

TRANSFER SAIGA ANTELOPE TO APPENDIX I

(Support for *Proposal 2*)



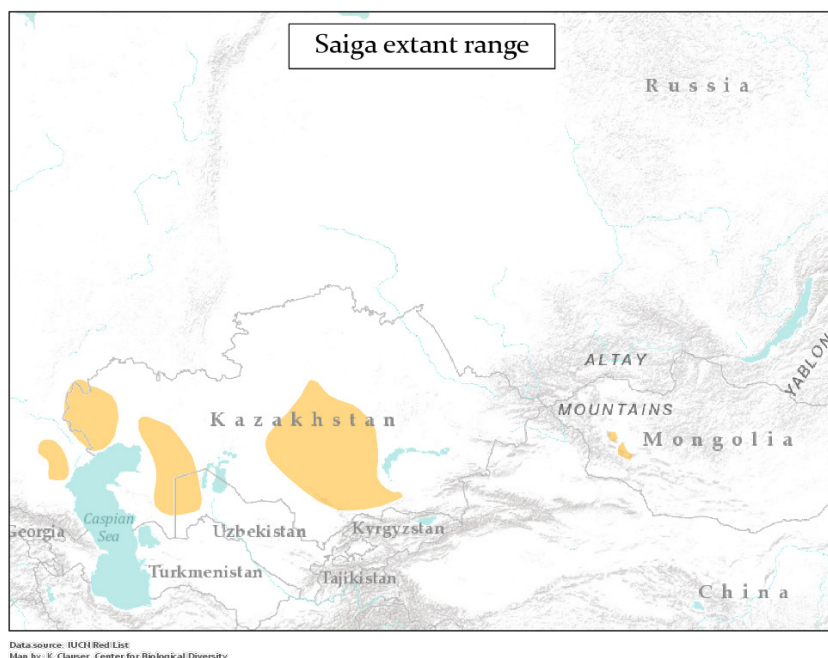
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Saiga are clearly affected by trade and meet the biological criteria for Appendix I detailed in Resolution Conf. 9.24 (Rev. CoP17). The species has experienced a marked long-term decline in its wild population, which is now at less than 20 percent of historic levels. Moreover, saiga are susceptible to large fluctuations in population size and are vulnerable to a multitude of intrinsic and extrinsic factors including disease and habitat loss, fragmentation, and degradation.

The saiga antelope (*Saiga tatarica*) is classified as Critically Endangered by the IUCN, and the species has suffered severe long-term declines throughout its range in Kazakhstan, Russia, Mongolia, Uzbekistan, and Turkmenistan. In the early 1960s, nearly two million saiga roamed the steppes of Central Asia, with an estimated 540,000 and 1.3 million saiga in Russia and Kazakhstan, respectively.¹ Through a combination of overhunting, poaching, habitat loss and degradation, and disease outbreaks, saiga populations plummeted to around 165,600 animals by January 2018, representing a 90 percent overall population decline from historic levels. The Mongolian subspecies, *S. t. mongolica*, is especially vulnerable with an estimated population of only 5,000.² A 2019 population survey indicates a climb in Kazakhstan's population back to roughly 300,000 individuals after a disease outbreak killed off the majority of the population in 2015.³ While this is welcome news, saiga still remain far below their historic baseline abundance and remain susceptible to sudden mass die-offs from disease outbreaks. Thus, saiga cannot yet be considered recovered.



In response to population declines by the mid-2000s, all saiga range States with existing wild populations had banned hunting saiga and international trade in saiga products.⁴ Despite these voluntary bans, trade in saiga horn primarily from government and private stockpiles (accumulated primarily before the range state bans), is traded widely among consumer countries in East and Southeast Asia, such as China, Singapore, Malaysia, and Japan for use in traditional medicine. This widespread consumer demand has fueled saiga poaching and created an illegal market for saiga products as evidenced by frequent reports of both small-scale and large-scale seizures of saiga horn in range and consumer States. As saiga horn stockpiles dwindle in consumer countries, and with no sign of significant future demand reduction, trade in wild-sourced saiga products, both legal and illegal, will likely increase pressure on wild saiga populations.

