

National Interest Analysis [2020] ATNIA 6

with attachment on consultation

**Amendments to Appendices I, II and III of the Convention on International Trade in
Endangered Species of Wild Fauna and Flora**

(Geneva, 28 August 2019)

[2019] ATS 23

NATIONAL INTEREST ANALYSIS: CATEGORY 1 TREATY

SUMMARY PAGE

Amendments to Appendices I, II and III of the Convention on International Trade in Endangered Species of Wild Fauna and Flora

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Nature and timing of treaty action

1. The treaty action is the amendment of the species listed on Appendices I, II and III of the *Convention on International Trade in Endangered Species of Wild Fauna and Flora* 1976 (the Convention) as decided at the 18th Conference of the Parties (the 18th Conference), held from 16 to 28 August 2019 in Geneva, Switzerland.
2. The amendments to Appendices I and II were adopted by the 18th Conference in accordance with paragraph 1 of Article XV of the Convention. Under Article XV (1) (c) of the Convention, amendments to Appendices I and II adopted at the 18th Conference automatically came into force 90 days after the 18th Conference, that is, on 26 November 2019, except for Parties that lodged a reservation during that interval in accordance with Article XV (3). The 18th Conference agreed to delay the listings of *Holothuria fuscogilva*, *H. nobilis*, *H. whitmaei* and *Cedrela* spp. in Appendix II by 12 months; these listings will come into effect on 28 August 2020.
3. The amendments to Appendix III were made following a request by a Party in accordance with paragraph 1 of Article XVI of the Convention. The amendments entered into force on the same date as amendments to Appendices I and II adopted at the 18th Conference, that is, on 26 November 2019.

Overview and national interest summary

4. The Convention is a multilateral environmental agreement that regulates the international trade in wild fauna and flora via the listing of species in Appendices. The amendments to the Appendices made at the 18th Conference relate to species being listed on, removed from or moved between the Appendices. This includes deletion, addition or transfer of taxa from, to or between the Appendices, and amendment to the annotations accompanying some already-listed taxa.
5. Regularly updating the list of species in the Appendices is critical to ensuring that the Convention can continue to effectively regulate the international trade in species at risk from over-exploitation. This both facilitates legal trade in specimens where appropriate and reduces burdensome regulation where it is not necessary.
6. The treaty action is consistent with Australia's strong commitment to the Convention and to international cooperation for the protection and conservation of wildlife more generally.

Undertaking the required regulatory action within the specified timeframes is required for Australia to meet its obligations as a Party to the Convention.

Reasons for Australia to take the treaty action

7. The Convention is a multilateral environmental agreement that entered into force generally on 1 July 1975 and for Australia on 27 October 1976. The Convention arose from recognition that international cooperation is essential to safeguard certain species of fauna and flora from over-exploitation where their trade crosses country borders.
8. Participation in the Convention advances Australia's domestic and regional conservation and trade interests by protecting native species from detrimental trade and facilitates legitimate wildlife trade into and out of Australia. The Convention also provides a forum for international cooperation in order for Australia to enhance relationships with other Parties for the benefit of promoting effective regulation of international wildlife trade.

Amendment of the Appendices

9. International trade of species of fauna and flora is regulated via the listing of species in three Appendices to the Convention. Species listed in Appendix I have the highest degree of protection and cannot be internationally traded, except under very specific and highly regulated circumstances (Article II (1) and Article III of the Convention). Species listed in Appendix II are not necessarily threatened by extinction but require international trade to be monitored to avoid overutilisation. International trade in specimens of species listed on Appendix II must be accompanied by a valid permit from the exporting country (Article II (2) and Article IV of the Convention). An export permit can only be granted if the country of export has determined that export of the species will not be detrimental to the survival of that species (known as a non-detriment finding).
10. A Party may also unilaterally identify species or populations within its jurisdiction where the cooperation of other Parties is needed to assist in regulating international trade and to avoid undermining domestic regulation (Article II (3) and Article V of the Convention). These species are included in Appendix III. A Party can request an Appendix III listing at any time, but requests are generally timed to coincide with a Conference of the Parties to simplify administration of the Appendices. The Conference of the Parties does not make decisions on these listings, though it may determine that a species requires broader protection and move a species from Appendix III to Appendix I or Appendix II of the Convention.
11. Timely amendment of the Convention Appendices ensures that species are regulated appropriately according to current conservation requirements and trade pressures. This is crucial to the effective operation and implementation of the Convention.

