**The Harvest and Export of *Galanthus woronowii* in Georgia, including the Development of Cultivation and the use of CITES Source Code Y – Assisted Production**

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**Background**

Georgia, as an independent State, has been exporting wild collected *Galanthus woronowii* bulbs since 1997. Exports commenced at 10 million and rose to 18 million in in 2004. Exports declined to 15 million in 2007. The export quota for wild specimens has remained at 15 million bulbs to this day (CITES Trade Database downloaded 18/11/23).

In 2004, the CITES Plants Committee expressed concern at the high level of exports of bulbs from Georgia, in particular Galanthus. *Galanthus woronowii* was included in the Review of Significant Trade in Specimens of Appendix II species at the [14th Meeting of the CITES Plants Committee, Windhoek (Namibia), 16-20th February 2004](https://cites.org/sites/default/files/eng/com/pc/14/E-Minutes-PC14-Annex3.pdf). This led to the establishment of CITES Project S302 which was carried out in 2008 – 2009. The project partners were Tbilisi Central Botanical Garden and Institute of Botany, Georgia, Batumi Botanical Garden, Georgia, the Royal Botanic Gardens, Kew, UK and Microsoft Research, Cambridge UK.

Following the first project workshop in September 2008, David Kikodze of the Georgian Scientific Authority, the project team leader, submitted a [case study](http://www.conabio.gob.mx/institucion/cooperacion_internacional/TallerNDF/Links-Documentos/WG4%20CS2.pdf) on the then situation in Georgia to the first International Workshop on CITES Non-Detriment Findings, Cancun, Mexico in November 2008. The considerations in the Geophyte sessions of this workshop and the resultant Guidance greatly facilitated the implementation of Project S302 and gave the project team the confidence to develop an NDF process adapted to local conditions in Georgia.

Project S302 formally delivered its report in 2009 “[Trade in Georgian Snowdrops – A Roadmap to Sustainability.](https://www.researchgate.net/publication/255564109_Trade_in_Georgian_Snowdrops_-_A_Roadmap_to_Sustainability) Report of CITES Project No S302 Improving Implementation of CITES *for Galanthus woronowii* and *Cyclamen coum* from Georgia (Kikodze, D. *et alia*, 2009)”. This formed the core to the later paper in Oryx [“Assessing non-detrimental trade for a CITES Appendix II-listed plant species: the status of wild and cultivated *Galanthus woronowii* in Georgia (Mc Gough, H. N. *et alia*, 2014).”](https://www.cambridge.org/core/journals/oryx/article/assessing-nondetrimental-trade-for-a-cites-appendix-iilisted-plant-species-the-status-of-wild-and-cultivated-galanthus-woronowii-in-georgia/20184EDE686D1C9389C3D56ECD01DE77) The CITES Standing Committee approved the recommendations of Project S302 at its [59th Meeting](https://cites.org/sites/default/files/eng/com/sc/59/E59-SumRec.pdf) in March 2010 and Georgia/*Galanthus woronowii* was removed from the Review of Significant Trade.

**The First Population Survey Results – *Galanthus woronowii* wild and cultivated**

Project S302 surveyed 41 wild populations of *Galanthus woronowii* (area of occupancy some 447 hectares then estimated to be 70% of total) and calculated to have 163 million harvestable bulbs (estimated 233 million in known total area). 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 was estimated at that time to be 196 hectares with a harvestable stock of 65 million bulbs.

Overall the 2008-9 field surveys and modelling of population data by Dr Matthew Smith of Microsoft Research led to a precautionary estimate that there was a total standing stock of some 300 million bulbs wild and cultivated in some 820 hectares. No stocks were identified which fulfilled the CITES definition of artificial propagation but it was thought that some sites with amended management might produce 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.

**Allocation of the Annual Quota for Wild *Galanthus woronowii* in Georgia**

The 1990’s and early 2000’s were turbulent times in Georgia. The CITES Authorities were under resourced and under significant pressure to grant CITES permits. To streamline the permit allocation process the government decided to auction access to the annual export quota for a period of ten years in 2008. An annual quota would be independently set on a scientific basis by the national CITES Scientific Authority. Four legal entities were award 10 year licenses to harvest and export *Galanthus woronowii* subject to the quota. The licenses would be subject to certain conditions as laid down by the CITES Authorities. These conditions were based on the recommendations of CITES Project S302 as approved by the CITES Standing Committee.

