

CITES Permits for Timber and Wood Products Stakeholders



Division of Management Authority
International Affairs Program
U.S. Fish and Wildlife Service

December 2016

Topics

- **Introductions: International Affairs Program**
- Wildlife Trade
- Recent CITES timber listings
- Previously Submitted Questions and Answers
- Open Discussion



Introductions

Introductions: Expert Panel

- Craig Hoover, Chief, Division of Management Authority
- Tim VanNorman, Chief, Branch of Permits
- Laura Noguchi, Chief, Wildlife Trade and Conservation Branch
- Amneris Siaca, Supervisory Wildlife Biologist, Branch of Permits
- Anne St. John, Biologist, Wildlife Trade and Conservation Branch
- Darcy Vargas, Biologist, Branch of Permits
- Emma Nelson, Biologist, Branch of Permits
- Keri Parker, Senior Biologist & Outreach Specialist, Office of Outreach and Communications



Topics

- USFWS International Affairs Program
- **Wildlife Trade**
- Recent CITES timber listings
- Previously Submitted Questions and Answers
- Open Discussion



What do alligator boots, a guitar with a rosewood fretboard, African elephants and giant pandas have in common?



Mei Xiang and Tai Shan. Taken by Jessie Cohen-Smithsonian's National Zoo (CC BY-NC-ND 2.0), 2005



U.S. Fish and Wildlife Service



International Wildlife Trade

- Wildlife trade is any sale or exchange of wild animal and plant resources by people.
- This can involve live animals and plants or a diverse range of products needed or prized by humans—including skins, medicinal ingredients, tourist souvenirs, timber, fish and other food products.

(TRAFFIC 2013)



U.S. Fish and Wildlife Service



Dreamstime.com



International Wildlife Trade

- The wildlife trade involves hundreds of millions of individual **plants and animals** from tens of thousands of species.
- Most wildlife trade is probably within national borders, but there is a large volume of wildlife in trade internationally.

(TRAFFIC 2013)



U.S. Fish and Wildlife Service



How Can Timber and Wood Product Traders Be Part of Conservation?

Compliance

Comply with international, national, state, and local wildlife and plant laws to ensure your lawful, sustainable activities are separate and distinct from those that harm vulnerable populations.

- **Become familiar with** conservation activities to benefit trees in the wild – especially your mainstay species.
- **Ask questions** when sourcing your stock.
- **Maintain** careful records and documentation.



Legal Trade: CITES

Convention on the International Trade in Endangered Species of Wild Fauna and Flora (CITES)



The aim of CITES is to ensure that international trade in specimens of wild animals and plants does not threaten their survival.

(CITES.org)



CITES 101: Balancing Conservation and Sustainable Use

CITES recognizes that **commercial trade may be beneficial to the conservation of species and ecosystems**, and to the development of local people when carried out at levels that are not detrimental to the survival of the species in question. (*Resolution Conf. 8.3 (Rev. CoP13) Recognition of the benefits of trade in wildlife*)



How does this impact timber and wood product traders?

- **Be aware** that certain international activities with timber and wood products are prohibited or regulated under international and domestic law.
- **BEFORE** you make plans to acquire a new species or engage in international activities with protected timber species or wood products, **make plans to ensure compliance.**



CITES: It all comes down to PERMITS

The backbone of CITES is the permit system that facilitates international cooperation in conservation and trade monitoring of species listed in the three Appendices.



- ✔ **Permits are issued only if a country's Management and Scientific Authorities determine that trade is legal and does not threaten the species' survival in the wild.**
- ✔ **Permits provide a means to balance use and conservation of protected species.**



What type of permit do I need?