Obligations

12. Australia is obliged to regulate international trade in species listed in the Appendices to the Convention. The only exception is if Australia makes a reservation, in which case Australia will be treated as a Party not subject to the Convention for the particular plant or animal species listed in an Appendix to which the reservation relates. If a reservation were made,

in order to trade in that species with any other Convention Parties that implement the listing, Australia would be required to provide equivalent documentation meeting the information standards of a CITES permit, including a finding that trade will not be detrimental to the survival of the species in the wild (a non-detriment finding).

13. The amendments to the Appendices do not change the existing substantive obligations of Parties to the Convention. Australia continues to be obliged to prohibit trade in the species included in Appendices I, II and III except in accordance with Article III, Article IV and Article V of the Convention respectively, and where personal and household effects exemptions under Article VII (3) may apply. The amendments change the composition of the list of species to which the Convention's export and import rules must be applied.

Amendments to species listings

14. The 18th Conference reviewed 57 listing proposals regarding Appendices I and II, of which 46 were adopted. Several requests for amendments to Appendix III were also timed to coincide with the 18th Conference. Costa Rica requested the deletion from Appendix III of six species of mammal and one species of bird. Cuba requested the inclusion in Appendix III of 24 species of lizard.
15. Australia is neither a range State (that is, the species do not naturally occur in Australia) for the majority of species covered by the adopted listing proposals for Appendices I and II or any of the Appendix III requests, nor does Australia have an industry in the international trade of the majority of these species. As such, there will be no ramifications for Australia arising from the listing amendments for the majority of these species.
16. The amendments that are relevant to Australia include: 'downlisting' six Australian native species from Appendix I to Appendix II; four marine species listings for which Australia is a range State; and four listings for species in which Australia is known to trade (rosewoods (*Dalbergia* spp.), cedars (*Cedrela* spp.), giraffes (*Giraffa camelopardalis*), and Asian small-clawed otters (*Aonyx cinerea*)).
17. *Downlisting of Australian native species*: the following species were transferred from Appendix I to Appendix II:
 - a. *Leporillus conditor* (Greater stick-nest rat)
 - b. *Psuedomys fieldi* (Shark Bay Mouse)
 - c. *Xeromys myoides* (Water mouse)
 - d. *Zyzomys pedunculatus* (Central rock-rat)
 - e. *Dasyornis broadbenti litoralis* (Western rufous bristlebird), and
 - f. *Dasyornis longirostris* (Western bristlebird).
18. The six downlisting proposals were developed by Australia with input from the states and territories and technical threatened species experts, and received endorsement of the CITES Animals Committee (the CITES scientific and technical committee for fauna). None of these species have been traded internationally since they were included in the CITES

Appendices in the 1970s. There is no evidence that international trade is or may be a threat to the survival of these species. The species therefore do not meet the criteria for inclusion in Appendix I.

19. *Marine species listings*: the following taxa were listed in Appendix II:

- a. Sea cucumbers (*Holothuria fuscogilva*, *H. nobilis* and *H. whitmaei*)
- b. Shortfin and longfin mako sharks (*Isurus oxyrinchus* and *I. paucus*)
- c. Wedgefish (*Rhinidae* spp.), and
- d. Guitarfish (*Glaucostegus* spp).

These species have ranges that extend into Australian waters and are relevant to Australian export fisheries in state and Commonwealth jurisdictions.