The auctioned quota was divided as follows:

1. Individual entrepreneur Simon Tatoshvili – 28.3%
2. Florexim Ltd - 23.59%
3. Agroproducts Ltd 23.59%
4. Iasemin Company Ltd 24.52 %

Two of these companies later merged but retained their share of the quota.

No quota was established for artificially propagated bulbs as none fulfilled the CITES definition of artificial propagation as outlined in Resolution Conf. 11.11. at that time.

It is important to note that as a rule the wild populations occur on public lands and established cultivation sites occur on private land.

In 2018 the 10 year auctioned award period of the quota ran out. The Authorities reauctioned access to the quota beginning a new 5 year period from 2019 and 2020. Legislation, which comes into effect in 2025, will formally restrict all future licenses to 5 years.

The reauctioned quota was divided as follows:

1. Individual entrepreneur Simon Tatoshvili (expires 2024)
2. Iasemin Company Ltd (expires 2024)
3. Individual entrepreneur Mamuli Surmanidze (expires 2025)

**Continuing Field Surveys to Inform Decision Making on NDFs and Quota setting**

Field surveys of *Galanthus woronowii* populations of various depth and scope were carried out in the years, 2010, 2011, 2012, 2014, 2018, 2019, 2020 and 2023.

The majority of funding for the surveys up to 2018 came from GIZ and it would have been impossible to carry out this work without their support in the critical years after the 2009 Significant Trade Project. The decision of the Georgian Government to fund surveys in 2018, 2019 and the extensive 2023 survey was especially valuable and timely, taking up where GIZ left off. Future surveys have been planned for every 4 years – funded from the State budget. This means that the survey programme is no longer dependent on donor funding. The Georgian Government is to be highly commended for this vital support.

Some surveys were more limited than others, for example, the 2019 and 2020 surveys were two consecutive surveys of selected populations. The 2009, 2014, 2018 and 2023 surveys were more detailed with the 2023 survey being the most extensive.

Dr Matthew Smith who carried out the first population modelling while at Microsoft in 2009 later became a lead scientist there. He is now a Director and Co-Founder of the UK-based startup Hypernature and a Lead Data Scientist at Marks and Spencer. In 2023 he provided *pro-bono* analysis of thetrends in *Galanthus woronowii* wild populations based on the surveys of 2009, 2014, 2018 and 2023. His report is attached as Annex 3.

The 2023 survey of 58 wild harvest sites by the Scientific Authority had a total population of 1.3 billion export sized bulbs. This survey is very roughly estimated to be 25% of the total wild population, excluding Abkhazia. The survey of 53 cultivated surveyed in 2023 had populations totalling some 18 million bulbs which included just over 13 million bulbs of export size (Institute of Botany, (2023). Assessment of *Galanthus woronowii* resource in the wild populations and cultivation fields. 2023. Technical reports 1 and 2 prepared by Institute of Botany, Ilia State University for the Ministry of Environmental Protection and Agriculture of Georgia). There is no data available on the current total standing stock in all cultivated sites in Georgia. However, it is estimated by the Scientific Authority that at present the standing stock on cultivated sites is in the range of 50-70 million bulbs. There are many more cultivation sites than first surveyed in 2009, and the next major survey will concentrate on detailing these.

In 2015 a workshop on CITES Non-Detriment Findings Guidance for Perennial Plants, [A nine -step process](https://www.9steps-cites-ndf.org/) to support CITES Scientific Authorities making science based non-detriment findings (NDFs) for species listed in CITES Appendix II was held in Tbilisi by BfN and TRAFFIC. It schooled the CITES Authorities in making adequate science based NDFs for geophytes. Following this workshop the 9-Steps have been used to make NDFs for plants in Georgia and this is now a requirement in national legislation.

**From W to A to Y. The origins and development of Cultivation of *Galanthus woronowii***

There is no definitive information on the origins of cultivation of *Galanthus woronowii* in Georgia. It is thought that first cultivation occurred through underplanting in local cornfields and orchards and also took advantage of the overflow of natural populations into private land managed by small holders. Growers reported in a trader meeting held in Tbilisi in 2010 that the first formal cultivation started in Adjara in 1993 assisted by Turkish traders. It is thought that some bulbs were imported from Turkey at this time to help establish these cultivation fields.

