

February 1, 2010

To Whom It May Concern:

Among the many marine proposals that the international community is considering listing under the Convention on International Trade in Endangered Species (CITES), there is one in particular to which we wish to draw your attention. Red and pink coral are long-lived, slow-growing sessile organisms that have been used for centuries in jewelry and interior decoration. These species possess skeletons that when highly polished and worked into a necklace, can fetch prices of up to USD\$25,000. The FAO ad-hoc advisory panel that evaluates commercially exploited aquatic species has noted: “*it seems probable that a substantial fraction of the production of Corallium spp. and Paracorallium spp. is in international trade and that international trade is an important driver of the harvest of these species.*”

Unregulated trade in *Corallium* and *Paracorallium* species is having a significant impact on populations in the Mediterranean and Pacific. Historically, *Corallium rubrum* colonies of up to 50 cm in height were a common sight in Mediterranean waters. Today, more than 90 percent of colonies in fished areas in the Mediterranean are 3 to 5 cm tall and less than half are sexually mature. Available data in the Pacific shows that landings have declined from 100 to 400 tons a year to less than five tons—despite continued demand for this resource. A CITES Appendix II listing would help to ensure that trade is sustainable and that national laws on the harvesting of these species are respected. The United States and Sweden, on behalf of the 27 member states of the European Union, have recognized the threats posed to the sustainability of this resource by unregulated international trade and are the co-proponents of a proposal to list the Family Coralliidae under Appendix II at the next Conference of Parties in March 2010. We urge you to support this proposal and the rationale for the listing is included in the information below.

The FAO Analysis and Size as a Measure of Decline in Colonial Organisms

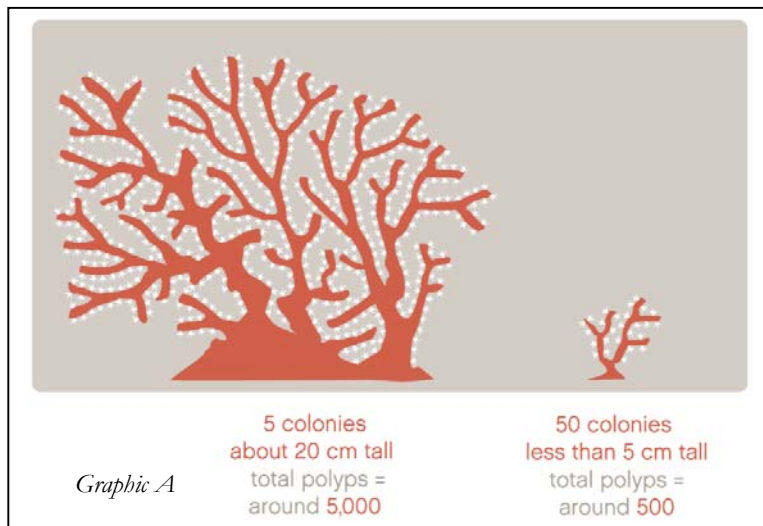
At the 14th Conference of Parties in 2007, some opponents of the listing used number of colonies as a measure of decline to argue that Appendix II criteria was not met. The FAO ad-hoc advisory panel that convened in December (2009) again came to the conclusion that, despite the proposal’s reference to decline as measured by size and number of polyps, the criteria for an Appendix II listing was not met.

There are clear challenges in applying the CITES listing criteria to colonial marine organisms “largely because they were clearly not established with these species in mind,” as the IUCN/TRAFFIC analyses states. We appreciate the review of IUCN and TRAFFIC, which fully take into consideration the unique biological characteristics of these species. The FAO analysis does recognize the importance of size as a measure of decline, but does not ultimately use it to measure the species against the criteria, instead opting for the more traditional fisheries approach of using number of colonies. However, this is not a traditional fishery in any sense. The number of colonies is an inappropriate and inaccurate measure of population size for these sessile, colonial organisms. In colonial animals, such as red and pink corals, colony numbers cannot measure population decline; decline should be identified by analyzing polyp numbers, as the polyps are the reproductive elements of the colony.

At CoP14, some of the arguments suggested that colonies 2 to 3 cm tall, some of which contain less than fifteen polyps, constitute a healthy population number and as such formed the basis against an Appendix II listing at the time. We know that the size of more than 90 percent of individuals in areas where fishing occurs currently ranges from 3 to 5 cm tall,

and even within this size range differences of less than 3 mm in diameter can represent anywhere from a 75 to 95 percent reduction in individuals. Therefore, a millimetre of difference in diameter between two colonies actually represents a difference of tens to hundreds of individual polyps. When undisturbed, mature colonies live for more than one hundred years, reach heights of up to 50 cm, and contain many thousands of individuals.

By using size as a population measure instead of number of colonies, as recommended by scientists working in the Mediterranean, data indicates that red and pink coral populations are indeed in decline (see below graphic A).



The IUCN analysis comes to the conclusion that it is conceivable that *Corallium rubrum*, the most studied precious coral species in the world, meets the criteria for inclusion in Appendix II by virtue of regulation of trade being necessary to prevent the species becoming eligible for inclusion in Appendix I in the near future. It reached this conclusion by applying the decline criterion for Appendix I listing to overall mass of the species rather than colony number. We consider this more appropriate for these species than the approach of FAO, which looks at these colonial invertebrates through a fisheries lens.