20. *Species Australia is known to trade*:

- a. *Cedrela* spp. (cedars) populations of the Neotropics were listed in Appendix II. The listing will only apply to logs, sawn wood, veneer sheets and plywood. The implementation of this listing will be delayed by 12 months, to 28 August 2020.
- b. Giraffe (*Giraffa camelopardalis*) was listed in Appendix II.
- c. Amendments to annotations in respect of rosewood (*Dalbergia* spp. and *Guibourtia demeusei*, *G. pellegriniana* and *G. tessmannii*) timber, as described at paragraphs 22-22 below.
- d. Asian small-clawed otters (*Aonyx cinerea*) were transferred from Appendix II to Appendix I.

Amendments to annotations

21. Many of the species listed in the Appendices to the Convention have interpretive annotations specifying: the populations of the species that are subject to the trade controls in the Convention; and/or the parts or products derived from the species that are subject to the trade controls; and/or the circumstances under which trade is permitted.

22. The amendments adopted to the annotation regulating trade in *Dalbergia* spp., *Guibourtia demeusei*, *G. pellegriniana* and *G. tessmannii* (rosewood timber) will make the scope of regulation clearer, and better focus on the risk associated with trade from range States. In particular, the 18th Conference agreed to exclude finished musical instruments, parts and accessories from regulation in respect of these listed species under CITES. Shipments of finished products of up to 10kg of wood of the listed species per shipment are also excluded from regulation. Australian trade in rosewood is worth millions of dollars annually, and Australia's musical instrument industry in particular is strongly supportive of the exclusion of musical instruments from CITES regulation.

Entry into force for Australia

23. The amendments to Appendices I and II, including amendments to annotations, agreed at the 18th Conference are consistent with Australia's commitment to the conservation of species threatened by international trade. Australia has not lodged a reservation under paragraph 3 of Article XV for any of the amendments. The amendments entered into force on 26 November 2019, with the exception of the Appendix II listings for sea cucumbers and *Cedrela* spp. which are subject to a twelve-month delayed entry, and will come into effect on 28 August 2020.
24. The amendments to Appendix III also entered into force on 26 November 2019. Parties may enter a reservation to Appendix III listings at any time (i.e. reservations are not limited to the 90-day period before the amendment enters into force as for Appendices I and II). Australia has not entered a reservation to any of the amendments under paragraph 2 of Article XVI of the Convention.

Reservations of other Parties

25. The following Parties have entered reservations in relation to Appendix I and II amendments adopted at the 18th Conference pursuant to Article XV (3) of the Convention.
 - a. Canada with regard to all amendments, due to the necessity to complete its domestic legal requirements for the entry into force of these amendments.
 - b. Japan with regard to the inclusion in Appendix II of shortfin and longfin mako sharks (*Isurus oxyrinchus* and *I. paucus*) and sea cucumbers (*Holothuria fuscogilva*, *H. nobilis*, *H. whitmaei*).
 - c. The Kingdom of Eswatini, Republic of Namibia, Republic of Zimbabwe, the Republic of Botswana, the United Republic of Tanzania, the Democratic Republic of the Congo, the Republic of South Africa, and the Republic of Zambia with regard to the inclusion in Appendix II of giraffe (*Giraffa camelopardalis*) and shortfin and longfin mako sharks (*Isurus oxyrinchus* and *I. paucus*).
 - d. The Republic of Indonesia with regard to the inclusion in Appendix II of shortfin and longfin mako sharks (*Isurus oxyrinchus* and *I. paucus*), guitarfish (*Glaucostegus* spp.) and wedgefish (*Rhinidae* spp.). Indonesia has advised that their reservation will only be in place until 26 May 2021.
 - e. The Kingdom of Norway with regard to the inclusion in Appendix II of shortfin and longfin mako sharks (*Isurus oxyrinchus* and *I. paucus*).
 - f. The Kingdom of Thailand with regard to the inclusion in Appendix II of the Tokay gecko (*Gekko gecko*) and the transfer from Appendix II to Appendix I of the Indian star tortoise (*Geochelone elegans*).