1 IUCN SSC Antelope Specialist Group 2018. *Saiga tatarica*. The IUCN Red List of Threatened Species 2018: e.T19832A50194357. <http://dx.doi.org/10.2305/IUCN.UK.2018-2.RLTS.T19832A50194357.en>.

2 IUCN SSC Antelope Specialist Group 2018. *Saiga tatarica ssp. mongolica*. The IUCN Red List of Threatened Species 2018: e.T19833A50194613. <http://dx.doi.org/10.2305/IUCN.UK.2018-2.RLTS.T19833A50194613.en>.

3 <https://www.fauna-flora.org/news/steppe-change-kazakhstan-saiga-population-doubled-last-two-years>

4 Saiga Conservation Alliance. Autumn 2018/Winter 2019 Saiga News Issue 24

While all saiga populations are at risk from poaching and illegal trade, disease and the fragmentation, degradation, and destruction of their habitat also pose significant threats. Saiga are prone to mass die-off events caused by disease that can kill hundreds of thousands of animals in days. One of the worst die-offs in recent history occurred in 2015 when 211,000 saiga—62 percent of the total population—in Kazakhstan were killed by the *Pasteurella multocida* bacterium.⁵ A similar die-off in 2016, caused in this case by the *peste de petits ruminants* virus (also known as “goat plague”), eliminated more than half of the then-total population of 11,000 Mongolian saiga.⁶ Saiga are a highly migratory species that rely on vast expanses of open, healthy grasslands to survive. The construction of fences, railroads, pipelines, and other infrastructure have negatively impacted saiga migratory routes in Kazakhstan,⁷ while overgrazing has severely degraded huge swaths of saiga habitat including at least 70 percent of Mongolia’s grasslands.⁸



Wild male saiga antelope (*Saiga tatarica*) visiting a waterhole at the Stepnoi Sanctuary, Astrakhan Oblast, Russia.
Photo credit: Andrey Giljov

A CITES Appendix I listing would afford saiga the highest level of international protections to ensure commercial trade does not contribute to the further decline of the species and would make the now-voluntary trade bans by range States enforceable and binding under CITES across range and consumer States. An Appendix I listing would further encourage collaboration among range and consumer States on enforcement including to reduce the potential laundering of poached saiga horn as stockpiled horn. Therefore, Parties are recommended to support CoP18 Prop. 2 submitted by Mongolia and the United States of America to transfer saiga from Appendix II to Appendix I.

NOMENCLATURE SHOULD NOT STAND IN THE WAY OF SAVING SAIGA

CoP18 Proposal 2 proposes to uplist “*Saiga tatarica*” to Appendix I. The proposal uses IUCN’s updated nomenclature for the species, which recognizes one species of saiga (*Saiga tatarica*) and two subspecies (*S.t. tatarica* and *S.t. mongolica*).⁹ However, the outdated CITES nomenclature (Wilson and Reeder 2005¹⁰) recognizes two species of saiga (*S. tatarica* and *S. borealis*), and thus some have incorrectly suggested that the proposal is for “split-listing” and would only uplist saiga outside of Mongolia (*S. tatarica*).

To the contrary, CoP18 Prop. 2 is intended to uplist all saiga antelope to Appendix I.¹¹ The supporting statement in the proposal covers all saiga, including those in the proponent-country Mongolia. The proposal addresses threats to all saiga, not just those facing the subspecies outside Mongolia. If the proposal were for a split listing, that would need to be specified and the geographic range of the split-listing indicated as specified in Annexes 3

5 Kock, R. A., Orynbayev, M., Robinson, S., Zuther, S., Singh, N. J., Beauvais, W. & Rystaeva, R. (2018). Saigas on the brink: Multidisciplinary analysis of the factors influencing mass mortality events. *Science advances*, 4(1), eaao2314.

