

Comments on First Draft and Draft Main Findings: Implications of actions to enhance synergies: An independent analysis and report

Sender		Comments
Region Oceania Narelle Montgomery		
Report		
	General Comments	Thank you for the opportunity to provide initial comments on the draft report regarding the potential of sharing services within the CMS family. The report provides a solid outline of the background, advantages and disadvantages generally associated with merging services, however, the information provided is very broad and does not provide any specifics in relation to the various services within the CMS family that could be shared.
Section 4		
	Main findings and recommendations	In order to maximize the usefulness of the report to the Standing Committee, it would be preferable for the Main Findings and Recommendations section to clearly articulate which services could be merged within the Bonn-based secretariats, and the advantages and disadvantages associated with each one.
	Policy options and recommendations	It would also be useful for the report to detail the proposed step-by-step approach (Option 2), such as which service should be merged first, second, etc., a rationale for the proposed order and a possible timeframe associated with each merger. This would allow the Standing Committee to deliberate on an actual proposal, as opposed to only the principles associated with such a proposal.
Region Europe Francois Lamarque		
Report		
	European Union	<ul style="list-style-type: none"> • The document gives a well-balanced overview of the pros and cons and the opportunities and risks of closer cooperation between the Secretariats within the CMS family, notably CMS and AEWA. • The authors based the study (among others) on interviews with many relevant persons, and the differences in views and the various nuances are well reflected. I find the main findings and options for the way forward not very surprising: there is likely scope for synergies, but it depends on various factors whether they can be realised, notably the way the process is managed and the cooperation of staff involved. • A more detailed quantification of the potential costs/benefits and risks of the various options would be desirable, although the authors clarify that this goes beyond the scope of the paper. The comparison with the synergies-process between the chemicals MEAs is interesting, but perhaps a more detailed

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		<p>investigation could reveal whether or not the potential benefits and costs in the case of the CMS family are similar to those realised by the chemicals MEAs.</p> <ul style="list-style-type: none"> • One minor technical comment on Table 5: following the amendments at COP11, we have 2/3 majority voting also on procedural matters (the EU reluctantly agreed). In the subsequent paragraph, it may be relevant to refer to the procedures of the relevant Standing Committees for delegated decisions.
	France	<ul style="list-style-type: none"> • The ToRs of the analysis should be provided (in an appendix for instance). This would allow to better understand the apparent limits of the study. • The resolution 11.3 requests an: “independent analysis and report on the legal, financial, operational, and administrative implications of actions to enhance synergies, such as through sharing services in common service areas”. The last part of the sentence is poorly addressed. The possible services to be shared are not developed (e.g. with different scenarios). This presentation could have facilitated a more concrete and in-depth approach which is dramatically lacking. • The analysis is, at this stage at least, very factual and general and not specifically CMS centred. Part 4 which is still pending, will certainly bring information on the different actions proposed to enhance synergies and their advantages/inconvenients. • The paragraphs on operational implications do not address the consequences of the various possible actions to enhance synergies on the implementation of the different Agreements or MoUs in the field which is of paramount importance for the Parties.
Section 4		
	France	<p>Point 8 of part 4 which stresses that the participation of the main stakeholders all along the process is a key point for the enhancement of synergies is very relevant. We agree one hundred percent on the importance of the transparency for the success of any attempt to foster synergies.</p> <p>Nevertheless, the disappointment/frustration felt after the reading of the first three parts remains unchanged.</p> <ul style="list-style-type: none"> • Part 4 reflects the whole document; it does not go beyond what was exposed before. The information remains quite general and could be applied to all types of structures. In that way and given this non specificity, it is thus obviously possible to say that “<i>these findings suggest that the potential advantages clearly outweigh the potential disadvantages</i>”. Synergies and sharing of common services in general are known to lead to scale economies. Does this apply to the various structures of the CMS family? It is hard to say based on the poor information provided in the analysis. • Point 3 states that “<i>This potential would depend on the extent of actions to enhance synergies...</i>” That is perfectly true; that is why it would have been useful to have a list of possible actions to share.

Sender		Comments
		<ul style="list-style-type: none"> The policy options and recommendations presented are very basic and obvious. They could have been formulated prior to any analysis.
	Italy	<p>The attention given to Overarching implications of synergies (paragraphs under 3.5) is appreciated. These paragraphs take into account aspects related to synergies we have to consider very carefully, because they are the actual reason for which we should pursue synergies: to make the goal of protecting migratory species becomes more central in global biodiversity framework and in the environmental policy agendas.</p> <p>Therefore we should encourage the attention to these aspects (external visibility and general policy direction, above all) even though, also in this case, the analysis should have been conducted in a more specific way (e.g. how much CMS family invests in communication and how could media and news benefit from CMS sharing services? Are there evidence of how political level would appreciate/benefit from operational synergies in CMS?).</p>
	Slovenia	<p>The part 4 of the document is very brief, therefore it can only be guessed on which background data it exists. From a perspective of a country where public finances are under more and more through scoping every year we would like to point out just one perspective:</p> <p>There is at least one daughter agreement - regional (ACCOBAMS), where staff is not part of UN staff and it does not have all the benefits (and for us as a Contracting parties not all the costs) of a UN staff, as well as UNEP charges. Additionally, one contracting party (Monaco in this case) unilaterally agreed to cover a substantial part of agreements costs. We presume this might not continue under proposed option 3 (all-at-once approach); therefore the conclusion regarding “the highest potential for exploiting the potential for benefits as soon as possible” might not be true, at least in this case. I presume that as a final consequence our yearly contribution would increase without any guarantee for better implementation of agreement's tasks, and this is hardly called a benefit.</p>
Region Africa		
Malta Qwathekana		
Report and Section 4		
	General Comments	<p>Before options and recommendations for next steps in pursuing such enhanced synergies can be proposed it seems there are lots of generalizations without supporting facts. For example the following statement “On balance, these findings seem to suggest that the potential advantages clearly outweigh the potential disadvantages” this is a very general statement without supporting evidence and require to be substantiated</p>

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		<p>by further detailed analysis showing where costs are going to increase and where savings are going to be made how much training mentioned in this document will cost etc.</p> <p>Exact estimates of the potential for cost reductions are difficult and resource-demanding to produce (and are beyond the scope of this study), (This is the most important aspect of this study to unpack the actual cost reduction in order to have a convincing argument and therefore the Terms of Reference should have covered this very important aspect of the study otherwise now it results in the study being referred for further research on this matter so that there is adequate data to inform better decision making on this matter). This issue of existing experience and probable best practices from other MEAs is good but should be adopted with caution as circumstances might not be the same.</p> <p>The autonomy of the agreements within the CMS family coupled with the limited overlaps in membership needs to be unpacked and clear strategies out in place on how this will be dealt with as these are very good recipe for complexities and difficult legal implications of having to reopen agreements for signing and ratification.</p>
Chile		
Report		
	General Comments	<p>Chile acknowledges the authors of the “Synergy study” and the Executive Secretary of UNEP CMS Dr. Bradnee Chambers for shared this comprehensive and constructive analysis.</p> <p>Chile would like to submit the following preliminary comments and amendments:</p> <ul style="list-style-type: none"> • The CMS has three working languages: English, French, Spanish and the text of the Convention exists in seven equally valid language versions. • The proposal to promote synergies among MEAs is always very welcome by regional Parties, and the next CMS St. Committee meeting will be a good opportunity to discuss it. • As a CMS Party, Chile highly appreciates the initiative of the CMS Executive Secretary in promoting a debate on this matter, which is being discussed by other Conventions. • It should be useful if an Abstract (executive resume) in Spanish version could be shared with other regional delegates before StC 45.
Costa Rica		
Report		
	General Comments	<p>Good day Mr. Chambers, in principle the proposal to promote synergies is always welcomed by the countries of the region. The document is clear and complete and we are prepared to discuss and analyze it in the near future. We consider that the proposal can be discussed during the Standing Committee meeting in Bonn. We are glad that the CMS Executive Secretary is proposing these subjects that have already being discussed by other Conventions.</p>

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		<p>However, we would like to have the Spanish version to be able to discuss it with the delegates of the region, in the meantime we will wait for the translation that the Secretary will provide in due course. I am always at your service and willing to support and participate in the discussion.</p>
Germany		
Report		
	General Comments	<p>The Resolution 11.3 requests an independent analysis and report on the legal, financial, operational, and administrative implications of actions to enhance synergies, such as through sharing services in common service areas to the decision-making bodies of the wider CMS Family.</p> <p>Germany acknowledges the authors of the “Synergy study”: we are grateful for the sound and comprehensive analysis. The draft presented meets the requirements requested in the resolution.</p> <p>Germany would like to submit the following comments and amendments:</p>
	Text specific remarks	<ul style="list-style-type: none"> • Page 11, para 1: The Headquarter Agreement between the German Government and UNEP/CMS dates back to 1984; the original Agreement was replaced in 2002 with a new one. • Page 11, 4th paragraph: the term “official language” is misleading. The CMS has three working languages of CMS: English, French, Spanish and the text of the Convention exists in seven equally valid language versions. • Page 16, 2.1.4., second para: With regard the establishment of the AEWA Secretariat Art. VI para 7 lit. b of the AEWA Agreement should be referenced: This provision requests the Meeting of Parties to establish an Agreement Secretariat within the Convention Secretariat. • Page 31/32: “The limited number of agreements involved and the large overlap among their Parties may have facilitated efforts for synergy in this case (although the difficulties and challenges encountered should not be underestimated).” DE proposes to delete the sentence in brackets as Germany did not encounter significant difficulties with the chemical conventions. The text in bracket is rather an assumption than clear facts. • Page 38, para 2: I wonder if it is necessary to elaborate on “trans-location” of non-Bonn based secretariats to Bonn. “Relocation” gives the impression that those entities have been located once in Bonn which is not the case; thus “translocation” might be are more suitable term. <p>However, Germany would like to highlight Art. 2 para 2 of the Headquarter Agreement (“Subject to the consent of the competent bodies of Agreements concluded under Article IV of the Convention, this Agreement shall apply mutatis mutandis to Secretariats of such Agreements which have been administratively integrated within the Convention Secretariat and are institutionally linked to the United Nations by agreement among such Secretariats, the Convention Secretariat and the United</p>

