

November 5, 1999

Madeleine K. Albright  
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Dear Secretary of State Albright and Secretary of the Interior Babbitt,

We are writing to urge the Administration to propose the listing of *Swietenia macrophylla* (big-leaf mahogany) in Appendix II of the Convention on International Trade in Endangered Species of Fauna and Flora (CITES), for a decision by the Conference of the CITES Parties at its next meeting in Nairobi in April 2000.

The scientific evidence is compelling that nearly all of the big-leaf mahogany range state populations qualify for an Appendix II listing — they may become threatened with extinction, unless trade is subject to strict regulation in order to avoid utilization incompatible with their survival. Mahogany is harvested predominantly through the practice known as selective logging, in which only mahogany and other valuable timber species—the "precious woods"— are extracted. This practice typically does not create conditions that foster regeneration and it results in removal of nearly all mature mahogany trees within a population, drastically reducing its reproductive potential. To maintain production levels, loggers are continually moving into increasingly remote unlogged old-growth forests, rather than harvesting within fixed areas from regenerating stands. Scientists have found that populations are in decline, and are concerned that current patterns, methods and levels of logging are unsustainable over the long term.

Mahogany logging is a major catalyst for deforestation of Neotropical lowland forests, thereby leading to reduction of available mahogany habitat and posing a significant threat to tropical biodiversity. As loggers expand operations into frontier forests and protected areas, road construction facilitates settlement by farmers and conversion of forests for ranching and agriculture.

A review of available evidence indicates that populations of big-leaf mahogany in Brazil, Bolivia, Mexico, Belize, Guatemala, and perhaps Peru and Nicaragua as well, meet the Appendix



II listing criteria established at CITES COP9, in that levels and patterns of legal and illegal harvesting in those countries for international trade cannot be maintained in perpetuity. Populations in Ecuador, Colombia, Panama, and Costa Rica also merit an Appendix II listing in that they could become candidates for an Appendix I listing (threatened with extinction and affected by trade) in the near future.

International trade plays a major role in the fate of mahogany populations, as a large portion of the mahogany harvest — perhaps as much as half — is destined for export. The species' high value has led to extensive trafficking and illegal logging in parks, forest concessions, and indigenous areas. Range countries have been unable unilaterally to prevent these activities. New research from PROARCA CAPAS of Guatemala, the Tropical Science Center of Costa Rica, and the World Wildlife Fund of Washington, D.C., finds that the ratio of illegal to legal mahogany logging in Central America is a minimum of 2:1, and may be as much as 6:1. South American countries face similar problems.

With 146 Parties, CITES is the international community's legal mechanism for addressing trade-related threats to the survival of a species. As the world's largest importer, the United States has a special responsibility to cooperate with range states under CITES to ensure the well-being of big-leaf mahogany. As the Administration seeks to liberalize trade in forestry products through a rapid reduction in tariffs, it is particularly important that it demonstrate a willingness to protect species that may be or are being harmed by trade.

An Appendix II listing under CITES enables importing and exporting countries to cooperate to reduce the impact of harvesting and consumption. It provides a legal basis for exporting countries to regulate exports in the interest of survival of the species or its populations. Equally important, it provides a legal basis for importing countries to monitor imports, thereby stemming illegal harvesting and trafficking and supporting range countries in their efforts to conserve and sustainably manage tropical forests.

In seeking an Appendix II listing, our goal is not to place big-leaf mahogany off-limits to human use. Rather, we seek to facilitate a shift to sustainable harvesting and trade. It is important to understand that an Appendix II listing under CITES will not facilitate a ban on commercial trade under Appendix I. Properly implemented, it will *preclude* an Appendix I listing by limiting trade pressure on the species to sustainable levels.

Similarly, an Appendix II listing will not motivate consumers to stop purchasing mahogany. On the contrary, effective implementation of an Appendix II listing would *strengthen* consumer confidence that mahogany was harvested sustainably. A multilateral decision in the highly visible and respected context of CITES would send a powerful signal that governments are acting to maintain the health and genetics of the species. The continuing failure to list the species as legally mandated under CITES, however, will only increase consumer disaffection and the risk of boycotts of the kind that have already drastically reduced demand in some importing countries.

Implementation of an Appendix II listing will lay the foundation for a shift in the direction of sustainability, but is not sufficient to ensure sustainable harvesting. Economic policies, market



failures and weak law enforcement are among the factors driving unsustainable harvesting. We encourage the Administration to continue its efforts to explore other measures that could complement a CITES listing. Options include certification and labeling to facilitate sustainable harvesting, cooperation to enforce trade controls and combat illegal harvesting, and funding of forest inventories and of pilot projects for conservation and sustainable management.

We are eager to work with you to craft an effective approach to this issue, and would be very pleased to discuss these matters further with you or your colleagues.

Sincerely yours,

David R. Downes, Senior Attorney, Center for International Environmental Law

William J. Snape III, Legal Director, Defenders of Wildlife

Orin Langel, Coordinator, Action for Community and Ecology  
in the Rainforests of Central America

Atossa Soltani, Director, Amazon Watch

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Erik van Lennep, Executive Director, The Arctic to Amazonia Alliance

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Bruce Rich, Director, International Program, Environmental Defense Fund

Saskia Ozinga, Coordinator, Fern (United Kingdom)

Andrea Durbin, Director, International Program, Friends of the Earth- United States

Ricardo Navarro, President, Friends of the Earth- El Salvador; President, Centro Salvadoreño de Tecnología Apropriada (El Salvador)

Juraj Zamkovsky, Friends of the Earth- Slovakia

John W. Grandy, Ph.D., Senior Vice President, Wildlife and Habitat Protection, the Humane Society of the United States

Justin Ward, Senior Policy Analyst, Natural Resources Defense Council

Daniel Katz, Executive Director, Rainforest Alliance



Jennifer Krill, Old Growth Field Campaigner, Rainforest Action Network

Tim Keating, Executive Director, Rainforest Relief

Reinhard Behrend, Director, Rainforest Rescue (Retted den Regenwald e.V.) (Germany)

Christopher H. Peters, President, Seventh Generation Fund for Indian Development, Inc.

Dennis Schvejda, Conservation Chair, Sierra Club- New Jersey Chapter

Sandy Gauntlet Indigenous Peoples' Focal Point, Underlying Causes of Deforestation and Forest Degradation Project

cc: George T. Frampton Jr., Acting Chair, Council for Environmental Quality