6 IUCN SSC Antelope Specialist Group 2018. *Saiga tatarica*. The IUCN Red List of Threatened Species 2018: e.T19832A50194357. <http://dx.doi.org/10.2305/IUCN.UK.2018-2.RLTS.T19832A50194357.en>.

7 Saiga Conservation Alliance. Summer 2014. Saiga News Issue. 18

8 Hilker, T., Natsagdorj, E., Waring, R. H., Lyapustin, A., & Wang, Y. (2014). Satellite observed widespread decline in Mongolian grasslands largely due to overgrazing. *Global Change Biology*, 20(2), 418-428.

9 <https://www.iucnredlist.org/species/19832/50194357>

10 Wilson, D. E., & Reeder, D. M. (1859). 2005. *Mammal species of the World: a taxonomic and geographic reference*.

11 CoP18 Proposal 2 (available: <https://cites.org/sites/default/files/eng/cop/18/prop/060319/E-CoP18-Prop-02.pdf>)

and 6 to Resolution Conf. 9.24 (Rev. CoP17), neither of which is done in the proposal.¹²

To the degree there is any confusion on the issue, CITES Rule of Procedure 24 authorizes proponents of a proposal “at any time” to “amend it to reduce its scope or to make it more precise.”¹³ Mongolia and the U.S. are well within their right to make the discussion of nomenclature in the proposal more precise by including a reference to Wilson and Reeder. Indeed, the proponents submitted a letter clarifying their intent to uplist all saiga to Appendix I.¹⁴

The proposal itself could be amended for precision which would not expand the proposal’s scope given the proposal already addresses all saiga throughout their range. Rule 24 does not limit or restrict how Parties make their proposals more precise. Given that the Rule authorizes Parties to narrow “or” make their proposal more precise these two authorizations must be read separately.

The rationales for foreclosing expansion of listing proposals are not present here, as this is not a situation that raises concerns about notice or abuse. Clarifying the nomenclature would only clarify with precision that the saiga occurring in Mongolia (*S.t. mongolica* or *S. borealis*) are included in the proposal. Since Mongolia submitted the proposal and seeks to clarify that its *own* saiga populations are included in the proposal, making the proposal more precise would not prejudice other Parties’ interests.

The saiga in Mongolia are highly imperiled, and Resolution Conf. 9.24 (Rev. CoP17) reminds us to “act in the best interest of the conservation of the species concerned and adopt measures that are proportionate to the anticipated risks to the species.”¹⁵ This precautionary approach further supports an amendment to ensure that all saiga are uplisted.

RULE 24:

At CoP12 in Chile in 2002, then Rule 22 (now Rule 24) was amended to provide that any Party that submitted a proposal to amend Appendices I or II may at any time make it more precise.¹⁶ Before this time, a Party could only withdraw a proposal or amend it to reduce its scope. The amendment adopted at CoP12 thus recognized that making a proposal more precise was a separate act from the act of reducing the proposal’s scope. Given this history, Rule 24 clearly empowers Parties at any time to: 1) withdraw a proposal; 2) amend it to reduce its scope; or 3) amend it to make it more precise.¹⁷

STOCKPILES

Based on the reported annual saiga horn consumption rate in China of between six and 10 tons and the persistent demand for horn in consumer countries, in 2006 the CITES Secretariat estimated total depletion of stockpiles would occur between 2016 and 2021. Thus, the continued trade in saiga horn and derivatives today raises serious questions about the legality of existing trade and stockpile management.

The current total stockpile of saiga horn, shavings, and other horn derivatives held by the seven most important consumer and trading countries (China, Japan, Kazakhstan, Malaysia, the Russian Federation, South Korea,

¹² Annex 6 states that in the proposal itself the “proponent should indicate the specific amendment to the Appendices and any relevant annotations or qualifications,” like split-listings. Annex 6 part A, Resolution Conf. 9.24 (Rev. CoP17). Annex 3 requires the proponents to delineate the “national or regional populations” to which the split-listing applied. Annex 3 on Split-Listings, Resolution Conf. 9.24 (Rev. CoP17).