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		<p>Nations.”). This means that the German Government would bear the costs of accommodation and basic equipment of Secretariats moving to Bonn on top of the benefits accruing from this agreement.</p> <ul style="list-style-type: none"> • Page 35 and or 42: Germany wonders if reduced travel cost for officials could be an issue to be considered under these chapters.
Uganda		
Report and Section 4		
	General Comments	<p>My personal opinion is that this is a very comprehensive analysis and it's a very good piece. It will help Parties make an opinion on how to deal with synergies. Extend my thanks to the consultant for a job well done.</p>
Elizabeth Mrema Director, UNEP/DELIC		
Report		
	Text specific remarks	
	p. 10 Section 2.1 para 3 with footnote 8	<p>Is the sentence suggesting that MOUs are not governed by international law? I do not think legally speaking this is correct. International law governed both legally binding treaties like CMS as well as non-legally binding treaties such MOUs. Much as the two are different in law for all practical and implementation purposes, not difference is made under CMS between agreements and MOUs save for the latter being easier to sign and become a signatory than the former. Under CMS, when it comes to implementation of CMS itself or Agreements no difference is made with MOUs as long as resources for their implementation and enforcement is available.</p>
	p. 23 under section 2.3 para 5 line 3	<p>After the words "CMS" add "as a framework instrument, “</p>
	p. 24 Table 3	<p>Under the Gorilla Agreement, shouldn't the seat of secretariat be "Bonn (in interim)?"</p>
	p. 25 and p. 26	<p>Also under seat of secretariat, what does it mean to be "managed by signatories"? Shouldn't the country hosting the secretariat be mentioned as it did for Abu Dhabi?</p>
	p. 27 Section 3.1 para 3 2nd last line	<p>"Overhead charges paid by the secretariats to the agreements hosted in Bonn". Is this true? Isn't these charges paid by the parties through their assessed contributions or donors through their funded projects?</p>
	p. 29 under sections 3.2	<p>Shouldn't the legal distinction between Agreements and MOUs be made and whether or not it applies to CMS with regards to enforcement? And Why CMS uses both modes?</p>
	p. 30 Table 4	<p>Don't the last five listed Agreements overlap?</p>
	p. 31 para 1	<p>With the examples given, any basis to use under the VCLOTreaties to also use.</p>

Sender		Comments
	p. 31 under Figure 1	It shows that only 7 Parties to different agreements are not parties to the framework convention (CMS). Is this true for the above or Figure 1? If so, footnote this information to clarify.
	p. 34 para 3 last line	After the word "Euros" add "as decided by the parties but UN/UNEP currency denomination is US\$".
	p. 34 para 4	How would IOSEA based at the UNEP Regional Office in Bangkok fare in this synergies argument? It is co-located with UNEP Regional Office, it uses financial and administrative services of the regional office etc.? Compare this with the Abu Dhabi office for Raptor and Dugong MOUs? Any legal implications to consider from the texts of the different Agreements or on the secretariat set up?
	p. 35	Under Cost reductions arising from synergies section - it is saying quantified data are not available. Is this true? The two ASCOBANS evaluations done, no data was provided? E.g.: no independent staff and parties pay only % of their salary, execution of activities undertaken through CMS and the Coordinator having her time divided between ASCOBANS and CMS?
	p. 36 para 1	Savings made are not only on funds but also staff as well as joint operational activities. Illustration from BRS conventions may be inevitable.
	p. 37 para 1	Consider adjusting the second sentence to " staff costs within EUROBATS arose after UNEP became the provider of its secretariat and thus guided by UN/UNEP rules and regulations including recruitment of personal as opposed to when the secretariat was provided by a party or government.
	p. 38 para 2	It would be appropriate to explain what UNEP uses for the 13 % Programme support cost so as not to be seen as funds are benefiting UNEP while in actual fact it is for parties' activities through the secretariat (67%) with UNEP retaining only 33% for those activities UNEP performs for the secretariat such as trust fund management, recruitment, auditing, investigations, staff cases, etc. etc.
	p. 44 at the end of para 1 continuing from previous page	While the short term argument may be agreed as yes, but for CMS doesn't this arrangement already exist and continues? If this is the case, would the argument still hold?
Section 4		
	Policy options and recommendations	My only comment on this document is the Option 3 on all at once approach. Option makes good sense but I do not recall to have read adequate elaboration of this option in the report, what it means, what it entails, etc. etc. Any lessons to learn from elsewhere or not, etc. etc. it may be appropriate at an appropriate section to elaborate further the background and rationale for this option before it is used on this document.

Sender		Comments
Hemini Vrontamitis Director's Office, UNEP/OfO Additional Comments from OfO Senior Legal Officer		
Report		
	General Comments	The report is a succinct and well researched document on the options available. OfO have some specific comments/observations as below:
	Text specific remarks	
		<p>Page 11 para 5 (and in various other parts of the report): As per standard UN Secretariat practice, we prefer to use the term Programme Support Costs instead of 'general 13% overhead charged by UNEP'. We would also request the insertion of the following text: "The UNEP Executive Director allocates an appropriate share of the annual Programme Support Costs (PSC) income attributable to all of the trust funds of the Convention to the Secretariat upon receipt of an annual cost plan that demonstrates that these funds will be used efficiently and effectively in support of Convention activities. The Executive Director allocates a share of 33% of the PSC income attributable to all of the trust funds of the Convention to the following central administrative functions. These items are indirect in nature and 67% is used to support the Secretariat directly.</p> <p>(Excluding services contracted locally by the Secretariats to UNOG, UNOV or other service providers):</p> <ul style="list-style-type: none"> a) Staff Recruitment, classification and selection process; b) Payroll and administration of staff entitlements including education grants, medical insurance including compensation in the event of death, injury or illness attributable to the performance of official duties on behalf of the UN or UNEP, home leave and repatriation; c) The United Nations' financial disclosure programme (billed by UN Headquarters in New York); d) Accounting and finance functions, including statement preparation, the issuance of allotments and allocations, payable/receivables, cash-flow management, treasury and contributions receipt and recording; e) Administration of end-of-service and post-retirement benefits including the administration of pension fund deductions and ASHI; f) Non-expendable property asset management; g) Internal audit, investigation, inspection and external audit;

Sender		Comments
		<p>h) Participation in the United Nations' administration of justice system; Shipping, pouch, visa and United Nations Laissez-Passers;</p> <p>i) Access to the corporate United Nations and UNEP intranet/internet and mail systems as well as the Enterprise Resource Planning system (Umoja)"</p> <p>In Page 11 para 5, which outlines some broad advantages of working with UNEP, we would also suggest inclusion of the following benefits:</p> <ul style="list-style-type: none"> • The Secretariat staff, as UNEP staff members, are entitled to and bound by all conditions of service of UN employees; • The Trust Funds of the Convention, its sister Agreements and MoUs are established and managed by the Executive Director of UNEP in accordance with the relevant financial regulations and rules of the United Nations, and the general procedures governing the operations of the Fund of UNEP; • UNEP policies which ensure best value for money, such as Results Based Management and other corporate standards and practices such as the Environmental, Social and Economic Sustainability Framework; the Policy and Strategy for Gender Equality and the Environment, and the Knowledge Management Strategy. • Other benefits include: better access to outsourcing; a wealth of administrative, procedural and institutional experience; programmatic support; and technical assistance. <p>Page 27 last paragraph: Pls replace the words "13% standard overhead charges" with Programme Support Costs</p> <p>Page 38 paragraph 2: Pls replace the words "13% standard overhead charges" with Programme Support Costs</p> <p>In addition, the OfO Senior Legal Officer has the following comments on section 2.1:</p> <ol style="list-style-type: none"> 1. The statement made in para 3 of Section 2.1 is not accurate. It says: "Whereas the CMS was originally deemed to aim at the conclusion of international treaties" -and the footnote that follows this statement clearly provides that it should be "herein understood in accordance with the 1969 Vienna Convention on the Law of Treaties (...)". Art. IV of the CMS in fact calls for the conclusion of "international agreements" but neither in Art.IV nor in Art.V (which provides "Guidelines for the Agreements") the Parties who adopted the Convention qualified the type of "international agreement" they intended to conclude. Thus later the Parties interpreted that they could use any type of "international agreement",