Adoption of, or amendments to, Resolutions

26. The 18th Conference also adopted and amended Resolutions for the better regulation of international trade in species, and parts and derivatives of species. Resolutions of the Conference of the Parties are not binding but are intended to assist interpretation and implementation of the Convention. Section 303CN of the EPBC Act provides that the Minister may have regard to Resolutions in making decisions about listed specimens.

Implementation

27. Australia implements the Convention via Part 13A of the EPBC Act. For a specimen listed under the Convention to be eligible for import to or export from Australia, it must be permitted under the EPBC Act. This includes a consideration of the effect of the export or import of the specimen on its survival and conservation status.
28. As required under section 303CA (1) of the EPBC Act, a list of species in the Appendices to the Convention was established in 2002 – the *List of CITES Species for the Purposes of the Act* (Cth). This list must be updated to include all species included in the Convention Appendices from time to time (EPBC Act ss 303CA (3) and 303CA (9)).
29. On 29 November 2019 amendments were made to the *List of CITES Species Amendment (Conference 18) Instrument 2019* (Cth) and the *List of CITES Species Amendment (Conference 18) Instrument 2020* (Cth). They are not disallowable instruments (under section 44(2)(b) of the *Legislation Act 2003* (Cth) and item 15 of the table in rule 10 of the *Legislation (Exemptions and Other Matters) Regulation 2015* (Cth)).
30. For Australian wild harvest export fisheries, the Convention's requirement for a non-detriment finding is met through the assessment of fisheries for declaration as approved wildlife trade operations (Section 303FN of the EPBC Act).

Costs

31. The treaty action is expected to impose minor additional regulatory costs on Australian businesses and the Australian Government and have no significant effect on Australia's trade interests. Based on preliminary calculations, the annual regulatory burden to Australian business, including permit application and compliance costs, is estimated as a saving of \$21 653 per year. This saving is largely due to reduction in regulatory burden related to permit requirements for rosewood musical instruments and small shipments of finished products. Australia currently has legislation and administrative arrangements in place to implement the provisions of the Convention.
32. The amendments to the Appendices will not require any new domestic regulatory arrangements to be developed, but will require trade in some species to meet stricter requirements.

Appendix I listings

33. Evidence indicates that the new listings of species in Appendix I to the Convention will not impact on Australian industry as there is unlikely to be existing import or export markets for these species.
34. The transfer of small-clawed otters (*Aonyx cinerea*) from Appendix II to Appendix I may have an impact on the non-commercial zoo industry. Businesses that intend to trade in live otters would be required to ensure a Cooperative Conservation Program was in place for trade in the species. This is a once-off application, completed on behalf of trading zoos by the regional peak zoological body (Zoo and Aquarium Association Australasia) that acts on behalf of its member zoos. There is no fee associated with this application. Businesses

intending to trade in live otters would be required to continue to apply for import or export permits, as was the arrangement when the species was listed on Appendix II.