CITES Project S302 2008-2009 field surveys found the total area of cultivation sites was estimated to be 196 hectares with a harvestable stock of 65 million bulbs. These surveys found that no cultivated stock fulfilled the CITES definition of artificial propagation (AP), although some sites with more formal management might soon qualify. The auction of the annual wild quota for 10 years in 2008 isolated many of the smallholders from exports as the 4 license holders held the monopoly on the Source W permits.

In March 2010, 14 cultivation sites were visited and sampled by Kew and Georgian team members (Despite CITES Project S302 being completed the team members agreed to continue to co-operate to support sustainable harvest of the resource). These privately owned sites included sites which had undergone long term management, including addition of fertilizer on a regular basis, and which yielded high crop levels. Many of the sites were producing plants which were close to AP. Identification of the exact line between wild populations and cultivated stock was difficult and often blurred, due to the long-term management of cultivation populations within the natural distribution area of the species. The 2010 survey identified large areas of such cultivation, which with more discrete management and monitoring could be considered to be AP.

During this period a number of the holders of the cultivation sites approached the CITES Management Authority with a request to explore a registration process which would allow registration of selected cultivation sites which fulfilled discrete criteria and hence that stock would be allowed to be exported as AP.

To explore these options a small workshop was convened in Tbilisi in September 2010 (the workshop where traders gave some background on first formal cultivation). The workshop explored the current levels and means of cultivation, the CITES definition of artificial propagation and how it might be applied to bulbs, the management of cultivation sites and the challenges associated with monitoring any AP material that might be produced in the future. Based on these surveys and workshop deliberations a process for registration of cultivation plots for AP was initiated in 2012. This included required changes in national legislation.

**Registration of Sites Producing Artificially Propagated Bulbs**

An applicant for registration who owned a cultivation plot, where *Galanthus woronowii* bulbs were cultivated for more than 5 years was eligible to obtain a permit for export of AP stock if certain conditions were fulfilled.

Conditions – applicant must supply:

1. Written statement containing: Amount of bulbs to be harvested annually, estimated number of bulbs on the plot, plot management activities, data on first planting of bulbs, source of mother stock, date & source of last planting/restocking
2. Extract from Public Registry
3. Positive Opinion from National Environment Agency (NEA - Agency of the CITES MA Ministry). They will inspect and sample plot density and report on same to CITES Authorities confirming there will be sufficient parental stock to maintain production. Following harvesting NEA will confirm harvest has been completed to agreed condition.

Before issuing the first permits for AP in 2012, 25 plots were surveyed by 3 Georgian botanists in 5 villages to assess their status. Exports of the first AP bulbs followed and continued until 2019. However the registration system proved resource intensive and a burden on the authorities, growers and smallholders. An alternative simpler mechanism was required to cater for the large number of bulbs held in cultivation fields by smallholders which had some level of management. These were sites producing bulbs which did not have access to export under the wild quota – Source W and did not quality for CITES Source code A – Artificially Propagated. There was a need for some middle way.

At the same time in discussions at CITES meetings, formal and informal, Georgia found that a number of CITES Parties considered that the definition of artificial propagation included in Res. Conf. 11.11 was dated and did not reflect the reality of the situation in many range States. Specifically, it catered for the more industrial style horticultural production frequent in highly developed countries and did not acknowledge, encompass, or promote the small-scale cultivation frequently carried out by smallholders in less developed areas. As a result of these concerns, a number of like-minded countries put forward a [document](https://cites.org/sites/default/files/eng/cop/17/WorkingDocs/E-CoP17-43.pdf) for discussion at the 17th Meeting of the CITES Conference of the Parties. This led to the adoption of revised [Resolution Conf. 11.11 (Rev. CoP18)](https://cites.org/sites/default/files/documents/COP/19/resolution/E-Res-11-11-R18.pdf) and the introduction of the new Source Code Y – assisted production - currently in use by CITES Parties.

The 2018 9-Step NDF analysis for wild exports highlighted the weaknesses in the system for wild bulbs in that it lacked an effective harvest monitoring and management process. Elements of such a process were in place but the traders were not supplying sufficient validated data which had been subject to a ground truthing process. In simple terms, it was not clear where the totality of bulbs that supply the export quota were sourced from.