Sender		Comments
		<p>including MoUs. The definition of "agreement" given in the CMS Art.1 (j) is "an international agreement relating to the conservation of one or more migratory species as provided for in Articles IV and V of [this] Convention" without making reference to the type of agreements (whether or not they should be international treaties in accordance with the 1969 Vienna Convention).</p> <p>2. It would have been good to receive the Headquarters Agreement referred to in para 4 of Section 2.1, as we requested. This would have allowed us to understand the reference made in this para to such Headquarters Agreement "between the Federal Republic of Germany, the United Nations Environment Programme and the Secretariat of the CMS" concluded in 2002. From a legal point of view it is difficult to understand why the Agreement would have been signed by both UNEP and the "Secretariat of the CMS" if that Secretariat is provided by the UNEP ED.</p> <p>3. Para 5 of Section 2.1 refers to a full-time staff in its Project Office in Bangkok "who is currently on sabbatical leave". I would recommend the authors make reference to the period of such sabbatical leave providing the relevant dates. The use of the word "currently" seems not to be accurate since the document will not necessarily be read only "in the present times".</p> <p>4. Para 7 of Section 2.1 starts with the statements "the working language of the Secretariat is English". I have not found this reference in the Convention. Was this decided by the Parties at any alter stage? If there is no legislative authority deciding that this should be such, then the statement is not correct and would need to be removed. One thing is facts, and another one is a legal mandate (a decision legally made by the Parties and therefore a request legally made to the Secretariat to operate in a certain way). If it is currently the way to work of the Secretariat to operate in English -for practical reasons/because it is the common language of its staff members/etc. - it does not mean that "English is the working language of the Secretariat". If documents that come to the attention of the Secretariat or correspondence addressed to the Secretariat is in another UN language, the Secretariat accepts and processes such documents/correspondence as necessary.</p> <p>5. Para 8 starts with the statement "Hosted by UNEP, the Secretariat follows (...)". I would recommend to change the word "hosted" with the word "provided" in order to be consistent with the mandate given to UNEP by the Parties and reflected in the text of the Convention.</p> <p>6. In para 8 there is reference to the "general 13% overhead charged by UNEP". I agree with Dionyssia's suggestion to delete the word "overhead" and replace it with "charged as per standard UN Secretariat</p>

Sender		Comments
		<p>practices on Programme Support Costs". I would suggest we further add "and in agreement with the relevant UN General Assembly resolutions and UNEP governing body decisions".</p> <p>7. In the same para 8 there is a statement reading "Being within the UNEP structure gives the Secretariat access to key UNEP infrastructure such as IT and telecommunications support, as well as broader operational support (...)". In my opinion this statement minimizes UNEP's role in providing the Secretariat just to "access to UNEP's infrastructure". If the phrase "Being within the UNEP structure" means that Secretariat is in a UN building then the phrase should be reformulated. If that is not the case then we should request that all the benefits of having UNEP provide the Secretariat be mentioned, only including the fact of access to UNEP's IT infrastructure as one of them.</p>
<p>Chair, CMS Scientific Council Fernando Spina</p>		
<p>Report & Section 4</p>		
		<p>I went through the very interesting documents produced by the consultants on “Implications of actions to enhance synergies: an independent analysis and report”. I have not been in touch with the consultants, nor contacted by them, hence I rely, for my comments below, on ideas I got through reading their reports; some aspects I might have tried to clarify talking to the consultants therefore are only based on my interpretations of the findings they report about.</p> <p>I understand that this is not going to be a fast process, given the CMS Family is made of multilateral environmental agreements with limited overlap of memberships, hence I understand the process will go also through contacts and involvement of Parties to the different CMS instruments, as the latter will need to support this initiative through their political mandate.</p> <p>I also understand the overall financial savings through the implementation of synergies across the Bonn-based Secretariats will amount, in the mid- to long-term, to an estimated annual 100-150,000€, which I consider being not a trivial amount.</p> <p>In terms of visibility I may agree on the concept that a larger CMS Family might lead to higher overall visibility for the Convention, yet I think it would be good retaining visibility of the single CMS instruments. From my experience, the existing taxa- and issues-specific CMS instruments give a positive idea and convey a powerful message of complex, varied, scientifically and expert-based conservation instruments ranging across all species, a very large number of countries and all continents.</p>

Sender		Comments
		<p>However, I may miss details on how the proposed synergies will optimize management and reduce costs, at the same time retaining visibility of the CMS instruments considered.</p> <p>As for the 3 proposed options, I think option 2 sounds like a good strategy which, I'm sure, will lead to maximizing the positive effects of enhanced synergies within the CMS Family.</p>
<p>Chair, EUROBATS Standing Committee Jeroen Panis</p>		
<p>Report</p>		
	<p>General Comments</p>	<ul style="list-style-type: none"> • It is a rather limited interpretation of the first request in UNEP/CMS/Resolution 11.3, namely to work “in consultation with the relevant Secretariats of CMS family instruments”, since these secretariats were not involved in the draft of the terms of reference, the choice of the consultant or the guidance of the execution of the project. As such, this lack of transparency is not helping the perception of this study as independent. • Regarding methodology: <ul style="list-style-type: none"> a) The report is based on interviews of key stakeholders, in itself a valuable approach. Unfortunately no information was given on the selection process of those key stakeholders. b) No information is given on the approach for the analysis or comparison of the different arguments used to reach conclusions and recommendations. One key factor would be the efficiency and effectiveness of fulfilling the goal of the convention, agreement or MOU. • On a whole the study stays at an abstract and theoretical level without touching on specific and concrete issues which would be the basis for any decision. Some examples: <ul style="list-style-type: none"> a) On the issue of back to back meetings: little considerations are given to practical aspects as inter alia the differences in composition of delegations of parties for different conventions, the workload of parties or the different geographical and species scopes of the conventions, agreements or MOUs. b) There is no inventory of existing collaborations between the convention and the different agreements and MOUs, especially between those based in Bonn. c) There is no financial analysis. • In a few places those interviews are used as an authoritative argument. It is therefore strange that the report of interview has not been shared with the interviewee (or at least not in my case). Again a blemish on the perception.

Sender		Comments
		<ul style="list-style-type: none"> • Why are representatives of BMUB interviewed? And with such a relative weight (2 interviews out of 21)? If this is because Germany is the Repository of CMS, why have the other Repositories not been interviewed? If this is because Germany is the host country of the instruments situated in Bonn, then why have the other host countries not been interviewed? • I can't see the relevance of the interview with the executive secretary of CBD, if the document is attaching such importance at the cooperation between the three chemical s convention (Basel, Rotterdam and Stockholm Conventions) and their executive secretaries (or comparable officials) are not consulted. Why are they not consulted? • The ASCOBANS case seems to be interpreted in a rather selective way. I will go into detail in my specific remarks. • The case for the claim that the situation regarding the Chemicals conventions and the CMS family are comparable, has not been made. • The text is not complete. Especially the executive summary is missing, triggering some reservations.
	<p>Text specific remarks</p>	<ul style="list-style-type: none"> • Regarding 2.1.1, the Ministry of Agriculture, Nature and Food Quality of the Dutch Government does not exist as such anymore. • Regarding 2.1.3, the rationale behind the decision to let the CMS secretariat serve as the secretariat for ASCOBANS was not of a financial but of a managerial nature. Failure on a management and leadership level leading to inter alia overspending, led to this decision. The key is in fact the following paragraph in de preamble of MOP resolution 5.2d: "Mindful of the report from the United Nations' Office of Internal Oversight Services (OIOS), Internal Audit Division, dated 24 August 2006 which found a lack of clarity in the roles and responsibility for the administration of budgetary preparations and management contributed to a sizeable overspend against provision in the triennium 2004-2006;". • Regarding 3.1, the decision to let the CMS secretariat serve as the secretariat for ASCOBANS was not a search for synergies, but a stopgap measure to address a serious management and leadership issue in the former secretariat. This was aggravated by the coincidence with a move to integrate the ASCOBANS secretariat into the UNEP/CMS Agreements Unit as was done with EUOROBATS and AEWA. What this therefore shows is not a successful synergy effort, but the fact that the tasks of a secretariat of a small convention can be accommodated by the CMS secretariat, at least when the parties are all party to CMS itself. Besides, based on the report of the questionnaires mentioned, the only conclusions that can be deducted are that management and leadership issues were addressed by the then executive secretary of CMS.

Sender		Comments
		<ul style="list-style-type: none"> • Regarding 3.3, item “Cost reductions arising from synergies: as mentioned in 3° reference to the survey”. I don’t see corroborating evidence in the referenced document. If you read point 8, you can see that efficiency and cost effectiveness appear satisfactory for the Parties, but point 12 points out that this is rather a consequence of improved management and leadership, not of the integration as such. • Regarding 3.3, item “Cost reductions arising from synergies: reference is made to the chemicals conventions. Are these not complementary conventions, focussing on different sides of the same issues, viz. international movements of toxic waste. Is this really comparable to a situation that several extra conventions are brought into existence to cover topics that could not be covered by an general approach, i.e. CMS? The comparison between both relationships should be more elaborated. While stating in the introduction of chapter 3.3 that a precise quantitative assessment of financial implications is beyond the scope of this study, numbers are available for savings at the Chemicals Conventions. However no information is given on the origin of or reason for these savings. Without evidence that this is a consequence of the synergy process, the conclusion is a moot point. • Regarding 3.3, last paragraph of item “Mobilisation of external funding”. the fact that organization perceived as more efficient and reliable have greater access to donations, is just what is says. This is not an argument in favour of merging or intense cooperation, but in favour of competent and transparent management. Nothing more. • Regarding 3.4, item “Efficiency and performance gains”. This is probably true in general, but to be able to decide a course a general observation is not enough. Needed is a specific and factual analysis, especially with regards to financial consequences, because it needs to be balanced with the next item “Costs of reorganization and adaptation”. As mentioned before, there is no list of existing collaborations between the different secretariats. • Regarding 3.4, item “Costs of reorganization and adaptation”. In the last paragraph a reference is made to “scepticism in interviews”. It would be relevant to elaborate on firstly the reasons and subject of the scepticism and secondly the relative importance of it. • Regarding 3.5, item “External visibility”. A serious claim has been made in the second paragraph about the lack of transparency caused by the complex structure of the family. What evidence backs up firstly the existence of this issue and secondly its gravity? Reference is made to “some interviewees”. A bit more information on the importance of this claim is needed (e.g. How many out of 21?). This is relevant to know, especially regarding my general remarks (2°, 3° and 4°). • Regarding 3.5, item “General policy directions”. It is clear that as a general rule we should strive to “as much synergy as possible”. Still this leaves the question unanswered about the reason of being of

