



WCS Position Statement for CMS CoP12

October 2017

Why we're at CMS CoP12:

The **Wildlife Conservation Society (WCS)** is a global conservation organization that takes a science-based approach to the protection of wildlife and wild places, including many of the migratory species listed on the CMS Appendices. WCS shares with CMS and the CMS Parties the common goal of conserving migratory species, which can only be achieved through enhanced and concerted actions at multiple levels and between all sectors and actors involved. WCS works to study and conserve CMS-listed species and on other related issues, such as transboundary cooperation, spatial planning and ecological connectivity, across several continents and in all of the world's oceans. For more information on WCS and our programs, please see page 2 or go to www.wcs.org.

In this document:

This document captures WCS's experience and our perspective on some of the documents and proposed decisions for species and issues that we work on. A summary of the proposals that we recommend for adoption can be found on page 3.

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Page 3 → [Species Proposals WCS Recommends for Adoption \(Summary\)](#)

Page 4 → [Interpretation and Implementation \(National Legislation; Review Mechanism; Partnerships\)](#)

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Page 17 → [Detailed Feedback on Species Proposals](#)

How to contact us:

WCS will be represented at CMS CoP12 by **Dr. Susan Lieberman** (slieberman@wcs.org) and **Alfred DeGemmis** (adegemmis@wcs.org). Should you have any questions, please contact us using the e-mail addresses provided.



WCS at CMS CoP12

The **Wildlife Conservation Society (WCS)** is a global conservation organization working to save wildlife and wild places through science, conservation action, education, and inspiring people to value nature. We envision a world in which wildlife thrives in healthy lands and seas, valued by societies that embrace and benefit from the diversity and integrity of life on earth. Our field programs in more than 60 countries in Asia, Africa, the Americas, and the Pacific build on more than 100 years of experience and scientific and technical expertise across the globe. To learn more about WCS, visit www.wcs.org.

WCS has a long history of partnership with the Convention on Migratory Species (CMS), which includes the signing of a formal Cooperation Agreement in 2007 and WCS's signing on as a Cooperating Partner to the Memorandum of Understanding on the Conservation of Migratory Sharks (CMS Sharks MOU) in 2016. WCS shares with CMS and the CMS Parties the common goal of conserving migratory species through enhanced and concerted actions at multiple levels and between all sectors and actors involved. WCS works on CMS-listed species and other related issues, such as transboundary cooperation, spatial planning and ecological connectivity across several continents and in all four of the world's oceans.

WCS will be represented by a small team of wildlife and policy experts at the 12th meeting of the CMS Conference of the Parties (CoP12) in Manila in October 2017. This document presents our views on documents before the Parties at CoP12, including proposals to amend the CMS Appendices, which are based on the best available scientific and technical information from our field and country programs around the world. We have not included recommendations for species we do not work on, or are found in countries where we do not work. We also are still analyzing some documents and consulting our field experts, and may have updated recommendations to share with Parties at CoP12.

Decisions made by Party governments over the course of the meeting will have profound implications for the future of species conservation and sustainable development. We look forward to meeting with Parties and others during CoP12, and to advancing the conservation of migratory species. Should you have any questions or concerns regarding WCS, or our position on any agenda item to be considered during CoP12, please contact **Dr. Susan Lieberman**, WCS Vice President for International Policy at slieberman@wcs.org and **Alfred DeGemmis**, WCS International Policy Program Coordinator, at adegemmis@wcs.org.





WCS recommends that the Parties **ADOPT** the following proposals:

SPECIES	ENGLISH NAMES	PROPOSERS	PROPOSED FOR	MORE INFO (LINKS)
<i>Pan troglodytes</i>	Chimpanzee	Republic of Congo, United Republic of Tanzania	Appendix I and II	WCS Advice Proposal, ScC Comments
<i>Lasiurus</i> spp. (<i>ega</i> , <i>blossevillii</i> , <i>borealis</i> , <i>cinereus</i>)	Hoary bat, Eastern Red Bat, Southern Red Bat, and Southern Yellow Bat	Peru	Appendix II	WCS Advice Proposal, ScC Comments
<i>Panthera leo</i>	Lion	Niger, Chad, Togo	Appendix II	WCS Advice Proposal, ScC Comments
<i>Panthera pardus</i>	Leopard	Ghana, I.R. Iran, Kenya, Saudi Arabia	Appendix II	WCS Advice Proposal, ScC Comments
<i>Ursa arctos isabellinus</i>	Gobi Bear	Mongolia	Appendix I	WCS Advice Proposal, ScC Comments
<i>Equus ferus przewalskii</i>	Przewalski's Horse	Mongolia	Appendix I	WCS Advice Proposal, ScC Comments
<i>Giraffa camelopardalis</i>	Giraffe	Angola	Appendix II	WCS Advice Proposal, ScC Comments
<i>Aquila nipalensis</i>	Steppe Eagle	Mongolia, Saudi Arabia (separate proposals)	Appendix I	WCS Advice Proposals: Mongolia, Saudi Arabia, ScC Comm.
<i>Sarcogyps calvus</i> , <i>Gyps</i> spp. (<i>bengalensis</i> , <i>indicus</i> , and <i>tenuirostris</i>)	Four vulture species in Asia (Red-headed, White-rumped, Indian, Slender-billed)	Pakistan	Appendix I	WCS Advice Proposal, ScC Comments
<i>Trigonoceps occipitalis</i> , <i>Necrosyrtes monachus</i> , <i>Gyps</i> spp. (<i>africanus</i> , <i>coprotheres</i> , <i>rueppelli</i>)	Five vulture species in Africa (White-headed, Hooded, White-backed, Cape, Rüppell's)	Kenya	Appendix I	WCS Advice Proposal, ScC Comments
<i>Rhincodon typus</i>	Whale Shark	Philippines, Israel	Appendix I	WCS Advice Proposal, ScC Comments
<i>Carcharhinus obscurus</i>	Dusky Shark	Honduras	Appendix II	WCS Advice Proposal, ScC Comments
<i>Squatina squatina</i>	Angelshark	Monaco	Appendix I and II	WCS Advice Proposal, ScC Comments
<i>Rhinobatos rhinobatos</i>	Common Guitarfish	Israel, Mauritania, Senegal, Togo (separate proposals)	Appendix II	WCS Advice Proposal, ScC Comments
<i>Rhynchobatis australiae</i>	White-spotted Wedgefish	Philippines	Appendix II	WCS Advice Proposal, ScC Comments



Interpretation and Implementation of the Convention

20. National Legislation to Implement CMS Provisions [[Document 20](#)]

WCS appreciates the submission of this document, and strongly supports the Secretariat's proposal to create a National Legislation Project to evaluate whether Parties have developed adequate legislation to meet their obligations under the Convention, particularly for species listed on CMS Appendix I. It is crucial that CMS Parties have national legislation and domestic measures in place enabling them to effectively implement and enforce the Convention. There is tremendous opportunity through a CMS National Legislation Project to assist Parties with sharing of information and best practices, identifying gaps, and improving their national legislation implementing the Convention, where appropriate. This will strengthen the effectiveness of the Convention, and aid in the conservation of species on its Appendices. WCS also agrees that collaboration between the CITES and CMS National Legislation Projects could be beneficial to Parties to both Conventions. WCS has been supporting Parties to strengthen the implementation and enforcement of CITES for many years, through the CITES National Legislation Project and directly with countries where we have ongoing programs. WCS can commit to supporting Parties, where resources are available, in a CMS National Legislation project as well.

21. Review of Decisions

21.1 Resolutions to Repeal in Part

Resolution 6.3 (Rev. CoP12), Southern Albatross Conservation [[Revision](#)]: WCS supports the updates being proposed to this Resolution. WCS manages two of the Jason Islands in the southern Atlantic Ocean, which together have 250,000 breeding pairs of breeding black-browed albatrosses, and fully supports greater cooperation by CMS Parties and others on albatross conservation in the Southern Hemisphere (in the Jason Islands and elsewhere).