- ❖ **Appendix-I** species generally require an **import permit** from the importing country and an **export permit** from the **exporting country**
- ❖ **Appendix-II** species require an **export permit or certificate** from the **exporting country**
- ❖ **Appendix-III** species require an **export permit** from the **listing country** and **certificate of origin** from all others
- ❖ **“Pre-Convention”** specimens require **CITES certificates** for **export**, but not import



(CITES.org)



Topics

- USFWS International Affairs Program
- Wildlife Trade
- **Recent CITES timber listings**
- Previously Submitted Questions and Answers
- Open Discussion



CoP17 Updates

Effective January 2, 2017, the following timber species, all commonly referred to as rosewood, will be listed in CITES Appendix II:



- **Kosso** (*Pterocarpus erinaceus*) aka African rosewood (no annotation, which means that it covers all parts and derivatives.)
- **Bubinga** (*Guibourtia demeusei*, *Guibourtia pellegriniana*, and *Guibourtia tessmannii*) (with an annotation)
- **Dalbergia spp.** (the entire genus except Brazilian rosewood (*Dalbergia nigra*)) (with an annotation)



CITES 101: What is an annotation?

An annotation identifies what parts or items are covered or not covered by the CITES listing—those parts or items that are or are not regulated.



Changes from CITES CoP17: Dalbergia and Bubinga

The listings of *Dalbergia* spp. (except for Brazilian rosewood (*Dalbergia nigra*), which is listed in Appendix I) and the three bubinga species (*Guibourtia demeusei*, *Guibourtia pellegriniana*, and *Guibourtia tessmannii*) carry the following new annotation:

- All parts and derivatives are included, except:
- a) Leaves, flowers, pollen, fruit, and seeds;
- **b) Non-commercial exports of a maximum total weight of 10 kg per shipment;**
- c) Parts and derivatives of *Dalbergia cochinchinensis* which are covered by Annotation #4;
- d) Parts and derivatives of *Dalbergia* spp. originating and exported from Mexico which are covered by Annotation #6.



Changes from CITES CoP17: Dalbergia and Bubinga

- In this new annotation, paragraph b) refers to both exports and re-exports and exempts from CITES controls “non-commercial” shipments weighing 10 kg or less.
- Under U.S. regulations (50 C.F.R. 23.5), “non-commercial” means related to an activity that is not commercial, and includes but is not limited to personal use.
- “Commercial” means related to an activity that is reasonably likely to result in economic use, gain, or benefit, including, but not limited to, profit (whether in cash or in kind).
- Examples of non-commercial shipments include gifts, items not intended for sale that are carried in personal baggage or as part of a household move, and items that are personally owned and shipped to oneself. We believe that many personally owned instruments, such as guitars and violins, will therefore be exempt from the Appendix II permit requirements. **It depends on whether the instrument contains 10kg or more of these species of wood and other factors.**
- **Items from these species that do not meet the requirements of this exemption must be accompanied by CITES documents when traded internationally.**
- Please see the letter available on our website for details on these annotations (<https://www.fws.gov/international/pdf/letter-appendix-II-timber-listings-november-2016.pdf>)



Changes from CITES CoP17: Dalbergia

Annotation #4, which applies to *Dalbergia cochinchinensis*, reads as follows:

All parts and derivatives, except:

- a) seeds (including seedpods of Orchidaceae), spores and pollen (including pollinia). The exemption does not apply to seeds from Cactaceae spp. exported from Mexico, and to seeds from *Beccariophoenix madagascariensis* and *Neodypsis decaryi* exported from Madagascar;
- b) seedling or tissue cultures obtained *in vitro*, in solid or liquid media, transported in sterile containers;
- c) cut flowers of artificially propagated plants;
- d) fruits, and parts and derivatives thereof, of naturalized or artificially propagated plants of the genus *Vanilla* (Orchidaceae) and of the family Cactaceae;
- e) stems, flowers, and parts and derivatives thereof, of naturalized or artificially propagated plants of the genera *Opuntia* subgenus *Opuntia* and *Selenicereus* (Cactaceae); and
- f) finished products of *Euphorbia antisyphilitica* packaged and ready for retail trade.