Sender		Comments
		<p>those agreements and MOUs. The Parties saw the need to set up specific targeted agreements with their own objectives and management through their respective secretariats to address issues that could not be covered by the general convention, i.e. CMS, and its secretariat. Looking at how some of the agreements and MOUs have been growing since then, are there then now any reasons why CMS and its secretariat can address these issues adequately at present?</p>
Section 4		
	General Comments	<ul style="list-style-type: none"> • The resolution 11.3 requests an: “independent analysis and report on the legal, financial, operational, and administrative implications of actions to enhance synergies, such as through sharing services in common service areas”. The topic of sharing services is barely touched. I would have expected a list of potential shareable services, which are analysed individually to see whether synergies occur, under what circumstances and how large the potential gains are. • Regarding methodology: <ol style="list-style-type: none"> a. It seems basically that only the merger/synergy reinforcing arguments which are mainly of an academic or theoretical nature, are withheld for the analysis. Other arguments are essentially being ignored; b. There is no real analysis: no definition of criteria for weighing different policy options; no analysis of effectiveness (in this case effectiveness regarding improvement of conservation status of the species concerned); no analysis of direct, indirect and redistribution effects; ... Not even a form of weighing of the different arguments for or against something; c. No distinction or hierarchy between policy options and implementation options; d. The different proposed solutions are not compared, not qualitatively let alone quantitatively and financial. A form of cost benefit analysis should be the foundation for every decision of this nature (CBA exist since 1848, RIA since 1978); • The proposed solutions are only of a general nature and are not grounded in an analysis of existing practical or policy issues or good practices.
	Text specific remarks	<ul style="list-style-type: none"> • Regarding 4 item 2 “Legal implications”. This shows we need to have some idea on the return-on-investment. If this is not trivial, why should we do this? • Regarding 4 item 3 “Financial implications”. This type of valuation is a case of benefit transfer. To be able to do that both situations should be sufficiently comparable. There is no evidence in the report that this is the case, besides the fact that international environmental conventions are concerned. At least some evidence and calculation should be provided to back up these claims about potential savings. It would be nice to know under which conditions these potential savings could be realised. Since there is no real cost benefit analysis this item is basically pointless.

Sender		Comments
		<ul style="list-style-type: none"> • Regarding 4 item “Operational and administrative implications”. This statement is based only on a theoretical approach of the question. Besides, there is almost no link with earlier parts of the report. • Regarding 4 item “Overarching implications”. The real overarching implication is that the agreements and MOUs were set up by the Parties to improve the conservation status of the species concerned. This issue is not addressed. I cannot imagine that other multilateral environmental fora providing the general policy guidance, would seek to merge services etc. at the cost of reaching those conservation aims. • Regarding 4 item 6. The name for option 2 is “step-by-step approach” which implies a final goal of merging everything and is as such just an implementation option of option 3.
Chair, EUROBATS Advisory Committee Ferdia Marnell		
Report		
	General Comments	<p>I welcome this report and the opportunity I was afforded to input into it and the further opportunity now to comment on it in draft form.</p> <p>I think it is important to re-state here what I said at the outset of my phone interview i.e. I am the scientific focal point for Ireland for CMS, but my country’s engagement with CMS is limited to a watching brief; we have not attended meetings for several years. By contrast, Ireland has played an active role in EUROBATS since its inception, and I have been actively involved in EUROBATS for 15 years as the scientific focal point for Ireland, and then for a four year period as Vice-Chair of the Advisory Committee and most recently as Chair of that Committee. From this knowledge base, I have a number of general comments on the report and its findings.</p>
		<ul style="list-style-type: none"> • There are important differences between improving efficiency and improving effectiveness. The mandate from the CMS COP in 2014 and the Conference on Sustainable Development held in Rio in 2012 both emphasise the goal of improving the effectiveness of CMS and other MEAs. Greater effectiveness can also give rise to improved efficiencies, through the reduction of unnecessary overlap and duplication, and enhanced coordination and cooperation. But it should be remembered that the goal of this review, and the focus of any resulting changes, should be to improve the effectiveness of our conservation efforts and not to reduce costs. • The report puts considerable emphasis on the improvement that was achieved in the ASCOBANS Agreement when its management was taken over by the CMS Secretariat. While it is reassuring that this Agreement is now on a firmer footing, it must be remembered that that Agreement had suffered from a period of poor management leading to financial difficulty. It does not follow that, and the report

Sender		Comments
		<p>fails to demonstrate how, a well-managed and properly functioning Agreement would derive any benefit from a similar change in structure.</p> <ul style="list-style-type: none"> • The comparison between the CMS family and the “Chemical Conventions” is interesting but there would appear to be very little in common between them and again the report does not demonstrate any valid basis for the comparison. If the authors believe the comparison is genuine, it would be very useful to see a more detailed description of the Chemical Conventions and a fuller analysis of the synergies they have achieved, the improvements in effectiveness gained through the mergers etc. etc. Without this the comparisons seem superficial and are potentially misleading. • There is a suggestion in the report that a more centralised CMS would be a more effective fund raising tool than the current structure. I have been involved in fund-raising, and also, in my role in a national conservation authority, as a fund distributor. I am not convinced by this argument and I do not believe that potential funders are put off by the current structure of CMS. CMS will be a better fund raiser if it devotes more time and effort to fund-raising. The same would apply to individual daughter Agreements. The issue is whether such independent fund-raising is a priority and where the resources to focus on fund raising would be diverted from? • It must be remembered that the various Agreements and MoUs under CMS have been established in response to particular demands and conservation requirements identified by Parties. The purpose of each of these individually is to improve the conservation status of species or species groups. The current report has not demonstrated how these individual goals would be furthered through any potential changes in shared services. Given that the report (in Chapter 4) identifies the need for a clear mandate from Parties to support the successful implementation of any further enhancement of synergies, some effort should be focussed in the final report on how the Parties’ desire to further their conservation efforts will be met by any such changes. • Finally, and perhaps most importantly, I note that we are being asked to consider the implications of enhanced synergies when in fact the actual synergies themselves are only hinted at and have not been presented in any detail. The COP Resolution refers to the potential for “sharing services in common service areas to the decision-making bodies of the wider CMS Family.” To my mind what is needed now is to explicitly identify these potential services and to examine them individually in more detail to establish where synergies may occur and under what circumstances and how, through a detailed cost benefit analysis, this in turn would further the fundamental goal of the CMS family: to conserve terrestrial, aquatic and avian migratory species throughout their range.

Sender		Comments
EUROBATS Secretariat Andreas Streit, Executive Secretary		
Report		
	General Comments	<p>The EUROBATS Secretariat considers this study to be part of a Party driven process that should remain in the hands of the Parties to CMS and the related Agreements as well as other Instruments with regard to the direction it takes and to the possible conclusions and decisions it might lead to. The Secretariat will therefore limit itself to corrections of factual errors in the present draft and to comments that are based on its own experience of operating within the CMS Family and the wider UNEP framework. Nevertheless it is noted that the present study has a fundamental shortcoming.</p> <p>Instead of first analyzing what is working well in the operation of the Convention and Agreement Secretariats as well as the co-operation within the CMS Family as a whole and - based on these findings - identify areas and opportunities for increased co-operation, efficiency and optimized use of available resources, the study remains on a rather academic level and quite detached from the day to day reality in particular with regard to the long standing and close co-operation of the Bonn based secretariats.</p> <p>As a matter of fact the CMS Family has already previously undergone significant changes in its setup, most of which were directed to synergies and increased efficiency. This is not sufficiently recognized and described in Chapter 3.1.</p> <p>Furthermore the study throughout its text tries to make a direct comparison with the Basel, Rotterdam and Stockholm Conventions (the so called Chemicals Conventions) without providing any information on where similarities between them and the CMS Family might exist. As far as can be recalled without detailed research, the background and reasons for the merger of functions in the Secretariats of the Chemicals Conventions was mainly triggered by significant overlap in their activities and substance of work as well as by partly contradictory decisions adopted at their respective COPs. At least from the EUROBATS perspective there are no issues that would provide a sensible reason for comparison with the setup of the Chemicals Conventions.</p>
	Text specific remarks	
	p. 13, last para	Already in its original text the Agreement has been expressly open for accession of non-European Range States. Based on scientific evidence the second amendment and a later resolution redefined the Agreement area in order to cover the Western Palearctic region thus recognizing biogeographical boundaries.
	p. 14, second para	The EUROBATS and ASCOBANS Secretariats became fully integrated into the UNEP administration as of 1 January 2001 as a result of identical resolutions adopted by the Parties at the respective MOPs held