Resolution 7.2 (Rev. CoP12), Impact Assessment and Migratory Species [[Revision](#)]: WCS supports the updates to this Resolution, and also supports a reference in paragraph 7 to CBD Decision VIII/28. However, WCS notes that Decision VII/28 and the associated guidelines were published in 2006 and therefore do not follow the no net loss principles and guidance of the Business and Biodiversity Offsets Program (BBOP) and the [BBOP Standard](#), or the International Finance Corporation Performance Standard 6, World Bank Environmental and Social Safeguards, Equator Principles and other best practice policy and methodologies best practices established in 2012. Therefore, WCS also strongly supports the conversion of paragraph 7 into a Decision initiating a formal process with technical bodies of CBD, Ramsar and World Heritage Conventions, CMS, and others, including the intergovernmental bodies such as the IFC and partnerships such as BBOP, to develop authoritative, coherent guidance on impact assessments for wildlife (recognizing the unique vulnerability and challenges associated with migratory species). WCS encourages Parties to consider the [Guidelines for Addressing the Impact of Linear Infrastructure on Large Migratory Mammals in Central Asia](#), developed by WCS and our partners, which contains such best practices.



Resolution 7.5 (Rev. CoP12), Wind Turbines and Migratory Species [\[Revision\]](#): WCS supports the proposed updates to this Resolution, but urges Parties to also ensure that it addresses onshore wind energy development (in addition to offshore), and that operational choices, such as reducing turbine speed to reduce the mortality of bats species, are considered during implementation.

Recommendation 8.16* (Rev. CoP12), Migratory Sharks [\[Revision\]](#): WCS supports the proposed revisions to this resolution. However, we note that in addition to the threats to shark species of habitat destruction, IUU fishing, and fisheries bycatch, we note that international trade and targeted fisheries (artisanal and commercial) also threaten shark species. We recommend that operative paragraph 1 be amended as follows: *“Requests all Parties to strengthen measures to protect migratory shark species against threatening processes, including habitat destruction, IUU fishing, overfishing, unsustainable international trade, and fisheries by-catch;”*

Resolution 9.X* (Rev. CoP12), Sahelo-Saharan Megafauna [\[Revision\]](#): The Sudano-Sahel region encompasses a broad area of savanna and woodland habitats across Africa, from Senegal to Somalia, and supports some of the last remaining great wilderness areas in Africa (with many CMS-listed species). The region is subject to tremendous security and development challenges, and has historically received less international attention and support than other parts of Africa. WCS has an active [conservation program in the Sudano-Sahel region](#), and strongly supports more active engagement of CMS Parties and the international community on wildlife conservation in the region.

Recommendation 9.X* (Rev. CoP12), Asian Big Cats [\[Revision\]](#): WCS supports the idea of an ongoing reporting obligation on Asian big cats and cooperation with other international treaties and mechanisms such as CITES. WCS works to protect tigers, snow leopards and other big cats through protection of their habitats; building capacity in range States; reducing human-cat conflict; conducting scientific research to help inform conservation strategies; and monitoring populations, population trends, and threats. In Asia, WCS works on tiger conservation in 8 tiger range States (Bangladesh, China, India, Indonesia, Malaysia, Myanmar, Russia, and Thailand), and we have supported snow leopard conservation in 6 range States (Afghanistan, Pakistan, China, Uzbekistan, Tajikistan, and Kyrgyzstan).

21.1 Consolidation of Resolutions

WCS generally supports the consolidation of Resolutions to reduce redundancy. Certain consolidated and updated Resolutions and Decisions are discussed in the context of other agenda items (for example, those on climate change and ecological networks and connectivity). We have discussed those in the context of the dedicated agenda item.





22. A Review Process for the Convention [[Document 22](#)] [[Workshop Documents](#)]

WCS strongly supports the draft Resolution and associated draft Decision that would encourage Parties to adopt a review mechanism for CMS. WCS has been closely involved in the review and compliance mechanisms for several international treaties relating to biodiversity conservation, including CITES and several others examined by the intersessional Working Group. WCS would be very pleased to join any future intersessional Working Group on this issue. WCS strongly urges Parties to CMS to welcome Third Party input as a means to trigger and/or inform a review process and we believe that the CMS Standing Committee, supported by the CMS Scientific Council, could be a reasonable solution given that a similar approach has worked for CITES in the past.

23. Synergies and Partnerships [[Document 23](#)]

WCS supports the proposed revisions to this Resolution. WCS particularly supports the addition of text encouraging Parties to “Explore ways to enable NGOs and CSOs to formally report on their work for the consideration of the decision-making bodies of the CMS Family; Ensure greater NGO and CSO involvement in the CMS Family processes...through better use of web and communication technologies and through facilitating dedicated dialogues prior to the decision-making bodies of the CMS Family...” WCS believes that the effectiveness of CMS, and the conservation of migratory species and their habitats, will be enhanced through greater collaboration with NGOs and other biodiversity-related multilateral environmental agreements.

Conservation Issues

24. Conservation Issues

24.1 Avian Species

24.1.1 The Prevention of the Illegal Killing, Taking and Trade of Migratory Birds [[Document 24.1.1](#)]

[\[Scientific Council Comments\]](#): WCS supports the creation of an Intergovernmental Task Force on Illegal Hunting, Taking and Trade of Migratory Birds in the East Asian-Australasian Flyway (ITTEA) to address species other than water birds. We note however that several key countries along this flyway are not currently Parties to CMS. WCS strongly encourages members of this Task Force to engage those governments, and to encourage them to sign and/or ratify CMS. WCS works in the field in many of the countries along the East Asian-Australasian Flyway (Bangladesh, Cambodia, China, Indonesia, Lao PDR, Malaysia, Mongolia, Myanmar, Papua New Guinea, Russian Federation, Singapore, Thailand, USA, and Viet Nam). WCS would be interested in joining this Task Force and providing our scientific expertise should the opportunity arise.

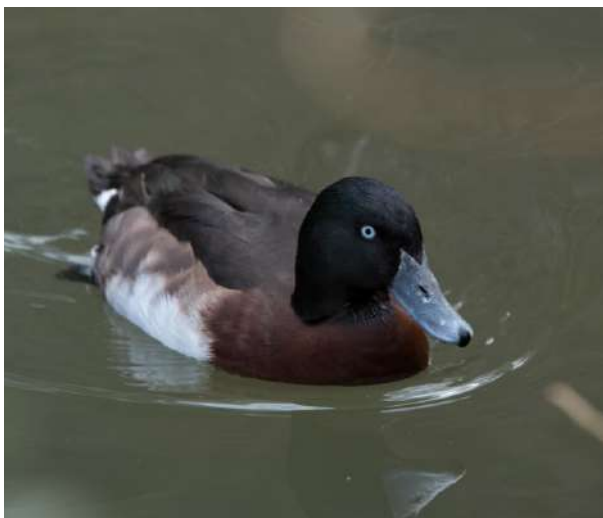


24.1 Avian Species (Continued)

24.1.3 Preventing Poisoning of Migratory Birds [[Document 24.1.3](#)] [[Scientific Council Comments](#)] [[Working Group Report](#)]: WCS supports the adoption of the draft Resolution and Decisions on this issue. We strongly support continued attention being paid to the critical issue of poisoning of migratory birds (and other species), including by agriculture pesticides, poison bait, veterinary pharmaceutical treatments, the use of lead for hunting and fishing, and potential synergistic effects of different poisons through ingestion from various food sources such as prey species. We support and encourage the continued work of the Preventing Poisoning Working Group.

24.1.4 Conservation of African Eurasian Vultures [[Document 24.1.4](#)] [[Scientific Council Comments](#)] [[Action Plan](#)]: WCS recommends the adoption of the draft Resolution and Decisions in this document, as well as the draft Multi-species Action Plan to Conserve African-Eurasian Vultures (Vulture MsAP). We appreciate the increased attention by CMS Parties to the conservation crisis facing African and Eurasian vultures, particularly of late due to intentional direct poisoning (mostly illegal) for trade or to mask the poaching of elephants and other species, and indirect poisoning to protect livestock from predators or through the use of veterinary diclofenac. Vultures are also threatened by habitat loss and degradation, decreasing food availability, and mortalities due to electrocution on power lines, wind turbine collisions, and other factors. We appreciate the interest of CMS Parties and recommend the CMS adopt/endorse best practice guidelines for Parties for mitigation of impacts of these infrastructure types on vultures.

