

A Practical Guide to CITES

For EU timber traders



Thematic article series no. 3
Published June 2018



Developed by NEPCon under the project “Supporting Legal Timber Trade” funded by the LIFE programme of the European Union and UK Aid from the UK government.



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This material has been funded by UK aid from the UK government; however the views expressed do not necessarily reflect the UK government’s official policies.

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Introduction

The Convention on International Trade in Endangered Species of Wild Fauna and Flora – or CITES as it is more commonly known as – is an international agreement that specifies how or if rare and endangered species of plants and animals can be traded internationally. It's a system that works via permits. Some species are not allowed to be traded commercially at all, whereas others can be traded if they have the relevant permit.

Read this article to find out:

- How CITES works
- How the EU Wildlife Trade Regulations (which implement CITES in EU countries) work
- What main timber species are covered by CITES and the EU Regulations
- What permits you need to import, export or re-export CITES-listed timber species
- Other useful, practical information such as what CITES permits look like, how you apply for one and what the regulations mean in terms of due diligence.

This article is primarily aimed at timber companies operating in the EU. The information on CITES permits applies to all timber companies in the world, but companies in the US and Australia need to comply with additional requirements¹ which are not discussed here.

Disclaimer: While we've done our utmost to ensure that the information in this article is correct at the time of publication, the CITES regulations are complicated and change over time. You should therefore use this article as a guide and not rely on it as a definitive description of your legal obligations.



1 How does CITES work?

The CITES Convention lists species in three different Appendices, each one with a different level of protection². Trade in any of these species to or from any country that is party to the convention - which is virtually all countries in the world - is regulated as follows:

- Species listed on **Appendix I** are threatened with extinction. Trade in specimens of these species is permitted only in exceptional circumstances.
- Species listed on **Appendix II** are not necessarily threatened with extinction, but trade in them is controlled to protect their survival.
- **Appendix III** is a list of species that a country has requested be listed in order to facilitate international cooperation in its trade.

Every three years, the countries that have signed up to the CITES Convention meet and vote on proposals to add or remove species (or sub-species) to Appendices I or II. Countries that have put a species on Appendix III may unilaterally make changes to its listing at any time. For example, at the most recent Convention, in 2017, more than

300 additional timber species (all *Dalbergia* rosewood and palisander species) were brought under CITES trade controls, see Box 1³.

Species may be listed on one of the Appendices at the level of a group of species, an individual species, a sub-species or a geographically distinct population⁴. For example, all primates are listed on Appendix II (other than those on Appendix I)⁵. Sometimes only certain parts of a listed species – for example, logs, sawn wood and veneer sheets – may be protected whereas other parts may not be protected.

The full text of the Convention can be found [here](#).



2 How do the EU Wildlife Trade Regulations work?

If you are based in the EU, then you not only need to abide by the CITES Convention, but also need to abide by the EU Wildlife Trade Regulations.

The EU uses the Wildlife Trade Regulations in order to implement the CITES requirements. The Wildlife Trade Regulations list species on one of four Annexes instead of the three Appendices of CITES⁶.

- **Annex A** is mostly equivalent to the species on CITES Appendix I. However, some Appendix I species may not be included and some CITES Appendix II and III species or non-CITES species may be included if the EU has adopted stricter protection measures.
- **Annex B** is mostly equivalent to the species on CITES Appendix II. However, as above, some Appendix II species may not be included and some CITES Appendix III species or non-CITES species may be included if the EU has adopted stricter protection measures.
- **Annex C** contains all CITES Appendix III species apart from those where an EU member state has stated that it will not be bound by the

CITES requirements (which is known as a country 'entering a reservation').

- **Annex D** contains all CITES Appendix III species for which an EU member state has entered a reservation, as well as some non-CITES species that are listed in order to be consistent with other EU regulations, such as the Habitats Directive and the Birds Directive.

In some cases, the requirements of the Wildlife Trade Regulations are stricter than those of CITES. We describe what permits are needed for both CITES and the Wildlife Trade Regulations below.

The European Commission and Traffic have produced a comprehensive guide to the Wildlife Trade Regulations which can be found [here](#).



3 What timber species are covered by CITES or the EU Wildlife Trade Regulation?

Roughly 5,800 species of animals and 30,000 species of plants are currently protected by the CITES Convention. At least 22 genera of commercial timber are protected – mostly with a single species within the genus protected; some with multiple species or the entire genus protected.

The tables below show which timber species are protected. Unless otherwise stated, the information comes from the highly informative guide on CITES and tree species by the Royal Botanic Gardens, Kew⁷. If you have further questions about this topic, we highly recommend this guide which provides more detail than we go into here.

