CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES
OF WILD FAUNA AND FLORA

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Nineteenth meeting of the Plants Committee
Geneva (Switzerland), 18-21 April 2011

Non-detriment findings

ADDRESSING THE CHALLENGES OF MAKING NON-DETRIMENT FINDINGS FOR GEOPHYTES

1. This document has been submitted by Georgia and the United Kingdom.*

Background

2. The Republic of Georgia has been exporting *Galanthus woronowii* since 1997 and *Cyclamen coum* since 2001. Exports of *Galanthus woronowii* commenced at 10 million per year and then rose to 18 million in 2003. Exports declined to 15 million in 2007 due to a reduced quota, and have remained at that level since that time. Between 200,000 and 300,000 *Cyclamen coum* tubers were exported per year between 2001 and 2003 with 100,000 exported in 2005 and 2006. There were no exports of *Cyclamen coum* in 2004, 2007 and 2008. The European Union is the major importer with the Netherlands dominating this trade. Virtually all of Georgia's bulb exports are re-exported through Turkey.

3. In 2004, the CITES Plants Committee expressed concern that the high level of exports of bulbs, in particular *Galanthus*, from Georgia was possibly unsustainable. To that time, there had been little information available on the conservation status of the species in trade, levels of artificial propagation, how CITES non-detriment findings (NDF's) were made and the scientific data behind the annual setting of export quotas. *Galanthus woronowii* was therefore included in the Review of Significant Trade in specimens of Appendix-II species at the 14th Meeting of the CITES Plants Committee, Windhoek (Namibia), 16-20 February 2004.

4. At the 16th Meeting of the CITES Plants Committee, Lima (Peru), 3-8 July 2006 the Committee categorized the issue to be of possible concern and made a series of recommendations. This included a recommendation to carry out field surveys, establish estimates of sustainable off-take and based on this research establish a conservative export quota for species in trade. Due to a number of circumstances this project was delayed until 2008. The 58th Meeting of the CITES Standing Committee, Geneva (Switzerland), 6-10 July 2009 decided that the deadline for Georgia to comply with the recommendations be extended until 31 December 2009 when the project was scheduled to finish and a conservative export quota based on the inventory of standing stock and estimates of sustainable off-take should be established in cooperation with the Secretariat and the Chair of the Plants Committee.

5. This work took place as CITES Project S302 in 2008 - 2009 with funding from the Netherlands. The project partners were Tbilisi Botanical Garden and Institute of Botany, Georgia, the Royal Botanic Gardens, Kew, UK and Microsoft Research, Cambridge, UK.

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* *The geographical designations employed in this document do not imply the expression of any opinion whatsoever on the part of the CITES Secretariat or the United Nations Environment Programme concerning the legal status of any country, territory, or area, or concerning the delimitation of its frontiers or boundaries. The responsibility for the contents of the document rests exclusively with its author.*

6. Following the first project workshop in September 2008 David Kikodze of the Georgian Scientific Authority and project team leader submitted a case study on the then situation in Georgia for the International Workshop on CITES Non-Detriment Findings, Cancun, Mexico in November 2008. The considerations in the Geophyte session of this workshop and the resultant guidance greatly facilitated the implementation of project S302 and gave the project team confidence to develop an NDF process adapted to local conditions in Georgia.

CITES Structures in Georgia

7. According to Georgian legislation, the extraction of snowdrop bulbs and cyclamen tubers in the wild requires a license only in the case where the harvested plant material is subject to export. The license is issued by the Ministry of Economic Development (MED) through an auction process. Prior to announcement of the auction, the Scientific Authority establishes the export quota for that year. The quota set for 2009 and 2010 was based on the survey work and research of the CITES project which was considered at a meeting of the Scientific Authority who then set a quota (including conditions) and communicated this quota to the Management Authority. The export permits for snowdrop bulbs are then issued by the Ministry of Environment Protection and Natural Resources (MEPNR - the CITES Management Authority of Georgia) on the basis of the license issued by MED and the export quota.

