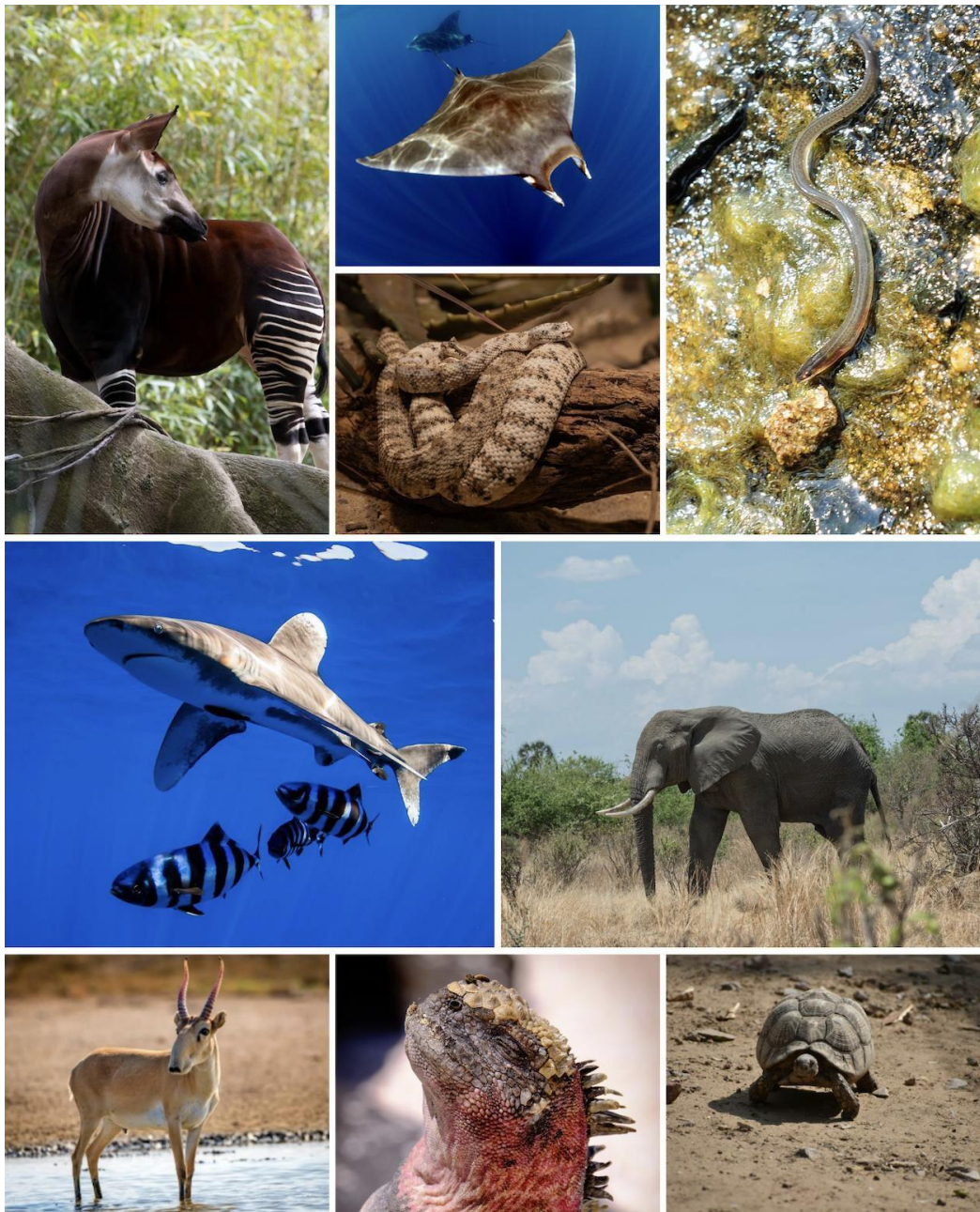


RECOMMENDATIONS FOR CITES COP20

Samarkand, Uzbekistan, 24 November - 05 December 2025



Quick links to contents:

1. [Executive summary of recommendations](#)
2. [Detailed comments: CoP20 working documents](#)
3. [Detailed comments: proposals to amend the appendices](#)

Introduction to WCS

The Wildlife Conservation Society (WCS) is a global NGO with over 125 years of experience in protecting wildlife and wild places, operating in more than 60 countries through science-based conservation efforts in collaboration with governments, Indigenous Peoples, local communities, academia, and other partners. With a strong on-the-ground presence, WCS addresses various aspects of wildlife exploitation and trade, including the trafficking of wild fauna and flora, and supports sustainable use strategies that benefit both biodiversity and local communities. WCS is a long-time supporter of CITES, contributes science-based recommendations, and will be represented by international and national expert staff at CoP20, with further input to be shared as the meeting approaches. Our views are based on the best available scientific and technical information, and information from our field and country programs around the world.