Appendix II listings

35. The new marine species listings in Appendix II to the Convention (sea cucumbers, shortfin and longfin mako sharks, wedgefish and guitarfish) may have an impact on Australian industry.
36. For continued exports of marine species sourced from Australian fisheries, the Australian Government will need to make a non-detriment finding before approving trade. These assessments would be made by the Department of Agriculture, Water and the Environment (the Department) (being Australia's CITES Scientific Authority) in conjunction with the assessment and approval of fisheries for export. State and territory fisheries managers have advised that they do not intend to seek approvals to export mako sharks (*Isurus oxyrinchus* and *I. paucus*), wedgefish (*Rhinidae* spp.) or guitarfish (*Glaucostegus* spp).
37. Accordingly, it is anticipated that a non-detriment finding will only be required for fisheries wishing to continue to export sea cucumbers (*Holothuria fuscogilva*, *H. nobilis* and *H. whitmaei*). Management procedures to enable continuation of any export are to be implemented before the listings take effect on 28 August 2020 for the sea cucumbers. Businesses that intend to export sea cucumbers after this time would be required to apply for export permits. Four existing Australian sea cucumber fisheries export these species. Based on best available information and consultation, we expect the number of exporters required to apply for CITES permits for these species will be no more than five export businesses per fishery.
38. The listing of *Cedrela* spp. in Appendix II may have an impact on Australian businesses that trade in raw timber, sawn wood, plywood and veneer sheets. Businesses that intend to trade in these specimens would be required to apply for import or export permits. Consultation did not identify any businesses that trade in these specimens.
39. The inclusion of giraffe (*Giraffa camelopardalis*) in Appendix II may have an impact on the non-commercial zoo industry. Businesses that intend to trade in live giraffes would be required to apply for import or export permits.
40. The import and export of species listed in Appendix II to the Convention generally requires a permit from the Department, at a cost of \$69 for a single use permit, or \$172 for a multiple consignment authority. Single use permits and multiple consignment authorities are valid for a period of six months. Pre-Convention certificates for export of items obtained before the listing of a species are available free of charge and are also valid for a period of six months.

Appendix III listings

41. There are no expected costs to Australian business resulting from the Appendix III amendments, as they are not Australian species and there is no evidence of Australian trade in the species.

Regulation Impact Statement

42. The Office of Best Practice Regulation has been consulted regarding the listing of species that occur naturally in Australia and/or are subject to international commercial trade in Australia. These are: Guitarfish (*Glaucostegus* spp; one species native to Australia); Wedgefish (*Rhinidae* spp; four species native to Australia); sea cucumbers (*Holothuria fuscogilva*, *H. nobilis* and *H. whitmaei*; two species native to Australia); Shortfin and Longfin Mako Sharks (*Isurus oxyrinchus* and *I. paucus*, both found in Australian waters); *Cedrela* spp.; and rosewood-producing trees (*Dalbergia* spp. and *Guibourtia demeusei*, *G. pellegriniana* and *G. tessmannii*). The consultation also included impacts on individuals and zoos from the listing of Giraffe (*Giraffa camelopardalis*) in Appendix II.
43. The Office of Best Practice Regulation advised that a Regulation Impact Statement is not required.

Future treaty action

44. Appendices I and II are amended from time to time in accordance with the provisions of Article XV of the Convention. Amendments may be adopted by a two-thirds majority of the Parties present and voting at a meeting of the Conference of the Parties, or through a postal procedure between meetings. Amendments to Appendices I and II then enter into force automatically 90 days following the meeting or the completion of the postal procedure for all Parties except those Parties that lodge a reservation.
45. Appendix III may be amended in accordance with the provisions of Article XVI of the Convention. A Party can request an Appendix III listing at any time, although the Conference of the Parties has recommended that changes be timed to coincide with amendments to Appendices I and II. Amendments to Appendix III enter into force automatically 90 days following communication of the list to the Parties by the Secretariat,
46. The Convention itself (other than the Appendices) can only be amended at an extraordinary meeting of the Conference of the Parties, pursuant to its Article XVII. Such amendments are to be adopted by a two-thirds majority of Parties present and voting and will enter into force for those Parties accepting it 60 days after two-thirds of the Parties have deposited an instrument of acceptance.
47. Any future amendment to the Appendices or the Convention more broadly would constitute a treaty action and be subject to Australia's domestic treaty making requirements, including tabling in Parliament and consideration by the Joint Standing Committee on Treaties (JSCOT).
48. The Convention does not expressly provide for the negotiation of future related legally binding instruments such as protocols or annexes.
49. Regarding reservations, Parties may enter a reservation with respect to a particular amendment to Appendices I or II, in accordance with paragraph 3 of Article XV, during the 90-day period before the amendment enters into force. Parties may enter a reservation to Appendix III listings at any time in accordance with paragraph 3 of Article XVI (i.e. reservations are not limited to the 90-day period before the amendment enters into force as

for Appendices I and II). Until a reservation is withdrawn, the Party shall be treated as a State not a Party to the Convention with respect to trade in the species concerned.

