



NOTIFICACIÓN A LAS PARTES

No. 2023/022

Ginebra, 2 de marzo de 2023

ASUNTO:

Inicio del examen del sistema de seguimiento y gestión del comercio significativo

1. De conformidad con la Decisión 17.108 (Rev. CoP18), la Secretaría ha puesto en marcha <u>el</u> <u>Examen del Sistema de Seguimiento y Gestión del Comercio Significativo</u> (Sistema de Gestión del ECS).

Introducción del sistema de gestión del ECS

- 2. El proceso de Examen del Comercio Significativo (ECS) es un proceso de observancia destinado a garantizar que el comercio de especies incluidas en el Apéndice II se realiza de forma sostenible y de conformidad con el Artículo IV de la Convención, y a identificar los casos en que se requieren medidas correctivas.
- 3. El sistema de gestión del ECS realiza un seguimiento del progreso de las combinaciones especie/país que han sido seleccionadas para ser examinadas, a través de las 4 etapas del proceso del ECS tal y como se describe en la Resolución Conf. 12.8 (Rev. CoP18) sobre *Examen del comercio significativo de especímenes de especies del Apéndice II.* El sistema aporta mayor transparencia al proceso y permite a las Partes sujetas a examen en el marco del ECS, así como a otros usuarios interesados, hacer un seguimiento de la situación de las recomendaciones.
- 4. El sistema de gestión del ECS incluye las combinaciones de especies y países que actualmente son objeto de examen, incluidas las que son objeto de una recomendación de suspender el comercio en el marco del ECS. También se incluyen los casos que se han eliminado del examen, tras recibir informes satisfactorios del Estado del área de distribución, desde la 76ª reunión del Comité Permanente (SC76, Ciudad de Panamá, noviembre de 2022). Sujeto a financiación adicional, la Secretaría espera seguir desarrollando la base de datos para incluir casos históricos de ECS.
- 5. Actualmente, el sistema de gestión de ECS solo está disponible en inglés. La Secretaría espera recibir financiación adicional para proporcionar versiones en francés y español del Sistema de Gestión de ECS a su debido tiempo.

Características principales

6. El Sistema de gestión de ECS incluye un resumen de los detalles y la situación de todos los casos de ECS en curso, las recomendaciones del Comité de Fauna o de Flora o del Comité Permanente dirigidas a la Parte interesada y la correspondencia entre esa Parte y la Secretaría.

7. Las Partes con combinaciones de especies/países examinadas en el ECS tendrán acceso al sistema para seguir la situación de sus casos en el proceso del ECS, recibir alertas sobre medidas pendientes y comunicarse confidencialmente con la Secretaría sobre los avances en la aplicación de las recomendaciones pertinentes. Las Partes no sujetas al proceso del ECS, los observadores y otras personas interesadas pueden acceder a la página pública del sistema de gestión del ECS para ver la información pública disponible sobre las combinaciones especie/país en curso en el ECS.

Acceso de las Partes

8. Para obtener acceso al sistema de gestión del ECS, la Secretaría se pondrá en contacto individualmente con las Partes o los Estados del área de distribución que tengan combinaciones de especies y países actualmente incluidas en el ECS.

Proyecto de guía del usuario y comentarios

9. Se ha elaborado un proyecto de manual del usuario para el Sistema de gestión de ECS como ayuda para comprender la base de datos y la información que contiene, que figura en el anexo de la presente notificación. Se invita a las Partes a enviar a la Secretaría sus comentarios sobre la base de datos y el proyecto de manual del usuario antes del 30 de abril de 2023. Por favor, envíe sus comentarios a la Sra. Dejana Radisavljevic (radisavljevicd@un.org).



CITES REVIEW OF SIGNIFICANT TRADE MANAGEMENT SYSTEM - GENERAL USER MANUAL

V1.1

Date: [XXX]

Draft

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1. INTRODUCTION

This User Manual is designed as an aid to understanding the CITES Review of Significant Trade Management System and the information it contains.

The CITES Review of Significant Trade (RST) process is a CITES compliance process intended to ensure that trade in Appendix-II species is conducted sustainably and in accordance with Article IV of the Convention, and to identify where remedial action is needed (Res. Conf. 12.8 (Rev. CoP18)). A summary of the RST process as outlined in Res. Conf. 12.8 (Rev CoP18) is provided in Annex 1 to this guidance.