What does this mean for timber and wood product traders?

None of the above exemptions apply to timber or wood product traders. Therefore, permits are required for *Dalbergia cochinchinensis*.

Please see the letter available on our website for details on these annotations
(<https://www.fws.gov/international/pdf/letter-appendix-ii-timber-listings-november-2016.pdf>)



Changes from CITES CoP17: Dalbergia

Annotation #6, which applies to specimens of *Dalbergia* spp. originating in and exported from Mexico, reads as follows:
[regulates] Logs, sawn wood, veneer sheets and plywood.

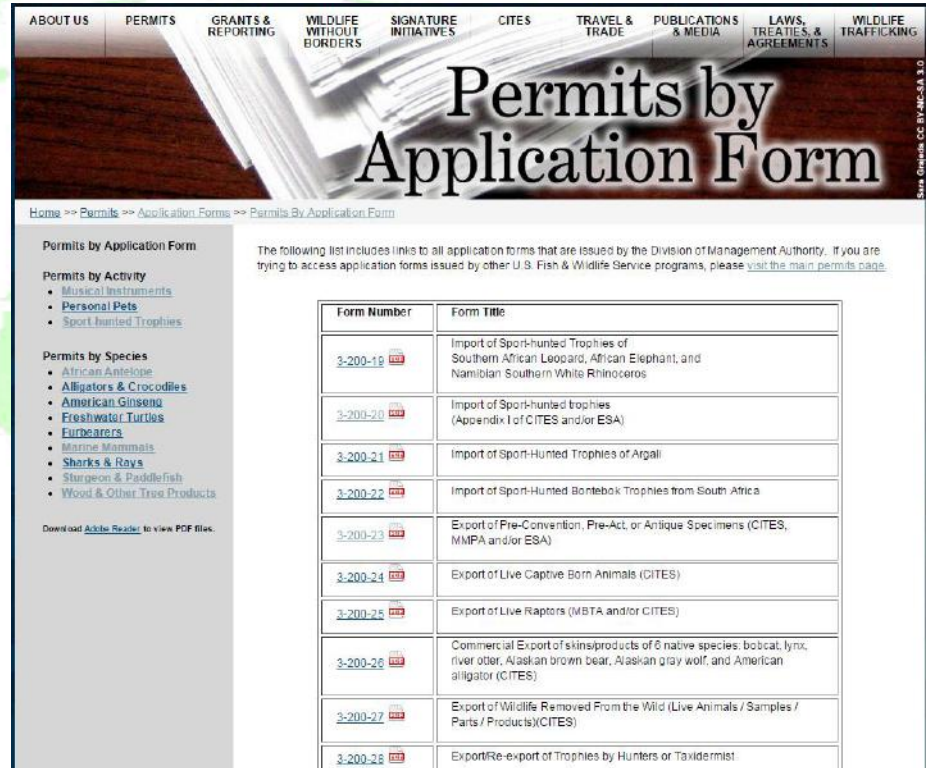
What does this mean for timber and wood products traders?
Logs, sawn wood, veneer sheets and plywood originating in and exported from Mexico, require permits.

Please see the letter available on our website for details on these annotations (<https://www.fws.gov/international/pdf/letter-appendix-II-timber-listings-november-2016.pdf>)



Permits 101: How do I apply?

Application forms are available from <https://www.fws.gov/international/permits/>.