24.1.8 Action Plan for Baer's Pochard [[Document 24.1.8](#)] [[Scientific Council Comments](#)]: WCS works in several countries along the migration route for Baer's Pochard, including breeding range and wintering grounds, and have contributed to the Action Plan contained in this document. WCS urges CMS Parties and other range states to adopt this Action Plan and to provide resources for implementation, and continue to collaborate closely on the conservation of this Critically Endangered species.

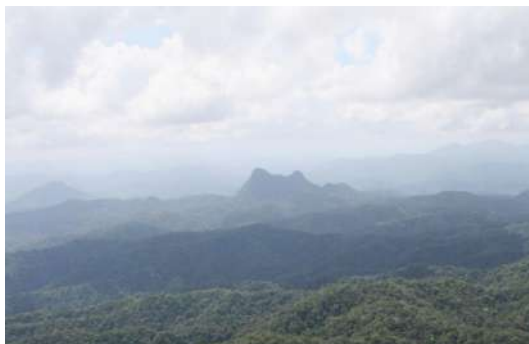
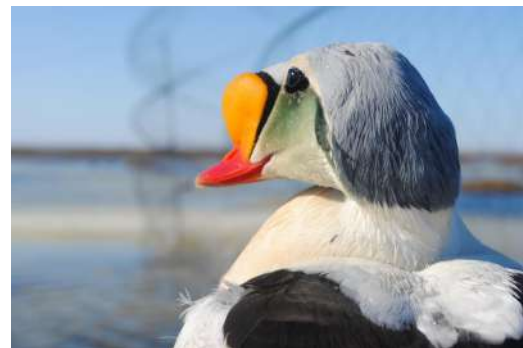




24.1 Avian Species (Continued)

24.1.10 Action Plan for the Americas Flyway [[Document 24.1.10](#)] [[Scientific Council Comments](#)]:

WCS congratulates Ecuador on leading a process to produce a draft Action Plan for the Americas Flyway to implement commitments made in Resolution 11.14 on Flyways. WCS has active field conservation programs (on migratory birds or their habitats) in many of the countries in the Americas and along the flyway (Argentina, Belize, Bolivia, Brazil, Canada, Chile, Colombia, Costa Rica, Cuba, Ecuador, Guatemala, Honduras, Nicaragua, Peru, and the USA), and looks forward to collaborating with CMS on this effort. We support the basic provisions of the Action Plan, as well as the Scientific Council's recommendation that Parties engage key North American States along this flyway (including those who are not currently Party to CMS). WCS also believes that there should be an accompanying Decision with time-bound instructions to relevant audiences to ensure that actions are taken and reviewed to implement this Plan. If changes to the Action Plan itself are discussed at the CoP, we suggest that legal hunting of CMS-listed species be discussed alongside illegal hunting (WCS is already working on illegal take and trade of some CMS-listed species in several countries along this Flyway). It is essential to work with range states that have legalized hunting programs for species covered by this Action Plan, which could negatively impact their survival if not properly managed. Additional recommendations would include i) that Net Positive Impact pilot schemes be planned less at the "flyway-scale," and more so at the local scale in key habitats along the flyway (as there are established methodologies for this type of approach); ii) that both direct and indirect impacts of hydroelectric dams are accounted for in the "rigorous EIAs" proposed under 1.1.4.4.; iii) that lead poisoning is addressed specifically as part of poisoning 1.1.5.; and iv) that research on wildlife health and zoonotic diseases (e.g. Influenza, West Nile, Encephalitis) be integrated into the Research and Monitoring recommendations in 3.1.1.





24.2 Aquatic Species

24.2.1 Important Marine Mammal Areas (IMMAs) [[Document 24.2.1](#)] [[Scientific Council Comments](#)]:

WCS supports the adoption of the draft Resolution and Decision in this document, but with some recommended edits. We concur that the identification and conservation of key habitats are critical to ensuring the conservation of marine mammals, particularly of the more than 60 marine mammal species currently listed on the CMS Appendices. We believe it is also vital to evaluate important areas for marine mammals in the context of [Key Biodiversity Areas](#) (KBAs). We recommend that the draft Resolution also endorse the [IUCN Global Standard for the Identification of KBAs](#), which has been endorsed by the IUCN Council. We encourage those working to identify IMMAs also work to enable the testing and identification of potential KBAs throughout the ocean, using the IUCN Global Standard, and to submit sites/areas as potential KBAs to the KBA Partnership, to further promote the conservation of marine mammal habitats.

24.2.2 Marine Noise [[Document 24.2.2](#)] [[Scientific Council Comments](#)] [[‘Technical Support Information’ Document](#)]:

WCS supports adoption of the draft Resolution, Decisions, and the use of the Guidelines referenced in this document. WCS notes that anthropogenic marine noise is an increasingly major threat to many marine species, and in particular threatens the conservation in the wild of many cetaceans and other marine mammals included on the CMS Appendices. Marine seismic surveys and commercial shipping lead to increasing noise levels in the marine environment and cause concern for the health of marine mammals and other marine species. WCS works with individual governments and intergovernmental organizations in efforts to mitigate marine noise and its impacts on marine mammals and other species. We have worked with the International Whaling Commission and intend to work with the International Maritime Organization (IMO), and look forward to further collaboration through CMS. Most recently, we worked with governments, IUCN, and others leading up to and during the June 2017 United Nations Conference to Support the Implementation of Sustainable Development Goal 14 (the “UN Ocean Conference”). We commend governments for including the issue of ocean noise in the [Call for Action adopted at The Ocean Conference](#). As part of the implementation of the Call, we recommend that States work together to: implement the recommendations of the IMO on shipping routes to protect whales from ship strikes and ocean noise; generate and utilize the best available science to mitigate impacts of ocean noise on marine species; and recognize ocean noise as a harmful marine pollutant that threatens many species and must be addressed. We recommend that the resolution adopted on this issue by CMS CoP12 also cite the aforementioned Call for Action. We further encourage Parties and oil and gas exploration companies to translate data on marine mammals collected during seismic surveys into actionable data for spatial planning, etc.





24.2 Aquatic Species (Continued)

24.2.3 Aquatic Wild Meat [[Document 24.2.3](#)] [[Scientific Council Comments](#)] [[Aquatic Mammals Working Group Report](#)]: WCS is supportive of continued research on aquatic wild meat, including the establishment of a working group under the CMS Scientific Council, and supports the recommendation of the Scientific Council to maintain separation between the discussions of terrestrial and aquatic wild meat. However, we recognize that there are strong interlinkages between terrestrial and marine aspects of wild meat with respect to food security and sustainable development issues, and we encourage both working groups to share learning and collaborate on solutions. In terms of scope and terminology, we far prefer the term “wild meat” to “bushmeat,” as it encompasses a greater diversity of habitats across the globe, and deals more broadly with the issue of human consumption of wildlife. We note that fish from capture fisheries are also “wild meat” (and indeed are the single greatest wild meat consumption globally), but we recommend that CMS limit the scope of this research and working group to human consumption for food of wild mammals, birds, reptiles, and amphibians, as the issues that relate to sharks, rays, and other fishes and fishery species are different. We believe the focus should remain on human consumption, both commercial and noncommercial (and not include uses for pets, curios, ornaments, or other purposes). Work on this issue should also recognize that some species are taken and traded internationally in very high numbers in both the pet and meat trades, and conservation solutions are not always different (in terms of the need for science-based management). We concur with the statement of the CMS Scientific Council that “The subject is closely linked to work with CITES on illegal trade,” but we note it is also closely linked with CITES work on legal trade (and ensuring it is sustainable). We therefore support the draft Resolution and Decisions, with modifications, and look forward to the discussion at CoP12. WCS has significant expertise on this issue, and would be pleased to participate in a working group on the subject.

24.2.6 Conservation and management of Whales and their Habitats in the South Atlantic Region [[Document 24.2.6](#)] [[Scientific Council Comments](#)] [[Action Plan](#)]: WCS congratulates Brazil on this document and greatly appreciates the thoroughness and rigor of the Action Plan for Whales and their Habitats in the South Atlantic (“Action Plan”). WCS supports the adoption of this Action Plan, and the draft Resolution and Decisions in the document. We agree with the Scientific Council’s suggestion to make it clearer how individual Parties will agree to actions for implementation under this plan, and on the recommendation to include efforts to mitigate the impacts of ship strikes. We believe it would be useful to include a map and a list of coastal States that are part of the South Atlantic (in Africa and South America), while also noting the need for actions by other States in both coastal waters and areas beyond national jurisdiction. We strongly support these efforts to enhance the conservation of the whales of the South Atlantic Ocean, and support the 5 goals and 14 actions of the Action Plan.