WCS hereby submits the following recommendations to the Parties on some of the working documents and proposals to amend the Appendices to be considered by CITES CoP20. This is a subset of issues to be discussed at CoP20, and we look forward to providing more input at the CoP, on both these issues and those we have not identified here. *Please contact Dr. Susan Lieberman (slieberman@wcs.org) and Alfred DeGemmis (adegemmis@wcs.org) with any questions about the contents of this document.*

WCS comments and recommendations¹

1. Executive summary of recommendations

Note: Document number links to a longer, more detailed position statement within this document.

CoP20 Working Documents		
Doc.	Title	WCS Recommendation
7.5	Arrangements for meetings of the CoP	<i>WCS strongly rejects suggestion to hold CoP every four years; urges Parties to require cost-saving analysis of hosting Secretariat in Nairobi, UNEP headquarters.</i>
14.	Enhancing the work and efficiency of the Convention through the permanent committees	<i>WCS recommends clearer criteria, weighting, evidence, and scaled scoring to make the prioritization matrix more objective and mandate-focused.</i>
15.	Role of CITES in reducing risk of future zoonotic disease emergence associated with international wildlife trade	<i>WCS recommends adoption of most of the draft Decisions in Doc. 15.1, and strongly urges Parties to adopt the draft Res.in Doc. 15.2, Annex 1.</i>

¹ The geographical designations employed in this document do not imply the expression of any opinion whatsoever on the part of the Wildlife Conservation Society concerning the legal status of any country, territory, or area, or concerning the delimitation of its frontiers or boundaries.

<u>17.</u>	World Wildlife Trade Report	<i>WCS urges Parties to reject draft Decisions and shelve further work on this report - adds unnecessary burdens and diverts resources from CITES' core priorities.</i>
<u>18.</u>	CITES and forests	<i>Scarce resources – WCS recommends Parties don't move forward with draft Decisions in Annex 1.</i>
<u>20.</u>	Capacity building framework	<i>WCS supports recommendations.</i>
<u>21.</u>	Compliance Assistance Programme	<i>WCS supports draft CAP Decisions and urges inclusion of NGOs, Indigenous Peoples, and local communities to strengthen relevance and effectiveness.</i>
<u>26.</u>	CITES Global Youth Network	<i>WCS supports recommendations.</i>
<u>27.</u>	Engagement of indigenous peoples and local communities	<i>Mixed utility of some of the recommendations; see full recommendation below. WCS strongly supports national-level processes to engage IPs and LCs in CITES processes and meetings. Recommends Parties reject Decisions 20.AA & 20.BB; each Party can decide whether and how to use this non-binding guidance at the national level - limited resources should be focused on core implementation. Also, no need to amend Res. Conf. 16.6 (Rev. CoP18).</i>
<u>28.</u>	Draft Res. on the creation of an advisory Subcommittee of the Standing Committee of People Living alongside Fauna and Flora species included in the CITES Appendices.	<i>WCS urges Parties to reject this draft Resolution, including the new terminology; see more detailed recommendation below.</i>
<u>29.</u>	Livelihoods	<i>WCS recommends Parties reject amending Res. Conf. 16.6 (Rev. CoP18) as proposed; recommends Parties reject draft Decisions 20.AA, BB or CC on certification and labelling systems. See more detailed recommendation below.</i>
<u>30.</u>	Integrating human rights, livelihoods, and food security into the implementation of CITES	<i>WCS urges Parties to oppose the document, and particularly reject paragraphs 3, 6 and 7.</i>
<u>31.</u>	Demand reduction to combat illegal trade	<i>WCS recommends edits to draft Decision 20.AA to fully acknowledge the value of approaches beyond the guidance.</i>
<u>34.</u>	National laws for implementation of the Convention	<i>WCS urges Parties to expand NLP criteria beyond minimum requirements, and adopt a more comprehensive, graduated assessment system to strengthen CITES implementation.</i>