The wild population surveys (Kikdoze, D. 2018a. Study of existing stock of *Galanthus woronowii* in wild sites and cultivated plots. Report to Ministry of Environment Protection and Agriculture, Tbilisi, Georgia) and (Kikodze, D. 2018b. Summary of Surveys of Wild Populations 2009 -2018. Excel Summary work sheet) supply indirect data – in that it was clear that some sites that were approved for harvest as part of the export quota were not harvested in that year and the bulbs must have come from elsewhere. Information obtained during the wild surveys and the surveys of cultivated sites (Rutherford, C. and Wilford, R. 2018. Supporting the Georgian CITES Scientific Authority in stock assessment of *Galanthus woronowii.* Report to GIZ.) suggested that the source of these bulbs was likely to be from registered and unregistered cultivation sites and some other privately held lands.

Simply put it was sometimes easier, and cheaper, to access and process bulbs from cultivation sites than from the wild. This process resulted in a partly unregulated harvest and a limited NDF in CITES terms. This does not, in effect, have a negative impact on wild populations but it was a source of concern that there was some unregulated harvest from cultivation fields. As a result, a precautionary quota of 15 million wild exports was maintained and Georgia moved to implement source code Y.

A further intensive survey of wild and cultivated sites was planned to assess the extent and status of the bulb populations in detail. Due to the impact of Covid and limited resources this was not possible until 2023 when substantial funding became available from the Georgian Government.

In preparation for the implementation of source code Y, the CITES Authorities developed legislation to implement formal Y registration system. Unfortunately, adoption was delayed since it is part of larger nature conservation legislation package and required longer public consultations. It is expected that the law will be adopted in 2024.

Georgia exported its first Y source code bulbs from cultivation fields in 2020, some 4 million, followed by 12 million in 2021 and 8 million in 2022. Formal 9-Step NDFs were carried out on wild populations (Annex 1) and Source Code Y populations (Annex 2) in 2023.

**Management of Source Code Y Cultivation Sites since 2020**

The current management of Y sites has evolved from that used for the previous registered CITES Source Code A sites which proved burdensome. The formal registration no longer applies but the monitoring system has evolved to cover Y. This will evolve further in the coming years. The Authorities are trying to balance adequate control with the level of risk to wild populations which is low based on the 2023 surveys. The aim is to develop an adequate system where all the stakeholders have full confidence in the process.

The 9-Step NDF process is a tool which brings together the data to assess level of risk in a standardised fashion and allows the assessment to be recorded, repeated, and compared in future assessments. This is a management legacy to be passed on to future managers of the resource. The 9-Steps has been used to make an NDF for Source Y based on the 2023 cultivation survey data and associated quota setting for total harvest and exports (Annex 2).

**Current Management Process**

The National Environment Agency (NEA) inspect the relevant cultivation site. The CITES Management Authority (MA) issue a first CITES export permit based on the first inspection report of the NEA – if positive. A second inspection report of NEA is produced after harvest of the bulbs for export. The MA issue an export permit the following year based on this second NEA report on the harvest site. The next NEA inspection and report happens after harvest in second year, which is the basis to issue an CITES export permit for third year.

Based on the current legislation, it is not allowed to issue a CITES export permit, if monitoring report for the previous year was not submitted for that site. An issue with current legislation is that it's not possible to restrict an export to a set percentage of the stock. Therefore, traders may apply to export the total commercial sized bulb stock. In in that case the MA does not allow export from that site for 3 years, allowing stock to recover. In the legislation planned to be adopted in 2024, it is recommended that a maximum of 30% of commercial size bulbs be harvested for one export.

A November 2023 interview with the major trader in Source Code Y bulbs and who co-ordinates their collection from a range of sites, outlined the management procedures in place up to 2023 for the cultivation fields for stocking/restocking. They follow much of that agreed for the original AP registration process. In effect, the core elements have been maintained and the National Environment Agency (NEA - A Legal Agency of Public Law) are now familiar with the process.