Sender		Comments
		back to back in 2000. EUROBATS Resolution 4.2 only formally endorsed the Headquarters Agreement which had already covered the EUROBATS, ASCOBANS and AEWA Secretariats since its entry into force.
	p. 23, second para	The word “proliferation” should be replaced because it has a negative connotation. Concern about a “proliferation and fragmentation of Multilateral Environmental Agreements” is popping up in discussions and academic papers since some ten years but is not at all applicable to the CMS Family. To the contrary, by its design and the political will of the Parties it has been and continues to be an essential part of the CMS mission to promote and facilitate the conclusion of agreements on the conservation of single species or groups of species as correctly stated on page 10, third paragraph.
	p. 27, third para	More or less from the outset it had been the political will of Parties to co-locate Agreement Secretariats with the CMS Secretariat under UNEP administration. For EUROBATS the decision had been scheduled at the first MOP after the establishment of the permanent secretariat in 1996 which was MOP 2 in 1998. Because of last minute irritations with regard to the cost implications, the decision was then postponed until MOP 3 in 2000 which was held back to back with ASCOBANS MOP 3 where an identical resolution was adopted for ASCOBANS.
	p. 27, last para	It is important to highlight that the joint Administrative and Fund Management Unit only became possible through the co-location of the EUROBATS, ASCOBANS and AEWA Secretariats and their integration in UNEP administration. Often wrongly presented or perceived as CMS staff this unit is composed of UNEP staff members who serve all co-located secretariats on an equal basis. Its tasks not only include the management of funding and payments but also human resources matters and travel arrangements.
	p. 28, third para and p. 35, third para	<p>This evaluation creates a wrong picture by not providing a reference to UNEP/CMS/Conf.10.34 on “The Merger of CMS and ASCOBANS Secretariat Functions” which contains two important statements and lessons learnt. In paragraph 9 of this document it is stated that “<i>The new arrangements do not necessarily produce less overall costs if hidden costs are factored in, such as unbudgeted extra staff time or the need for all involved officers, therefore a higher number of staff, to attend meetings of the Agreement’s bodies.</i>” And more importantly paragraph 16 states “<i>While the arrangement works very well for a small Agreement like ASCOBANS, the Joint Secretariat would not see merged Secretariat functions as a viable option for larger Agreements and would not advocate it as a generally applicable example. This should especially be stressed in view of the impending decision regarding the Future Shape of CMS.</i>”</p> <p>It is also surprising that none of the staff mainly working for ASCOBANS was interviewed in order to obtain first-hand information on all effects of the merger, also the negative ones.</p> <p>Furthermore it is stated that the contributions by Parties to ASCOBANS have remained stable while not mentioning that the same is the case with the contributions of EUROBATS Parties. Without any merging</p>

Sender		Comments
		arrangements the contributions to EUROBATS have not increased in the past eight years and will also not increase in the just started new four year budget cycle.
	p. 35, last para continued on p. 36	<p>While the study repeatedly states that it is difficult to present figures with regard to potential savings arising from increased synergies it presents figures from the Chemicals Conventions without providing any information on where these savings precisely were obtained from. It has to be assumed that a large part of the reported 3-4 per cent savings on the overall budget were generated through the abolishment of high ranking posts in the executive management of the Conventions.</p> <p>However, the situation in the CMS Family is a totally different one. The Executive Secretaries of the co-located Agreements are employed at the same grade and salary level as the CMS Programme Officers. Only two CMS staff members who are heading MOU Secretariats (IOSEA and the Abu Dhabi Office) are employed at a higher grade but largely (in case of IOSEA) or fully (in case of Abu Dhabi) not financed through the CMS budget. None of the synergy scenarios presented so far is suggesting the cutting of posts but only introduce new functional titles or reorganized structures. It is difficult to understand where savings could be derived from with at the bottom line actually more staff being involved in tasks to be carried out for the various Agreements.</p>
	p. 37, first para continued on p. 38 and footnote 16	<p>This paragraph should be completely rewritten in order to provide all relevant facts and the complete picture instead of highlighting the case of one individual staff member. As mentioned earlier, it has been the clear political will of the Parties to co-locate the AEW, ASCOBANS and EUROBATS Secretariats with the CMS Secretariat and to have them administered through UNEP by providing a joint Administrative and Fund Management Unit. The Executive Secretaries of the three Agreements have been from the outset employed at the same grade as the CMS Programme Officers as soon as this decision of the Parties came into effect (for ASCOBANS and EUROBATS in 2001, for AEW already in 2000 because it coincided with the establishment of the permanent Secretariat. Following an upgrade of the CMS Programme Officers, the Parties to the three Agreements adjusted the grades of the Executive Secretaries accordingly at their respective MOPs. Only for ASCOBANS this decision did not materialize because the post was abolished at the end of 2006.</p>
	p. 40, Footnote 20	<p>An explanation is required on which available evidence such a statement could possibly be based. There is no known case of a country that has not acceded to either CMS or one of the Agreements for reasons of their organizational structure neither is any example for inefficient or “more efficient” structures provided. Which added value can such an isolated statement provide without any factual basis?</p> <p>Parties accede to CMS because they want to commit themselves to the conservation of migratory species and they accede to the Agreements if these are relevant to their geographical region and for their political priorities.</p>

Sender		Comments
	pp 41 to 43	<p>Chapter on Efficiency and performance gains: The entire chapter remains very vague, largely detached from the day to day reality in the CMS Family and as mentioned in the general remarks above is not based on a thorough analysis on what is working well and which close co-operations are already in place since long.</p> <p>One of the few examples provided relating to travel arrangements is factually wrong. These are processed by the joint Administrative and Fund Management Unit and not by the individual Secretariats. It is the newly and UN-wide introduced administrative system UMOJA that obliges all staff members to process their individual travel requests, a task previously carried out by few staff members for all others.</p> <p>Another example proved relates to conference organization. Mutual assistance is since long and successfully practiced between the CMS and AEWA Secretariats. Due to budget and staff constraints this is however not a realistic option for e.g. the EUROBATS Secretariat, which until now successfully manages to organize its conferences with the available resources and as far as known also to the satisfaction of the Parties.</p>
	p. 46, third para	<p>Again a strong statement is made by referring to a “<i>lack of transparency resulting from the current complex structure of the [CMS] Family</i>” without providing any factual evidence. At least the EUROBATS Secretariat is not aware of any “lack of transparency” related to its setup or work.</p>
Section 4		
	General Comments	<p>Different from what we believe to have been the intention of the Parties in Resolution 11.3. and different from its title referring to “enhanced synergies”, the analysis takes a much narrower approach by only focusing on “common or shared services” within new or reorganized structures as if this was a goal in itself without first analyzing actual and objective needs as well as the resources required. Even before a sound evaluation of the “Pilot” for shared services – the joint CMS/AEWA Communications unit – has been provided and a decision been taken on whether to continue it or not, other joint units (e.g. conference services) are being proposed without providing any details, cost or other implications. On the other side there is a long list of past and ongoing successful activities within the CMS Family that are representing true synergies. However, these are not valued at all in the analysis although they might well illustrate the best way forward for additional and enhanced synergies that can be achieved across the CMS Family also in the future.</p>
	Comments on individual paragraphs	<ul style="list-style-type: none"> - Paragraph 3: For the EUROBATS Secretariat it is impossible to understand how an amount for expected cost reductions can be mentioned without providing any information from where these savings possibly could be derived and by stating at various other places of the analysis that the CMS Family is under-resourced.

Sender		Comments
		<ul style="list-style-type: none"> - Paragraph 4: Once again, these “findings” appear to be detached from the reality in the CMS Family and are not based on assessed facts. - Paragraph 5: The CMS Family will obtain the greatest visibility if it is successful in its goal to effectively conserve migratory species of wild animals. It is very surprising that nowhere in the study this goal is given any attention. - Paragraph 6: The options are narrowed down to institutional/organizational matters while many more options for truly enhanced synergies certainly exist. The Parties will require much more detailed information that is based on the actual needs of the CMS Family to become able to take an informed decision. <p>This also applies to the remaining paragraphs of chapter 4.</p>
AEWA Secretariat Jacques Trouvilliez, Executive Secretary & Secretariat		
Report		
	General Comments	<p>Once informed by the CMS Secretariat of the choice of the consultants on the 3rd June and having asked for the ToR the 19 June, the participation of the UNEP/AEWA Secretariat to this process had taken the form of an interview of one hour and a half the 2nd July. We then received for comments an incomplete draft of the report on the 20th August and for a very short period as the deadline was the 26th August. The timing was really difficult for the Secretariat as we were organizing a CMS/AEWA/Raptor MoU workshop on poisoning the 24th and then on 25th to 27th the preparatory meeting of MOP6 for African Parties in Cape Town. The comments provided below will then be completed for the 1st of September with the analysis of the last part of the document received on the 25th August. It should be noted that we are still waiting for the Executive Summary.</p>
	p. 8	<p>The methodology said there is analysis of existing experiences within the CMS Family but in the following pages no real analysis is presented (AFMU, joint Communication unit...). Furthermore, the synergies already in place are not analyzed, even not listed. There is good examples of past collaborations and ongoing ones which show that synergies could be achieved without any common units or services.</p>
	Text specific remarks	
	p. 11	<p>UNEP and other UN departments did not provide translation services to AEWA.</p>
	p. 16	<ul style="list-style-type: none"> - Conclusion was on 16 June 1995 (not 15 August 1996), it should be corrected elsewhere in the document; - AEWA have 119 Range States (not 123), it should be corrected elsewhere in the document;