The screenshot shows the 'Permits by Application Form' page on the FWS website. The page features a navigation menu at the top with categories like ABOUT US, PERMITS, GRANTS & REPORTING, WILDLIFE WITHOUT BORDERS, SIGNATURE INITIATIVES, CITES, TRAVEL & TRADE, PUBLICATIONS & MEDIA, LAWS, TREATIES, & AGREEMENTS, and WILDLIFE TRAFFICKING. The main heading is 'Permits by Application Form'. Below the heading, there is a breadcrumb trail: Home >> Permits >> Application Forms >> Permits By Application Form. The page is divided into two main sections. On the left, there are two lists: 'Permits by Activity' and 'Permits by Species'. 'Permits by Activity' includes links for 'Musical Instruments', 'Personal Pets', and 'Sport-hunted Trophies'. 'Permits by Species' includes links for 'African Antelope', 'Alligators & Crocodiles', 'American Ginseng', 'Freshwater Turtles', 'Furbearers', 'Marine Mammals', 'Sharks & Rays', 'Sturgeon & Paddlefish', and 'Wood & Other Tree Products'. Below these lists is a link to 'Download Adobe Reader to view PDF files.'. On the right, there is a paragraph of text: 'The following list includes links to all application forms that are issued by the Division of Management Authority. If you are trying to access application forms issued by other U.S. Fish & Wildlife Service programs, please visit the main permits page.' Below this text is a table with two columns: 'Form Number' and 'Form Title'. The table lists 10 different permit forms with their respective numbers and titles.

Form Number	Form Title
3-200-19	Import of Sport-hunted Trophies of Southern African Leopard, African Elephant, and Namibian Southern White Rhinoceros
3-200-20	Import of Sport-hunted trophies (Appendix I of CITES and/or ESA)
3-200-21	Import of Sport-Hunted Trophies of Argali
3-200-22	Import of Sport-Hunted Bontebok Trophies from South Africa
3-200-23	Export of Pre-Convention, Pre-Act, or Antique Specimens (CITES, MMPA and/or ESA)
3-200-24	Export of Live Captive-Born Animals (CITES)
3-200-25	Export of Live Raptors (MFTA and/or CITES)
3-200-26	Commercial Export of skins/products of 6 native species: bobcat, lynx, river otter, Alaskan brown bear, Alaskan gray wolf, and American alligator (CITES)
3-200-27	Export of Wildlife Removed From the Wild (Live Animals / Samples / Parts / Products)(CITES)
3-200-28	Export/Re-export of Trophies by Hunters or Taxidermist



Permits 101: How do I apply?

Import of timber and wood products

- You only need a permit from our office for import, if the species is CITES Appendix I and not pre-Convention. **Pre-Convention specimens do not require CITES import permits.**
- You do, however, need a permit from the country of export/re-export. Contact information for foreign CITES offices is available from <https://cites.org/eng/cms/index.php/component/cp>.
- Reminders:
 - Have the CITES permit endorsed by the foreign country at the time of export/ re-export
 - The original CITES permit must travel with the shipment (make copies before shipping)
 - The permit must be validated / cleared upon import at the port by the appropriate inspection agency
 - Keep a stamped copy of the permit and all related documentation in a permanent file
 - Be sure to provide a copy of the permit to future owners



Permits 101: How do I apply?

Export/ re-export of timber and wood products

- Submit application form 3-200-32.
- Indicate on your application whether you are applying for a single use permit, or a master-file.
- What is a master-file and when is that relevant?
 - The Service has established a “master file” system where exporters can request evaluation of their entire existing inventory and, if approved, receive multiple, partially completed CITES permits to allow multiple shipments from that inventory within a year to three years time.
 - Each partially completed CITES permit can be used to export one shipment and identifies the exporter’s name, the species being exported, and includes a description of the timber or product.
 - The importer’s name and the quantity (in cubic meters) of specimens within the shipment and other details would be added by the exporter and verified by the appropriate Inspector upon inspection and clearance at the port.
- Reminders:
 - Check with CITES authorities in countries to which you will be shipping to ensure that you are complying with their requirements <http://www.cites.org/cms/index.php/component/cp>
 - Remember to contact partner offices and agencies for guidance on their procedures, such as inspections and clearance at the port.