We have endeavoured to ensure that the main commercial timber species covered by CITES are included in the tables below, but to be sure whether you need a permit or not, especially given that the number of protected species will change over time, you should check by:

- Looking in the [CITES Appendices](#)
- Looking in the [EU Annexes](#)
- Using the [Species+](#) website which is a helpful searchable database developed by CITES and the World Conservation

Monitoring Centre of the UN Environment Programme that lists species protected under both CITES and the EU Wildlife Trade Regulations. [Cites and Timber \(RBG, Kew\)](#) includes useful instructions for using this site.

Endangered CITES-listed species may sometimes be passed off as a related, similar-looking but non-CITES-listed species. For example, CITES-listed African teak (*Pericopsis elata*) is sometimes intentionally mislabelled as iroko (*Milicia excelsa*)⁸. You should therefore pay close attention to the species determination. [Our article on the laboratory techniques](#) to help determine the species (and geographical origin) of timber may be of help.

There are some extra points to note about whether or not you will need a permit. In particular:

- Both CITES and the EU Wildlife Trade Regulation provide protection for *wild* plants and animals. You do not need any permits for plants that were 'artificially propagated'^{9*} or that come from a commercial plantation. The 'plantations' column in the tables below gives an indication of whether there are known commercial

* The exemption only applies if the plants are produced exactly in accordance with Resolution Conf. 11.11 (Rev. CoP15)⁹, if not permits are required.

plantations available.

- If you imported or exported a species before it was covered by the Convention, you do not need to retrospectively apply for any permits¹⁰.
- The CITES Convention may only protect certain parts of a tree. For example, only logs, sawn wood and veneer of Mongolian oak (*Quercus mongolica*) are protected, whereas all parts of *Swietenia humilis* (mahogany) are covered^a. We have noted information on which parts of the species are currently protected in the table below. For up-to-date information, see the 'notes' section of the [Species+](#) website. Note that in cases where processed timber is allowed to be exported without a permit, logs are sometimes smuggled by making a rudimentary cut in another otherwise unprocessed log and claiming the wood to be processed.
- The CITES Convention sometimes only protects species from specific geographical areas. We have noted this information in the tables below. We have noted information on which parts of the species are currently protected in the table below. For up-to-date information,

see the 'notes' section of the [Species+](#) website.

- The CITES Convention allows countries to put a 'reservation' on a species. If this is the case for the species and country you wish to trade, and you are¹¹:
 - ◊ Exporting to another country which has a reservation on the species, or to a country which is not party to CITES, then you do not need any CITES permits
 - ◊ Exporting to a country which is party to CITES and has not put a reservation on the species, then you will need an export permit.
- The CITES Convention allows countries to suspend all trade in a certain species for a certain period of time¹². We have noted information on current 'suspensions' in the table below. For up-to-date information, check the [Species+](#) website.
- Countries sometimes set export quotas for species, limiting the volume for which export permits can be issued. The [Species+](#) website contains information on quotas.

Commercial tree species on CITES Appendix I / EU Annex A

Commercial, international trade in wild-sourced specimens of these species is prohibited.

Scientific name	Common name	Distribution	Uses	Parts and populations protected ^b	Reservations – countries that have stated they shall not be bound by the CITES rules ¹³	Suspensions – any national export suspensions of CITES international suspensions. Check Species+ for details ¹⁴	Are there any commercial plantations?
<i>Abies guatemalensis</i>	Guatemalan Fir, Mexican fir	El Salvador, Guatemala, Honduras, Mexico	Construction, charcoal, Christmas trees	All	None	No	Yes
<i>Araucaria araucana</i>	Monkey puzzle tree or Chilean pine	Chile and Argentina	Construction, plywood, flooring, paper pulp	All	None	No	Yes
<i>Balmea stormiaef</i>	Ayuque	Mexico, Guatemala, El Salvador	Christmas tree, ornamental wood	All	None	No	No
<i>Dalbergia nigra</i>	Brazilian rosewood	Brazil ¹⁵	Furniture, musical instruments ¹⁶	All	None	No	No
<i>Fitzroya cupressoides</i>	Alerce	Argentina, Chile	Furniture, musical instruments, construction	All	None	Chile	None known
<i>Pilgerodendron uviferum</i>	Guaitecas cypress	Argentina, Chile	Construction, furniture, boat building	All	None	No	None known
<i>Podocarpus parlatorei</i>	Parlatore's podocarp	Bolivia, Argentina, Peru	House building, fence posts	All	None	No	None known

^b All populations are protected unless stated otherwise

^c Not taken from Cites and Timber (RBG, Kew)

^a With some exceptions not applicable to the timber trade, such as seeds and pollen

Commercial tree species on CITES Appendix II / EU Annex B

Commercial, international trade in wild-sourced specimens of these species is permitted only with the appropriate permits (see section below).