“*When I decide to establish or fully restock snowdrop bulbs on a cultivated site, I submit a request with site details (cadastral code (property registration code used in Georgia), statement from Agency of Public Registry) to the municipal governments to undertake the bulbs application control. The local government representatives come to the site and attend the bulb application procedure, after they issue a statement on this. After 5 years (5 years from when bulbs planted), I submit a request to the National Environment Agency (NEA) to inspect the site and assess the standing stock of bulbs, I officially pay NEA for this service. NEA experts inspect the site, assess the stock, and produce the report for the Ministry. I submit another request to NEA later requesting them to attend the bulb harvest at the site and NEA experts then come and attend the bulb harvest including the counting of harvested bulbs. They produce a second report, and both reports are submitted to the MEPA (Ministry of Environmental Protection and Agriculture - the CITES MA) for them to approve and issue the export permit.* “

Table 1 outlines the current and future management controls on harvest of wild populations and the future management controls on harvest of populations of Source Code Y cultivation sites. Annex 1 and 2 = NDFs for Source W and Y populations using the 9-Step NDF process. Annex 3 is the Trend Analysis and Annex 4 a simple presentation.

**Discussion and Conclusions**

No formal guidance has been produced by CITES for Parties on the use of source code Y. However, UNEP-WCMC has produced the document “[CITES. 2021. Preliminary guidance on terms related to the artificial propagation of CITES regulated plants. UNEP-WCMC, Cambridge.](https://cites.org/sites/default/files/eng/prog/captive_breeding/Art_Prop_Guidance_Feb2022.pdf) This guidance will be further developed for use by the Parties. In relation to Source Code Y it states:

“*In effect, the situation in relation to the application of source codes W and Y is a gradient or cline, and it is more challenging to define the boundaries between these two codes compared with source codes A and W. In effect, the source code Y was adopted by Parties to allow them to assess situations that fall within this cline and apply the new source code as they determine to be appropriate. Further examples of the suitability ‘assisted production’ and source code Y are likely to be available in a few years’ time when Parties have implemented its application more widely*. “

The situation in Georgia relating to *Galanthus woronowii* is a good example of that gradient or cline. There are clear wild populations, populations that were registered for source Code A and a wide range of populations which exist on the cline – many of which occur on private land held by smallholders. Source Code Y gives greater access to the material from those cultivation fields to enter trade. It also allows a single source code to be applied to a range of material on that cline if an adequate NDF has been carried out. This makes life much simpler for all involved in the cultivation and management of the resource. This is especially true in the case of Georgia where the wild quota has been auctioned to a limited number of traders. In addition, *Galanthus woronowii* has proven to be a species which grows well in cultivation and the more flexible conditions relating to Source Code Y in comparison to Source Code A is well fitted to Georgian conditions.

Table 1 includes the future conditions for W and Y, with a stabilizing export quota planned for Y and a formal registration system to be out in place for Y as soon as enabling legislation clears national parliament. The Y exports and management will be monitored to assess how well the new system works and to assess if the registration process conditions require adjustment.

To date Source Code Y has proved to be a useful addition to the CITES Source Codes and Georgia looks forward to learning further from its application to Galanthus. Flexibility is key to supporting adequate implementation of the Convention across the cline of diversity found in CITES Parties