Withdrawal or denunciation

50. Any Party may denounce the Convention by written notification to the Depositary Government (Government of Switzerland) at any time, in accordance with Article XXIV. The denunciation takes effect twelve months after the Depositary Government has received the notification.

51. Any denunciation by Australia would constitute a treaty action and would be subject to the domestic treaty making requirements.

CONTACT DETAILS

Wildlife Trade Regulation Section
Heritage, Reef and Wildlife Trade Division
Department of Agriculture, Water and the Environment

ATTACHMENT ON CONSULTATION
Amendments to Appendices I, II and III of the Convention on International Trade in
Endangered Species of Wild Fauna and Flora

(Geneva, 28 August 2019)

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CONSULTATION

Summary of outcomes

52. The Department consulted with state/territory governments, the Indigenous Advisory Committee, the Office of the Threatened Species Commissioner, relevant industry bodies, non-government organisations (NGOs) and members of the public on proposed amendments to Appendices I and II of the Convention in advance of the 18th Conference of the Parties. Submissions and comments were received and considered.
53. The consultation did not include those amendments to Appendix III adopted concurrently with the amendments to Appendices II and III adopted at the 18th Conference, as Australia was not made aware of these proposed amendments until after the 18th Conference. The Department's assessment of the Appendix III amendments identified no impact on Australian stakeholders as the species are not found in Australia and there is no evidence of Australian trade in these species.
54. Following consultation, the Department concluded that the species conservation benefits that would be gained as a result of changes to the Convention Appendices, agreed at the 18th Conference, outweighed the impacts on Australia. This is due to:
- relatively low levels of Australian imports or exports of affected species;
 - for those species that are exported, the management agencies responsible believe that harvest regimes are sustainable, meaning non-detriment findings for continued export of species should be able to be made, potentially subject to management variations; and
 - no change in the ability to trade domestically in affected species.
55. The Department wrote to relevant government agencies to advise of the outcomes of the 18th Conference, highlighting aspects of particular relevance.

Consultation process

Consultation on Australia's six species listing proposals (downlistings)

56. From 17 April 2018, the Department consulted with state/territory governments, the Government of Papua New Guinea, the CITES Animals Committee and its Nomenclature Specialist, NGOs and scientists on the development of Australia's proposals to the 18th Conference to amend the Convention Appendices. Australia's proposals were to transfer *Dasyornis broadbenti litoralis* (Western Rufus Bristlebird), *Pseudomys fieldi* (Shark Bay Mouse) (including updating relevant nomenclatural references), *D. longirostris* (Western

Bristlebird), *Leporillus conditor* (Greater Stick-nest Rat), *Xeromys myoides* (Water Mouse), and *Zyzomys pedunculatus* (Central Rock Rat) from Appendix I to Appendix II.

57. Comments in support of Australia's proposals were received from the CITES Animals Committee and its Nomenclature Specialist, the Government of Papua New Guinea, the Western Australian Department of Biodiversity Conservation and Attractions, the South Australian Department of Environment, Water and Natural Resources, the New South Wales Office of Environment and Heritage, the Northern Territory Department of Environment and Natural Resources, the Queensland Department of Environment and Science and consulted scientists. No other comments on Australia's proposals were received.