Scientific name	Common name	Distribution	Uses	Parts and populations protected	Reservations – countries that have stated they shall not be bound by the CITES rules ¹⁷	Suspensions – any national export suspensions of CITES international suspensions. Check Species+ for details ¹⁸	Are there any commercial plantations?
<i>Aniba rosaeodora</i>	Rosewood, Pau rosa	Brazil, Colombia, Ecuador, French Guiana, Guyana, Peru,	Rosewood oil, for perfumes	Logs, sawn wood, veneer sheets, plywood	None	No	One commercial plantation in Brazil
<i>Aquilaria</i> and <i>Gyrinops</i>	Agarwood	Bangladesh, Bhutan, Cambodia, China, India, Indonesia, Lao People's Democratic Republic, Malaysia, Myanmar, Papua New	Oil for perfumes and cosmetics, carvings, beads, traditional medicine	All parts except seeds, seedlings, finished products, fruits and leaves	Kuwait, Qatar, Syria, UAE – see Species+ for details	Philippines India	Yes
<i>Bulnesia sarmientoi</i>	Palo santo, holy wood	Bolivia, Paraguay, Brazil, Argentina	Flooring, furniture, handicrafts, oil for perfumes and cosmetics	Logs, sawn wood, veneer sheets, plywood, powder and extract but	None	No	None known
<i>Paubrasilia echinata</i> ^d	Pernambuco, pau-brasil	Brazil	Violin bows	Logs, sawn wood, veneer sheets, unfinished	None	No	No
<i>Caryocar costaricense</i> ^e	Costus, Ajo	Colombia, Costa Rica, Panama, Venezuela	Construction of bridges, marine construction, heavy flooring	All parts except fruits, seeds, seedlings, flowers,	None	None	None known
<i>Dalbergia</i> spp. ¹⁹ (except those included in Appendix I)	Rosewoods	Throughout the tropics	Construction, furniture, musical instruments	All parts with a few exceptions – see	India	DR Congo, Guinea, India, Madagascar	No
<i>Diospyros</i> spp.	Ebony	Madagascar, with one species (<i>D. ferrea</i>) also found in East	Furniture, musical instruments	Logs, sawn wood and veneer sheets from Madagascar	None	Madagascar	None known
<i>Gonystylus</i> spp.	Ramin	Southeast Asia	Furniture, veneer, tools, handles	All parts except fruits, seeds, seedlings,	None	No	None known
<i>Guaiacum</i> spp.	Lignum vitae	Central and	Mechanical	All parts	None	No	No large

^d All populations are protected unless stated otherwise

^e Not taken from Cites and Timber (RBG, Kew)

^x CITES, Change of taxonomic nomenclature of *Caesalpinia echinata* and its potential implications for trade data and control, July 2017, <https://cites.org/sites/default/files/eng/com/pc/23/E-PC23-31-02.pdf>

Scientific name	Common name	Distribution	Uses	Parts and populations protected	Reservations – countries that have stated they shall not be bound by the CITES rules ¹⁷	Suspensions – any national export suspensions of CITES international suspensions. Check Species+ for details ¹⁸	Are there any commercial plantations?
<i>Guibourtia demeusei</i> , <i>G. pellegriniana</i> , <i>G. tessmannii</i>	Bubinga	West and Central Africa	Furniture, musical instruments	All parts with a few exceptions – see	None	DR Congo	Yes. FSC-certified plantations
<i>Osyris lanceolata</i>	African sandalwood	sub-Saharan Africa	Essential oil for the cosmetic and pharmaceutical industries	All parts except seeds, pollen, finished products.	None	DR Congo	None known
<i>Pericopsis elata</i>	Afromosia or African teak	West and central Africa	Flooring, furniture, veneer, boat building	Logs, sawn wood and veneer sheets	None	Cote d'Ivoire, DR Congo	No large commercial plantations
<i>Platymiscium pleiostachyum</i>	Cristóbal	Costa Rica, El Salvador, Nicaragua	Furniture, flooring, panelling, musical instruments	All parts except fruits, seeds, seedlings, flowers,	None	No	None known
<i>Prunus africana</i>	African cherry	Central and south Africa	Bark for medicinal purposes	All parts except fruits, seeds, seedlings,	None	DR Congo, Equatorial Guinea, Tanzania	No
<i>Pterocarpus erinaceus</i>	African rosewood, kosso	West Africa	Construction, furniture, musical instruments, charcoal, fodder for livestock	All	None	Guinea, Guinea Bissau, Liberia	None known
<i>Pterocarpus santalinus</i>	Red sandalwood	India, Sri Lanka, Pakistan	Traditional instruments. Red dye used in cosmetics, food and pharmaceuticals	Logs, wood chips, powder, extracts	None	India	Yes
<i>Swietenia</i> spp.	Mahogany	Central and South America and the Caribbean	Musical instruments, veneer, furniture, panelling	<i>humilis</i> : All parts except fruits, seeds, seedlings, flowers, finished products <i>macrophylla</i> : logs, sawn wood, veneer sheets, plywood	None	Dominica, Grenada	Yes
<i>Taxus chinensis</i> , <i>T. cuspidata</i> , <i>T. fuana</i> , <i>T. sumatrana</i> , <i>T. wallichiana</i>	Yew	Afghanistan, Bhutan, China and Taiwan, Democratic Republic of Korea, India, Japan, Malaysia, Myanmar, Nepal, Pakistan, the	Horticulture, anti-cancer drugs, Chinese traditional medicine	All parts except seeds, pollen, finished products	None	Afghanistan, India, Philippines	Yes