Decision 17.108 (Rev. CoP18) requested the Secretariat to develop, test and establish a Review of Significant Trade Tracking and Management database as an essential tool for the effective implementation and transparency of the process. The Review of Significant Trade Management System was developed by the United Nations International Computing Centre (UNICC) and can be accessed from: <u>rst.cites.org/public</u>. During development, the Secretariat also convened and consulted a Technical Advisory Group (comprising Parties that have been subject to the Review of Significant Trade, individuals with experience in database development and use, as well as representatives of interested non-governmental organizations) on the requirements of the tracking and management system. Initial data on case information was input into the database by UNEP-WCMC, and the case information is maintained by the CITES Secretariat.

The Review of Significant Trade Management System tracks the progress of species-country combinations for the Parties that have been selected for review, through the stages of the Significant Trade Review process. The database contains all cases that were ongoing at the time of the 74th meeting of the Standing Committee (SC74, Lyon, March 2022), including cases where a Standing Committee recommendation to suspend trade on the basis of the RST was in place, and any cases which subsequently entered the RST process. It does not comprehensively include the historical RST cases that were closed before SC74.

For each case, the database includes the following information which is publicly accessible: a summary of the case details and status, any recommendations of the relevant CITES Committee (Animals Committee, Plants Committee and Standing Committee) directed to the Party, a record of meetings, an activity log of all actions relating to the case, and a document repository, containing all AC/PC/SC documents. The system thus allows progress on a case to be tracked through the different stages of the RST process.

In addition, the system also provides a portal for Parties that are subject to the RST process to communicate with the CITES Secretariat on progress in the implementation of recommendations directed to them; these functionalities are confidential and only accessible via a login. Any Party that is subject to the RST process will need login details to access the confidential pages. A separate guidance document for Parties with cases in the RST process is available.

Note that the user view may differ from the screenshots in this guidance due to differences in screen size.

2. NAVIGATION

On the landing page, you have the option to Search for specific cases on a number of criteria, view the list of all ongoing cases (including cases which are subject to a Standing Committee recommendation to suspend trade), or log in to access the confidential features of the management system (Parties with cases in the RST process only, see separate guidance) (Figure 1).

	Search the da specific case criteria below	atabase for a e using the v				Log in to access confider features of the managem	tial ent
CIES	Review of Significant Trade Management System	Search Revi		View the list of all ongoing cases		system (Parties only)	e Login
	Search Filter by spec	Advanced Searc	h		•		
	Filter by phas		•	Filter by stage	•		
61.	Current Actio	n					
		Reset		Apply			

Figure 1. Overview of the landing page for the Review of Significant Trade Management System

2.1. Search for cases

You will see by default the <u>basic search</u> that contains some of the fields by which you can refine your search: • Species /Common name • Phase (paragraph in the	Search Advanced Search
 Resolution) Country Stage Current Action (In progress/ completed) Case Status (closed/ initiated/ ongoing/retained/trade suspension) Deadline (missed/met) Specific time frame (from a specified date to another) 	Filter by Species common Name Filter by phase Filter by country Filter by stage Current Action In Progress Commileted Reset Apply
An <u>advanced search</u> allows to filter by:	Search Advanced Search
 Kingdom Meeting at which a case was selected for inclusion in the RST process Higher Taxonomy Categorisation (Least Concern/Possible Concern /Urgent Concern/Priority Species for cases selected 	Filter by kingdom Filter by meetings Taxonomy Filter by phylum Filter by class Filter by order Filter by family Filter by order Filter by family Categorization Less Concern Action is Needed Exceptional Case
prior to CoP17, or Less Concern /Action is Needed /Status is Unknown /Exceptional Case for cases selected at CoP17 or later)	Reset Apply
• Committee which selected the taxon for inclusion (AC/PC/SC)	
 Removal reason if closed case Decision Type (suspended /restricted/allowed /conditional depending on whether any trade permitted) Terms of trade (all/commercial/wild /exceptions if the Decision type allows any trade) 	

To obtain a list of cases for a country:

Select the country from the 'Filter by country' drop-down (Figure 2.1a), then click 'Apply'. Remember to select the desired case status(es) from the Case status field if you want to see Closed, Retained or Initiated cases as well, as the list is automatically filtered to return cases with the status "Ongoing" and "Trade suspension" only (Figure 2.1a). Note that if you reset the filters, you may need to refresh the page for the case list to return to its default view.