¹³ CoP18 Doc. 4.1 at 11 (available: <https://cites.org/sites/default/files/eng/cop/18/doc/E-CoP18-004-01.pdf>).

¹⁴ [CoP18. Doc. 105.2 \(Rev. 1\)](#)

¹⁵ Annex 4, para 1 Resolution Conf. 9.24 (Rev. CoP17).

¹⁶ <https://www.cites.org/sites/default/files/eng/cop/12/doc/E12-01-1.pdf>

¹⁷ The supporting statement by the Secretariat for amending the rule to include the ability of Parties to make listing proposals “more precise” or to “precise it.” <https://www.cites.org/sites/default/files/eng/com/sc/46/46-07-4.pdf>

and Singapore¹⁸) is unknown, as is the breakdown of pre-Convention specimens and specimens acquired after the Appendix II listing entered into force in February 1995. These unknowns complicate assessing demand for saiga products, prevent informed decision-making, cast doubt on stockpile management, and can facilitate the laundering of poached saiga horn onto the legal market.



Male saiga fighting.

Photo credit: Richard Reading/U.S. Fish and Wildlife Service

have instituted hunting and international trade bans or moratoria.²⁰ Given that no new saiga horn has entered the market legally and that there has been no reported reduction in demand or consumption rates for saiga products, the Secretariat's predicted timeline for saiga stockpile depletion should remain accurate.

Despite this, saiga horn stockpiles persist, raising questions about the legality of the specimens included in the stockpiles and stockpile management practices. For example, at the end of 2011, China reported a total, nationwide saiga horn stockpile of 115 tons,²¹ or about 88 percent of the five country stockpile total originally reported to CITES in 2006. At the third meeting of the CMS MoU signatories in 2015, Singapore reported possessing a pre-Convention stockpile of saiga parts and derivatives amounting to less than 20 tons.²² If no new saiga horn is legally entering the market and consumption rates have not declined (if anything, consumption rates have likely increased as populations in consumer countries grow), then the current levels of saiga horn stockpiles can only be explained by inaccurate past stockpile estimates and/or the addition of illegally-sourced saiga horn.

Reports of actual stockpile figures have been sporadic since the saiga's Appendix II listing. This irregular reporting can be attributed to an unwillingness or inability to regularly provide updated stockpile figures by consumer countries. For instance, China did not report updated stockpile figures at the 2015 CMS MoU meeting and instead declared that it cannot ascertain the amount of privately-held stockpiles because there is no registration requirement.²³ Moreover, a 2018 TRAFFIC assessment of saiga horn trade in Malaysia concluded that "the discrepancies in trade data and the lack of information on stocks in the country—either quantities held by traders, those maintained in government custody and those privately-held, if any—make it impossible to ascertain current legal stocks permitted for trade."²⁴

An accurate accounting of stockpiled specimens, including a breakdown of pre-Convention specimens that by definition do not have a CITES record documenting their import from a saiga range state, is necessary to effectively monitor offtake to prevent illegal saiga horn from being laundered through the stockpile as

¹⁸ [CoP14 Doc. 56, 2007. Saiga antelope](#)

¹⁹ *Id.*

²⁰ [Saiga Conservation Alliance, Autumn 2018/Winter 2019 Saiga News Issue 24](#)

²¹ [CoP16 Doc. 56, 2013. Saiga antelope](#)

²² [UNEP/CMS/Saiga/MOS3/Inf.22.3](#)

²³ [Saiga Conservation Alliance, Autumn 2018/Winter 2019 Saiga News Issue 24](#)

²⁴ [Gomez, L. and Krishnasamy, K. 2019. A rapid assessment of the trade in Saiga Antelope horn in Peninsular Malaysia. Traffic Bulletin 31\(1\)](#)

“pre-Convention.” Yet past CITES decisions directed toward saiga consumer states have avoided calling for regular, comprehensive reporting on stockpiles. Instead, decisions have typically consisted of weak, broad recommendations for countries to “[ensure] effective stockpile management” or “take into consideration the recommendation” to regularly monitor stockpiles. Not since CITES CoP13 (Bangkok, 2004) have saiga consumer and trading countries been directed to report their stockpiles to the Secretariat.