8. Four legal entities were awarded 10-year licenses to harvest and export snowdrop bulbs after the auction organized by MED in 2008. The annual quota is distributed among these license holders proportionally in accordance with the auction results.

9. The annual quota is currently divided as follows:

   a) Individual entrepreneur Simon Tatoshvili is allowed to harvest 28.30% of annual quota.

   b) Florexim Ltd. is allowed to harvest 23.59 % of annual quota.

   c) Agroproduct Ltd. is allowed to harvest 23.59 % of annual quota.

   d) Jasemin Company Ltd. is allowed to harvest 24.52 % of annual quota.

10. Recently, two of these companies have merged and retain their shares of the quota.

11. In accordance with the license conditions, in the years 2008 and 2009 license holders were obliged to submit the geographic coordinates of the harvest sites to MEPNR prior to commencement of bulb harvest, and starting from 2010, bulb harvests can now only take place at sites approved by MEPNR. This is based on the findings of the CITES research project and resultant recommendations made by the Scientific Authority to ensure sustainability.

12. The Georgian Scientific Authority (SA) is an advisory board to the Minister of Environment Protection and Natural Resources; the SA is composed of eight members who are experts in relevant fields, including botanical experts with extensive experience and institutional knowledge of the geophyte flora of Georgia. The SA now makes non-detriment findings based on the findings of the CITES survey and applies the NDF through quotas with attached conditions. The SA is authorized to establish an annual harvest and export quota for snowdrop bulbs and cyclamen tubers and convey it to the Minister of Environment and Natural Resources, who further convey it to MED. In accordance with the decree of the Minister of Economic Development, the quota (with conditions) is distributed among the license holders. Before 2006, the annual quota was established based on the results of field site verification surveys conducted by experts recommended by the SA. In 2006, the SA recommended 18 million bulbs as a sustainable annual quota for *Galanthus woronowii* and underlined that a revised quota should be established based on the results of new scientific studies. In the years 2007, 2008, 2009 and 2010 the SA recommended 15 millions snowdrop bulbs as the annual quota for wild bulbs. The same quota will apply for 2011.

13. MEPNR is the CITES Management Authority and is responsible for issuing CITES permits, and developing policy, legislation and regulatory acts.

The CITES Project

14. This project, carried out from September 2008 to December 2009, reviewed the current trade, conservation status and distribution of *Galanthus krasnovii*, *Galanthus woronowii* and *Cyclamen coum* in Georgia. Field research, literature and workshop reviews were carried out by experts from the CITES Authorities of Georgia, the Royal Botanic Gardens, Kew, UK and Microsoft Research, Cambridge, UK.

15. Research revealed that *Cyclamen coum* as exported from Georgia is *Cyclamen coum* subsp. *caucasicum*. This plant is very widely distributed in Georgia and an annual export quota of 500,000 wild tubers is considered to be precautionary.

16. All known populations (outside Abkhazia) of *Galanthus krasnovii* were surveyed. One extant site was found and it was recommended that the ongoing export ban on this species be maintained.

17. Forty one wild populations of *Galanthus woronowii* (area of occupancy some 447 hectares - estimated to be 70% of the total) were surveyed and calculated to have 163 million harvestable bulbs (estimated 233 million in total area). In addition, data from 12 of the 15 cultivation sites visited covering some 6.5 hectares revealed 2.2 million harvestable bulbs. The total area of cultivation sites is estimated to be 196 hectares with a harvestable stock of 65 million bulbs. Overall field surveys and modelling of population data lead to a precautionary estimate that there is a total standing harvest stock of some 300 million bulbs, wild and cultivated, in some 820 hectares. No stocks were found that currently fulfil the CITES definition of artificial propagation but some sites with amended management might provide artificially propagated bulbs in the near future. Based on this research an annual harvest and export quota of 15 million bulbs was considered to be precautionary and not detrimental to the populations of *Galanthus woronowii.*

18. Based on the results of this project the CITES Scientific Authority of Georgia made CITES non-detriment findings for *Cyclamen coum* (implemented through an annual quota of 500,000 tubers), *Galanthus krasnovii* (export banned) and *Galanthus woronowii* (implemented through an annual quota of 15 million bulbs with conditions on collection and management regimes).