		Search	Advanced Search				•
	a)	Filter by Species commo	on Name			· ·	
		Filter by phase				•	
		GHANA 😵 Filter by	y country	Filter by	stage	•	
		Current Action	npleted			_	
		Case Status	Ongoing	etained 🗸	Trade Suspension	•	÷
		4					
		Reset			Apply		
b)	Country	Reset Species scientific name	Common Name	Meeting	Apply Recommendations	Status	More
b)	Country GHANA		Common Name Slender Chameleon	Meeting AC25		Status Trade Suspension	More :
b)		Species scientific name			Recommendations		
b)	GHANA	Species scientific name Chamaeleo gracilis	Slender Chameleon	AC25	Recommendations	Trade Suspension	:
b)	GHANA	Species scientific name Chamaeleo gracilis Chamaeleo senegalensis	Slender Chameleon Senegal Chameleon	AC25 AC25	Recommendations	Trade Suspension	* * *
b)	GHANA GHANA GHANA	Species scientific name Chamaeleo gracilis Chamaeleo senegalensis Pandinus imperator	Slender Chameleon Senegal Chameleon Emperor Scorpion	AC25 AC25	Recommendations	Trade Suspension Trade Suspension Trade Suspension	•

Figure 2.1. Example filter parameters (a) and filtered case list (b) (search parameters: cases from Ghana with status 'Ongoing' and 'Trade suspension')

2.2. Review list/search results

The Review list option or, if having performed a search, the search results, provide each taxon/country combination as a separate record, displaying the country, species scientific and common name, the meeting at which the taxon/country combination was selected, a link to the recommendations for the case (if any), the case status, the stage in the RST process in which the case currently is, the date of trade suspension (if relevant), the deadline for the latest action needed to progress the case in the RST process, and a 'More' option which allows to open or download details of the case (Figure 2.2).

Below the table, you can see the total number of cases corresponding to your search and navigate between pages.

Back									
Country	Species scientific name	Common Name	Meeting	Recommendations	Status	Stage	Date of trade suspension	Deadline	Mor
ALGERIA	Anguilla anguilla	Eel	AC29	=	Ongoing	Stage 4		13-Nov-2022	:
BELIZE	Myrmecophila tibicinis		PC15	=	Trade Suspension	Stage 4	15-Jun-2010	10-Apr-2022	:
BENIN	Chamaeleo gracilis	Slender Chameleon	AC25	=	Trade Suspension	Stage 4	03-Feb-2016	10-Apr-2022	:
BENIN	Kinixys homeana	Home's Hinged-backed Tortoise	AC25	=	Trade Suspension	Stage 4	03-Feb-2016	10-Apr-2022	:
BENIN	Pandinus imperator	Emperor Scorpion	AC24	=	Trade Suspension	Stage 4	02-May-2013	31-Dec-2099	:
BENIN	Chamaeleo senegalensis	Senegal Chameleon	AC25	=	Trade Suspension	Stage 4	03-Feb-2016	10-Apr-2022	:
BENIN	Pterocarpus erinaceus	Kosso		=	Ongoing	Stage 4		31-Dec-2099	:
BURKINA FASO	Pterocarpus erinaceus	Kosso		=	Ongoing	Stage 4		31-Dec-2099	:
CAMEROON	Trioceros montium	Mountain Chameleon	AC27	🔳 Details of	a case can be	opened	by clicking either	of these icc	ons
CAMEROON	Prunus africana	African Cherry	PC21		Ongoing	Stage 4		10-Apr-2022	:
			· s	elect number o	f items	Iter	ns per page: 20 🔹 👔	- 20 of 85 🛛 <	()

Figure 2.2. Overview of the cases list: how to navigate in the table and access details of a case

Important: The case list is automatically filtered to show only cases with the status "Trade Suspension" and "Ongoing". The search tool can be used to show additional cases which have been Closed, Retained, or Initiated.

3. CASE RECORD

From the main page, you can open any record by clicking on its Recommendations icon or 'Open detail' under 'More' (see Figure 2.2).