Commercial tree species on CITES Appendix III / EU Annex C

Commercial, international trade in wild-sourced specimens of these species is permitted only with the appropriate permits (see section below).

Scientific name	Common name	Listed on Appendix III by which country(s)	Distribution	Uses	Parts and populations protected ^f	Reservations – countries that have stated they shall not be bound by the CITES rules ²⁰	Suspensions – any national export suspensions of CITES international suspensions. Check Species+ for details ²¹	Are there any commercial plantations?
<i>Cedrela</i> spp. Some species are on Annex C, some Annex D	Spanish cedars	Brazil, Bolivia, Colombia, Guatemala, Peru ⁹	Central and South America and the Caribbean	Furniture, musical instruments, light construction	Logs, sawn wood and veneer sheets	None	Dominica, Grenada	Yes
<i>Dipteryx panamensis</i>	Almendro	Costa Rica, Nicaragua	Nicaragua, Costa Rica, Panama, and Colombia	Construction	All	None	No	Yes
<i>Fraxinus mandshurica</i>	Manchurian ash	Russia	China, Republic of Korea, Japan and south east Russia (Sakhalin Island)	Veneer for furniture, musical instruments and marquetry	Logs, sawn wood and veneer sheets	None	No	Yes
<i>Pinus koraiensis</i>	Korean pine	Russia	China, Japan, Democratic People's Republic of Korea, Republic of Korea and Russia	Furniture, sports equipment, musical instruments, construction, boat building, flooring, plywood, veneer, pulp. Resin is used to produce turpentine. Edible pine nuts	Logs, sawn wood and veneer sheets	None	No	Yes
<i>Podocarpus neriifolius</i>	Podocarp	Nepal	Southeast Asia	House building, boat building, furniture, musical instruments	All parts except seeds, seedlings, flowers and fruit	None	India	None known
<i>Quercus mongolica</i>	Mongolian oak	Russia	China, Japan, Republic of Korea, Mongolia, Russia (Sakhalin Island)	Construction, sports equipment, furniture, boats	Logs, sawn wood and veneer sheets	None	No	Yes, but production levels unknown

^f All populations are protected unless stated otherwise
⁹ For details of which country applies to which species, see [Species+](#)

Did you know?



Compliance with national law is a prerequisite for the issuance of a CITES export permit. However, there are no guidelines for Management Authorities to verify legal compliance and often checks are not conducted*. Thus, a loophole is created within the EU Timber Regulation (EUTR), since products with CITES permits are exempt from the due diligence requirements. This issue is in the process of being addressed, but in the meantime, those committed to sourcing legal timber are advised to apply due diligence to products with CITES permits too.

To find out more about the EUTR, visit www.nepcon.org/sourcinghub

* Chatham House, The EU Timber Regulation and CITES, 2014 <https://www.chathamhouse.org/publications/papers/view/199158>



4 What permits do I need?

The information we have compiled below is a summary of what you are most likely to need to know to import, export or re-export a CITES or EU protected species. It is not, however, a full list of all the rules and regulations. If you are ever unsure about whether you need a permit or not, contact your national CITES Management Authority. Their details are listed [here](#).

Species on CITES Appendix I or EU Annex A

Commercial international trade in species on Appendix I / Annex A is not allowed. However, if the trade is not primarily for commercial purposes *and* if the trade is not detrimental to the survival of the species *and* if the specimen was obtained legally, then the trade may be permitted if the following permits are obtained and presented at the port of entry or exit²²:

- To import the specimen: an import permit issued by the relevant authority in the country you wish to import into.
- To export the specimen: an export permit issued by the relevant authority in the country you wish to export from. An export permit can only be issued once an import permit has been obtained.

- To re-export the specimen: a re-export permit issued by the relevant authority in the country you wish to export from. A re-export permit can only be issued if the specimen was previously imported in accordance with the Convention.
- To trade the specimen internally (within the same country or within the EU): no permits are needed unless required by national law. In the case of the EU^h, internal trade is prohibited, although there are some exemptions to this, including for artificially propagated plants*, in which case an intra-trade permit is required²³.