24.3 Terrestrial Species

24.3.1 Conservation of African Carnivores [[24.3.1.1 - African Carnivores Initiative, Scientific Council Comments](#)] [[24.3.1.2 - Conservation and Management of Cheetah and African Wild Dog, Scientific Council Comments](#)] [[24.3.1.3 - Conservation and Management of the African Lion, Scientific Council Comments](#)]: WCS appreciates the submission of these documents and supports the African Carnivores Initiative (“the Initiative”) as a means of collaboration between range states to facilitate the conservation of these African carnivores: African lion (*Panthera leo*), cheetah (*Acinonyx jubatus*), leopard (*Panthera pardus*) and wild dog (*Lycaon pictus*). This Initiative is designed to assist Parties in implementing CITES and CMS Decisions and Resolutions that pertain to these species. We concur that the Initiative has significant potential to address the threats to these species, including: habitat loss and fragmentation; human/wildlife conflict; prey depletion; unsustainable trade; and poaching and illegal trade. WCS supports greater attention on transboundary cooperation and collaborative actions for these species, and hopes that the Initiative will encourage such efforts.

WCS is committed to conserving Africa’s wildlife through partnerships designed to benefit both people and nature. WCS operates the largest and longest standing NGO field conservation program in Africa, with science-based marine and terrestrial projects in: Cameroon, Central African Republic, Republic of the Congo, Democratic Republic of the Congo, Equatorial Guinea, Gabon, Kenya, Madagascar, Mozambique, Nigeria, Rwanda, South Sudan, Tanzania, Uganda, and Zambia. Our science-based field program conducts research and assists government partners in the conservation and management of some of Africa’s most iconic species, including elephants, gorillas, chimpanzees, bonobos, giraffes, okapi, bongo, lions, leopards, cheetahs, wild dogs, cetaceans and marine turtles, among others.

We note that the document states that the Initiative will be used to: develop concrete, coordinated and synergistic conservation programs for all four carnivore species, with local and regional projects implemented across their African range; develop policy guidance and recommendations for Range States, CITES and CMS concerning the four species; and organize the collaboration with other conservation initiatives and organizations, such as IUCN. We support all of those goals. As an international organization working on African carnivore conservation in almost all of the aforementioned countries, WCS urges CMS Parties, in adopting this Initiative, to include conservation organizations working on the ground on these species, in collaboration with range State governments, in addition to IUCN. WCS looks forward to working with CMS and CITES Parties on this Initiative. We encourage a wide variety of donor agencies, governments, foundations, and private donors to provide funding for this Initiative, as we note that many of the proposed actions will also deliver livelihood benefits and improve land use management that will improve economic security in several countries, but we also believe that efforts to implement it can commence even before full funding is obtained.





24.3 Terrestrial Species (Continued)

24.3.3 Adoption of the African Elephant Action Plan [[Document 24.3.3](#)] [[Scientific Council Comments](#)]: WCS appreciates this document submitted by Burkina Faso, Ghana, Kenya, and South Africa, as African elephant range States from across Africa. We support the adoption of the African Elephant Action Plan (AEAP) by the CMS CoP. It will better align work of range States across Multilateral Environmental Agreements, especially those that are party to both CITES and CMS. The AEAP was approved by consensus of all 37 African elephant range States during CITES CoP15 in 2010, and it contains key measures necessary to conserve African elephants on the ground. There are additional measures needed that relate to trafficking in ivory, and many of those efforts must be implemented by transit and consumer States. However, the AEAP remains a key document focused on field conservation programs for elephants in Africa, and is worthy of support from governmental, intergovernmental, and private donors.

WCS works with government and community partners on African elephant conservation in nine countries. Our field program includes: protecting elephants and their habitats; assisting governments in anti-poaching enforcement efforts; reducing human-elephant conflict; building capacity in range states; conducting research on elephants to help inform conservation strategies; and monitoring elephant numbers, population trends, and threats to elephants and their habitats. We recommend that CMS CoP12 adopts the draft resolution in this document, to facilitate CMS-relevant activities in the AEAP.





24.4 Cross-Cutting Issues

24.4.2 Climate Change and Migratory Species [[Document 24.4.2](#)] [[Scientific Council Comments](#)] [[Workshop Report](#)]: WCS supports the consolidation and updating of the existing Resolutions on climate change, and thanks the Secretariat and the Climate Change Working Group of the Scientific Council for creating time-bound Decisions for Parties to report on the implementation of the CMS Program of Work on Climate Change. WCS generally agrees with the established Program of Work, and is currently working in close collaboration with Parties and local governments and communities to assess the existing impacts of climate change, particularly the vulnerability of both CMS-listed and non-listed species (as well as protected areas). Our ultimate goal is to increase resilience by establishing larger, well-connected protected area systems that provide climate refugia for vulnerable species, along with facilitating transboundary cooperation on the species whose life cycles make them most vulnerable to the effects of climate change. WCS notes that the scope of this program of work is quite large, and climate finance is often not well suited to performing analyses to guide the implementation of large-scale projects along migration routes. WCS strongly urges Parties and non-Parties to increase funding for, and participation in, efforts to strengthen climate resilience at relevant scales and to include such activities in climate funding mechanisms.

24.4.4 Bycatch [[Document 24.4.4](#)] [[Scientific Council Comments](#)] [[Review of Methods](#)]: WCS supports the updating of this Resolution. We commend the CMS Parties for continuing to collaborate to help reduce fisheries bycatch and to mitigate the threat to the conservation status of CMS-listed species. As one of the most significant threats to the conservation of aquatic species included in the CMS Appendices, and the greatest threat to some species particularly those in Appendix I, it is vital that CMS Parties work to implement this Resolution.

Paragraph 8 of the operative portion of the resolution states, “Encourages all Parties that are Range States of ~~seabirds, marine turtles and cetaceans~~ aquatic species listed in Appendices I and II, and which have relevant fisheries, to co-operate mutually and with other countries to reduce as far as possible the incidental taking by such fisheries of such migratory species, for example by the sharing of, and further development of, practical and effective mitigation devices for seabirds, marine turtles and cetaceans;”. We concur with the proposed edits (here and elsewhere in the document). We note however that the paragraph refers to practical and effective mitigation devices. There are many cases where mitigation strategies, but not necessarily devices, have been effective in reducing bycatch or mitigating its impact (e.g. time and area closures, zero retention policies), which is reflected elsewhere in the document. There are also a range of protocols developed for both reducing bycatches and maximizing survivorship through safe handling and release of incidentally captured animals (e.g., sawfishes, whale sharks). We therefore recommend this sentence be changed to read “practical and effective mitigation devices, protocols, and strategies...”





24.4 Cross-Cutting Issues (Continued)

24.4.7 Addressing Unsustainable Use of Wild Meat [[Document 24.4.7](#)] [[Scientific Council Comments](#)]: WCS welcomes this well researched document submitted by the CMS Secretariat on the impacts of unsustainable hunting for wild meat on species, habitats, and the food security and livelihoods of local communities. We appreciate that the document also highlights the impacts of not only subsistence hunting and consumption, but also commercial hunting of wild terrestrial animals for the commercial meat trade (often to urban centers, or even across borders). We strongly recommend adoption of the draft Decisions contained in this document. We note that the document, while focused on unsustainable hunting and consumption, does not discuss the fact that much of the hunting and trade of CMS-listed species for wild meat is illegal, and as such efforts underway by States to combat illegal wildlife trade should also include commercialized wild meat. WCS believes that the analysis of the direct and indirect impacts of wild meat consumption on terrestrial and avian species listed on CMS, as called for in the draft Decision, will greatly assist Parties in determining the best conservation and management options.

WCS appreciates that the document highlights the Sustainable Wildlife Management (SWM) Program of the Food and Agricultural Organization of the United Nations (FAO), the Centre for International Forestry Research (CIFOR), the Centre de Coopération Internationale en Recherche Agronomique pour le Développement (CIRAD) and WCS. SWM, one of the largest efforts ever undertaken to reduce the loss of wildlife from illegal or unsustainable hunting for wild meat through demand reduction, increasing domestic production, and best practices in community wildlife management, is funded by the European Union and implemented by an FAO-led consortium with CIFOR, CIRAD and WCS. We are pleased to note that FAO, CIFOR, CIRAD, and WCS will host a side event during CoP12 (on the evening of 26 October) where the program will be presented and discussed with participants, particularly in the context of CMS-related potential actions. We look forward to seeing you there and engaging in further discussion of this topic.