Sender		Comments
		<ul style="list-style-type: none"> - the fix-term posts that are financed by the core budget come to 6,75 FTE ...not 8,85; - The working languages are English and French (cf. Rule 52 of the RoP MOP official meeting languages). - There are 4 AEWA Parties which are not Parties to CMS. The word yet has to be deleted if we wanted to stay factual. - The statement of the third paragraph about the joint Secretariat is incorrect and should refer to a joint Executive Secretary
	p. 23	<p>The first sentence gives a negative connotation. It should be reworded or deleted.</p> <p>French as official working language plays an important role for AEWA. Reducing us to English does not reflect the reality.</p> <p>What is the significance and the pertinence of this sentence: Nevertheless, despite their autonomy, they are linked to the CMS, which remains the only agreement within the CMS Family which is not restricted to a certain geographical area (and thus truly global), has the largest number of Parties ? As per construction the instruments developed under the CMS auspices should concerned either a group of species or a region. It is therefore normal that CMS remains as it is.</p>
	p. 27	<p>No evaluation of the cost, benefit and efficiency of the AFMU is provided. It is the first example within the CMS Family of a shared service even if AEWA is not associated to the management of this team.</p>
	p. 28	<p>The conclusions of the CMS Secretariat report UNEP/CMS/Conf.10.34 clearly stated in paragraph 16 While the arrangement works very well for a small agreement like ASCOBANS, the joint Secretariat would not see merged Secretariat functions as a viable option for larger agreements and would not advocated as a generally applicable example. The report here give incomplete information which could lead to a wrong conclusion.</p>
	p. 29 and p. 34	<p>The assessment of the joint Communication Unit is not used in the report. No cost reduction have been demonstrated.</p>
	p. 32	<p>Strange link between the membership and the cost sharing. Two instruments with the same Parties still have to decide how they will share the resources.</p>
	p. 36	<p>The savings made by the BRS have to be described to explain how it was achieved. Was it staff cost or any other items? As cost increase it should also be mentioned that the composition of new units requires staff functioning as head of these units. Somebody coordinating a whole team should normally not be a P2, but a P3 or P4, of which we don't have so many. If such coordinator posts of common teams are being reassessed by HR, this will lead to much higher staff costs as UNON would not allow recruitment on P2 level.</p>
	p. 40 and p. 41	<p>The report give the idea that there is no other way than synergy or merging to increase productivity and/or efficiency. It is not true.</p>

Sender		Comments
	p. 41	<p>The sentence <i>organizations perceived as more efficient and reliable are able to secure greater access to donations</i> is true but it has not been demonstrated that it has a link with the size of the organization. Small and specialized organizations are often more successful in fund-raising than bigger ones.</p> <p>The example of specialized staff for travel of whole CMS family is not a good example as it would not work under the new UMOJA where every staff have to do his own requests!!!</p> <p>The sentence <i>It has also been proposed that a joint unit for the organization of conferences and meetings could be established</i> is vague. Who have proposed this joint unit? During the interview, the UNEP/AEWA Secretariat have explained why it will not be an advantage or a benefit for AEWA. The information given is unbalanced.</p> <p>The sentence <i>there could be expert units working across the instruments, focused, for instance, on certain taxa, or certain regions</i> could concern the Avian unit of CMS as there was a project to merge the implementation units. The AEWA secretariat have advocated during the interview that we have not enough resources to fully implement the AEWA strategic plan and that the Avian unit of the CMS is notably understaffed. A merging will not at all solve the problem! This remark lead to raise a methodological problem as there is no report of the interviews. We have proposed to consider a common unit on IT issues but did not find any reference to this proposal in the report.</p> <p><i>We agreed that our comments are made available through an annex to the final version of the report.</i></p>
Section 4		
	General Comments	<p>We would like to reiterate, that the AEWA Secretariat is very much in favor of enhancing synergies and embracing changes in areas that are likely to bring real added value not only to the services provided to the Parties as well as other stakeholders by the various Secretariats, but also to the conservation and sustainable use of migratory species in general. As a Secretariat it is our role, together with the governing bodies of the Agreement, to facilitate that the AEWA Parties have access to the best available knowledge regarding any decisions they are requested to make. Hence our comments and concerns should be taken as a sincere attempt to make sure that the current process leads us to the best possible outcome for all.</p> <p>Overall, the AEWA Secretariat finds that the “Main findings and recommendations” presented in Part 4 of the commissioned Independent Analysis and Report clearly fall short of the mark with respect to the kind of in-depth analysis and information required at this time. Without such a detailed analysis depicting actual scenarios including full coverage of the possible benefits and implications including costs and risks of various choices, the Contracting Parties to the CMS Agreements are not being provided with the information necessary to enable them to take informed decisions on the way forward regarding the further enhancement of synergies within the CMS Family.</p>

Sender		Comments
		<p>Overall, we believe that the report as a whole is vastly theoretical and certain conclusions are not based on factual evidence, or at least such evidence is not presented therein. As mentioned above, the major deficiency of the study is the lack of any proposed specific scenarios for increasing synergies (to include the exact modalities of staffing changes, arrangements, cost and benefit sharing, roles and responsibilities, workflows, etc.) which should have been the central focus of the paper, including a comprehensive description of the various implications of each scenario.</p> <p>As it stands now, we do not see the added value of the paper to the ongoing discussion and possible future decisions to be taken.</p>
	Legal Implications	<p>In the whole study MoUs and Agreements are considered to be the same, which is not the case both from a legal and financial aspect.</p>
	Financial Implications	<p>The potential savings for the CMS Family calculated on the basis of the example of the merged Secretariats of the Chemicals Conventions (Basel Rotterdam Stockholm Conventions/BRS) are highly questionable. Firstly, after one year and a half, no savings can be demonstrated related to the pilot phase of the Common CMS/AEWA Communication Unit. From the point of the AEWA Secretariat, the effect has at many times been quite the opposite as 20% of the AEWA FTEs (Full time equivalent positions) are dedicated to this unit and unable to undertake other AEWA-related tasks they would previously have dealt with.</p> <p>Secondly, as commented earlier on the previous chapters of the study, there is no presentation of how the savings at BRS have been achieved and what budget items they actually constitute. If the BRS savings were, for example, the result of cuts in staffing, this should have been made clear in the report. Extrapolating a figure from the BRS budget to the CMS Family budgets is misleading and methodologically incorrect.</p> <p>Thirdly, using the BRS experience as an example would have greatly profited from interviewing those with in-depth experience of their process as well as the outcomes (both at the Secretariat and amongst the Parties as well as the various governing bodies), which – to the best of our knowledge – was not done.</p> <p>Overall, the conclusions on the financial implications cannot be used in the decision-making process as they stand now. Realistic and concrete financial implications need to be calculated on the basis of specific scenarios which include more detailed accounts of actual actions suggested to be undertaken.</p>
	Operational and Administrative Implications	<p>Any such independent analysis and study should aim to present all options as equally as possible in order to provide balanced information to decision-makers. Hence another deficiency of the study is that it has not properly considered the option of increasing synergies without sharing common services and without merging Secretariats. The fact that there has long been a well-established and well-functioning practice amongst the CMS Family to seek out and implement synergies with regard to substantive issues,</p>

Sender		Comments
		<p>administration, meeting logistics etc. - which was extensively reported on during the interviews with the authors, including a long list of solid examples – is merely mentioned. The latest example of such synergies is the CMS/AEWA/Raptors MoU Southern African workshop on Poisoning held on the 24th September 2015 in Cape Town, South Africa, with a tremendous investment of both AEWA and Raptors MoU staff time.</p> <p>By disregarding the points mentioned above, the information presented and discussed in the paper unfortunately appears biased and seems to imply that a certain degree of merger (partial or full) between the Secretariats is the only way to increase synergies in the implementation of the CMS Family instruments.</p> <p>We strongly believe that fruitful synergies can also be further developed without establishing common services.</p>
	<p>Overarching Implications</p>	<p>This paragraph dealing with the greater external visibility is not really backed up by anything in the previous sections. The branding of the CMS Family is an important issue, but again – apart from some general sentences - the report offers no detailed description of how this could be undertaken. Work on common CMS Family projects such as the joint CMS Family website, the CMS Family Species Champions Programme as well as the future aligned CMS/AEWA Communication Strategy are examples of how the Secretariats are already working together to share costs and to strengthen the CMS Family brand.</p>
	<p>Policy Options and Recommendations</p>	<p>Option 1: This option is not correctly formulated – there are existing synergies within the CMS Family and they have been in a constant process of evolvement (see comment above under operational and administrative implications). The proposed option does not really discuss the possibility of increasing synergies without creating common services. It should be portrayed as an option of equal value.</p> <p>Option 2: This option states that the joint CMS/AEWA Communication Unit should be further developed. In addition, it is suggested that further common units – such as for conference services – could be developed over time. It is not clear what the further development of the joint Communication Unit would imply or what the establishment of further common units would involve thus making it impossible to assess potential implications of this option. It should be however noted that the Parties have asked for a better implementation of the CMS instruments which implies an increase in the substantive services not the support services provided by the Secretariats. The example of a joint conference service/unit is not feasible for the AEWA Secretariat as was explained during the interview.</p> <p>Option 3: The suggested option of a joint Executive Secretary is contradictory with the objectives of a greater visibility of the instruments of the CMS Family. We believe that for each instrument it is beneficial to maintain a clearly identified leadership and management. Linked with strategic leadership under the</p>

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		auspice of the Executive Secretary of the CMS, this top management staff could represent the structure to increase the overall visibility of the CMS Family together with a branding campaign.
	Conclusion	<p>We agree with the last sentence of the report. Even without new common services, synergies should be further developed and the AEWA Secretariat, as in the past, is ready to tackle this issue together with the rest of the CMS Family.</p> <p>However, as mentioned above, we strongly advocate the need for a real in-depth analysis portraying the actual possible scenarios with detailed descriptions of the implications that various choices will have for the functioning of not only the Secretariats but the Convention and its Agreements as a whole.</p>
ACAP Secretariat Warren Papworth, Executive Secretary		
Report		
	General Comments	I think the consultants have done an excellent job and produced a very good analysis of the key issues. I wasn't quite sure if our comments were for inclusion in a revised/final draft of the report, or if they were to be added as an annex. If the amendments I've suggested are incorporated into a revised report then I don't see a need for them to be added as an annex. However, if they're not incorporated then I'd appreciate them being included in an annex. I am happy for my comments to be attributed to me and for them to be publically available.
	Text specific remarks	
	p. 18	For clarity, I suggest adding to the sentence ending with "... after Tasmanian public service ", the following additional text "with the Executive Secretary's salary being determined on a triennial basis by MOP as part of its budget deliberations (refer MOP Resolution 5.6)".
	p. 35	Suggest adding new dot point, "Financial support provided by Host Governments to Secretariats". Significant levels of financial support may be provided to Secretariats under Headquarters Agreements with Host Governments, or through Memorandum of Understandings with their hosts. For example, under its Headquarters Agreement with the Australian Government, ACAP is exempt from all direct taxes and is also exempt from customs and excise duties and entitled to a refund of value-added tax (refer Articles 9 and 10 of the HQA). In addition, office accommodation and financial and personnel services e.g. payment of accounts and salaries, are provided to the ACAP Secretariat under a Memorandum of Understanding it has with the Government of Tasmania. These services/benefits are estimated to be worth around AUD 130,000 – 170,000 p.a.