It is also important to note that Annex 5 in Resolution Conf 9.24 (Rev.CoP14) states: “where numerical guidelines are cited in this Annex, they are presented only as examples, since it is impossible to give numerical values that are applicable to all taxa because of differences in their biology.”

It is clear that these species have seen an overall marked decline, particularly in heavily fished areas. The 1989 FAO Congress on *Corallium rubrum* noted that in Italy and Spain coral fishing is “very intense” and is being carried out in “deeper and deeper waters.” In addition, the Congress noted that in Italy there is “overexploitation due to irrational management and insufficient legislation.” Now, more than twenty years later, there is still a lack of connected, meaningful management throughout the Mediterranean, and poaching of smaller, immature colonies continues to occur unabated. A CITES Appendix II listing can provide a valuable mechanism to begin to leverage and implement management systems which are mindful of the local and traditional value of these species.

Implementation

At the 14th Conference of Parties, some concerns were raised around implementation of an Appendix II listing for red and pink coral. These have been addressed through the following:

- The development of a Coralliidae and Precious Corals identification guide by TRAFFIC, to be distributed to all CITES member nations for enforcement agency and related personnel use.
- The convening of the First International Workshop on *Corallium* Management, Science and Trade, held in Hong Kong in March 2009 and the Mediterranean workshop on red and pink coral, held in Naples in September 2009.
- An 18-month delay in implementation of the listing, as written in the United States and European Union's proposal, if it is successfully listed at CoP15, in order to ease the administrative burden on exporting countries.

The Mediterranean and Pacific workshops are the result of the United States' offer to convene leading red and pink coral scientists, management authorities and conservation organizations to address implementation and identification issues related to a red and pink coral listing. In addition, it has been acknowledged that there are limitations to a personal effects exemption, as discussed at CoP14, and countries must address this to ensure sustainable trade is not undermined. An Appendix II listing remains beneficial and necessary, as the majority of the *Corallium* and *Paracorallium* trade involves bulk commercial shipments of raw coral and processed items. The provisional assessments of CoP15 proposals by the CITES Secretariat states: "*the proposal [by Sweden, on behalf of the 27 member states of the European Union and the United States] also adequately addresses implementation issues such as identification of products in trade, pre-Convention specimens, personal and household effects and making non-detriment findings.*"

Species Currently Listed Under Appendix III

Red and pink coral species in international trade must currently be identified to the species level, due to the four species (*Corallium elatius*, *Corallium japonicum*, *Corallium konjoi*, and *Corallium secundum*) listed under Appendix III by China in July 2008. The EU and U.S. proposal requests the entire Family Coralliidae be listed under Appendix II, effectively reducing the current administrative burden on exporting countries and enforcement officers.

Need for International Oversight of the Red and Pink Coral Trade

The workshops and the listing of four species on Appendix III are positive developments that will lead to increased collaboration amongst all stakeholders concerned about the global red and pink coral trade. A CITES Appendix II listing for the Family Coralliidae would complement these existing efforts and local management, as the science and available trade data continues to show a need for international regulation and oversight of these species:

- Decline in the documented size structure of harvested red and pink coral populations is equivalent to removal of 80 to 90 percent of the individuals (polyps) that make up the colonies. Once populations are depleted at this level, they are not known to recover in an ecologically meaningful amount of time.
- Maximum sustainable yield for *Corallium rubrum* is achieved when colonies are 98 years old. Current practices in the Mediterranean are to harvest colonies at 7 to 10 years of age.
- Overexploitation in the Mediterranean has led to a decline in landings and alterations to the population structure, thereby meeting Appendix II criteria and thus warrants listing.
- The Italian coral industry now sources 70 percent of its coral from the Pacific.
- Pacific landings have declined from 100 to 400 tons per year in the 1980s to less than five tons in 2007—despite continued demand for the resource.

- China's Appendix III listing of four *Corallium* and *Paracorallium* species indicates that there is growing concern over these species in the Pacific region, and a listing of the entire Coralliidae family would reduce administrative burdens on importing countries.
- From 2001 to 2008 the U.S., as the world's largest importer of this resource, imported more than 28 million pieces of *Paracorallium* and *Corallium*.
- The global trade in red and pink coral is estimated at 30 to 50 metric tons annually, with the black coral trade estimated at five metric tons. Despite this disparity in the size of the global trade, the entire order of black coral has been listed under Appendix II since 1981. In addition, a recent scientific review of precious coral exploitation indicated that the Hawaiian black coral fishery is the only precious coral fishery that could be considered sustainable.

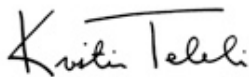
Considering the available biological and trade data, Coralliidae meet the criteria for an Appendix II listing under Res. Conf. 9.24 (Rev. CoP14) and action should be taken at the 15th Conference of Parties to ensure these species are successfully listed.

We urge you to support the proposal by Sweden (on behalf of the 27 member states of the European Union) and the United States, to list red and pink coral under Appendix II. Time is of the essence, if we are to conserve remaining Mediterranean and Pacific populations, and the livelihoods and rich traditions that depend on them.

Thank you for your consideration.

Yours sincerely,

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