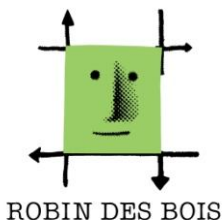
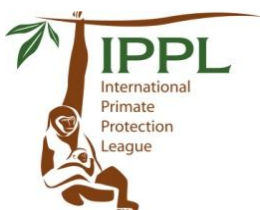


CITES CoP17 Prop. 17

No downlisting of the Peregrine Falcon!



EUROGROUP
FOR
ANIMALS



September 2016

Dear CITES Delegates,

The undersigned conservation and animal protection organisations urge you to oppose CITES CoP17 Prop. 17 (transfer of the peregrine falcon from CITES Appendix I to II) for the following reasons:

- Peregrine falcons are still highly valued in international trade for falconry purposes, with market prices of up to USD 113,000 each for rare color morphs.
- Illegal offtake of eggs and eyasses (falcon chicks) as well as smuggling is ongoing – with recent cases documented in Russia¹, Iraq, Spain^{2,3}, France, UK⁴, Turkey, Pakistan⁵, and Chile⁶. For example, in 2014, four members of a European syndicate of raptor traders (including peregrine falcons) were imprisoned in Belgium for illegal trading in birds of prey, including peregrine falcons⁷. BirdLife International reports that in early September 2016, the Kuwait coast guard detected dozens of wild birds, including 16 peregrine falcons, on a ship from Iran⁸.
- The Middle East remains the main destination for both legal and illegal trade. A recent scientific study found that the number of trapped saker and peregrine falcons in Saudi Arabia increased over a 23-year period⁹.
- Many peregrine falcon range States, which are CITES Parties, are in categories 2 or 3 of the CITES National Legislation Project¹⁰, which means they have "*Legislation that is believed generally not to meet all of the requirements for the implementation of CITES*" (Category 2) or "*Legislation that is believed generally not to meet the requirements for the implementation of CITES*" (Category 3). For some range States there are CITES trade suspensions in place. In addition, many range States are not even CITES Parties, which further hampers enforcement controls.
- The proposal indicates that Iran, Netherlands, and Pakistan expressed concern about the effectiveness of existing legislation in addressing illegal trade.
- A downlisting could stimulate trade, provide an avenue for laundering of illegally captured birds, and in many countries would result in a decrease in penalties for illegal activities.
- The proposal contains limited data on status and trends of wild populations outside of Europe and North America.

¹ <http://siberiantimes.com/ecology/others/news/n0460-scandal-of-rare-falcons-being-smuggled-out-of-russia-as-playthings-of-rich-arab-sheikhs/>

² <http://www.thelocal.es/20160211/spain-busts-gang-trafficking-falcons-for-uae-races>

³ <http://www.nwcu.police.uk/news/nwcu-police-press-releases/peregrine-falcons-heavy-fines-imposed-on-offenders-in-spain/>

⁴ <http://www.dailymail.co.uk/news/article-1304440/Man-jailed-trying-smuggle-rare-peregrine-falcon-eggs-Dubai.html>

⁵ <http://www.dawn.com/news/1218424/permit-issued-to-dubai-ruler-for-export-of-25-rare-falcons>

⁶ <https://www.theguardian.com/environment/2016/jan/28/rare-falcon-egg-seized-from-smuggler-hatches-and-is-returned-to-wild-in-chile>

⁷ <http://raptorpolitics.org.uk/2014/08/17/well-known-vulture-and-raptor-traders-imprisoned-by-belgium-court/>

⁸ <http://www.birdlife.org/middle-east/news/kuwaiti-coast-guards-foil-bid-smuggle-risk-bustards-falconry-trade>

⁹ Shobrak, M. (2015): Trapping of Saker Falcon Falco cherrug and Peregrine Falcon Falco peregrinus in Saudi Arabia: Implications for biodiversity conservation. Saudi Journal of Biological Sciences 22(4): 491–502.

¹⁰ <https://cites.org/eng/legislation>

Finally, the precautionary criteria in Resolution Conf. 9.24 (Rev. CoP16), Annex 4, paragraph 2a) – particularly that the species remains in demand in international trade – are not met. We call on you to oppose this proposal.

Thank you very much considering our opinion and we look forward to working with you at CITES CoP17.

Yours sincerely,

- 1) Ericka Caballos, Animal Conservation and Welfare Foundation, Poland
- 2) Jan Creamer, President, Animal Defenders International, United Kingdom
- 3) Dr. Jill Robinson MBE, Founder and CEO Animals Asia Foundation, Hong Kong
- 4) Susan Millward, Executive Director, Animal Welfare Institute, USA
- 5) Rhishja Cota-Larson, Founder & Creative Director, Annamiticus, USA
- 6) Colum Muccio, Administrative and Development Director, Wildlife Rescue and Conservation Association (ARCAS), Guatemala
- 7) Will Travers, CEO, Born Free Foundation, United Kingdom
- 8) Borys Kala, Chair of the CITES Working Group, CEEweb for Biodiversity, Hungary
- 9) Axel Hirschfeld, Committee Against Bird Slaughter (CABS), Germany
- 10) Thomas Schröder, President, Deutscher Tierschutzbund, Germany
- 11) Ericka Caballos, CATCA Environmental and Wildlife Society, Canada
- 12) William W. Rossiter, Executive Director, Cetacean Society International, USA
- 13) Undine Kurth, Vice President, German League for Nature, Animal and Environment Protection – DNR, Germany
- 14) Mona George Dill, President East Caribbean Coalition for Environmental Awareness (ECCEA)
- 15) Helmut Brücher, Eurogroup against Bird Crime, Germany
- 16) Ilaria Di Silvestre, Programme Leader Wildlife, Eurogroup for Animals, Belgium
- 17) Elodie Gerome-Delgado, Deputy Manager, Fondation Brigitte Bardot, France
- 18) Michael Kennedy, Campaign Director, Humane Society International Australia
- 19) Cynthia Dent, Representant legal, Humane Society International Latin America
- 20) Dr. Teresa Telecky, Wildlife Director, Humane Society of the United States
- 21) Dr. Carolyn Bocian, International Primate Protection League, USA
- 22) Heike Finke, Member of the Board, Nature And Biodiversity Conservation Union (NABU), Germany
- 23) Sigrid Lüber, President, OceanCare, Switzerland
- 24) Muriel Arnal, President, One Voice, France
- 25) Dr. Christoph Schmidt, Chair, Pro Wildlife, Germany
- 26) Reinhard Behrend, Chair, Rettet den Regenwald, Germany
- 27) Charlotte Nithart, Director, Robin des Bois, France
- 28) Andrzej Kepel, Chair, Polish Society for Nature Conservation SALAMANDRA, Poland
- 29) Dr. Jennifer Schmidt, Director of Science & Research, The Shark Research Institute, USA
- 30) Ann Michels, Executive Director, Species Survival Network, International
- 31) María Elena Sánchez, Presidenta, Teyeliz A.C., Mexico
- 32) Julie Sherman, Executive Director, Wildlife Impact, USA
- 33) Belinda Wright, OBE, Wildlife Protection Society of India
- 34) Jessica Bridgers, Executive Director, World Animal Net, USA