24.4 Cross-Cutting Issues (Continued)

24.4.11 Improving Ways of Addressing Connectivity in the Conservation of Migratory Species [[Document 24.4.11](#)] [[Scientific Council Comments](#)]: WCS thanks the CMS Scientific Council and those who participated in the intersessional workshops building on Resolutions 10.3 and 11.25 hosted by the Government of Italy. We congratulate the CMS Scientific Council and the members of this working group on presenting this new Resolution to ensure that national governments and other stakeholders continue to undertake research efforts and maintain databases to better understand ecological networks along migration routes, and to take into account the conservation of ecological networks formed by migratory species and their migration routes in planning processes, in order to ensure long-term functioning of migration processes. Given the transboundary nature of this resolution, WCS believes that the CMS Secretariat has a strong role to play in the implementation of this Resolution, as do CMS daughter instruments, intergovernmental organizations, nongovernmental organizations and others with a presence along migration routes and in technical advisory roles on spatial planning and development/conservation efforts.

WCS, as a member of the [Key Biodiversity Area \(KBA\) Partnership](#), strongly recommends that the CMS Secretariat, Scientific Council, and Parties liaise with the KBA Partnership, as many key habitats for CMS-listed species are either currently recognized as KBAs, or may so qualify pursuant to the criteria in the IUCN [KBA Standard](#). It would be useful to consider, as part of the CMS process *inter alia*, whether or not key habitats for migratory species qualify as KBAs. WCS supports the draft Decision requesting that Parties contribute to efforts to map migration routes for addition to the CMS Global Atlas of Migratory Animal Movements. WCS recommends additional text for the Resolution and Decision requesting the Secretariat to lead on preparation of an analysis of linear barriers to migratory species in Africa and Latin America (including linear infrastructure developments and large scale private and public fencing initiatives), in order to develop policy guidance for governments, building on the experience and lessons learned in the implementation of the [Guidelines for Addressing the Impact of Linear Infrastructure on Large Migratory Mammals in Central Asia](#). WCS also played an important role in the development of the Atlas of Migratory Animals in Central Asia; we believe that our extensive field presence and scientific and conservation expertise (globally, including both Africa and Latin America) make us a valuable partner in such an exercise, and we look forward to partnering with CMS Parties on this endeavor.





24.4 Cross-Cutting Issues (Continued)

24.4.12 Transfrontier Conservation Areas for Migratory Species [[Document 24.4.12](#)]: WCS thanks the CMS Secretariat for submitting this document. WCS has been engaged in transboundary conservation in Africa, Asia, the Americas and Oceania for decades, and understands the importance of transboundary cooperation for both biodiversity and environmental conservation and neighboring states that benefit from collaboration. We have ongoing or forthcoming conservation programs within many transboundary areas identified in Africa in this document such as Niassa-Selous (Mozambique and the United Republic of Tanzania); Sudd-Badingilu-Boma-Gambella (South Sudan and Ethiopia); Imatongs-Kidepo (South Sudan and Uganda); Lake Tanganyika (the United Republic of Tanzania, Burundi, Democratic Republic of Congo, Zambia, Malawi and Mozambique); and the Greater Virunga (Democratic Republic of Congo, Rwanda and Uganda). We note that these are an especially important tool for CMS-listed species, or populations, that cross over national borders. WCS supports the Decisions contained in this document. We also support the recommendation to replicate the study of linear infrastructure undertaken as part of the Central Asian Mammals Initiative in places such as East Africa, southern South America and others where a large-scale analysis of growing linear infrastructure development would assist planners in assessing impacts on migratory species. WCS programs are already undertaking work along these lines at the country and sub-regional level, and would be pleased to engage with CMS Parties on this topic.

24.4.13 Community Participation and Livelihoods [[Document 24.4.13](#)]: WCS thanks the CMS Secretariat for submitting this document. As part of our conservation work with local and indigenous communities across dozens of countries, we understand the vital role that local livelihoods play in the development agenda for rural communities, and the ways in which they can positively impact conservation efforts for CMS-listed species and their habitats. We support further exchange of best practices and workshops on the topic to scale best approaches, and would be pleased to be involved in such discussions to contribute our own learning.





Amendment of the CMS Appendices

25. Amendment of the CMS Appendices

WCS hereby submits the following recommendations to the Parties regarding proposals to amend the CMS Appendices. We have not included recommendations for species we do not work on, or those that are found exclusively in countries where we do not work (although we may indeed recommend their adoption). We also are still analyzing some proposals and consulting our field experts, and may have updated recommendations to share with Parties during CoP12.

We also note that some of the proposals are for species that are not traditionally considered migratory, and WCS stresses that the focus of this Convention should remain on migratory species. However, we do recommend inclusion of those species on the Appendices (and adoption of those proposals) where the species otherwise qualifies, and inclusion on the CMS Appendices has potential to facilitate or enhance cooperation between range States (including transboundary cooperation), reduce threats to the species, and/or benefit the conservation of the species in the wild.

25.1 Proposals for Amendment of Appendices I and II of the Convention [Document 25.1]

251.1 Chimpanzee (*Pan troglodytes*) on Appendix I and II [[Document 25.1.1](#)] [[Scientific Council Comments](#)]: WCS appreciates the submission of this proposal by the governments of the Republic of the Congo and the United Republic of Tanzania, to include the chimpanzee (*Pan troglodytes*) in CMS Appendices I and II. WCS works in the wild and with government partners on the conservation of three of the four chimpanzee subspecies (*P.t. troglodytes*, *P.t. ellioti* and *P.t. schweinfurthii*) and their habitats. We work on the ground in 11 of the 21 chimpanzee range States in Africa (where the species is extant, according to the IUCN Red List of Threatened Species): Cameroon, Central African Republic, Republic of the Congo, Democratic Republic of the Congo, Equatorial Guinea, Gabon, Nigeria, Rwanda, South Sudan, Tanzania, and Uganda. The main threats to chimpanzees are habitat loss, disease, and hunting, especially for meat.

The chimpanzee is completely protected by national law in all range States and is on CITES Appendix I; it is therefore illegal across their range to kill, capture or trade in chimpanzees or their body parts. Therefore, inclusion on CMS Appendix I is consistent with and supportive of national and international law. WCS also notes that many chimpanzee range States share contiguous habitats containing chimpanzee populations that are suspected to cross national jurisdictions, and transboundary cooperation is critical to the conservation of chimpanzees and their habitats; Appendix II listing can stimulate such vital cooperation. WCS believes that inclusion on CMS Appendix I and II has potential to benefit the conservation of chimpanzees across their range, and recommends adoption of this proposal.



25.1 Proposals for Amendment of Appendices I and II of the Convention (Continued)

25.1.2 Lasiurus Bats on Appendix II [[Document 25.1.2](#)] [[Scientific Council Comments](#)]: WCS appreciates the submission of this proposal by the Government of Peru and supports the proposal to list the hoary bat (*Lasiurus cinereus*), eastern red bat (*Lasiurus borealis*), southern red bat (*Lasiurus blossevillii*), and southern yellow bat (*Lasiurus ega*) on CMS Appendix II. These species are highly migratory, and move through multiple range States across the Americas. WCS notes with concern that recent scientific research suggests that millions of bats are killed by wind turbines in countries such as Peru, where they are attracted to large congregations of insects. There are mechanical solutions to this problem, however, and close collaboration on management of wind energy across their range can provide a strong platform for conserving these species that are integral to the ecosystems that they inhabit.

25.1.3 Lion (*Panthera leo*) on Appendix II [[Document 25.1.3](#)] [[Scientific Council Comments](#)]: WCS appreciates the submission of this proposal by the governments of Niger, Chad and Togo. We also congratulate range States on the meeting of African lion range states held in Entebbe, Uganda in May 2016. WCS works in the wild and with government partners on the conservation of lions and their habitats in at least seven countries across Africa, including Cameroon (Bouba Njida), the Democratic Republic of the Congo (Kabobo-Luama and Virunga-Hoyo), Nigeria (Yankari Game Reserve), Mozambique (Niassa National Reserve), Tanzania (Ruaha-Katavi, Tarangire National Park), Uganda (Murchison Falls National Park, Queen Elizabeth National Park, Kidepo Valley National Park), and South Sudan (Bandingalo, Boma and Southern National Parks, Sudd).