Permits 101: Timber and Wood Products: Documentation Requirements (Master File)

- Scientific name (genus, and species) and common name
- Description of items (e.g. lumber, sawn wood, guitars, other instruments)
- Volume of each species in cubic meters overall for entire inventory
- Helpful to include approximate volume in cubic meters for each product part (fretboard, neck, body, etc.)
- Combination of species typically contained in each instrument
- Evidence of lawful acquisition, including date of acquisition and corresponding documentation or other information on how the instrument was acquired (e.g., bill of sale)
- Evidence of lawful import if relevant (CITES permit, U.S. Customs import declaration)
- Provide the current location of the timber or products including address and country.
- Check with CITES authorities in countries to which you will be shipping to ensure that you are complying with their requirements <http://www.cites.org/cms/index.php/component/cp>



Mark Bidder CC BY-NC-ND 2.0



Permits 101: Timber and Wood Products: Documentation Requirements (Single Use)

- Scientific name (genus, and species) and common name of each species contained within shipment or each product within the shipment
- Description of items (e.g. lumber, sawn wood, guitars, other instruments)
- For timber, volume of each species in shipment in cubic meters
- For products, volume of each species in cubic meters contained in each product
- Evidence of lawful acquisition
- Evidence of lawful import if relevant (CITES permit, U.S. Customs import declaration)
- Provide the current location of the timber or products including address and country.
- Check with CITES authorities in countries to which you will be traveling to ensure that you are complying with their requirements
<http://www.cites.org/cms/index.php/component/cp>



Mark Bidder CC BY-NC-ND 2.0



Permits 101: Pre-Convention Brazilian rosewood: Documentation Requirements

- Brazilian rosewood (*Dalbergia nigra*)
- Listed June 11, 1992 under **CITES Appendix I**
- Proof that the instrument was made with Brazilian rosewood harvested before the species was listed under CITES (invoice, notarized statement, CITES Pre-Convention Certificate)
- Check with CITES authorities in countries to which you will be traveling to ensure that you are complying with their requirements <http://www.cites.org/cms/index.php/component/cp>



Mark Bidder CC BY-NC-ND 2.0



Unsure how to proceed?

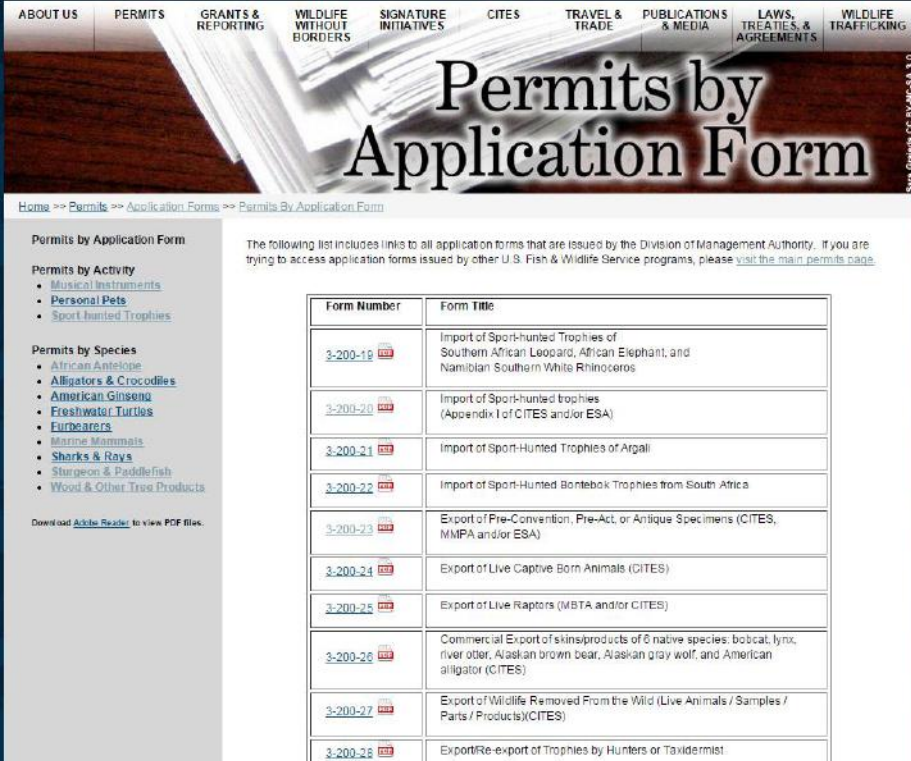
Unsure of the status under the species you wish to import or export, or if you need a permit?

