood logs, more than seven times the volume of the previous year, and that levels of trade in the first quarter of 2018 appeared to exceed the 2017 total.

61. Regarding Sierra Leone, it is reported that volumes traded have surged in the last two years despite a national log export ban. The report notes that at over 84,000 cubic meters of logs traded in the first quarter of 2018, Sierra Leone had already exceeded the total traded in 2017. It also notes that in the run up to the national government elections in March of 2018, the longstanding log export ban was temporarily lifted, and this may have fuelled the surge in exports. The new President reinstated the ban on 4 April 2018.
62. The chapter on rosewood suggests that a large share of the trade in rosewood is illegal, in violation of CITES provisions and national legislation. Some of the matters raised in the report are already being addressed, such as for example in the case of Nigeria explained in paragraph 56 above. At SC70, the Standing Committee also requested the Plants Committee to consider the inclusion of *Pterocarpus erinaceus* from all range States in the Review of Significant Trade and to report its findings and recommendations to the 73rd meeting of the Standing Committee (SC73).¹³ The Secretariat believes that such work by the Plants Committee is essential.
63. The Secretariat further believes that the Task Force on illegal trade in specimens of CITES-listed tree species as proposed in document CoP18 Doc. 32, will provide an important opportunity to also address matters related to illegal trade in *Pterocarpus erinaceus* as it affects West and Central Africa.

Country specific matters and key strategic regions

64. The four species-specific case studies identify a variety of Party-specific matters and key strategic regions that should be targeted by scaling up enforcement efforts, as well as measures to strengthen the basic operational CITES infrastructure in the Parties concerned and promote the effective implementation of CITES. These relate to both legal and illegal trade in CITES-listed species from the two subregions as indicated for example in paragraphs 26, 29, 35, 47, 56, 57, 60 and 61 above, as well as within the two subregions as highlighted for example in paragraphs 30, 32 and 59 above. It is beyond the scope of the present document to give full justice to all the matters raised in the threat assessment report and the mentioned paragraphs only serves as examples of some of the key matters identified. Parties are invited to consult the full report for further detailed information.
65. Parties in West and Central Africa are encouraged to draw upon the information and recommendations in the threat assessment report to support the development of national and regional law enforcement responses, and to step up efforts to effectively implement CITES. The Secretariat and the Chair of the Standing Committee in this regard propose draft decisions 18.AA and 18.BB in Annex 1 to the present document. Draft decision 18.BB is particularly relevant for those Parties in West and Central Africa identified as being affected by illegal cross border trade in wildlife within the region, that should make dedicated efforts to address this illegal trade.

CITES Secretariat engagement with Parties in the two subregions

66. Since CoP17, the Secretariat has been involved in a number of initiatives and activities in the two subregions, primarily supporting capacity-building efforts of Parties. For example, the Secretariat has co-organized or participated in a number of workshops related to national legislation¹⁴, including a Second Workshop for selected African Parties on *Strengthening national legal frameworks for the effective implementation of CITES and for combatting illegal trade in wildlife*, held in Abidjan, Côte d'Ivoire, in February 2017. This workshop was attended by 24 participants from 12 African Parties (Benin, Burkina Faso, Cabo Verde, Chad, Côte d'Ivoire, Djibouti, Eritrea, the Gambia, Guinea Bissau, Mali, Sierra Leone and Togo). The Secretariat further co-organized and co-financed with the United Nations Environment Programme (UNEP), United Nations Development Programme (UNDP), United Nations Office on Drugs and Crime (UNODC) and United Nations Department of Economic and Social Affairs (UN DESA) a symposium on *Strengthening Legal Frameworks to Combat Wildlife Crime in Central and West Africa*, held in Abidjan, Côte d'Ivoire, in September 2018. The Symposium was attended by senior representatives from CITES MAs and criminal justice authorities from 19 Parties (Angola, Benin, Burkina Faso, Cameroon, Cape Verde, Central African Republic, Chad, Congo, Côte d'Ivoire, the Democratic Republic of the Congo, Gabon, Guinea, Guinea-Bissau, Mali, Niger and Togo). The objectives of the Symposium were to identify ways to strengthen national

¹³ <https://cites.org/sites/default/files/eng/com/sc/70/exsum/E-SC70-Sum-12-R1.pdf>

¹⁴ <https://cites.org/sites/default/files/eng/cop/18/doc/E-CoP18-026.pdf>

legal frameworks for the sustainable management of, and trade in, wild fauna and flora and to better address illicit trafficking in wildlife at the national and subregional levels.