Trade within the EU and with their overseas territories

In general, timber can be traded freely between EU members states, though the trade in wild

^h Note that Gibraltar is currently part of the EU and that, for the purposes of CITES, San Marino, Ceuta and Melilla are treated as part of the EU

* The exemption only applies if the plants are produced exactly in accordance with Resolution Conf. 11.11 (Rev. CoP15)⁹, if not permits are required.

specimens of Annex A species is banned, as it is outside the EU.

Intra-EU trade in timber on Annex B, C or D does not usually require any permits, though in some cases it may be necessary to show that species on Annex B were acquired legally²⁴.

Only France and UK have overseas territories with wooden species on the CITES list. Both have some territories which are considered part and some which are not considered part of the EU.

National laws may be stricter than these requirements, so you will need to check the requirements of the countries you are exporting from and importing into.

Species on CITES Appendix II or EU Annex B

International trade is permitted if the following permits are obtained and presented at the port of entry or exit²⁵:

- To import the specimen: no permit is needed unless required by national law. If you wish to import the specimen into an EU country, then the Wildlife Trade Regulations require you to have an import permit which

can only be issued if the main reason for the trade is not commercial. In addition, you will also need to provide documentary evidence of the legality of the trade, including the CITES export or re-export permit.

- To export the specimen: an export permit issued by the relevant authority in the country you wish to export from. An export permit can only be issued only if the specimen was legally obtained and if the export will not be detrimental to the survival of the species.
- To re-export the specimen: a re-export permit issued by the relevant authority in the country you wish to export from. A re-export permit can only be issued if the specimen was previously imported in accordance with the Convention.
- To trade the specimen internally (within the same country or within the EUⁱ): an intra-trade permit is required.

Trade within the EU and with their overseas territories

For species listed in Appendix B, an import permit is required.

However, some specimens may be exempt from these permits. Only France and UK have overseas territories with wooden species on the CITES list. Both have some territories which are considered part and some which are not considered part of the EU. So for the former an intra-trade permit is

likely required and for the latter a CITES export/import permit is required.

National laws may be stricter than these requirements, so you will need to check the requirements of the countries you are exporting from and importing into.

Box 1: What if I'm buying Indian rosewood or sissoo?

In January 2017 over 300 new timber species were listed on CITES Appendix II, these included all rosewood and palisander species of the genus *Dalbergia*²⁶. This caused an outcry because two species are not only commonly used in the manufacture of musical instruments in India (an important export for the country) but are also considered to be readily available²⁷: Indian rosewood and sissoo or northern Indian rosewood (*Dalbergia latifolia* and *Dalbergia sissoo*). Thus, the Government of India entered a reservation, they have stated that they shall not be bound by the CITES rules for the whole genus.

This means that for entry into the EU (and other CITES Parties) documentation 'comparable' to CITES documentation is required. This is evidence for the legal and sustainable origin issued by the country's competent authorities²⁸. For *Dalbergia latifolia* and *Dalbergia sissoo* the Indian authorities are issuing VRIKSH Shipment Certificates²⁹. VRIKSH is India's timber legality assessment and verification scheme, established in 2013 and administered by the Export Promotion Council for Handicrafts (EPCH)³⁰. Only VRIKSH certified companies can obtain VRIKSH Shipment Certificates; to obtain the Shipment Certificates a company need to apply to EPCH detailing the product(s) being shipped and the material used during manufacture, along with a copy of records documenting in the supply chain. Certificates are generally issued within 10-15 days.

Details of the process, required documents and application forms are available on the VRIKSH website: <http://vrikshindia.in>

ⁱ Note that Gibraltar is currently part of the EU and that, for the purposes of CITES, San Marino, Ceuta and Melilla are treated as part of the EU. Trade with other overseas territories of EU member states will need import and export permits.



Species on CITES Appendix III or EU Annex C or D

International trade is permitted if the following permits are obtained and presented at the port of entry or exit³¹:

- To import the specimen: no permit is needed unless required by national law. If you wish to import the specimen into an EU country, then the Wildlife Trade Regulations require you to have an 'import notification' no matter what EU country you're in. This is a declaration that you fill in and submit (with other relevant CITES documents) to the customs officials in the EU country you wish to import into.
- To export the specimen from a country that lists the species on Appendix III: an export permit issued by the relevant authority in the country you wish to export from.

The export permit can only be issued only if the specimen was legally obtained.

- To export the specimen from a state that does not list the species on Appendix III: a certificate of origin issued by the relevant authority in the country you wish to export from.
- To re-export the specimen: a re-export permit issued by the relevant authority in the

country you wish to export from.