35.	Compliance matters	<p><i>Doc. 35.1: WCS supports proposed mission to India; for all such missions, we recommend inclusive, transparent preparation and stakeholder engagement, with ICCWC involvement to safeguard civil society and information sources.</i></p> <p><i>Doc. 35.2: WCS recommends adoption of draft Decision in Annex 2, amended to ensure this agenda item is considered at both SC81 and SC82.</i></p>
36.	Review of the provisions of Res. Conf. 17.7 (Rev. CoP19) on Review of trade in animal specimens reported as produced in captivity	<i>WCS recommends that Parties ADOPT proposed amendments to paragraphs 2 d) and 2 h) of Res. Conf. 17.7 (Rev. CoP19); and supports adoption of draft Decision 20.AA.</i>
37.	Possession of specimens of species included in App. I	<i>WCS strongly supports recommendations in paragraph 15, including the proposed amendments to Res. Conf. 8.4 (Rev. CoP19)</i>
38.	Review of Res. Conf. 11.3 (Rev. CoP19) on Compliance and enforcement	<i>WCS supports recommended amendments to Res. Conf. 11.3 (Rev. CoP19); encourages Parties to revisit issue of professional bodies.</i>
39.	Enforcement matters	<i>WCS strongly supports increased focus on anti-corruption measures and financial investigations; supports recommendations, but proposes amendments to Res. Conf. 17.6 (Rev. CoP19) and Decision 19.79.</i>
40.	Wildlife crime enforcement support in West and Central Africa	<i>WCS supports draft Decisions, while stressing that enforcement support should be core work, not subject to extrabudgetary resources.</i>
41.	CITES Big Cats Task Force	<i>WCS regrets limited response to Notification N. 2023/130 on a possible resolution for all big cats; supports draft Decisions in Doc. 41, urging Parties to report both on implementation and incidents of illegal big cat trade.</i>
45.	Illegal trade in cheetahs (<i>Acinonyx jubatus</i>)	<i>WCS recommends more explicit actions in the draft Decisions, including reference to the supply chain and actions by both range and destination countries and increased efforts to strengthen enforcement and collaboration.</i>
47.	Tortoises and freshwater turtles (Testudines spp.)	<i>WCS supports draft Decisions but recommends stronger action and amendments to Res. Conf. 11.9 (Rev. CoP18) or a Decision to direct the Secretariat to work with UNODC and others on a report to the SC and CoP21 on trafficking in tortoises and freshwater turtles, with clear recommendations and country-specific actions.</i>

49.	Legal acquisition findings	<i>WCS supports, with comments and recommendations on the draft Decisions and proposed amendments to Res. Conf. 18.7 (rev. CoP19).</i>
50.	Non-detriment findings	<i>WCS supports, with comments and recommended edits to the draft Decisions.</i>
51.	Non-detriment findings for specimens of App. II species taken from areas beyond national jurisdiction	<i>WCS supports, but is concerned that recommendations in paragraphs 10 and 11 of this document are lost; should discuss in the context of agenda items 50 and 52.</i>
52.	Introduction from the sea	<i>WCS appreciates the need for more clarity and compliance, but urges the Parties not to amend the core elements of the Resolution.</i>
56.	Electronic systems and information technologies	<i>WCS supports.</i>
59.	Stocks and stockpiles	<i>WCS supports in general, with suggested edits.</i>
72.	Identifying information on species at risk of extinction affected by international trade	<i>WCS supports in general, with suggested edits.</i>
73.	Trade in endemic species	<i>WCS strongly supports; some elements more suitable in Resolution text instead of as a time-limited decision.</i>
76.	Elephants (<i>Elephantidae</i> spp.)	<p><i>Docs. 76.1-76.3: WCS urges Parties to renew Decisions with Doc. 76.2's stronger amendments; adopt amendments to Res. Conf. 10.10 (Rev. CoP19) in 76.1, Annex 2; and adopt draft Decisions included in Doc. 76.3, Annex 2;</i></p> <p><i>Doc. 76.6: WCS supports conclusions reached by African elephant Range States, particularly because they reflect consensus;</i></p> <p><i>Doc. 76.7: WCS supports African elephant range States' Communiqué but opposes any language that could allow commercial ivory exports.</i></p>
77.	Asian big cats (<i>Felidae</i> spp.)	<p><i>Doc. 77.1: WCS does not support deleting Decisions 18.105 and 18.106 - evidence shows they have not been sufficiently implemented.</i></p> <p><i>Doc. 77.2: WCS notes with concern that several large tiger facilities were not visited during missions and that key edits proposed at SC77 and SC78 are missing from the draft Decisions in Doc. 77.2; supports draft Decision 20.AA in general, with suggested edits.</i></p>