Without accurate estimates and effective management of private and state-owned stockpiles in China and other consumer nations, it will be impossible for CITES Parties to successfully monitor trade in saiga specimens, prevent laundering of illegal horn, and take the necessary steps to adjust for the eventual depletion of legal stockpiles.

PRE-CONVENTION

The massive quantity of saiga parts and derivatives traded annually in the late 20th century, and the destructive impacts of this trade on wild saiga populations, prompted CITES Parties to list the species on Appendix II at CoP9 (Ft. Lauderdale, 1994). The listing came into force in February 1995, and all saiga parts and derivatives acquired and stockpiled before then are considered “pre-Convention” specimens. According to Article VII(2) of the Convention, trade in pre-Convention specimens does not require a non-detriment finding and is conducted with a pre-Convention certificate in lieu of export and/or import permits.²⁵

While countries like China and Singapore are believed to possess significant quantities of pre-Convention saiga specimens, there has never been regular reporting (or, for some countries, any reporting at all) by consumer countries of the precise breakdown of their stockpiles of pre-Convention specimens and specimens acquired after the Appendix II listing entered into force.

Since 1995, more than 47 tons of saiga horn and other saiga specimens have been traded internationally with source code ‘O’ designating pre-Convention, along with an additional 163,000 pre-Convention saiga “horns”, “derivatives”, and other specimens of unknown weight according to the CITES trade database. There is no accurate data for domestic consumption rates of pre-Convention saiga specimens in consumer countries.

By definition, there is no CITES record of acquisition of pre-Convention saiga specimens. Without an accurate estimate of stockpiled pre-Convention specimens, and a public declaration of such figures, it is impossible to monitor offtake to prevent illegal saiga horn from being laundered through stockpiles by simply declaring it “pre-Convention”. Indeed, Parties can potentially supplement existing stockpiles with illegal saiga horn declared as “pre-Convention” for as long as there is a surviving wild population from which to acquire horn.

SEIZURES

While actual numbers are unknown, the high volume of horn seized in recent years suggests that significant quantities of illegal saiga horn—horn taken in contravention of the range country hunting and trade bans and CITES’ Appendix II export permit requirements—are entering consumer markets and offsetting reductions to legal stockpiles. An Appendix I listing should lead to improved stockpile management, increased enforcement to prevent illegal trade, both internationally and domestically, and curb demand.

Poaching and illegal international trade in saiga horn have persisted since the species was listed on CITES Appendix II, and several large-scale seizures have occurred in recent years suggesting the ongoing involvement of organized criminal syndicates in the illegal trade. Between early-2012 and mid-2014, 14.9 tons of saiga horn

²⁵ <https://www.cites.org/eng/disc/text.php#VII>



1,276 saiga horns seized by Harbin Customs in China on April 28, 2018. Photo credit: General Administration of Customs, P.R. China

around the world between 2007 and 2012.³⁰ According to the International Fund for Animal Welfare, Russian authorities made at least eight saiga seizures, primarily at border crossings or checkpoints, in 2018 involving 358 horns.³¹

The impacts of poaching and illegal trade are not limited to saiga; they incur a human cost as well. In 2019 alone, two Kazakh rangers, Erlan Nurghaliev and Kanysh Nurtazinov, have been killed by poachers, and another was shot and was still being treated in the hospital at time of writing.³²