Figure 1 shows an example of the licensing system for Russian Mongolian oak (*Quercus mongolica*), an Appendix III species commonly encountered within the European timber trade.

National laws may be stricter than these requirements, so you will need to check the requirements of the countries you are exporting from and importing into.

Figure 1: Importing timber products containing Russian Mongolian oak into the EU – an example of the licensing system for species on CITES Appendix III





5 What does a CITES permit look like?

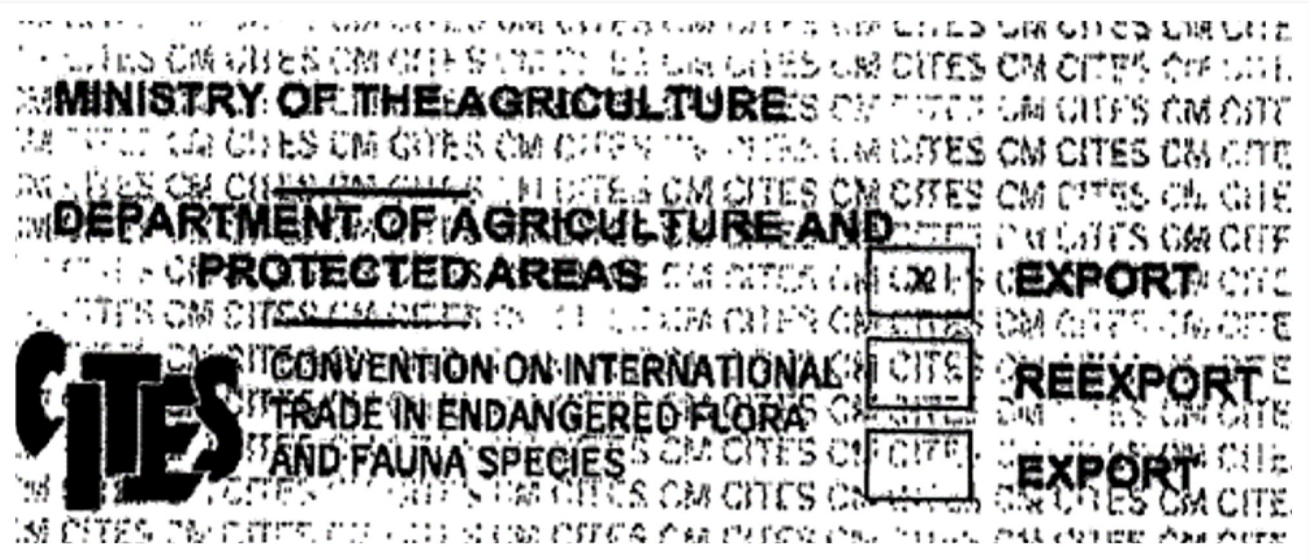
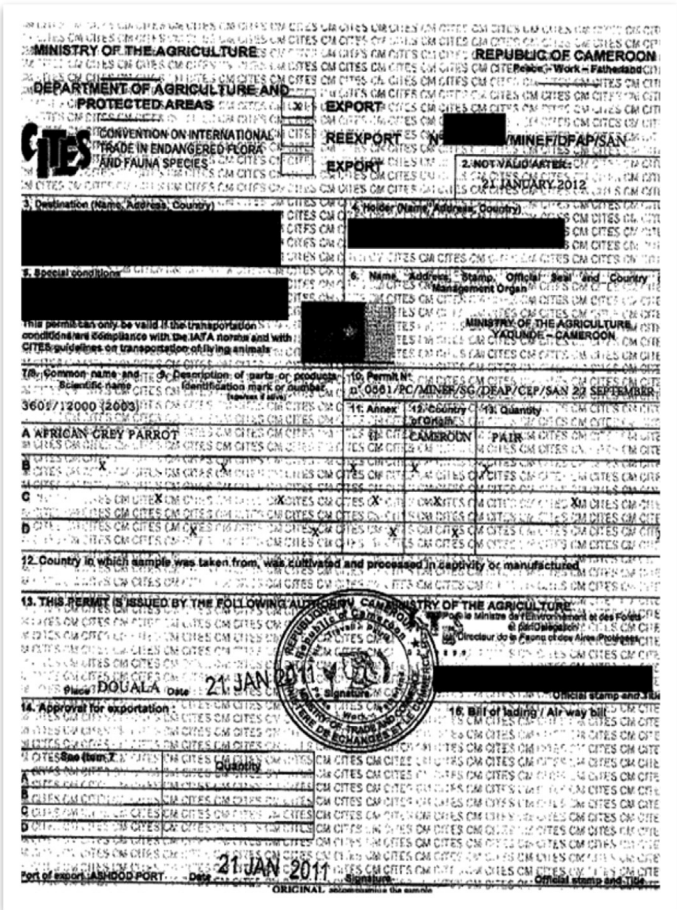
Cites and Timber (RBG, Kew) has useful examples of what CITES permits look like. You should check that the details on the permit are all correct.