- Search by scientific name or common name on the [CITES Species Database](http://www.speciesplus.net/). <http://www.speciesplus.net/>
- When in doubt, we're glad to help. Email us at managementauthority@fws.gov.



Permits 101: What to Expect

- **Plan ahead** (processing requires between 45 and 90 days, depending on the complexity of the application).
- **Submit a hard copy** of your application to our office.
- **Keep a copy** for your records and reference.
- **Include a processing fee** or confirmation of fee exempt status.



ABOUT US | PERMITS | GRANTS & REPORTING | WILDLIFE WITHOUT BORDERS | SIGNATURE INITIATIVES | CITES | TRAVEL & TRADE | PUBLICATIONS & MEDIA | LAWS, TREATIES, & AGREEMENTS | WILDLIFE TRAFFICKING

Permits by Application Form

Home >> Permits >> Application Forms >> Permits By Application Form

The following list includes links to all application forms that are issued by the Division of Management Authority. If you are trying to access application forms issued by other U.S. Fish & Wildlife Service programs, please [visit the main permits page](#).

Form Number	Form Title
3-200-19 PDF	Import of Sport-hunted Trophies of Southern African Leopard, African Elephant, and Namibian Southern White Rhinoceros
3-200-20 PDF	Import of Sport-hunted trophies (Appendix I of CITES and/or ESA)
3-200-21 PDF	Import of Sport-Hunted Trophies of Argali
3-200-22 PDF	Import of Sport-Hunted Bontebok Trophies from South Africa
3-200-23 PDF	Export of Pre-Convention, Pre-Act, or Antique Specimens (CITES, MMPA and/or ESA)
3-200-24 PDF	Export of Live Captive Born Animals (CITES)
3-200-25 PDF	Export of Live Raptors (MFTA and/or CITES)
3-200-26 PDF	Commercial Export of skins/products of 6 native species: bobcat, lynx, river otter, Alaskan brown bear, Alaskan gray wolf, and American alligator (CITES)
3-200-27 PDF	Export of Wildlife Removed From the Wild (Live Animals / Samples / Parts / Products)(CITES)
3-200-28 PDF	Export/Re-export of Trophies by Hunters or Taxidermist



Permits 101: Application Forms

- Instructions are on the application form.
- Complete every question.
- Write “N/A” if a question does not apply to your activity.
- If in doubt, include an explanation in your cover letter or an attachment.
- Applications that arrive without the processing fee or without complete information may be returned or **may require additional processing time.**

Form Number	Form Title
3-200-19	Import of Sport-hunted Trophies of Southern African Leopard, African Elephant, and Namibian Southern White Rhinoceros
3-200-20	Import of Sport-hunted trophies (Appendix I of CITES and/or ESA)
3-200-21	Import of Sport-Hunted Trophies of Argali
3-200-22	Import of Sport-Hunted Bontebok Trophies from South Africa
3-200-23	Export of Pre-Convention, Pre-Act, or Antique Specimens (CITES, MMPA and/or ESA)
3-200-24	Export of Live Captive-Born Animals (CITES)
3-200-25	Export of Live Raptors (MIBA and/or CITES)
3-200-26	Commercial Export of skins/products of 6 native species: bobcat, lynx, river otter, Alaskan brown bear, Alaskan gray wolf, and American alligator (CITES)
3-200-27	Export of Wildlife Removed From the Wild (Live Animals / Samples / Parts / Products)(CITES)
3-200-28	Export/Re-export of Trophies by Hunters or Taxidermist