WCS is concerned about the threats to African lions, including habitat loss and degradation, reduction of wild prey, human-wildlife conflict, illegal killing, unsustainable or unregulated hunting, and disease. More effort is needed to support a broader land use and management framework that addresses threats both within and outside protected areas. More research is also needed to inform the conservation of lions across their range, along with further transboundary cooperation and prioritization. All of the aforementioned activities, vital to lion conservation, could benefit from an Appendix II listing, and we recommend that Parties adopt the proposal. We also encourage participation by range States in the proposed African Carnivore Initiative (see agenda item **24.3.1** in this document), and we encourage governments and donor agencies to provide sufficient resources for implementation of both CMS and CITES Decisions related to African lions.



25.1 Proposals for Amendment of Appendices I and II of the Convention (Continued)

25.1.4 Leopard (*Panthera pardus*) on Appendix II [[Document 25.1.4](#)] [[Scientific Council Comments](#)]: WCS is concerned about the decline of leopard populations, particularly for key sub-species such as *Panthera pardus orientalis*, *P. pardus nimr*, and *P. pardus japonensis*. We support an additional international commitment to the protection through this proposed listing of *P. pardus* on CMS Appendix II, with the international collaboration it requests. We encourage range States to support this listing, and to focus any initiatives or concerted actions on the three subspecies of greatest concern and where international cooperation would most benefit the conservation status of the species. We also recommend that range States report out on the progress made under this listing, with a view to potentially list key sub-species in Appendix I at CoP13.



25.1.5 Gobi bear (*Ursus arctos isabellinus*) on Appendix I [[Document 25.1.5](#)] [[Scientific Council Comments](#)]: Nearly two decades of successful conservation work on the Eastern Steppe have shaped WCS's vision for its conservation: that Asia's last wildlife migration spectacle of over one million Mongolian gazelles thrive across the world's largest intact temperate grassland, and a full assemblage of Asiatic wild ass (khulan), goitered gazelle, saiga antelope, gray wolf, Siberian marmot, white-naped crane, saker falcon, houbara bustard, Pallas' cat and other wildlife species are sustained by a network of well-managed national parks and communal lands. We collaborate closely with the Government of Mongolia on these efforts, and, although we do not work directly on Gobi bear, we support Mongolia's effort to enhance transboundary cooperation on this species.

25.1.8 Przewalski's horse (*Equus ferus przewalskii*) on Appendix I [[Document 25.1.8](#)] [[Scientific Council Comments](#)]: As with the Gobi bear (above), we support Mongolia's effort to enhance transboundary cooperation on this species, even though we do not work directly on Przewalski's horse. However, WCS is actively engaged with the Central Asian Mammals Initiative (CAMI), which includes this species even though it is not currently listed in the CMS Appendices. We therefore welcome this proposal from Mongolia to provide additional incentive for range States to work together on conservation of Przewalski's horse and the other mammal species that undertake long migrations across Central Asia.



25.1 Proposals for Amendment of Appendices I and II of the Convention (Continued)

25.1.10 Giraffe (*Giraffa camelopardalis*) on Appendix II [[Document 25.1.10](#)] [[Scientific Council Comments](#)]: WCS appreciates the submission of this proposal by the Government of Angola. Giraffes occur in 21 sub-Saharan African countries, and the populations of some of the 9 recognized giraffe subspecies are transboundary. WCS works in the wild and with government partners on the conservation of giraffes and their habitats in seven of the range States for giraffes (habitat for 5 of the giraffe subspecies) -- Cameroon, DR Congo, South Sudan, Mozambique, Uganda, Tanzania, Rwanda.

WCS is concerned about the threats to giraffes leading to declines in many of their populations, including habitat loss (largely through land conversion, deforestation, and expansion of agricultural and extractive activities), illegal killing and illegal trade, and climate change (including drought). Last year, the status of the giraffe on the IUCN Red List of Threatened Species was changed to Vulnerable (from Least Concern) across its range, having declined by an estimated 40% over three generations, further highlighting the increasing need to protect them. Listing the giraffe on CMS Appendix II will help encourage collaboration between giraffe range states for better conservation and management of the species and its habitats, and we recommend adoption of this proposal.



25.1.13 Steppe eagle (*Aquila nipalensis*) on Appendix I [[Doc - Mongolia](#)] [[Doc - Saudi Arabia](#)] [[Scientific Council Comments](#)]: WCS appreciates the submission of these proposals by Mongolia and Saudi Arabia, and support the inclusion of this species in Appendix I of CMS. The steppe eagle was moved from Least Concern to Endangered on the IUCN Red List of Threatened Species in 2015, in recognition of very rapid recent declines across much of the range, particularly in Europe. It is native to the following countries where WCS works (range States based on the IUCN Red List): Afghanistan; Bangladesh; China; DR Congo; India; Kenya; Malaysia; Mongolia; Myanmar; Pakistan; Russian Federation; Rwanda; Singapore; South Sudan; Tanzania; Thailand; Uganda; and Viet Nam, with the majority of all breeding taking place in Central Asia and Eastern Europe and the largest populations in Mongolia and the Russian Federation). We have engaged on steppe eagle conservation in the past, and they are an integral part of several WCS landscapes, and many others.



25.1 Proposals for Amendment of Appendices I and II of the Convention (Continued)

25.1.14 Four Vulture Species - Red-headed Vulture (*Sarcogyps calvus*), White-rumped Vulture (*Gyps bengalensis*), Indian Vulture (*Gyps indicus*) and Slender-billed Vulture (*Gyps tenuirostris*) - Occurring in Asia on Appendix I [[Document 25.1.14](#)] [[Scientific Council Comments](#)]: WCS appreciates the submission by the government of Pakistan of this proposal to list four Asian vulture Species in CMS Appendix I: red-headed vulture (*Sarcogyps calvus*), white-rumped vulture (*Gyps bengalensis*), Indian vulture (*Gyps indicus*) and slender-billed vulture (*Gyps tenuirostris*). WCS recommends the adoption of this proposal. All four species are listed as Critically Endangered on the IUCN Red List of Threatened Species (assessed and published in 2016).

Sarcogyps calvus (the red-headed vulture) is found in Bangladesh, Cambodia, China, India, Lao PDR, Myanmar, Nepal, Pakistan, Thailand, and Viet Nam, and is possibly extinct in Bhutan and Malaysia. *Gyps bengalensis* (white-rumped vulture) is found in Afghanistan, Bhutan, Brunei Darussalam, Cambodia, India, Iran, Lao PDR, Myanmar, Nepal, Pakistan, the Russian Federation, Thailand, and Viet Nam, and is believed to be extinct in Bangladesh, China, and Malaysia. It was once described as possibly the most abundant large bird of prey in the world, with a global population of possibly several million individuals. However, following dramatic declines through the 1990's across its range, its global population is now estimated to be between 2,500 and 10,000 mature individuals. *Gyps indicus* (Indian vulture) is found in Afghanistan, India, and Pakistan. *Gyps tenuirostris* (slender-billed vulture) is found in Bangladesh, Cambodia, India, Lao PDR, Myanmar, and Nepal, and is extinct or possibly extinct in Malaysia, Thailand, and Viet Nam. WCS has active field programs in 11 of these range States, and would be pleased to collaborate with range State governments and other scientists on the conservation of these species.

These vulture species, along with others in the region, have all suffered extremely rapid population declines in the recent past, most likely largely due to poisoning from feeding on carcasses of animals treated with the veterinary drug diclofenac (used to treat livestock), in combination with other causes. The significant declines (and local extirpations) of Asian vultures are due to several factors in addition to poisoning by diclofenac, including: significant declines in wild ungulates; agricultural intensification; changes in waste disposal techniques; direct persecution; and disease. In addition, vultures have some of the lowest reproductive rates among birds and are particularly vulnerable to all of these threats.