Fake CITES permits can be a problem. [Our guide to how to spot fake documents](#) includes some real-life examples of forged CITES permits and gives tips on how to spot them. For example, the two supposed permits shown here (see Figure 2) get the name of the CITES Convention wrong – one gives it the wrong name and the other gets the spelling wrong.

If in doubt about the validity of a permit, check with the office that supposedly issued it – the national Management Authority.

At present, the CITES permit system is still largely paper-based but a project is underway to introduce electronic permits³².

Figure 2: A fake CITES permit from Cameroon





6

FAQs

What should I do if I wish to trade with a country that has not signed up to CITES?

182 countries plus the EU have signed up to the CITES Convention, so there are very few countries which have not signed up³³. A list of the countries that have signed up is available [here](#).

However, if you wish to export from or import into a country that is not party to the Convention, then you will need to obtain the equivalent permits listed in the section above.

Do I also need to carry out due diligence for the EU Timber Regulation?

No. Provided you've obtained all the CITES permits that you have to have, then you are allowed to assume that the timber is a low risk of being illegally harvested, transported and traded and therefore are not obliged to carry out any further due diligence³⁴.

However, the risk of violation of the CITES regulation has been noted in some countries so it is advisable to take extra care when sourcing CITES species from those countries, see the [NEPCon Sourcing Hub](#) for more details.

I'm importing timber with a FLEGT licence. What do I need to do?

If you are importing CITES-listed timber from Indonesia, which at the time of writing is the only country with a FLEGT licensing scheme in operation, into an EU country then you will need both the CITES documentation and the FLEGT licence³⁵.

Who should apply for the permit?

If you are importing, exporting or re-exporting a species that needs a CITES permit, then you need to apply for the relevant permit, or ask an agent to do so for you.

Who do I apply for the permit to?

Every country that has signed up to CITES has a national Management Authority to which you should apply for the relevant permit. The Management Authorities are listed [here](#).

How much does a permit cost?

Each national Management Authority sets their own fees, so the costs vary from country to country. In UK the fees vary from £59 to £74 for re-export and export permits³⁶; in the US they cost \$100³⁷.