CAPTIVE BREEDING

Saiga are notoriously difficult to breed in captivity. No zoo has ever been able to maintain a sustainable breeding population, and captive breeding facilities have been beset by high mortality rates associated with mass-die offs, stress, inbreeding, and extreme weather. After more than a century of captive breeding efforts there are currently less than 800 saiga spread among seven captive breeding facilities in Russia, Kazakhstan, Ukraine, and China.³³

BREEDING FACILITY	COUNTRY	NUMBER OF SAIGA*
Endangered Wildlife Breeding Center	China	<120
Center for Wildlife and Conservation of Biodiversity	Kazakhstan	16
Center of Rare Animals of European Steppes	Russia	52
Yashkul Captive Breeding Station	Russia	4
Saiga Captive Breeding Center	Russia	31
Askania Nova Biosphere Reserve	Ukraine	551
Shi Zhen Tan Pharmaceutical	Ukraine	23

* Population estimates as of 2016/2017.³⁴

²⁶ Saiga Conservation Alliance. Spring 2018. Saiga News Issue 23

²⁷ Saiga Conservation Alliance. Winter 2015/Spring 2016 Saiga News Issue 20

²⁸ Saiga Conservation Alliance. Autumn 2016 Saiga News Issue 21

²⁹ General Administration of Customs. 2019. 海关总署发布打击象牙等濒危物种及其制品走私十大典型案例

³⁰ CoP16 Inf. 4. 2013. Reported seizures of saiga antelope specimens, 2007 to 2012

³¹ IFAW. 2019. Report on the research into illegal trade in saiga antelope derivatives in Russia

³² RadioFreeEurope/RadioLiberty. 2019. Kazakhs Outraged Over Killing Of Wildlife Ranger Who Pursued Saiga Poachers; AKIpress. 2019. President Tokayev orders to toughen poaching control

³³ Karimova, T. Yu., Lushchekina, A.A., and Rozhov, V.V. 2018. Saiga Management at Zoos and Breeding Centres: making effective use of the lessons learnt for the restoration of wild saiga populations. KMK Scientific Press Ltd.

³⁴ Id.

Despite the immense difficulties associated with breeding saiga in captivity, captive breeding has been suggested as a potential source of saiga horn to supply the traditional medicine industry. One Chinese pharmaceutical company has already established its own private breeding facility in Ukraine to harvest saiga horn for use in its medicinal products.³⁵

An Appendix I listing will allow Parties to provide critical oversight for commercial saiga captive breeding facilities, as Resolution Conf. 12.5 (Rev. CoP15) requires: registration of breeding facilities for species listed on Appendix I with the CITES Secretariat; review of such registrations by Animals Committee (and where necessary Standing Committee); the specimens must meet the CITES definition of “bred in captivity” described in Resolution Conf. 10.16 (Rev.*); and if approved, are regulated as Appendix II specimens per Article VII(4) of the Convention, requiring an NDF and an export permit.

If saiga remain on Appendix II there is no opportunity for oversight from Parties, which increases the risk that illegally sourced saiga horn could be laundered as “captive bred.” Under Article VII(5) of the Convention, exports of specimens from species that meet the CITES definition of “bred in captivity” do not require an NDF and are traded with a captive breeding certificate in lieu of an export permit. CITES Parties have no opportunities to review details about the facility, raise questions, or lodge objections.



Mother saiga and calf in the steppe in Cherniye Zemly (Black Earth) Nature Reserve, Kalmykia, Russia.

Credit: Igor Shpilenok/U.S. Fish and Wildlife Service

With an annual consumption rate of 6-10 tons of saiga horn annually in China alone, it will be impossible to produce enough saiga horn from captive sources to meaningfully contribute to the current levels of demand for saiga horn medicinal products. Given that a pair of saiga horns weighs roughly 500 grams, it will require between 12,000 and 20,000 male saiga, which are naturally underrepresented in both captive and wild populations, to satisfy current Chinese demand for saiga horn every year, to say nothing of demand in other consumer countries like Singapore, Malaysia, and Japan.