67. The Secretariat has also provided small-scale funding to Benin, Côte d'Ivoire, Mauritania, Niger and Togo, as has UNEP to Angola and the Gambia, to enable an analysis of the legislation in place, identification of gaps and the development of draft legislation for the effective implementation of CITES.
68. The Secretariat has undertaken technical missions to Nigeria (2018) and Guinea (early 2019) in support of improving compliance with the Convention and has worked with Nigeria since mid-2018 on the terms of reference for the development of non-detriment findings for *Pterocarpus erinaceus*. In this process, the Secretariat has advised Nigeria to focus its efforts on: establishing sustainable harvest quotas of *Pterocarpus erinaceus* in three selected States; developing a monitoring mechanism to verify exports; and establishing adaptive management protocols for this species. This work is ongoing.
69. The Secretariat notes that the current CITES Tree Species Programme is supporting Parties in West and Central Africa in implementing conservation and management measures to ensure that their trade in CITES-listed tree species is sustainable, legal and traceable. One component of the Programme includes strengthening Parties ability to formulate non-detriment findings. Notably, the Programme is funding projects in the region from Benin, Cameroon, the Democratic Republic of the Congo, Nigeria and Togo, including a project on awareness raising and capacity-building for the sustainable management of *Pterocarpus erinaceus* throughout Benin, Nigeria and Togo. Further details are provided in document CoP18 Doc. 16.
70. Under the European Union funded Minimising the Illegal Killing of Elephants and other Endangered Species (MIKES) project, the CITES Monitoring the Illegal Killing of Elephants (MIKE) programme is supporting site-based efforts to strengthen management capacity to address wildlife crime in four key protected areas in West and Central Africa: Bouma Bek National Park, Cameroon; Dzanga Sangha Proceed Areas, Central African Republic; Okapi Faunal Reserve, the Democratic Republic of the Congo; and the Parc W Complex in Burkina Faso, Niger and Benin. The specific capacity-building support is tailored to each site. Typical support provided includes activities to strengthen the effectiveness and efficiency of wildlife law enforcement patrols through the provision of training, equipment and supporting infrastructure; to improve the management of patrols through work focused on enhancing the planning and implementation of operations, including support for operations control rooms and communications; as well as other activities that are strengthening site-based intelligence to better inform law enforcement operations and local level investigations so that offenders are apprehended and prosecuted effectively.
71. Additionally during 2018, at the request of the CITES MA of Gabon, the Secretariat provided technical support to Gabon's capacity-building efforts, including by providing input to an external auditors' mission aimed at evaluating Gabon's CITES MA, in addition to the Secretariat participating in a regional capacity-building workshop on the application of the nine step guidance for non-detriment findings for tree species, which was organized by Gabon in collaboration with Germany.
72. In light of the fact that the threat assessment report was only recently finalized, the implementation of Decision 17.97, paragraph c), has not yet commenced. Modest funding to assist Parties in West and Central Africa with the implementation of measures and activities to address some of the recommendations identified is available under the ICCWC Strategic Programme. The Secretariat will work closely with its partners in ICCWC and, in consultation with the Parties concerned, identify how this funding could be best mobilized in support of efforts to address wildlife crime. Efforts will also be made to secure further funding to support Parties in West and Central Africa, as well as to mobilize additional support through the individual work programmes of ICCWC partner agencies. In this regard, it is proposed that Decision 17.97, paragraph c), be replaced with draft decision 18.FF, paragraph b), presented in Annex 1 to the present document.
73. The Secretariat notes that it would seem that a large number of Parties in West and Central Africa could benefit from capacity-building support as outlined in document CoP18 Doc. 21.2, support through a Compliance Assistance Programme as proposed in document CoP18 Doc. 28, and targeted guidance in the making of non-detriment findings, as proposed in document CoP18 Doc. 45. In light of the various opportunities noted above to strengthen Parties' compliance with CITES, particularly for technical and capacity-building activities, draft decision 18.FF, paragraph c), presented in Annex 1 to the present document is proposed.