Once a case is opened, at the top is a summary of the case details, split into two boxes: a case overview, and the latest action for the case (these may appear side by side or one below the other depending on your screen size). Below this summary are four tabs detailing:

- the recommendations of the relevant CITES Committee directed to the country,
- records of meetings
- activity log of all actions relating to the case,
- and a **document** repository, containing all AC/PC/SC documents relevant to the case, and letters between the CITES Secretariat and the Party

3.1. Case summary

At the top are two boxes providing a summary of the key information for the case. Here we use the example of *Pericopsis elata* from Côte d'Ivoire to visualise the possible options for each field (Figure 3.1a and b).

Current		Current stage
	ariat notifies all parties of recommendations or taken by SC	Res. Conf. 12.8 (Rev. CoP18) - Stage 4 - n)
Action	required by	Deadline
Secreta	ariat	10-Apr-2022
Status		Completed on
Comple	sted	12-Apr-2022
b)	Categorisation ——— Concern, Priority Sp	ast Concern, Possible Concern, Urgent pecies, Less Concern, Action is Needed, , Exceptional Case, Other, N/A
b)	Categorisation ——— Concern, Priority Sp Status is Unknown	pecies, Less Concern, Action is Needed, , Exceptional Case, Other, N/A Current stage
b)	Categorisation Concern, Priority Sp Urgent Concern Current action Secretariat notifies all parties of recommend	pecies, Less Concern, Action is Needed, , Exceptional Case, Other, N/A Current stage dations or
b)	Categorisation Concern, Priority Sp Urgent Concern Current action Secretariat notifies all parties of recommend actions taken by SC	pecies, Less Concern, Action is Needed, , Exceptional Case, Other, N/A Current stage dations or Res. Conf. 12.8 (Rev. CoP18) - Stage 4
b)	Categorisation Concern, Priority Sp Status is Unknown, Current action Secretariat notifies all parties of recommend actions taken by SC Action required by	pecies, Less Concern, Action is Needed, , Exceptional Case, Other, N/A Current stage dations or Res. Conf. 12.8 (Rev. CoP18) - Stage 4 Deadline

Figure 3.1. Case overview (a) and summary of latest action (b) (example case: *Pericopsis elata* from Côte d'Ivoire)

In this example for *P. elata* from Côte d'Ivoire (Figure 3.1), the current **Status** of the case in box a) is "Trade Suspension". However, other options for the status could include: "initiated", "retained", "closed" or "ongoing". The **Trade Suspension** field lists the date at which the suspension started, if relevant. Accordingly, for *P. elata*, the **Decision type** is "suspended", but other alternatives could be "restricted", "allowed" or "conditional" depending on whether any trade might be permitted. If trade is allowed, then the **Terms of trade** may be specified. Here there are none, given the suspension, but other possible options are: "all", "wild", "commercial", and "exceptions".

The categorisation and the latest action for the case is summarised in the second box (b) (Figure 3.1b). The **Categorisation** details the conclusion by the Animals or Plants Committee on whether the case needs to progress from the initial stage, and may be "Least Concern", "Possible Concern", "Urgent Concern", "Priority Species" for cases selected prior

to CoP17, or "Less Concern", "Action is Needed", "Status is Unknown", "Exceptional Case" for cases selected at CoP17 or later. The box further provides:

- **Current action:** the most recent (completed or pending) action in the activity log (in the case of *P. elata,* the Secretariat notifies the Parties of the SC recommendation to suspend trade).
- **Current stage:** this reflects the corresponding stage and paragraph of the RST process for the action, including the relevant revision of Res. Conf. 12.8.
- Action required by: this provides the user group that needs to complete the current action: either the Secretariat, Animals/Plants/Standing Committee or a Party (in this case, the Secretariat).
- **Deadline:** The deadline set for completion of the current action; note that where a deadline was not specified at the relevant Animals/Plants/Standing Committee, a deadline of the 31st December 2099 has been set as an arbitrary date in the RST tracking system.
- The **Status** indicates whether the action is complete, and the **Completed on** specifies the date.

3.2. Recommendations tab

Case recommendations are entered by the Secretariat and can be viewed in the 'Recommendations' tab in the case detail. Recommendations are listed chronologically, with those formulated by the AC/PC appearing first, followed by any recommendations transmitted to Parties by the Standing Committee. For example, the recommendations directed to Côte d'Ivoire for *Pericopsis elata* are provided in Figure 3.2 below.