Sender		Comments
Section 4		
	Main findings and recommendations	<p>Point 4 (3) Financial Costs, add new sentence to end of paragraph. Additionally, they may lose financial benefits they currently enjoy under Headquarters Agreements and Memorandum of Understandings with their host Governments e.g. exemption from taxes and the provision of accommodation and administrative support. In the case of the ACAP Secretariat these benefits are estimated to be approximately AUD 130,000 – 170,000 per year.</p> <p>Under point 4(4) add new penultimate sentence, “Caution should also be exercised that the focus of the Secretariats on supporting the implementation of their Agreement/MoU is not dissipated by the organisational/managerial needs of being part of a larger organisation.”</p>
ACCOBAMS Secretariat Florence Descroix-Comanducci, Executive Secretary		
Report and Section 4		
	General Comments	<p>Thank you for giving the opportunity to provide feedback on this important initiative. I have no major comment on the content. My main concern is to ensure that, for any of the scenarios proposed, the independency of the Agreements vis-à-vis the CMS Secretariat remains as clear as it is currently.</p>
Wadden Sea Secretariat Rüdiger Stempel, Executive Secretary		
Report		
	General Comment	<p>Thanks also to the consultants, who did an excellent job and provided a thorough and well-founded analysis.</p>
	Text specific remarks	
	p. 13, para 4	<p>States that the CWSS Secretariat has a staff of eight FTE. Following recent decisions by the Parties we are currently in the process of recruiting two further officers, one of whom may actually already be recruited by the time the analysis is published. For the sake of accuracy I would therefore suggest that we change the wording to reflect this, perhaps by writing something to the effect of: “It currently has a staff of eight</p>

Sender		Comments
		FTE. At the time of writing, the recruitment of two additional officers (one FTE, one PTE) was in progress.”
	p. 28, para 2	The analysis states that the ASCOBANS merger was undertaken “against the background of financial difficulties”. In fact, this was not the case. While ASCOBANS (like the other Bonn-based Secretariats) struggled with the unfavourable EUR/USD exchange rate at the time, it was conclusively proven that the Secretariat was not in financial difficulty and that misunderstandings in this regard had arisen due to an unintended transfer of money (by an officer of the AFMU in Bonn). I am attaching the report of ASCOBANS AC 15, which contains supporting evidence on pp. 5 et seq. (Section 4.1.3.) for your information. I would therefore request that the passage “against the background of financial difficulties” be deleted.
	The first para on p. 37	Refers to an increase in staff costs within EUROBATS after the secretariat joined the UNEP administrative framework. The same also applies to the ASCOBANS secretariat, which became part of the UNEP family simultaneously with EUROBATS. This should perhaps be noted.
Bert Lenten CMS Secretariat Report		
	Text specific remarks	
	p. 11, para 2, 2nd line	It might be good to split this in D, P and GS Staff.
	p. 11, para 4	The working languages for the Convention are English, French and Spanish...so please delete the other official languages of the UN and German.
	p. 11, para 4, 3rd line	Translation of documents is contracted out to 'private' translators...we don't use UN and/or UNEP translators in general. We have done that in the past but it is too costly. Only for agreement texts we might use them again on an ad hoc basis. Please note that for interpretation during meetings we also use external Interpreters and not anymore UN and UNEP Interpreters.
	p. 11, para 5, 3rd and 4th lines	UNEP does not provide support for telecommunications. CMS is paying UNV for telecommunications. Until 2015, we also paid all IT costs to UNV, who provided these services to us. As of 2015 UNEP might take over these costs but this is still not 100 percent sure. So I would leave any reference to IT and telecommunications out.
	p. 11, para 5, 6th line	Please note the Administrative and Fund Management Unit is paid from the 13 % overhead that CMS and its UNEP administrative Agreements are generating.

Sender		Comments
	p. 12, para 1	China and Japan should be added in my view.
	p. 14, para 2, 2nd line	At CMS COP5 it was decided to go for co-location of all European-based Agreements in Bonn...perhaps reference should be made to that decision...of course the MOP of each Agreement had the right to decide not to co-locate their agreement as was the case for ACCOBAMS.
	p. 14, para 2, 6th line	EUROBATS became fully integrated in UNEP after the adoption of Res 3.1... the Headquarters Agreement has nothing to do with that.
	p. 14, para 5	EUROBATS Secretariat: It might be good to split this into P and GS Staff.
	p. 15, para 2, 10th line	ASCOBANS is also covered by the Headquarters Agreement.
	p. 15, para 4, 3rd line	Official language is, as far as I know, only English. Sometimes the Agreement text is translated, as a matter of courtesy, into other languages but this does not mean that these are official languages agreed by MOP.
	p. 16, para 1, 7th line	Sudan is also a Party to AEWA and not CMS
	p.16 , para 2, 8th line	The official working languages are English and French... however as a courtesy the text of the Agreement has been also been translated into Arabic and Russian.
	p. 21, para 2	The interim coordinator worked 100% from October 2014 till 1st of July 2015... since then she works 50 % for IOSEA and 50 % as CITES/ CMS Programme Officer.
	p. 23, para 2	It is not clear what is meant... are we talking about the working language of the Secretariat or of the Convention and Agreements. As indicated before, the official working languages for CMS are English, French and Spanish.
	p. 23 , para 3, 1st line	If treaties mean the Convention and its Agreements, the statement is correct ... if it also means MOU it is not... because none of them have assessed contributions and are fully dependent on voluntary contributions.
	p. 23, para 5, 5th line	This is not correct. If you add all budgets together for the Agreements, it is higher than the amount CMS receives.
	p. 29, last para, 6th line	As indicated under AEWA, they have 3 countries that are not Party to CMS.
	p. 30, Table 4	I don't understand what this table wants to portray.
	p. 33, Table 5	Also for budget issues we need consensus in CMS
	p. 38, para 2	Please leave Dugong and Raptors out because they are part of the CMS Secretariat and have UN Salaries and pay the 13 %... the only thing that is different is that they are hosted by UAE... however we don't pay rent and maintenance costs here in Bonn and probably the salary will be lower here for the Staff ... I assume that the actual costs for salaries and common service costs (telephone) will be more or less what is now paid only for salaries in Abu Dhabi.

Sender		Comments
	p. 39, Figure 3	I am not sure what the intention is to have this figure. The problem with our budget is that sometimes we lower the cost to be covered by Parties by withdrawing from the Trust Fund... perhaps it would be better to use the grand total before withdrawing from the Trust Fund to indicate the real costs.
	p. 40, para 2	I don't believe you can conclude this from the figures. Such a conclusion could be made if things were stable. However over the last 10 years or so, the number of MOUs has substantially increased... the number of activities has increased but the Budget has not increased in parallel. At the moment we are juggling with the limited resources available to do our utmost to implement the mandates we have received from COPs/ MOPs. It has never been the intention to reduce costs but to do more with the same... and this is actually happening.
	p. 40, para 3	Over the last few years we have experienced that particularly with major donors sending in project proposals that would benefit CMS and e.g. AEWA had more chance to obtain funding. Perhaps this should be added... also Parties like it when their voluntary contributions support CMS and one of more of its Agreements or MOUs.
	p. 40, para 3, 3rd line	This is a fear that some staff have. I am aware of that... however with respect to our 'normal donors' being the Parties they have allocated X amount to support e.g. EUROBATS, ASCOBANS and CMS etc... I am not sure if they will give less at the end of the day.
Section 4		
	Main findings and recommendations	2. Legal Implications In my view, there is a lot of overlap between the Parties to CMS and some of the legal binding agreements at least. To make it more concrete, AEWA has 3 Parties out of 75 that are not CMS Party, ASCOBANS 100 % overlap, EUROBATS probably 100 %, Gorilla's 100 % etc, hence this statement is not correct.
		3. Financial Implications We should be careful with such a statement because Parties might use this to cut our budget. My view would be that perhaps resources that could be saved, could be redirected to increase output.
	Policy options and recommendations	6. Option 3 (all-at-once approach) At the beginning of the main doc, it was stressed that merging of Secretariat was not looked into. So it is a bit odd to propose the 3rd option. In my view the 3rd option should be immediately identifying all common services and implementing them.
Florian Keil CMS Secretariat		
Report		
	General Comments	It is clear from reading the draft analysis, that the experiences and lessons learned from the pilot in joint communications, information management and outreach between the CMS and AEWA Secretariats are