Asian vultures are nationally protected in many but not all range States; in some countries, enforcement measures are insufficient or largely absent. These Asian vulture species are included on CMS Appendix II, CITES Appendix II, and Annex I of the Memorandum of Understanding on the Conservation of Migratory Birds of Prey in Africa and Eurasia (Raptors MOU). A Multi-species Action Plan to Conserve African-Eurasian Vultures is also under development. International cooperation is indeed critical to the conservation, survival, and recovery of Asian vulture species. These four Critically Endangered Asian vulture species qualify for inclusion on CMS Appendix I. WCS believes that along with the effective implementation of the Vulture Multi-species Action Plan, implementation of CMS Appendix I will help motivate action for the species' conservation, including through improved legislative, regulatory and enforcement measures in range States.



25.1 Proposals for Amendment of Appendices I and II of the Convention (Continued)

25.1.15 Five Vulture Species - White-headed Vulture (*Trigonoceps occipitalis*), Hooded Vulture (*Necrosyrtes monachus*), White-backed Vulture (*Gyps africanus*), Cape Vulture (*Gyps coprotheres*) and Rüppell's Vulture (*Gyps rueppelli*) - Occurring in Sub-Saharan Africa on Appendix I [[Document 25.1.15](#)] [[Scientific Council Comments](#)]: WCS appreciates the submission by the Government of Kenya of this proposal to list these five vulture species on CMS Appendix I. WCS recommends the adoption of this proposal by CoP12, and we believe that international cooperation, through CMS and otherwise, is essential to the conservation and recovery of these species, and that implementation of CMS Appendix I will help motivate action for the species' conservation through improved legislative, regulatory and enforcement measures in range States.

These 5 Sub-Saharan African vulture species are listed as Endangered (the cape vulture) or Critically Endangered (the other 4 species) on the IUCN Red List of Threatened Species (assessed and published in 2016 and 2017). Along with other African vulture species (such as the lappet-faced vulture and Egyptian vulture), are experiencing significant and rapid declines due to a large number of multiple threats, including: reductions in populations of wild ungulates and other medium-sized mammals (leading to decreases in the amount of carrion available); habitat conversion; indirect (non-targeted) poisoning at baits set to kill jackals, lions, hyenas, and other species; secondary poisoning from carbofuran and other poisons; deliberate poisoning to prevent vultures drawing attention to poaching activities (particularly of elephants and rhinos); hunting for traditional medicine, fetish markets, and traditional and other belief-based practices; wild meat consumption; exploitation for domestic and international trade; land conversion; improvements in abattoir hygiene and rubbish disposal; electrocution on energy infrastructure; other negative interactions with human infrastructure; and poor grassland management. In addition, vultures have some of the lowest reproductive rates among birds and are particularly vulnerable to all of these threats.

Recent data suggest the white-headed vulture's already small population is declining at an extremely rapid rate across its range, particularly in parts of West Africa. The hooded vulture (*Necrosyrtes monachus*) is declining rapidly with an estimated 83% decline over three generations. The white-backed vulture (*Gyps africanus*) is a widespread and previously common vulture in Africa, the species is now undergoing very rapid declines. It has declined by over 90% in West Africa, and has largely or completely disappeared from some parts of its range. The cape vulture (*Gyps coprotheres*) is species is declining, with severe population declines in parts of its range. Rüppell's vulture (*Gyps rueppelli*) has experienced a very rapid population decline of 97% over three generations, with extremely rapid declines have been reported in West Africa in particular.

These African vultures are nationally protected in some but not all range States; in some countries, enforcement measures are insufficient or largely absent. These African vulture species are included on CMS Appendix II, CITES Appendix II, and Annex I of the Memorandum of Understanding on the Conservation of Migratory Birds of Prey in Africa and Eurasia (Raptors MOU). We are pleased that Kenya is actively engaged in development of the Vulture Multi-species Action Plan (MsAP), which will provide a framework for range states to engage and cooperate on a wide range of key activities to address threats and promote vulture conservation throughout the ranges of all five species in this proposal. WCS has active field programs in 14 of the range States for these species, and would be pleased to collaborate with range State governments and other scientists on conservation efforts.



25.1 Proposals for Amendment of Appendices I and II of the Convention (Continued)

25.1.20 Whale Shark (*Rhincodon typus*) on Appendix I [[Document 25.1.20](#)] [[Scientific Council Comments](#)]: WCS appreciates this proposal submitted by the governments of the Philippines, Israel and Sri Lanka, and recommends its adoption. The whale shark, the world's largest fish, is listed as Endangered on the IUCN Red List of Threatened Species. The species has experienced significant declines, particularly in the Indo-Pacific, largely due to directed and incidental captures in fisheries (including setting of tuna purse seine nets around whale sharks); ship strikes and international trade (both illegal trade and legal but unsustainable trade) are also important threats. These declines and potential extirpations undermine sustainable development in coastal range States, particularly those with existing or planned whale shark ecotourism. Many CMS Parties are also whale shark range States and have no legal protections currently in place for the species. The whale shark is included in Annex I (Highly Migratory Species) of the UN Convention on the Law of the Sea (UNCLOS), but to date, no management initiatives have included the whale shark under UNCLOS or the UN Agreement on Straddling and Highly Migratory Fish Stocks. Thus, the role of CMS is even more critical. The species is highly migratory, and it clearly meets the criteria for inclusion on CMS Appendix I. WCS believes that successful implementation of CMS Appendix I can motivate action for the species' conservation, including through improved legislative, regulatory and enforcement measures in range States. We also hope that this action will encourage adoption and enforcement by RFMOs and fishing countries of prohibitions on the setting of purse seines on whale sharks (as has been adopted by the Indian Ocean Tuna Commission).

25.1.21 Dusky Shark (*Carcharhinus obscurus*) on Appendix II [[Document 25.1.21](#)] [[Scientific Council Comments](#)]: WCS appreciates the submission of this proposal by the Government of Honduras, and recommends its adoption. The dusky shark is listed globally as Vulnerable on the IUCN Red List of Threatened Species; it is recognized as Endangered in the Northwest Atlantic and Western Central Atlantic. It is a large wide-ranging highly migratory shark species, experiencing long-distance, seasonal migrations. The dusky shark is among the slowest-growing, latest-maturing of sharks, with a very low intrinsic rate of increase and a resulting high vulnerability to depletion from fisheries. The dusky shark has experienced significant declines, due to both directed and incidental take in fisheries as well as the international fin trade. Dusky sharks are frequently caught by longline and large gillnet fisheries, and are also taken in coastal directed fisheries in many countries. Regional Fishery Bodies (RFBs), including Regional Fisheries Management Organizations (RFMOs), where dusky sharks are taken have not undertaken stock assessments or adopted management measures for this species. A contributing factor is that the dusky shark is more coastal than pelagic, and less of interest to RFBs. The species is also largely unmanaged by coastal States. CMS Appendix II has the potential to fill a gap for this species and lead to collaboration and cooperation among range (and fishing) States, to improve the conservation of the dusky shark.



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25.1 Proposals for Amendment of Appendices I and II of the Convention (Continued)

25.1.23 Angelshark (*Squatina squatina*) on Appendices I and II [[Document 25.1.23](#)] [[Scientific Council Comments](#)] [[Eastern Atlantic and Mediterranean Angel Shark Conservation Strategy](#)]: WCS recommends the adoption of this proposal, submitted by the Government of the Principality of Monaco. The angelshark is listed globally as Critically Endangered on the IUCN Red List of Threatened Species, and is now locally extinct or extremely rare over much of its former range as a result of severe population depletion, local extinction, and range contraction, due to both targeted and incidental take in fisheries. Inclusion of the angelshark on CMS Appendix I and II is fully in line with strict conservation and management measures adopted under other intergovernmental agreements, including the Barcelona Convention, the General Fisheries Commission for the Mediterranean (GFCM), the Bern Convention on the Conservation of European Wildlife and Natural Habitats, the Convention for the Protection of the Marine Environment of the Northeast Atlantic (OSPAR), and the Baltic Marine Environment Protection Commission (HELCOM); it is also fully protected in EU waters. WCS appreciates that Monaco will also propose the Angelshark for listing in Annex I to the Sharks MOU and will lead work with range States and partners to implement a Concerted Action.