#	Туре	Deadline	Action	Justification	Status	Attachment	Quo
204	Short Term	08-Sep-2011	The Management Authority should set a zero quota and inform the CITES Secretariat so that it can be included in the national export quotas on the CITES website. Before trade resumes the Management Authority should clarify with the Secretariat how it determines that the level of trade is not detrimental to wild populations.		Not Implemented	Û	0
685	Long Term	31-Dec-2099	The Standing Committee, at its 62nd meeting, recommended that all Parties suspend trade in specimens of P. elata from CI until that country demonstrates compliance with Article IV, paragraphs 2 (a) and 3, for this species, and provides full information to the Secretariat regarding compliance with recommendation of the Plants Committee.	Recommendation to suspend trade maintained at SC66, SC70 and SC74	Implemented	Q	



The following information is summarised in the recommendations tab:

- **Type:** The category of the recommendation, as specified in the document which set the recommendations: Short term (e.g. 6 months), Long term (e.g. 2 years), or Final.
- **Deadline**: The deadline for the implementation of the recommendation, as indicated in the relevant AC/PC document¹. For recommendations for which there is no specified deadline, such as trade suspensions, a deadline of 31 December 2099 has been added to the system.
- **Justification:** Any additional information or context. For example, to note that a recommendation was determined to be no longer relevant by the Standing Committee, or

¹ The Standing Committee may agree to change the deadline of recommendations; any changes to a recommendation deadline will be noted as a separate recommendation by the Standing Committee, rather than the original deadline being edited.

if the recommendation to suspend trade was maintained at subsequent Standing Committee meetings.

- Status: The progress against a recommendation, as determined by the Animals or Plants Committee. "Initial" is the default status of a recommendation. A recommendation may be marked as "amended" if the original recommendation was agreed to be altered at a subsequent meeting, for example, to change the deadline. Note that a recommendation will only be marked as "implemented", "partially implemented" or "not implemented" by the Secretariat at the outcome of an Animals or Plants Committee or Standing Committee meeting.
- Attachment: The meeting document which directed the original recommendation to the Party. Clicking on the paperclip symbol for an action will take you to the Document library, and the document relevant to the action will be highlighted with a grey box.
- **Quota:** Only included if the relevant AC/PC/SC recommendation specified a quota.

3.3. Record of meetings tab

This section contains all the Animals/Plants Committee, Standing Committee and Conference of the Parties documents for meetings occurring after the database was launched at the 19th meeting of the Conference of the Parties (CoP19, Panama, November 2022).

3.4. Case activity log

In this tab, users can see the history of the actions for each case, listed chronologically with the most recent action first (Figure 3.4).

ecommendations	Records of meetings	Activity log	Documents			
Name				Deadline	Completed on	Attachment
Secretariat notifies	all parties of recommendation	or actions taken by SC	C - Res. Conf. 12.8 (Rev. CoP18)	10-Apr-2022	12-Apr-2022	
SC reviews recomm	nendations to suspend trade ir	place for over 2 years	- Res. Conf. 12.8 (Rev. CoP18)	11-Mar-2022	11-Mar-2022	
Secretariat monitor	s progress - Res. Conf. 12.8 (F	Rev. CoP18)		07-Jan-2022	07-Jan-2022	
SC reviews recomm	nendations to suspend trade ir	place for over 2 years	- Res. Conf. 12.8 (Rev. CoP17)	05-Oct-2018	05-Oct-2018	
SC reviews recomm	nendations to suspend trade ir	place for over 2 years	- Res. Conf. 12.8 (Rev. CoP17)	05-Oct-2018	05-Oct-2018	
SC reviews trade s	uspension recommendations le	onger than two years an	nd takes appropriate measures - Res. Conf. 12.8 (R	15-Jan-2016	15-Jan-2016	
SC reviews trade s	uspension recommendations le	onger than two years an	nd takes appropriate measures - Res. Conf. 12.8 (R	15-Jan-2016	15-Jan-2016	0
Sec. notifies Parties	s of recommendations/actions	of SC - Res. Conf. 12.8	(Rev. CoP13)	26-Aug-2012	28-Aug-2012	

Figure 3.4. Overview of the actions in the Activity log tab (example case: *Pericopsis elata* from Côte d'Ivoire)

This history includes the list of actions, the deadline for each action, when it was completed, and any relevant documents.

