



# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Washington, D.C. 20240



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Jorge G. Alvarez-Romero  
Comisión Nacional para el Conocimiento y  
Uso de la Biodiversidad (CONABIO)  
Dirección de Enlace y Asuntos Internacionales  
Coordinador de la Autoridad Científica CITES de México  
Liga Periférico-Insurgentes Sur 4903  
Parques del Pedregal, Tlalpan, 14010  
Mexico City, Mexico

Dear Mr. Alvarez:

I am writing you in response to the Notification to the Parties, Number 2007/032 concerning the use of the IUCN *Guidance for CITES Scientific Authorities: Checklist to assist in making non-detriment findings for Appendix II exports* (checklist) to assist in making non-detriment findings. In response to the questions in the Notification, we are providing the following answers:

**5. a) Is the IUCN checklist used or referred to during the process of making non-detriment findings?**

Yes. The Scientific Authority of the United States does refer to the IUCN checklist to develop non-detriment findings.

**c) If yes, how?**

The reference provides practical guidance to ensure that all relevant factors are considered in making the appropriate finding. We have also found it to be very useful for orientating new employees to CITES and the process of making non-detriment findings.

**5. d) If yes, have you identified any problems, challenges or difficulties in using the IUCN checklist? Please explain.**

We have found that the radar plots, the visual representation of the factors associated with a non-detriment finding, are not that useful. *why?*

**5. e) Has your country applied other general methodologies or procedures to formulate non-detriment findings. Please briefly explain the methodology and indicate the main elements or factors that are considered.**

Yes, as noted in Section 3.10: "Procedures used by the United States of America in making CITES non-detriment findings," pages 30-34, of the IUCN checklist, we have developed three types of general export non-detriment findings referred to as "general advices" for certain CITES-listed species and activities. These include non-detriment findings, which can be annual or multi-year findings, developed for specific facilities, species, or State-managed programs. To develop facility-based findings, we consider all relevant factors, such as the establishment of the original founder stock and whether additional animals are imported into the United States for commercial breeding purposes. Species-based findings include certain low-risk non-native captive-bred animal species or artificially propagated plant species. For such advices, we evaluate whether or not the animal species and specimens meet the "bred in captivity" criteria according to CITES Resolution Conf. 10.16 (Rev.), and whether plant specimens qualify as "artificially propagated" according to the criteria of Resolution Conf. 11.11 (Rev CoP13). We have also developed general advices for scientific specimens (e.g., biological samples, eggs) and salvaged specimens (e.g., skulls) of certain animal species. For State-managed programs of certain Appendix-II native plant (i.e., *Panax quinquefolius*) and animal species (e.g., *Polyodon spathula*), the general advice is based upon annual monitoring and harvest information provided by the appropriate State resource agency.

Thank you for the opportunity to respond. If there are any questions, please contact me at (703)358-2497 or [rosemarie\\_gnam@fws.gov](mailto:rosemarie_gnam@fws.gov).

Sincerely,

A handwritten signature in cursive script that reads "Rosemarie Gnam".

Rosemarie Gnam, Ph.D.  
Chief, Division of Scientific Authority