Implementation of Decisions 17.97, paragraph c), and 17.100

74. The threat assessment report demonstrates that there is a significant need for financial and technical support in West and Central Africa, both to address wildlife crime and to support a more effective implementation of CITES. Addressing this will require collective efforts and intervention at multiple levels by different role players.
75. Parties in West and Central Africa are encouraged to make deliberate efforts to identify priority actions that could benefit from donor and development community support, support from ICCWC, the Global Environmental Facility (GEF) and others, and take steps to proactively communicate and present these needs to such potential donors and the development community entities. In this regard, Parties concerned applying to the new GEF four-year funding cycle known as GEF-7, running until 2022, are encouraged to consider the matters relevant to them as outlined in the West and Central Africa Threat Assessment Report and associated recommendations and to consider including activities to address these matters in proposals and work programmes as part of GEF-7.
76. Support from Parties, donors, governmental, intergovernmental and non-governmental organizations and others is essential, including ensuring that the mobilization of resources and technical support are targeted towards addressing the matters identified by the threat assessment and associated recommendations. In this regard, it is proposed that Decision 17.100 be replaced with draft decision 18.DD, as presented in Annex 1 to the present document.
77. The Chair of the Standing Committee and the Secretariat also believe that it would be appropriate to make deliberate efforts to draw the attention of relevant United Nations agencies, the African Union, the Commission of Central African Forests (COMIFAC), the GEF, and other development agencies, to the West and Central Africa Threat Assessment Report and recommendations in Annex 2 to the present document, and to encourage that it be taken into consideration in the development of any work programmes or activities initiated by these entities in the two subregions. In this regard, draft decision 18.FF, paragraph a) is proposed.
78. To assist Parties in West and Central Africa to identify best practices, promising initiatives and opportunities for support, as well as to gain a better understanding of how these Parties respond to the matters identified in the threat assessment report, the Chair of the Standing Committee and the Secretariat propose to keep the measures and activities implemented in the two subregions under review, as suggested in draft decision 18.FF paragraph d).
79. The Chair of the Standing Committee and the Secretariat also propose further discussion of the threat assessment by the Standing Committee to consider if any further measures, activities or recommendations are required. Accordingly, it is recommended that progress made by Parties in West and Central Africa in relation to addressing the matters in the West and Central Africa Threat Assessment, and the recommendations in Annex 2 to the present document, are reviewed by the Standing Committee. In this regard, draft decision 18.EE is proposed.

Conclusion

80. The threat assessment report shows that wildlife crime and a lack of effective implementation of CITES have significant negative consequences for a large number of Parties in West and Central Africa. These two subregions are heavily targeted by organized crime groups, often resulting in severe negative impacts on their natural resources and for the Parties concerned. The report for example states that in the case of the Gambia illegal exports of rosewood are estimated to be worth about half of the country's total exports, about 10% of its GDP, and more than 20 times the budget of the Ministry of Environment, Climate Change and Natural Resources. Considering that many of the Parties in the two subregions are on the United Nations Development Programme's list of low development countries, this is very significant.
81. Parties in West and Central Africa are encouraged to actively raise awareness among decision- and policy-makers at the highest levels to ensure that they fully understand the importance of effective CITES implementation and the serious threat posed by wildlife crime to natural resources. Every effort should be made to mainstream effective CITES implementation and enforcement in national budgeting processes.
82. Undertakings such as the identification of *Strategic Areas of Intervention and Priority Recommendations to Develop a Counter Wildlife Trafficking Response in West Africa*, and ongoing efforts regarding the development of the *West Africa Strategy on Combating Wildlife Crime (WASCWC)* demonstrate a strong desire and commitment from the Parties concerned to step up their efforts in the fight against wildlife crime

and to address the associated challenges. This is essential to enhancing capacity and facilitating responses to the matters identified in the threat assessment report. The finalization and implementation of the WASCWC should be encouraged and actively pursued.

83. Equally, international support is essential. This should include financial and technical support, but also support from importing Parties in protecting these two subregions by carefully scrutinizing trade to ensure that illegal specimens are not laundered into legal trade. Noting that scientific studies and related management information to determine what could be “sustainable” are not widely available, the international community should be encouraged to place priority in working with range States in West and Central Africa, to undertake thorough scientific assessments of species prevalence in the relevant countries. The resulting information should be taken into immediate consideration to improve existing non-detriment findings or prepare scientifically robust non-detriment findings.

Recommendations

84. The Conference of the Parties is invited to:

- a) adopt the draft decisions in Annex 1 to the present document;
- b) note the recommendations in Annex 2 to the present document;
- c) delete Decisions 17.97, paragraphs a) and b), 17.98 and 17.99, as they have been implemented.
- d) delete Decisions 17.97, paragraph c) and 17.100, as they have been incorporated in the proposed draft decisions in Annex 1 to the present document.