78.	Great apes (<i>Hominidae</i> spp.)	<i>WCS strongly supports draft Decision and stands ready to share information to support Parties and the Task Force.</i>
79.	Pangolins (<i>Manis</i> spp.)	<p><i>Doc. 79.1: WCS rejects Secretariat's conclusion that current responses to pangolin trafficking are sufficient and urges Parties to establish an in-session working group to develop time-bound, measurable recommendations; supports proposed amendments to Res. Conf. 17.10 (Rev. CoP19).</i></p> <p><i>Doc. 79.2: WCS supports draft Decisions, noting the importance of honing the conversion parameters to better understand trade.</i></p>
81.	Jaguars (<i>Panthera onca</i>)	<i>WCS strongly supports adoption of a stand-alone Resolution on the jaguar, rather than amending Res. Conf. 12.5 (Rev. CoP19).</i>
83.	Songbird trade and conservation management (<i>Passeriformes</i> spp.)	<i>WCS recommends retaining Decisions due to the worsening impact of the songbird trade and the under-representation of songbirds in the CITES Appendices.</i>
84.	Rhinoceroses (<i>Rhinocerotidae</i> spp.)	<i>WCS urges States to provide complete and up-to-date data on rhino poaching and trade, strengthen enforcement, and ensure the Secretariat works with NGOs with in-country expertise; supports renewal of Decision 18.116 but stresses the need for time-bound, directed reporting to prevent backsliding as poaching and illegal trade rise.</i>
85.	Saiga antelope (<i>Saiga</i> spp.)	<p><i>Doc. 85.1: WCS generally supports the draft Decisions, with some recommended edits;</i></p> <p><i>Doc. 85.2: WCS supports adoption of draft Decision 20.AA. WCS concurs source code U should not be used for saiga specimens.</i></p>
88.	Sharks and rays (<i>Elasmobranchii</i> spp.)	<p><i>Doc. 88.: WCS supports the Secretariat's draft Decisions on sharks and rays and urges adoption of Annex 3 in Doc. 88.1 to establish a more effective, broad-scale RST process for highly mobile marine species;</i></p> <p><i>Doc. 88.2: WCS supports Proposal 34 to list gulper sharks on App. II and adoption of Doc. 88.2 Annex 1 decisions to improve monitoring, reporting, and management.</i></p>
102.	Considering the 'look-alike' criterion Annex 2B A of Res. Conf. 9.24 (Rev.	<i>WCS recommends that Parties reject draft Decisions as unnecessary, burdensome, and unsupported by</i>

	CoP17) on Criteria for amendment of App. I and II	<i>CITES' long-standing practice of effective implementation under Article II(2)(b).</i>
113.	Taxonomy and nomenclature of African elephants (<i>Loxodonta spp.</i>)	<i>WCS recommends that Parties endorse either option B or C, in addition to supporting draft Decision 20.AA and draft amendments to Res. Conf. 10.10 (Rev. CoP19).</i>

CoP20 Species Proposals			
	Proponent(s)	Proposal	Recommendation
3	KZ	Amend App. II annotation for Saiga tatarica to allow commercial exports from the population in KZ.	REJECT
4	NA, ZA, TZ, ZW	Remove Giraffa giraffa populations in eight countries from App. II. Other populations would remain in App. II.	REJECT
5	DRC	Include Okapi johnstoni in App. I.	ADOPT
6	IL, TJ	Include Hyaena hyaena in App. I.	ADOPT
9 & 10	NA	9 on Ceratotherium simum simum : amend annotation to allow trade in live animals for in-situ conservation, hunting trophies, and rhino horn stockpiles, with restrictions; 10 on Diceros bicornis : amend the annotation to allow trade in rhino horn stockpiles, with certain restrictions.	REJECT
11	BR, CR, PA	Include Choloepus didactylus and Choloepus hoffmanni in App. II	ADOPT
12	DRC	Transfer Cercocebus chrysogaster from App. II to App. I	ADOPT
13	NA	Allow NA to trade in registered stocks of raw ivory of Loxodonta africana , under certain conditions.	REJECT
14	BW, CM, CI, NA, ZW	Amend Annotation A10 for the Loxodonta africana populations of BW, NA, ZA and ZW to harmonize the conditions of trade in live <i>Loxodonta africana</i> , for selected purposes.	ADOPT
15	CM, CG, GA, NE, NG, SN, SL, TG	Bycanistes spp. and Ceratogymna spp. included in App. II	ADOPT
16	BJ, BF, BI, CM, TD, CG, GM, GN, NE, NG, SN, SL, TG	Transfer Gyps africanus and Gyps rueppelli from App. II to I.	ADOPT