**Table 1: Management of Wild Harvest Sites 2023 and Source Y Harvest Sites 2024**

|  |  |  |
| --- | --- | --- |
| **WILD 2023 & ongoing**  **Harvest Management recommended by SA** | **WILD 2023 & ongoing**  **Implementation by MA**  **License Conditions for Companies holding Wild Quota** | **CULIVATED SOURCE Y Management recommended by SA from 2024**  **Registration for Source Y** |
| Based on data from the Scientific Authorities (SA) extensive field surveys the SA identifies areas where collection is allowed. | Note: Quota for wild exports is divided among 3 traders which bought the rights to the wild quota for 5 years.  Note: Department of Environmental Supervision (DES) is the relevant body to receive reports from the license holders. It is a Ministry subunit and operates on a state budget. Its mandate is to ensure traders/license holders do not break public law.  The National Environmental Agency is legal agency of public law. It can carry out services for the public for fees. On this basis the traders/growers can apply for services – such as inspections and pay for them. | **Registration Application:** Extract from NAPR incl. site map, the length of ownership, site photographs, cadastral code.  Basic details of management Estimated number of harvestable bulbs.  Original source of bulbs & available information on NDF of same and legality.  Date of last harvest and amount harvested.  Has the site been surveyed by the CITES Scientific Authority if so, give dates.  Has the site been inspected by the DES or NEA, if so, give dates and name of inspector. |
| The harvest is only allowed from designated sites; each trader is provided with a list of all designated sites including indicative locations, allowable harvest per site, approximate site areas and shapefiles/geographical coordinates. | License holder must submit x y coordinates and shp-files in UTM coordinate system of the territories subject to snowdrop harvest to the Ministry of Environmental Protection and Agriculture (CITES MA Ministry) and its subunit – DES annual basis prior to the commencing of bulb harvest. In addition, the license holder shall also submit the signed site layout/situation plan of the sites where the bulb harvest is planned from in the current year, and information on the bulb standing stock and approximate schedule of resource extraction (bulb harvest) by specific sites. | **Registered Site Harvest:** Name of site, cadastral code, NAPR map.  Basic details of current management.  Est. number of harvestable bulbs on site.  Date of last harvest and amount harvested.  Has any restocking occurred – give details.  Amount bulbs to be harvested.  Proposed harvest dates.  Has an appointment been made for an inspection by DES/NEA at time of harvest, if so, give details and name of inspector. |
| Each year the “traders” must submit details of which areas they intend to collect from and the amount they plan to collect. | The license holder shall also submit the signed site layout/situation plan of the sites where the bulb harvest is planned from in the current year, and information on the bulb standing stock and approximate schedule of resource extraction (bulb harvest) by specific sites. In case the bulb harvest schedule is changed the information on the updated schedule shall be submitted via email to the MEPA & DES. | No application processed unless an appointment made for inspection at time of harvest. Cultivation sites allocation of quota will be managed as follows:  1. Harvest will be allowed of 30% of commercial sized bulbs for 3 years in a row.  2. No harvest will be allowed for 3-5 years following Year 3 harvest depending on field assessment. |
| NDF carried out and quota set by SA & divided across license holders =15 million/year. | NDF carried out and quota set by SA and divided across license holders =15 million/year. | NDF carried out and quota set by SA for 2024 = 4 million. |
| Permits granted on this basis. | Exports permits granted on this basis. | Exports permits granted on this basis. |
| Following harvest, the traders should submit details of the harvest including photographs to the Management Authority. | When harvest & export completed, license holder shall submit a report to MEPA annually by 1 Oct. The report should contain: 1) method of bulb harvest, 2) storage method of bulbs, 3) bulb sorting/calibration, 4) bulb drying, 5) bulb transportation, 6) numbers of personnel & involvement of locals, 7) inf. on territories where the bulbs were harvested 8) harvest date, 9) actual numbers of harvested bulbs of commercial and non-commercial. 10)Photos incl. showing bulb harvest. | Once approval has been obtained from MA and harvest has been completed the registered site grower shall submit a harvest report, with details of bulbs harvested – their number, undersized bulbs rejected, including photographs of the process. |
| SA recommend additional controls from 2024. See column 2. | **Additional License Conditions recommended by SA from 2024:**  1. The traders/exporter should notify the MEPA via hotline, email or letter on the exact dates and locations of harvest sites at least 10 days prior to bulb uptake to agree the dates of site visit and inspection.  2. If the trader sources bulbs from 1 to 20 sites, at least 2 randomly selected sites should be inspected, and results presented in a formal signed report with photos. if number of sites exceed 20 - at least 4 sites should be subject to inspection. The harvest inspection should be carried out by NEA or DES.  2. At least 20% of smaller sized bulbs left after calibration should be returned to at least 50% of wild sites the bulbs were harvested from. The details of all such sites together with planned dates for transplanting should be submitted to the CITES MA for prior approval by SA. The remaining bulbs may be used for re-stocking the cultivation sites. | **Registration Site Restocking:** Name of site, cadastral code, NAPR map.  Basic details of current management.  Estimated number of harvestable bulbs  Date of last harvest and amount harvested.  Number of bulbs to be restocked.  Source of restocked bulbs –only allowed from sites where a recent NDF had been carried out on the stock, including the bulbs intended for restocking the registered site. Supporting Documentation supplied with the application.  Proposed restocking date. Has an appointment been made for DES/NEA inspection at time of restocking, give details and name of inspector. |