



**HUMANE SOCIETY
INTERNATIONAL**
AUSTRALIA

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Submission on the updates to the appendices of the Convention on International Trade in Endangered Species (CITES)

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About HSI

Humane Society International (HSI) is the world's largest animal protection organisation and HSI Australia established our office in 1994. We work to create a humane and sustainable world for animals advocating across wildlife conservation and animal welfare policy areas.

Our vision is for a world where people treat animals and nature with respect and compassion.

Submitted to:

Committee Secretary
Joint Standing Committee on Treaties
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Humane Society International Australia has had long-standing engagement with the Convention on International Trade in Endangered Species (CITES) and for two decades been a regular observer at its Conferences of Parties (COPs) and associated committee meetings, including at its 19th COP in Panama in November 2023.

CITES is the global instrument that regulates international trade in wildlife and, when implemented well, is a critical tool to prevent trade from threatening the conservation status of species. While not its express purpose, in controlling international wildlife trade it can also minimise animal suffering.

HSI Australia acts as the Oceania Regional Bureau for the [Species Survival Network \(SSN\)](#) which is a coalition of over 100 charities and non-governmental organisations from all over the world who work to promote wildlife protection through CITES. We welcome the opportunity to provide our views to the Joint Standing Committee on Treaties in relation to the most recent amendments to the CITES appendices following COP 19.

Australia implements CITES through the Commonwealth *Environment Protection and Biodiversity Conservation Act, 1999* (EPBC Act), fulfilling our obligations to either regulate sustainable trade in species listed on Appendix II or to implement a prohibition on commercial trade for species listed on Appendix I.

HSI Australia gives our full support for the Australian Government to implement the latest changes to the CITES appendices under the EPBC Act for the species for which we are a range state. To assist with consideration of the full set of listings the Committee may find it helpful to reference the Species Survival Network's COP 19 Species Digest <https://ssn.org/cop/cites-cop19/>. The Digest was published at the outset of the COP providing SSN's view on each of the proposed species listings. It details why the threats to each species from international trade warrants stronger CITES controls. The Committee will be able to look up the species that were listed and that are relevant to Australia.

Of the species for which Australia is a range state, HSI Australia has a particular focus on the reptile and the shark species. Therefore, we limit our comments to these matters.

Pygmy bluetongue lizard (*Tiliqua adelaidensis*)

We congratulate the Australian Government for nominating and securing a listing for one of our own endemic reptiles on Appendix I at COP 19 – the pygmy blue tongue lizard (*Tiliqua adelaidensis*). Even though exports of this species from Australia have been prohibited for decades, in 2017 the species started being detected for sale in pet markets in Europe fetching prices in the region of 6000-9000 euros, with the source of the animals presumed illegal¹. Trafficking this species from the wild is a serious threat to its declining and fragmented populations and therefore international cooperation through CITES to prohibit international trade is essential.

Indeed, while Australia has long banned commercial export of our live native animals, much of Australia's unique reptile and bird fauna is highly sought after by animal collectors on international markets and are often the victims of wildlife trafficking. Such trafficking poses a grave risk to both conservation and animal welfare. Therefore, we are encouraging the Government to build on the listing for the pygmy blue tongue lizard with nominations for further species at future COPs – an effort for which ourselves and the SSN would strongly advocate. We

must ensure we are using the full force of CITES to combat wildlife trafficking of all of our at-risk native reptile and bird species.

Requiem sharks, hammerhead sharks (*Sphyrnidae* spp), freshwater stingrays

HSI Australia also gives strong support for domestic implementation of the shark and ray species listed on Appendix II of CITES at COP 19. Sharks are an imperilled group of animals with 37% of shark species now threatened with extinctionⁱⁱ. The primary driver for declines is unsustainable and unregulated fisheries and global demand for fins and meat and increasingly, liver oil. While HSI Australia might hope for stronger measures to clamp down on the global trade in shark meat and fins, the Appendix II listings will enable trade in these species to be regulated at sustainable levels and are to be strongly supported.

We have been consulting with the Government on the Non-Detriment Findings they are now required to do for the new shark and ray species listed on Appendix II that Australia still intends to export. The Non-Detriment Findings are the sustainability assurance that CITES parties give to each other when trading in Appendix II species. It is important that Non-Detriment Findings are drawing on the best available scientific evidence and taking a precautionary approach. HSI Australia appreciated the opportunity we had to provide input on the NDFs drafted for the Requiem sharks and hopes this level of engagement will continue. We also encourage the Australian government to coordinate with regional partners, to co-manage shared populations of CITES-listed sharks and to provide guidance - ensuring that shark Non-Detriment Findings throughout the South Pacific are held to the same high standard as those drafted for Australia's populations.

HSI Australia would be pleased to provide any further information that the Committee may request in relation to this matter.

ⁱ Species Survival Network CITES COP 19 Digest <https://ssn.org/cop/cites-cop19/>

ⁱⁱ Dulvy et al., Overfishing drives over one-third of all sharks and rays toward a global extinction crisis, *Current Biology* (2021), <https://doi.org/10.1016/j.cub.2021.08.062>