



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Washington, D.C. 20240



DEC 14 2004

In Reply Refer To:
FWS/DMA TRE 2-02

Sr. Leoncio Alvarez Vasquez, Jefe
Instituto Nacional de Recursos Naturales (INRENA)
Calle Diecisiete No 355 (Los Petirrojos)
Urbanizacion El Palomar
San Isidro - Apartado Postal 4452
Lima 27, Peru

Dear Sr. Alvarez Vasquez:

I greatly appreciated meeting with you at the 13th meeting of the Conference of the Parties to CITES in October 2004, regarding progress being made in Peru on implementation of the CITES Appendix-II listing of bigleaf mahogany (*Swietenia macrophylla*). At that meeting, you provided us with a written report (entitled "*Informe Nacional: Gestion y Conservacion de la Caoba Swietenia macrophylla en el Peru*") on Peru's management of bigleaf mahogany and activities being taken to implement the Appendix-II listing of this species. We have reviewed the information in the report and are encouraged by the steps being taken in Peru to ensure the sustainable use of bigleaf mahogany and implement the Appendix-II listing of the species. However, the report does not provide a clear statement that the Peruvian Scientific Authority is now making non-detriment findings prior to the Management Authority issuing CITES export permits for the species.

We are now writing to you with respect to concerns that have been brought to our attention regarding exports of bigleaf mahogany wood from Peru to the United States since the CITES Appendix-II listing of the species became effective. We recently met with representatives of the Natural Resources Defense Council and Defenders of Wildlife, two non-governmental organizations (NGOs) in the United States with interests in the conservation of species, and they informed us that it is their belief that CITES export permits for bigleaf mahogany are being issued in Peru without prior findings by the Peruvian CITES Scientific Authority that such exports are not detrimental to the survival of the species. These two NGOs had already written to us on June 28, 2004, and September 10, 2004, expressing their concerns, and we provided your office with copies of these letters and our responses to them.

At the International Timber Trade Organization (ITTO) regional workshop on implementing the Appendix-II listing for bigleaf mahogany, which was held in Pucallpa, Peru, in May 2004, the Government of Peru presented its National Report on its implementation of this Appendix-II listing. The two NGOs mentioned above have pointed out that, on page 9 of the National Report, the Government of Peru stated the following:

"The Scientific Authority has not yet emitted an opinion about mahogany populations and non-detrimental harvest levels. In order to emit an accurate opinion the possession of accurate information about mahogany populations is considered essential. This can be achieved through a specific national inventory of mahogany populations.

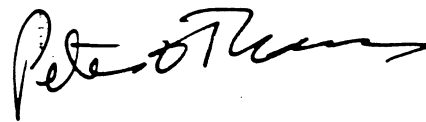
As you know, Article IV of the CITES treaty makes clear that an export permit for a species listed in Appendix-II shall only be issued if the Scientific Authority makes a prior finding of non-detriment and the Management Authority makes a prior finding of legal acquisition. It has now been more than six months since the Pucallpa workshop and more than one year since the Appendix-II listing for bigleaf mahogany became effective. However, it is unclear to us whether the Peruvian Scientific Authority is making non-detriment findings for this species.

We would appreciate it if you would inform us whether the Scientific Authority of Peru is currently making findings of non-detriment for bigleaf mahogany prior to the Management Authority issuing CITES export permits for the species.

The listing of bigleaf mahogany in CITES Appendix II is an important step in the conservation of this valuable species. The United States is committed to properly implementing the listing and ensuring that all imports of bigleaf mahogany into the United States are in accordance with CITES requirements.

We look forward to your response to this letter and thank you for your concern and interest in this important matter.

Sincerely,



Peter O. Thomas, Chief
Division of Management Authority

cc: CITES Scientific Authority of Peru:
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Facultad de Ciencias Forestales
Av. Universitaria s/n
Apartado Postal 456
La Molina
Lima 1, Peru

cc: CITES Secretariat