



AAC Recommendation on the CITES

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Caviar trade falls under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) regulations. The aim of the CITES is to ensure that the international trade of specimens or products of wild animals and plants does not threaten their survival.

The CITES procedures impose certain controls on the international trade of the selected species. All import, export, re-export and introduction from the wild of species covered by the CITES have to be authorised through a licensing system.

Each Party to the CITES must designate one or more management authorities (MA) in charge of administering that licensing system and one or more scientific authorities (SA) must advise them on the effects of trade on the status of the species. This means that the application of the CITES regulation is settled at the national level, which leads to differences in treatment between different countries.

The species covered by the CITES are listed in three appendices (I, II and III) according to the threat of extinction and the degree of protection they need.

All sturgeon species (except *Acipenser sturio* and *brevirostrum*) are now in Appendix II of the CITES, which specifically states “species not necessarily threatened with extinction, but in which trade must be controlled in order to avoid utilization incompatible with their survival”.

Currently, 99% of caviar is now coming from aquaculture. Yet, the production and trade of aquaculture caviar represent no real danger to wild stocks.

Although intra-EU caviar trade is relatively simple regarding the CITES rules, extra-EU trade requires considerable administrative work and time, depending on the country of origin. Indeed, according to several caviar producers, this delay between the order and the shipment can take 24 days because of all the different steps involved in the process of licensing. Considering the growing demand of caviar without preservatives and which have an average shelf life of 90 to 120 days, the impact of lengthy procedures is damaging.

Recommendations:

1. The AAC requests the CITES to apply three different control levels to market players,

depending on the results of their previous five years:

- For players with no previous issues regarding the CITES legislation (more precisely on the origin of caviar) during the last five years, a proposal to require only a multiannual licence with a single control every year (paid by the player) to avoid delays and unnecessary excessive paperwork is suggested.
- For players with less than two issues regarding the CITES legislation (more precisely on the origin of caviar) during the last five years, an annual licence with three controls every year (paid by the player) is suggested.
- For players with more than two issues about the CITES legislation during the last five years and for new players (less than five years in the business), the current level of control (licence for each shipment) is suggested.

2. Additionally, we inform you that:

The AAC recommends the inclusion of an aquaculture industry representative in the Animal Committee of the Conference of the Parties of CITES.

The Conference of the Parties (CoP) is the supreme decision-making body of the CITES. The CoP comprises all signatory member states, as well as United Nations Agencies, Inter-Governmental Organizations (IGO), Non-Governmental Organizations (NGO) and private sector organizations. The CITES is split into several committees, as shown opposite.

Inside the Animal Committee (responsible for caviar discussions), representatives from the caviar repacker and importer players are invited and part of the debates. Strangely, representatives from sturgeon producers (and so primary caviar producers) are not.

3. The AAC encourages the CITES to provide replies to industry's requests on caviar matters.



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