19. The Management Authority is implementing these controls with ongoing advice and participation of the Scientific Authority. Management and monitoring systems are outlined in the report and these are being put in place to ensure an ongoing sustainable harvest and export.

20. The CITES Standing Committee approved the recommendations of the project at its 59th Meeting in March 2010 and Georgia/*Galanthus woronowii* was removed from the Review of Significant Trade.

Progress since completion of the CITES Project

21. At the 15th meeting of the CITES Conference of the Parties in Doha, Qatar, David Kikodze of the CITES Scientific Authority of Georgia was elected by the region as an alternate representative on the CITES Plants Committee.

22. Since that time the Georgian authorities have been implementing the recommendations of the project and during March 2010, 14 cultivation sites were visited (8 for the first time) and sampled by Kew and Georgian project members. This included sites which had undergone long term management, including the addition of fertilizer on a regular basis, and which yield high crop levels. Many of these sites are producing plants which are close to fulfilling the CITES definition of artificial propagation. Identification of the exact line between wild populations and cultivated stocks is difficult and often blurred, due to the long term management of cultivated populations within the natural distribution area of the species.

23. There are large areas of such cultivation, which, with more discrete management and monitoring could be considered to be artificially propagated. Currently, no exports are allowed outside the quota set for wild origin material and these are confined to the quota holders. The holders of the cultivation sites or “smallholders” have approached the CITES Management Authority with a request to explore a registration process which would allow registration of cultivation sites which fulfilled discrete criteria and hence that stock be allowed to be exported as artificially propagated. To explore these options a small workshop was convened over two days in Tbilisi in September 2010. This was made up of representatives of RBG, Kew and the CITES Authorities of Georgia. A meeting was also held with the Georgian traders. The workshop reviewed the current levels and means of cultivation, the CITES definition of artificial propagation and its practical application to bulbs, the management of cultivation sites and the challenges associated with monitoring any artificially propagated material that might be produced in the future.

24. As a result of these discussions the CITES Authorities are considering further studies and additional data collection to ensure that a secure process for registration is established which has the confidence of the international community. The CITES Authorities are seeking international involvement in the field studies and data analysis. It is likely that it may take at least 2 years to prepare and implement the registration of artificial propagation sites in line with a series of criteria – a "propagation checklist" derived from the CITES definition of artificial propagation. No exports will be allowed from sites which are not subject to prior scientific inspection.

25. Following this workshop a discussion was also held on the hosting of a European Regional Meeting of the CITES Plants Committee in Georgia in 2011, at the new Herbarium building in the Tbilisi Botanical Garden and Institute of Botany. Since that time the Minister of Environment Protection and Natural Resources has written to the Chair of the Plants Committee and the CITES Secretariat offering to host the meeting in September 2011. The proposed date for this meeting is the week of 19th September 2011.

Recommendations to the Plants Committee

26. To assist Georgia to continue to improve its implementation of CITES it requests that the Plants Committee:

    a) Take note of its progress on non-detriment findings for Galanthus;

    b) Provide feedback and comments on the results of the CITES project;

    c) Provide feedback and advice on Georgia's plans to allow limited exports of artificially propagated bulbs, the proposed timetable and possible assistance available from Plants Committee experts;

    d) Consider providing guidance to Parties on the application of the definition of artificial propagation to Geophytes; and

    e) Support the CITES European Regional Meeting in September 2011, in particular that Parties encourage and support the attendance of experts on the management, sustainable use, cultivation and trade of geophytes.