25.1.24 Common guitarfish (*Rhinobatos rhinobatos*) [[Document 25.1.24: \(a. Israel\) \(b. Mauritania\) \(c. Senegal\) \(d. Togo\)](#)] [[Scientific Council Comments \(a. Israel\) \(b-d. others\)](#)]: WCS appreciates the proposals submitted by Israel, Mauritania, Senegal and Togo to include the common guitarfish (*Rhinobatos rhinobatos*) in CMS Appendix II, and Israel's to include the Mediterranean population in Appendix I. WCS recommends the consolidation and adoption of all of these proposals. The common guitarfish is no longer common, and is listed as Endangered on the IUCN Red List of Threatened Species. Although its distribution is fairly wide, it is threatened by fishing pressures throughout most of its range (including a documented decline in the Mediterranean), particularly since it is found along coastal inshore areas where fisheries operations are extensive and intensive. It is taken as incidentally in trawl and gillnet fisheries, and is also targeted for its meat and fins (in unregulated fisheries in the majority of range States). The species is particularly vulnerable due to its life history characteristics. WCS believes therefore that the species meets the criteria for inclusion on these Appendices, and that inclusion of the common guitarfish on Appendix I in the Mediterranean and Appendix II throughout its range fully supports conservation and management measures adopted by other intergovernmental agreements (SPA/BD protocol of the Barcelona Convention, GFCM Recommendations). WCS appreciates that the proponents of this proposal will work to include the common guitarfish on the annexes of the Sharks MoU.

25.1.25 White-spotted wedgefish (*Rhynchobatis australiae*) on Appendix II [[Document 25.1.25](#)] [[Scientific Council Comments](#)]: WCS recommends the adoption of this proposal from the Philippines to list the white-spotted (or bottlenose) wedgefish (*Rhynchobatus australiae*) on Appendix II of CMS. Although *R. australiae* is categorized on the IUCN Red List of Threatened Species as globally Vulnerable due to local population depletions driven by overfishing in artisanal and commercial fisheries, its IUCN Red List evaluation is more than a decade old and needs updating. White-spotted wedgefish are taken in target fisheries and as secondary catch, primarily for their fins, which are extremely valuable in international trade. *R. australiae* is a large, shark-like batoid found in shallow inshore waters of the Indo-West Pacific (Thailand, Indonesia, the Philippines and Australia according to the IUCN Red List of Threatened Species). The species is especially vulnerable because of its use of shallow coastal habitats, susceptibility to multiple fishing gear types, large size, and value in trade. It is traded for its skin, meat and fins; the large fins of *R. australiae* are among the most highly valued in the international fin trade, which further threatens the species.



Concerted Actions

26. Implementation of the Concerted Actions Process

26.1 Concerted Actions [[Document 26.1](#)] [[Scientific Council Comments](#)]

WCS generally supports the consolidation and updating of old Resolutions. WCS applauds the streamlining of the Concerted Actions process, and believes that it can serve both Appendix I and II species well. We agree believe that proposed outcomes and timelines should be proposed for actions to be taken by range States and other stakeholders should in all future proposals for Concerted Actions, such that the CMS Scientific Council and Sessional Council, as well as the Conference of Parties, can evaluate whether progress is being made. We also believe that existing Concerted and Cooperative Actions should be updated to include these implementation timelines by the next CoP in 2020.

26.2 Concerted Actions for the triennium 2018-2020 [[Document 26.2](#)] [[Scientific Council Comments](#)]

26.2.3 Atlantic Humpback Dolphin (*Souza teuszii*) [[Document 26.2.3](#)] [[Scientific Council Comments](#)]: The Atlantic humpback dolphin, endemic to tropical and sub-tropical near-shore waters of western Africa, is currently listed as Vulnerable on the IUCN Red List and is listed on Appendix I and II of CMS. Without immediate, sustained and effective conservation measures the species risks local and potentially global extinction. WCS supports the proposed Concerted Action, including a meeting of range States to develop a renewed, range-wide Plan of Action for this species, the creation of a regional ad hoc Task Force, the creation of MPAs networks (including transboundary MPAs for populations that cross international boundaries) to cover key habitat, and additional research and monitoring to evaluate the impacts of these actions. WCS believes that this is an appropriate use of the Concerted Action mechanism, as it will provide an opportunity for range States to collaborate on specific deliverables, and strongly urges range States and other CMS Parties to provide resources for implementation of these actions. WCS has extensive experience working with local fishing communities in the Republic of Congo to eliminate catches of Atlantic humpback dolphins, and would be pleased to participate in a meeting of range States and experts.

26.2.4 Arabian Sea Humpback Whale (*Megaptera novaeangliae*) [[Document 26.2.4](#)] [[Scientific Council Comments](#)]: WCS welcomes this proposal for a Concerted Action from the Appointed Counsellor for Aquatic Mammals, and strongly encourages its adoption by the CoP. WCS works to conserve several CMS-listed cetacean species. WCS's Howard Rosenbaum is the CMS Humpback Whale Focal Point, and we belong to the Arabian Sea Whale Network (which focuses specifically on this population). In 2014, scientists from WCS and other organizations made a fascinating discovery that these whales inhabiting the Arabian Sea are the most genetically distinct and isolated whale population in the world. The results suggest they have remained separate from other humpback whale populations for perhaps 70,000 years, extremely unusual in a species famed for long-distance migrations. The implementation of this Concerted Action will help ensure that this isolated population is protected from incidental take through increased capacity for research on this population, and greater collaboration through an approved conservation and management plan.



26.2 Designation of Species for Concerted Actions for the triennium 2018-2020 (Continued)

26.2.6 Mobulid Rays (*Mobulidae* spp.) [[Document 26.2.6](#)] [[Scientific Council Comments](#)]: WCS co-authored this Concerted Action Proposal with the Manta Trust, and is currently revising the proposal to address the concerns raised by the CMS Scientific Council in its review. The manta and devil rays that comprise the Family *Mobulidae* are among the least productive of the chondrichthyan fishes. Peer-reviewed productivity analyses of both manta rays and devil rays have concluded that these species have the potential to be driven to local extinction at low levels of fishing mortality. Thus, there is an urgent need – consistent with their listing on CMS Appendix I – to adopt measures to eliminate fishing mortality – through strict fishery prohibitions and active deployment of mitigation measures and safe-handling and release protocols that can maximize survivorship of incidentally captured animals. We urge the Parties to endorse the revised Concerted Action Proposal submitted to the CoP and to implement the actions as a matter of priority.

26.2.7 Whale Shark (*Rhincodon typus*) [[Document 26.2.7](#)] [[Scientific Council Comments](#)]: WCS supports the proposal submitted by the Philippines for a Concerted Action on the whale shark. We believe that regional workshops in Southeast Asia among Parties can contribute to improved understanding of whale shark ecology, connectivity and threats; generate tourism guidelines; establish rules about onboard observers on commercial shipping lines & fishing vessels; review national legislation of CMS Parties; highlight the economic benefits whale shark conservation; and generally increase awareness about the CMS Sharks MOU and its utility amongst Range States from the Southeast Asian region. We particularly applaud the efforts of the Philippines to engage with neighboring countries on Southeast Asia, and encourage them to engage those who are not currently Parties to CMS. Recognizing that tuna purse seine fleets continue to set their nets around whale sharks (as indicators of the presence of tunas) and that this practice incidentally captures – and kills – whale sharks, and that this practice is not universal, we would suggest the addition into this proposal of a specific action that all fishing countries, range States, and RFMOs prohibit and strictly enforce setting of tuna purse seines around whale sharks (as has been done by the Indian Ocean Tuna Commission). We also believe that the topic of illegal and intentional take and trade of whale sharks should be addressed within the context of these workshops, as continued trade in whale shark fins and illegal take for shark products and live trade has been documented in several countries where WCS is active, including some where WCS works.

Formal and Concluding Business

27. Manila Declaration on Sustainable Development and Migratory Species [[Document 27](#)]

WCS thanks the Government of the Philippines for submitting this draft Declaration for approval by the CoP. We recognize the immense contribution of migratory species to the sustainable development agenda, including the implementation of SDGs 14 and 15 as well as other Goals. We recommend that Parties insert the following text into a new operative paragraph: “Calls upon multilateral development banks and developed country Parties, and other donor agencies, to work to ensure that their multilateral and bilateral development aid integrates with wildlife conservation -- particularly as relates to migratory species.”