- As the history of a case may span different revisions of the Resolution on the Review of Significant Trade since the case was initiated, the relevant revision in place when an action was set is visible next to each action in the activity log.
- **Deadline:** Each action deadline is set by the Secretariat, based on the deadlines specified for each stage and phase in the relevant revision of the Resolution in place at the time the action was set.

- Completed on: Incomplete actions will have no date in this column. Note that the Secretariat will mark actions as complete; Parties will not be able to edit this.
- Attachment: For every record it is possible to see if any relevant documents are attached; some actions may have multiple documents. Clicking on the paperclip symbol for an action will take you to the Document library, and the document relevant to the action will be highlighted with a grey box. However, note that any letters between the Party and Secretariat will have been marked as confidential and will not be publicly viewable.

3.5. Documents library

Recommendations	Records of meetings	Activity log	Documents	
Uploaded by	•			Download all documents
РС17-WG04 86 КВ	(Rev.1).pdf	PC17_summary_ 471 KB	record.pdf	PC17-08-05.pdf 314 KB
PC17-WG04 86 KB	(Rev. 1).pdf	PC18-sum.pdf 409 KB		PC18-WG03.pdf 48 KB

Figure 3.5. Overview of the documents library functionalities (example case: *Pericopsis elata* from Côte d'Ivoire)

In the Documents library tab, you will be able to see a full list of the public case documents (Figure 3.5). You can filter the documents based on the different actors in a case (the Party, Secretariat, Animals or Plants Committee Chair or Standing Committee) using the 'Uploaded by' dropdown menu. It is also possible to download all public documents for the case.

Annex 1

STAGE ONE 1YEAR	 a) Sec. compiles or recruits consultants to compile trade data for possible RST sélections (90 after CoP); b) Species/country combinations of greatest concern are included in Stage 2 of the review process by the AC or PC at their first regular meeting following a meeting of the CoP; c) In exceptional cases, a species/country combination may be brought to AC/PC attention for inclusion in Stage 2 (through Sec.); c) In exceptional cases, a species/country combination may be brought to AC/PC attention for inclusion in Stage 2 (through Sec.); c) Understanding Resolution Conf. 12.8 (Rev. CoP)
STAGE TWO 1YEAR	 d) Sec. informs range States that their species have been selected and requests information on the scientific basis for establishing exports compliant with Article IV of the Convention (30 days after AC/ PC meeting or selection in exceptional cases). Sec. compiles report and on information provided by range State and presents it to the next AC or PC; e) The above-mentioned report will divide selected species/country combinations into preliminary categorisations: 'action is needed,' 'unknown status' and 'less concern;' f) Sec. conveys the report to range States and invites them to provide additional information for consideration at the next AC or PC;
STAGE THREE 1YEAR	 g) AC or PC reviews the Sec.'s report and information from range States and recategorises species/ country combinations of 'unknown status,' as well as any other preliminary categorisations as necessary. i. Species/country combinations of 'less concern' will be removed from the RST process and Sec. will notify the range State (within 30 days); any change of a zero quota to be communicated and justified to Sec. and AC or PC Chair; ii. Species/country combinations of 'action is needed' will be retained in the RST process. AC or PC to make recommendations; h) Sec. transmits recommendations to range States (30 days after AC or PC); i) AC or PC prepares separate recommendations to SC for problem cases as outlined in Annex 3 of Res. Conf. 12.8 (Rev. CoP18);
STAGE FOUR ONGOING	 j) Sec. monitors progress; k) Sec. determines whether recommendations are implemented; i. where recommendations have been met, the Sec. notifies the range State; ii. where the recommendations have not been met, the Sec. recommends to SC appropriae action including possibly a trade suspension; iii. where the recommendations have not been met, or partially met, the Sec. requests AC or PC to revise recommendations. Sec. Informs ranfge State of revised recommendations (within 30 days); l) Sec. reports to SC; m) Where recommendations not met, SC decides on appropriate action and makes reccommendation.; n) Secretariat notifies all Parties of any recommendations of actions taken by SC; o) Recommendation to suspend trade should only be withdrawn where the range State demonstrates to SC its compliance with Article IV, paragraph 2(2), 3 or 6(a); p) SC reviews recommendations to suspend trade in place for over 2 years and takes measures.