

## CORRESPONDENCE

## Correspondence: Challender et al. (2021) misinterpret the recommendations regarding an IUCN-CITES interface in Frank and Wilcove (2019) and advocate poor policy

Challender et al. (2021) critique our paper (Frank & Wilcove, 2019) in which we report that species assessed by the IUCN Red List as threatened with extinction that are also traded internationally can languish for well over a decade until they are protected under CITES (via Appendix I or II), if they are protected at all. We flagged this as an information gap between scientists (i.e., Red List working groups) and policymakers (CITES signatories). Challender et al. argue that, in doing so, we have somehow misrepresented the international policy process and the relevant policy instruments. We have not.

Challender et al. incorrectly claim that we believe that *all* species should immediately go up for a vote once they are assessed by the IUCN as threatened and have been shown to be traded internationally. Our recommendation is more nuanced than that. First, we recommend that using the data from the Red List, parties to the treaty as well as the CITES Secretariat, should assess the information and propose species for inclusion in Appendix I or II. The review process and voting should ensure ample consideration of the socioeconomic and political concerns related to protecting the species that Challender et al. worry about. Second, we argue that having a mechanism that reduces the friction of parsing new scientific data can help in reducing those dangerously long time lags that have led to some species nearly disappearing after just a decade of heavy trading. We do not say this reform should be implemented immediately. Instead, we write that over time, the ultimate goal should be a near-automatic process.

Challender et al. argue that CITES has its own listing criteria that should be given as much credence as the extensively reviewed, time-tested Red List criteria. We have much greater confidence in the Red List criteria than we do in the CITES criteria. The process that governs the Red List assessments has undergone two revisions, one in 1994 and another in 2001, that served to “improve the objectivity and repeatability of the assessment process and to develop

quantitative criteria” (Gärdenfors et al., 2008). The Red List is now regarded as “the most comprehensive resource detailing the global conservation status of plants and animals,” (Rodrigues et al., 2006). The CITES listing criteria, on the other hand, are opaque and less objective in large part because they aim to simultaneously assess the scientific status of a species *and* balance the interests of multiple stakeholders. In contrast, the Red List criteria are based on objectively measured trends in populations sizes or area of habitat; policymakers can use that information to decide how to balance any competing interests between conservation and human activities. This is also the approach of the US Endangered Species Act: the initial decision to list a species must be based solely on the best available science; resolving conflicts between conservation and human activities is addressed in subsequent steps.

Challender et al. also believe that CITES protection (via Appendices I and II) should be reserved for vanishing species whose *main* threat is international trade versus those for which international trade is one of multiple threats and maybe not even the primary one. We firmly argue that international trade of rare species should be restricted well before it becomes the primary imperilment to their survival. When a species is in decline, it should be enough that trade is a *contributing* threat in order to justify placing strong restrictions on that trade, lest it contribute to the species’ ongoing decline. Our interpretation is also consistent with the plain language of the CITES treaty itself. Article II, Section I states that “Appendix I shall include all species threatened with extinction which are or *may be* affected by trade” (emphasis added).

Challender et al. (2021) argue that improving CITES is complicated and can take years to accomplish. However, that in no way invalidates the fundamental conclusions of our paper: Many species that need protection from international trade wait far too long to receive it; having clear and objective criteria for deciding when a species

This is an open access article under the terms of the [Creative Commons Attribution](https://creativecommons.org/licenses/by/4.0/) License, which permits use, distribution and reproduction in any medium, provided the original work is properly cited.

© 2022 The Authors. Conservation Letters published by Wiley Periodicals LLC

is imperiled plus improving the information flow from scientists to policymakers can give beleaguered species needed protection or, at the very least, make clear the reasons why that protection has been denied.

#### ACKNOWLEDGMENTS

We thank the editor and reviewer for their helpful comments on the manuscript.

#### CONFLICT OF INTEREST

The authors declare no conflict of interest.

#### AUTHOR CONTRIBUTIONS

All authors contributed to the writing, editing, and reviewing of the manuscript.

#### DATA ACCESSIBILITY STATEMENT

No primary data were collected for this manuscript.

Eyal G. Frank<sup>1</sup>   
David S. Wilcove<sup>2</sup>

<sup>1</sup> Harris School of Public Policy, University of Chicago,  
Chicago, Illinois

<sup>2</sup> School of Public and International Affairs, Department of  
Ecology and Evolutionary Biology, Princeton University,  
Princeton, New Jersey

#### Correspondence

Eyal G. Frank, Harris School of Public Policy, University  
of Chicago, Chicago, Illinois.  
Email: [eyalfrank@uchicago.edu](mailto:eyalfrank@uchicago.edu)

#### ORCID

Eyal G. Frank  <https://orcid.org/0000-0002-5876-5319>

#### REFERENCES

- Challender, D. W. S., Brockington, D., Hinsley, A., Hoffmann, M., Kolby, J. E., Massé, F., Natusch, D. J. D., Oldfield, T. E. E., Outhwaite, W., Sas-Rolfes, M., & Milner-Gulland, E.J. (2021). Mischaracterizing wildlife trade and its impacts may mislead policy processes. *Conservation Letters*, August. <https://doi.org/10.1111/conl.12832>.
- Frank, E. G., & Wilcove, D. S. (2019). Long delays in banning trade in threatened species. *Science*, 363(6428), 686–688.
- Gärdenfors, U., Hilton-Taylor, C., Mace, G. M., & Rodríguez, J. P. (2008). The application of IUCN Red List criteria at regional levels. *Conservation Biology*, 15(5), 1206–1212.
- Rodrigues, A. S. L., Pilgrim, J. D., Lamoreux, J. F., Hoffmann, M., & Brooks, T. M. (2006). The value of the IUCN Red List for conservation. *Trends in Ecology & Evolution*, 21(2), 71–76.

**How to cite this article:** Frank EG, Wilcove DS  
Correspondence: Challender et al. (2021)  
misinterpret the recommendations regarding an  
IUCN-CITES interface in Frank and Wilcove (2019)  
and advocate poor policy. *Conservation Letters*.  
2022;15:e12863. <https://doi.org/10.1111/conl.12863>