Before You Act, Check with Other Offices and Agencies

- USFWS Office of Law Enforcement (designated ports, import/export license)
- USDA Animal and Plant Health Inspection Service
- State Governments
- Local Governments
- Foreign Governments



Courtesy P. Pieper



Courtesy P. Pieper

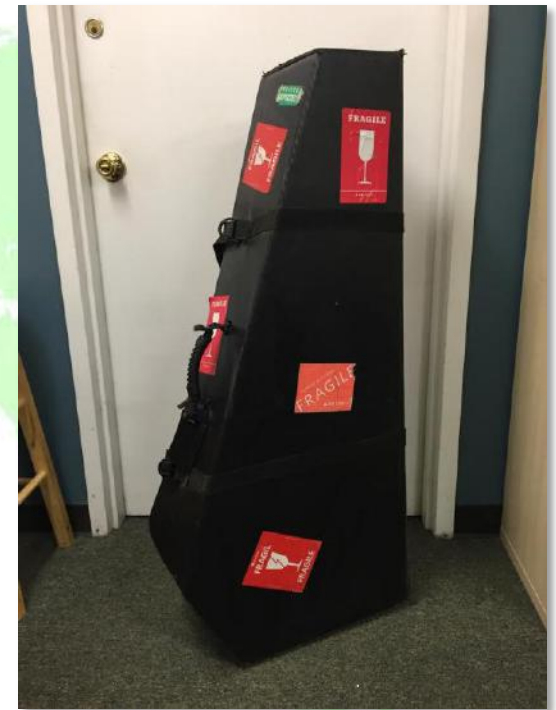


Port Inspections and Clearances

Shipments containing CITES-listed species must be declared, inspected and stamped by the following:

- Wildlife (USFWS)
- Products with wood and wildlife (USFWS) (this includes non-CITES wildlife such as mother-of-pearl)
- Wood and wood products (exports) - United States Department of Agriculture, Animal and Plant Health Inspection Service (USDA/APHIS)
- Wood and wood products (imports) - Department of Homeland Security, Customs and Border Protection (DHS/CBP)

Contact USDA-APHIS to determine their requirements <http://www.aphis.usda.gov/wps/port/aphis/ourfocus/importexport> or call the USDA-APHIS Plant Protection and Quarantine office for guidance: (301)851-2046.



Courtesy P. Pieper



Topics

- USFWS International Affairs Program
- Wildlife Trade
- CITES and Permits 101
- Recent CITES timber listings
- **Previously Submitted Questions and Answers**
- Open Discussion



Question:

Will FWS accept permit applications in advance of the implementation date?



Question:

How will shipments in transit on the effective date be treated on import to the US?



Question:

How will the Master File work if a manufacturer has inventory of both finished products and wood components?



Question:

How long will permit application processing generally take?



Question:

Will imports and exports for repairs or warranty work for instruments only with Appendix II rosewoods require permits?



Question:

What about the stock I already have? Is it pre-Convention? How do I document that stock to make sure it will be considered pre-Convention?



Question:

Does this apply for only raw or unfinished wood? Or does it indeed apply for a finished guitar that might have a piece of rosewood included in it as well.



Question:

For rosewood species that were already on Appendix II, with annotations, does the new ruling override the annotations? And if so are the stockpiles of wood that were received after the original listing now considered Pre-convention?



Questions?

For more information:

Online at:

- www.fws.gov/international
- www.CITES.org

Email us at:

- managementauthority@fws.gov



Courtesy P. Pieper



Topics

- USFWS International Affairs Program
- Wildlife Trade
- CITES and Permits 101
- Recent CITES timber listings
- Previously Submitted Questions and Answers
- **Open Discussion**

