CITES CoP17 Prop. 17

No downlisting of the Peregrine Falcon!
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, Spain²³, 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.

² http://www.thelocal.es/20160211/spain-busts-gang-trafficking-falcons-for-uae-races
⁴ http://www.dailymail.co.uk/news/article-1304440/Man-jailed-smuggling-rare-peregrine-falcon-eggs-Dubai.html
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 Muocio, 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