Consultation on the remainder of the species listing proposals

Industry Groups

58. From 14 February 2019, the Department consulted stakeholders in the following industries: commercial marine fishing industry, recreational fishing industry, musical instrument industry, furniture industry, timber importers, antiques industry, and recreational hunters. Communications advised of the 18th Conference and invited comments on the list of proposals for amendment to the Appendices. In total, approximately 110 industry representatives and individual traders were contacted directly.
59. Extensive communication was also undertaken with traders of rosewood following the 18th Conference to ensure that the full implications of the amendment to the listing were understood by industry. These stakeholders included rosewood traders, the musical instruments industry, timber manufacturers, and furniture importers.
60. Formal responses from industry representatives identified that proposals of greatest interest to Australian industry were those relevant to rosewood and cedar timbers, and mammoth ivory. Relevant industries did not express significant concern about the proposals adopted at the 18th Conference. The proposal to include woolly mammoth (*Mammuthus primigenius*) on Appendix II was not adopted at the 18th Conference.
61. Comments were taken into account in the Department's preparation of Australia's positions, and considered in the context of broader scientific evidence on the conservation status of species.

Non-government organisations

62. From 14 February 2019, the Department consulted NGOs advising of the 18th Conference and invited comments on the species proposals and agenda items. A full list of NGOs contacted is provided below.
63. A teleconference was held on 20 March 2019 between the Department and representatives from NGOs, including representatives from Conservation Analytics, For the Love of Wildlife, Humane Society International, International Fund for Animal Welfare, and TRAFFIC. A second teleconference was held with Creative Conservation Solutions and a representative of the IUCN Sustainable Use and Livelihoods Specialist Group on 5 April 2019.

64. Written comments were received from the following 14 non-government representatives: Australian Marine Conservation Society, Born Free, Creative Conservation Solutions, Environmental Investigations Agency, For the Love of Wildlife, Conservation Analytics, Humane Society International, IWMC World Conservation Trust, RSPCA, Save African Rhino Foundation, TRAFFIC, Wildlife Conservation Society, Wildlife Management International, and World Animal Protection.
65. Comments were taken into account in the Department's preparation of Australia's positions, and considered in the context of broader scientific evidence on the conservation status of species.

Public Consultation

66. The Department invited public comment on proposals to be considered at the 18th Conference via the Department's website on 1 February 2019.
67. Comments were received and were considered against scientific evidence about the conservation status of the species during the Department's preparations. Eight submissions were received in total, including one during the 18th Conference in response to media reports, and one from a NGO based in Japan that had not been directly consulted.

Australian delegation

The Australian delegation to the 18th Conference comprised four officers from the (then) Department of the Environment and Energy. Two representatives from the Taronga Conservation Society Australia (New South Wales Government) participated as advisors to the delegation.

LIST OF STATE/TERRITORY AGENCIES CONSULTED

Australian Capital Territory

Environment, Planning and Sustainable Development Directorate

New South Wales

Department of Primary Industries

Department of Planning, Industry and Environment

Northern Territory

Department of Environment and Natural Resources

Department of Primary Industries and Resources

Queensland

Department of Agriculture and Fisheries

Department of Environment and Science

South Australia

Department for Environment and Water

Department of Primary Industries and Regions

Tasmania

Department of Primary Industries, Parks, Water and Environment

Victoria

Department of Jobs, Precincts and Regions

Department of Environment, Land, Water and Planning

Western Australia

Department of Water and Environmental Regulation

Department of Fisheries

Department of Biodiversity, Conservation and Attractions

LIST OF NON-GOVERNMENT ORGANISATIONS CONSULTED

Australian Conservation Foundation

Australian Marine Conservation Society

Australian Rhino Project

Birdlife Australia

Born Free

Conservation Analytics

Creative Conservation Solutions

Environmental Investigations Agency

For the Love of Wildlife

Four Paws

Friends of the Earth (Australia)

Humane Society International (Oceania office)

International Fund for Animal Welfare (Australian office)

IWMC World Conservation Trust

Monitor Conservation Research Society

Painted Dog Conservation

PEW

RSPCA

Save African Rhino Foundation

Sea Shepherd

TRAFFIC

Wildlife Conservation Society

Wildlife Management International

World Animal Protection

World Wildlife Fund (WWF)