Sender		Comments
		important for the larger debate, so I would recommend to the consultants to try to expand on both the “experiences and lessons learned” with regard to the pilot a little more in their independent analysis (trying to look at it holistically from both the CMS and AEWA perspective and also seeking alternative views, possibly from external communication experts). It is the basis for any further development. Stating that the arrangement of the pilot will be assessed at the next AEWA MOP in November 2015, seems a little too simplistic and not really helpful in guiding or informing decisions on the way forward.
CMS Secretariat		
Report		
	Text specific remarks	
	p. 11, para 5	Hosted by UNEP, the secretion applies UN finance and administrative rules and regulations; check the statement that “being within UNEP gives the Secretariat access to key UNEP infrastructure, such as IT and telecommunications support” as UNV I thought gets paid to do this. Also, is the ADMU provided by UNEP or a UNON?
	p. 11, para 5, 3rd and 4th lines	The IT and telecommunication support we use are not part of the UNEP infrastructure. I would suggest to replace with ‘UN infrastructure’.
	p. 15, 2nd line	It should be: <i>Physeter macrocephalus</i>
	p. 19, 2nd bullet	Delete “UNEP’s”. Its either just GRASP, or its “the UNEP/UNESCO Great apes... Clause should read... “such as UNEP or the Great Apes Survival P’ship (GRASP). Para under 2.2. Remove reference to Concerted Actions, as there is no direct link between MOUs and CCs.
	p. 21, para 2	The sentence “ due to a sabbatical leave...” should be replaced with “during the one-year sabbatical leave of the full-time coordinator, starting in October 2014, the MoU Secretariat was coordinated by a full-time replacement located in the CMS Secretariat in Bonn. This temporary co-location with the CMS Secretariat allowed for much closer cooperation between IOSEA and CMS colleagues and let to a number of positive spill-over effects, which would not have taken place otherwise.”
	p.22, para 3	The Dugong MoU benefits from a financial and in-kind commitment by Environment Agency – Abu Dhabi on behalf of the Government of the United Arab Emirates, which hosts at its headquarters a CMS project office: CMS Office – Abu Dhabi.
	p. 22, para 5	The Raptors MoU is part of the arrangements with, and the support by, Environment Agency – Abu Dhabi on behalf of the Government of the United Arab Emirates.
	p. 23, para 2	It gives a somehow narrow appreciation of the use of languages within the family. I would suggest a redrafting along these lines: ‘Overall, English developed into being the main working language within the Family, although additional languages are being used depending on the geographic scope of the individual

Sender		Comments
		instruments (e.g. French plays an important role in the inner workings of ACCOBAMS, and Spanish is used as the main working language in some of the MOUs directly managed by the respective signatories).’
	p. 23, para 2, 3rd line	Add “of the Secretariat” after “working languages”.
	p. 23, para 5 1 st line	Reference to MOUs is confusing, they are not autonomous agreements, as implied. Sharks MOU is a global MOU, with potentially all countries as Signatories. CMS is not unique in this.
	p. 24 Table	Gorilla Agreement – Seat of Sec is “ Bonn (interim), rather than “not yet established”
	p. 26 Table	Monk Seal - remove “interim” from Secretariat. Sharks - Staff: one FTE (p2). Budget: 2013 – 2015 EUR 1,145,866
	p. 28, para 2	The sentence ‘Hence, the ASCOBANS Secretariat does not have staff members of its own, but the ASCOBANS budget pays for a portion of time of several staff members of the CMS Secretariat’ is not entirely correct. CMS does not have any share of the time of the team assistant (Bettina), the position being paid from the ASCOBANS budget only. I would suggest a redrafting of the paragraph along these lines: ‘As mentioned in section 2.1.3, the Parties to ASCOBANS furthermore decided in 2006 against the background of financial difficulties that the CMS Secretariat would provide Secretariat services to ASCOBANS, with the cost covered by the Parties to ASCOBANS.3 On the basis of this arrangement, the ASCOBANS budget pays for a portion of time of several staff members of the CMS Secretariat: the Executive Secretary for CMS is also the acting Executive Secretary for ASCOBANS, with 3% of his salary financed by ASCOBANS; a programme officer from the CMS Secretariat invests 15% of her time to ASCOBANS; an Associate Programme Officer spends 75% of her time for ASCOBANS (acting as main contact person for ASCOBANS in the Secretariat). A Team Assistant working half-time completes the staff complement, for a total of 1.43 FTE.’
	p. 30, Table 4	... on Party overlap. It’s not clear to me what the final 5 single Agreements in the list refer to. Overlap with what?
	p. 33, para 2	Legal autonomy – remove MOUs from this, as they don’t establish autonomous legal systems. The wording is confusing.
	p. 34, para 2	Different admin – legal frameworks Delete “collocated in Bonn” as this applies to Abu Dhabi and BKK as well.
	p. 35	It says quantified data is not available, however, the ASCOBANS secretariat staff have relevant data, but were not asked to provide it. It’s important not to oversell the wider applicability of the merger of ASCOBANS. CMS COP 10 document, drafted by Elizabeth Mrema and Heidi Frisch, states: 16. While the arrangement works very

Sender		Comments
		well for a small Agreement like ASCOBANS, the Joint Secretariat would not see merged Secretariat functions as a viable option for larger Agreements and would not advocate it as a generally applicable example. This should especially be stressed in view of the impending decision regarding the Future Shape of CMS. (THE MERGER OF THE CMS AND ASCOBANS SECRETARIAT FUNCTIONS (Conf.10.34)
	p. 35, Table 5	Also for budget issues we need consensus in CMS.
	p. 38, para 2	Dugong and Raptors MOUs are part of UNEP and so the 13% rule already applies.
	p. 41, para 2	Under Efficiency and Performance gains: It would be impossible to organize travel for the “whole CMS Family”, as this includes non-UNEP entities. The Joint Admin Unit already provides this specialization to the Bonn based Secretariats. Expert units working across taxa already exist. Maybe use language like “Build on...”
	p. 41, para 4	The example provided for possible specialization of staff does not seem a good one, now that with the entry into effects of Umoja individual staff members are basically required to make their own travel arrangements. Procurement could be a better example.
	p. 42, para 1	Continuing from previous page. I don’t understand this paragraph. It refers to admin units achieving efficiencies. However, there is only one (existing) joint admin Unit (Bonn) for UNEP administered Agreements and MOUs. It might be helpful if they gave examples of what they mean.
	p. 42, para 4	Already being done. Such efficiency gains, in back to back meetings, are already achieved wherever possible.
	p. 42, para 5	Joint strategies, action plans and guidelines are already being developed wherever relevant and practical. We have numerous successful examples.
	p. 42, para 6	Rather than only talking of potential gains, it might be relevant to mention the work the secretariats have done already over the last 6 years at least, to achieve just the efficiency gains that are being suggested. Of course more can be done – but it would build on the successes which already exist.
	Footnote 42	CMS Office Abu Dhabi currently employs 5 persons and a sixth post is currently vacant.
	p. 46, para 2	It seems unrealistic to expect CMS to have the same visibility as CBD, under any circumstances.
	p. 46, para 3	I suggest not using the term “lack of transparency”, as it may sound pejorative. Rather, I would suggest “lack of clarity”.
	p. 46, para 5	The term “chemicals conventions” is indeed catchier than “CMS Family”. I’d love to hear if they have a suggestion for a better term. As I see it, simply using “CMS” on its own, would not increase any sense of visibility, clarity, or ownership. “Migratory Species Convention and Agreements “not very catchy either.
	p. 48 Final paragraph	Enhanced synergies are indeed in tune with the direction provided by countries at other global fora, which is way the CMS family has been pursuing them for a number of years now.

Sender		Comments
	<p>General Comments on MoU and Agreements</p>	<p>Parties are urged to conclude agreements concerning species whose conservation status would be improved by international concerted action; these species are listed on Appendix II. Agreements are independent international treaties in their own right. They have their own budgets and, in most cases, their own staff. Their provisions are legally binding, but the process of bringing them into being can take a long time, as after the successful negotiation of the text, they have to be ratified by national parliaments. CMS: a framework convention CMS provides for separate, international legally-binding instruments and other agreements among range states of single migratory species or, more often, groups of species. These agreements can be adapted to the requirements of particular regions with the aim of enhancing the effectiveness of the Convention's efforts. 19 International MoU and 7 Agreements have been concluded under the CMS umbrella, for bats, birds, elephants, dolphins and whales, marine turtles and seals as listed below.</p> <p>Memoranda of Understanding (MoU) are an alternative arrangement to promote international action. These are administrative arrangements among ministries rather than international treaties. They do not need to be ratified and are consequently less onerous to conclude, so can come into effect quite quickly. Their provisions are however not legally binding and they depend on voluntary contributions rather than mandatory subscriptions to finance their implementation.</p> <p>Please check the table 2.2 Overview of the Subsidiary Bodies Established by CMS and its Instruments http://www.cms.int/sites/default/files/publication/manual_e.pdf</p>
	<p>Languages of the Convention</p>	<p>The working languages of the Convention are English, French and Spanish. In this regard, reporting formats are provided in the appropriate working language(s) of CMS and its instruments. The CMS National Reporting Format is available in the three working languages of the COP which are English, French and Spanish. In the case of some of the Agreements, such as AEWa and EUROBATS, however, the National Reporting Formats are only available in English and French which are the two working languages of their MOP.</p>
	<p>Recommended citation for the Manual</p>	<p><i>Manual for the National Focal Points for CMS and its Instruments. 2014. UNEP / CMS Secretariat and UNEP/ AEWa Secretariat, Bonn, Germany 112 p.</i> http://www.cms.int/sites/default/files/publication/manual_e.pdf</p> <p>Please refer also to CMS Family Guide <i>CMS FAMILY GUIDE THE ENCYCLOPAEDIA of the Convention on the Conservation of Migratory Species of Wild Animals</i> http://www.cms.int/en/node/925</p>