References

- 1) See, for example, CIFOR, The role of CITES in the governance of transnational timber trade, 2015, http://www.cifor.org/publications/pdf_files/OccPapers/OP-130.pdf
- 2) CITES, How CITES works, <https://www.cites.org/eng/disc/how.php>
- 3) CITES, New CITES trade rules come into effect as 2017 starts, 2 January 2017, https://www.cites.org/eng/new_CITES_trade_rules_come_into_effect_as_2017_starts_02012017
- 4) CITES, The CITES species, <https://www.cites.org/eng/disc/species.php>
- 5) Primates, CITES, <https://primatecarewelfare.wordpress.com/conservation/law-and-policy/cites-and-cbd/>
- 6) European Commission, The European Union and Trade in Wild Fauna and Flora, http://ec.europa.eu/environment/cites/legislation_en.htm; Kew Publishing, CITES and timber: a guide to CITES-listed tree species, 2016, https://www.kew.org/sites/default/files/Cites_and_Timber_ed2016_16Dec2016_1.pdf
- 7) The Royal Botanic Gardens, Kew, CITES and timber: a guide to CITES-listed tree species, 2016, https://www.kew.org/sites/default/files/Cites_and_Timber_ed2016_16Dec2016_1.pdf
- 8) Deklerck V, Finch K, Gasson P, *et al.* Comparison of species classification models of mass spectrometry data: Kernel Discriminant Analysis vs Random Forest; A case study of Afrormosia (*Pericopsis elata* (Harms) Meeuwen). Rapid Commun Mass Spectrom. 2017; 31:1582–1588. <https://doi.org/10.1002/rcm.7939>
- 9) CITES, Conf. 11.11, Regulation of trade in plants, <https://www.cites.org/sites/default/files/document/E-Res-11-11-R17.pdf>
- 10) CITES, Resolution Conf. 13.6, Implementation of Article VII, paragraph 2, concerning 'pre-Convention' specimens, <https://www.cites.org/eng/res/13/13-06R16.php>
- 11) The Royal Botanic Gardens, Kew, CITES and timber: a guide to CITES-listed tree species, 2016, https://www.kew.org/sites/default/files/Cites_and_Timber_ed2016_16Dec2016_1.pdf
- 12) CITES, Countries currently subject to a recommendation to suspend trade, <https://www.cites.org/eng/resources/ref/suspend.php>
- 13) Information on reservations taken from Species+, <https://www.speciesplus.net/species>
- 14) Information on suspensions taken from Species+, <https://www.speciesplus.net/species>
- 15) IUCN Red List, Dalbergia nigra, <http://www.iucnredlist.org/details/32985/0>
- 16) IUCN Red List, Dalbergia nigra, <http://www.iucnredlist.org/details/32985/0>
- 17) Information on reservations taken from Species+, <https://www.speciesplus.net/species>
- 18) Information on suspensions taken from Species+, <https://www.speciesplus.net/species>
- 19) CITES, New CITES trade rules come into effect as 2017 starts, 2 January 2017, https://www.cites.org/eng/new_CITES_trade_rules_come_into_effect_as_2017_starts_02012017
- 20) Information on reservations taken from Species+, <https://www.speciesplus.net/species>
- 21) Information on suspensions taken from Species+, <https://www.speciesplus.net/species>
- 22) CITES, How CITES works, <https://www.cites.org/eng/disc/how.php>; European Commission, The differences between EU and CITES provisions in a nutshell, http://ec.europa.eu/environment/cites/pdf/differences_b_eu_and_cites.pdf
- 23) European Commission, CITES, Permits, certificates and notifications, http://ec.europa.eu/environment/cites/info_permits_en.htm
- 24) European Commission and TRAFFIC, European Union Wildlife Regulations, 2017, http://ec.europa.eu/environment/cites/pdf/referenceguide_en.pdf
- 25) CITES, How CITES works, <https://www.cites.org/eng/disc/how.php>; European Commission, The differences between EU and CITES provisions in a nutshell, http://ec.europa.eu/environment/cites/pdf/differences_b_eu_and_cites.pdf
- 26) CITES, New CITES trade rules come into effect as 2017 starts, https://www.cites.org/eng/new_CITES_trade_rules_come_into_effect_as_2017_starts_02012017
- 27) ITTO, India seeks exemption from the CITES Dalbergia requirements, http://www.itto.int/mis_detail/id=5418
- 28) European Commission, Questions and Answers on the Implementation in the EU of the Listing of Rosewood and Palisander Species into CITES Appendix II at CITES CoP17, http://ec.europa.eu/environment/cites/pdf/cop17/implementation_of_cites_cop17_listing_of_rosewood_clean.pdf
- 29) Government of India, Ministry of Environment, Forest and Climate Change (Wildlife Division), Uploading the CITES Comparable document i.e. Vriksh Shipment Certificate for export of *Dalbergia sissoo* and *Dalbergia latifolia* on CITES Website <http://www.moef.nic.in/sites/default/files/CITES%20COMPARABLE%20DOCUMENT.pdf> see also Green Clean Guide, New CITES trade rules for Dalbergia species, <http://greencleanguide.com/new-cites-trade-rules-for-dalbergia-species/> and VRIKSH, Process Documentation for Vriksh CITES Shipment Certificate (Dalbergia spp. as per CITES App. II), http://vrikshindia.in/external_file/ProcessDocumentation.pdf
- 30) VRIKSH, About VRIKSH, http://vrikshindia.in/index.php/user/about_us
- 31) CITES, How CITES works, <https://www.cites.org/eng/disc/how.php>; European Commission, The differences between EU and CITES provisions in a nutshell, http://ec.europa.eu/environment/cites/pdf/differences_b_eu_and_cites.pdf
- 32) CITES, eCITES, <https://www.cites.org/eng/prog/eCITES>
- 33) CITES, How CITES works, <https://www.cites.org/eng/disc/how.php>
- 34) Chatham House, The EU Timber Regulation and CITES, April 2014, https://www.illegal-logging.info/sites/files/chlogging/Saunders_and_Reeve_EUTR_and_CITES.pdf
- 35) FLEGT, FLEGT, certification and CITES, <http://www.flegtlicence.org/flegt-certification-cites>
- 36) Animal and Plant Health Agency, Schedule of fees applicable for CITES applications, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/602751/cites-gn11.pdf
- 37) U.S. Fish and Wildlife Service, Federal fish and wildlife permit application form for the export/re-export of plants and plant products, <https://www.fws.gov/international/pdf/permit-application-form-3-200-32-export-re-export-of-plants.pdf>

We are thankful to Priyanka Jagdale, Independent Sustainability Consultant- India, Catherine Rutherford, Independent Consultant, and Peter Gasson, Research Leader, Wood and Timbers at the Royal Botanic Gardens, Kew, who provided expertise that assisted the development of this thematic article.

About Supporting Legal Timber Trade

Supporting Legal Timber Trade is a joint initiative run by NEPCon with the aim of supporting timber-related companies in Europe with knowledge, tools and training in the requirements of the EU Timber Regulation. Knowing your timber's origin is not only good for the forests, but good for business. The joint initiative is funded by the LIFE Programme of the European Union and UK Aid from the UK Government.



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