Regardless, it is clear that captive breeding facilities like the Chinese-owned facility in Ukraine will attempt to produce saiga products for international trade. Unless consumer countries commit to demand reduction, the substantial annual consumption rates of saiga products together with the dwindling supply of existing stockpiles will provide greater incentives to illegally source saiga horn from wild populations. There is a risk that captive breeding facilities designed to produce saiga horn on a commercial scale, faced with low productivity due to the challenges associated with breeding saiga in captivity, may launder illegally sourced saiga horn to supplement their output. A CITES Appendix I listing will allow for effective monitoring of trade from captive sources to ensure it is not detrimental to the survival of wild saiga populations by providing crucial oversight from CITES Parties of captive breeding and related activities.

AN APPENDIX I LISTING DOES NOT FORECLOSE TRADE IN TROPHIES

CITES allows the trade in hunting trophies of Appendix I listed species. The end use of such specimens is deemed personal and thus non-commercial.³⁶ Such trade does require permits from the exporting and importing countries and in Resolution Conf. 2.11 the Parties to CITES agreed that the non-detriment finding of

³⁵ [Saiga Conservation Alliance, Autumn 2018/Winter 2019 Saiga News Issue 24](#)

³⁶ Resolution Conf. 5.10 (Rev. CoP15).

the importing country “be carried out independently of the result of the scientific assessment by the exporting country.”³⁷ Beyond this additional scrutiny, an Appendix I listing does not foreclose trade in hunting trophies of Appendix I listing species.

THE STATUS QUO IS NOT SAVING SAIGA

Saiga range States voluntarily imposed trade restrictions to curb poaching and hunting of saiga. Additionally, these same range States have entered into a voluntary Memorandum of Understanding concerning Conservation, Restoration and Sustainable Use of the Saiga Antelope (“MOU”), under the umbrella of the Convention on Migratory Species (CMS).³⁸ However, as the mortality events of 2015-16 illustrate, saiga are prone to rapid population depletion and recent seizures indicate poaching is still rampant. Thus, good will and voluntary actions are not sufficient—especially in the event of large scale population declines from disease.

A CITES Appendix I listing while maintaining saiga on CMS’ Appendix II will curtail commercial trade while also encouraging cooperation between range and consumer States on saiga conservation.³⁹ The benefits of uplisting to Appendix I are: the provision of additional resources given the conservation priority of Appendix I species; improved stockpile management; CITES oversight for registration of captive breeding facilities; and increased enforcement and opportunities for demand reduction while still allowing for trade in trophies when such trade is legal and not detrimental. These benefits are important especially for a species like saiga that readily meets the criteria for uplisting.

We welcome the draft Decisions pertaining to saiga in Document 86,⁴⁰ but note that as with the CMS MOU these commitments are not binding. Given the significant decline of saiga populations, the ongoing demand for saiga horn, and the pending threat of disease outbreaks, the legally binding obligations of an Appendix I listing are required to protect saiga for future generations. We urge all CITES Parties to vote in support of CoP18 Prop. 2 to transfer all saiga from Appendix II to Appendix I.

37 Resolution Conf. 2.11 (Rev. CoP9).

38 <https://www.cms.int/en/legalinstrument/saiga-antelope> Note that only Kazakhstan, Mongolia, Russian Federation, Turkmenistan, and Uzbekistan are signatories to the CMS Saiga MOU.

39 The criteria for Appendix I listings under CITES and CMS are different. Under CITES, the species may be affected by trade and have a small or restricted population, or have undergone a marked decline. Res. Conf. 9.24 (Rev. CoP17), Annex 1. Under CMS, the species must be in danger of extinction throughout all or a significant portion of its range. CMS Art. I.1.e. As a result, the saiga can be up-listed to Appendix I of CITES and remain on Appendix II of CMS with the voluntary MOU intact.

40 Doc. 86 CoP18 (available: <https://cites.org/sites/default/files/eng/cop/18/doc/E-CoP18-086.pdf>).