17	CA, US	Transfer <i>Falco peregrinus</i> from App. I to II.	AMEND [zero quota from the wild]
18	BR	Include <i>Sporophila maximiliani</i> in App. I; include <i>Sporophila angolensis</i> , <i>Sporophila atirostris</i> , <i>Sporophila crassirostris</i> , <i>Sporophila funerea</i> , <i>Sporophila nuttingi</i> in App. II.	ADOPT
22	EC	Transfer <i>Amblyrhynchus</i> spp. from App. II to I.	ADOPT
23	EC	Transfer <i>Conolophus</i> spp. from App. II to I.	ADOPT
25	BO, MX	Include <i>Crotalus</i> spp., <i>Sistrurus</i> spp. in App. II.	ADOPT
26	CM, GN, NG, TG	Transfer <i>Kinixys homeana</i> from App. II to I.	ADOPT
28	AR, BS, BR, KM, DO, EC, EU (27), FJ, GA, HN, LB, OM, PA, WS, SN, SC, LK, SD, TG, UK	Transfer <i>Carcharhinus longimanus</i> from App. II to I.	ADOPT
29	BR, EC, EU (27), PA, SN	Include the <i>Galeorhinus galeus</i> , <i>Mustelus schmitti</i> , <i>Mustelus mustelus</i> in App. II.	ADOPT
30	BS, BZ, BR, KM, DO, EC, FJ, GA, JM, MV, PA, WS, SN, SC, SD, TG	Transfer <i>Mobulidae</i> spp. from App. II to I.	ADOPT
31	AR, BS, BD, BZ, KM, DO, EC, FJ, GA, MV, PA, PH, WS, SN, SC, LK, TG	Transfer <i>Rhincodon typus</i> from App. II to I.	ADOPT
32	BD, BJ, BR, BF, BI, CV, CF, KM, CG, GA, GN, GW, MV, ML, NE, NG, PA, SL, SD, TG	<i>Glaucostegus</i> spp.: add the annotation "A zero annual export quota for wild-taken specimens traded for commercial purposes".	ADOPT
33	BD, BJ, BR, BF, BI, CF, KM, CG, GA, GM, GN, GW, MV, ML, NE, NG, PA, SN, SL, SD, TG	<i>Rhinidae</i> spp.: add the annotation "A zero annual export quota for wild-taken specimens traded for commercial purposes".	ADOPT
34	BR, KM, DO, EC, EU (27), LB, NG, PA, SN, SY, UK	Include <i>Centrophoridae</i> spp. in App. II.	ADOPT
35	EU (27), HN, PA	Include <i>Anguilla</i> spp. in App. II (entry into effect to be delayed by 18 months).	ADOPT

<u>38</u>	AR, BO, PA	<i>Acanthoscurria chacoana</i> , <i>A. insubtilis</i> , <i>A. musculosa</i> , <i>A. theraphosoides</i> , <i>Avicularia hirschii</i> , <i>Avicularia rufa</i> , <i>Avicularia avicularia</i> , <i>Catumiri argentinense</i> , <i>Cyriocosmus berate</i> , <i>Cyriocosmus perezilesi</i> , <i>Grammostola rosea</i> , <i>Haplotremus albipes</i> , <i>Holothela longipes</i> , <i>Pamphobeteus antinous</i> , <i>Umbyquira acuminatum</i> : include in App. II	ADOPT
---------------------------	------------	--	-------

Detailed comments: CoP20 working documents

Note: Links subject to change based on new versions uploaded to CITES website.

Strategic matters
<p><u>7.5 Arrangements for meetings of the Conference of the Parties</u></p> <p>WCS recognizes the financial challenges facing the Secretariat, and its budget, particularly as relates to the hosting of meetings of the CoP.</p> <p>We strongly urge Parties to REJECT the suggestion to hold meetings of the CoP every four years, instead of the 2 years specified in Article XI of the CITES treaty. In today’s rapidly changing world, where biodiversity is declining at unprecedented rates, four years is far too infrequent.</p> <p>The Secretariat highlights the high costs of hosting a CoP in Geneva, where the Secretariat is based. We concur that Geneva is very expensive. We urge the Parties to require a funding analysis of the cost of hosting the Secretariat in Nairobi, the headquarters of UNEP, which administers the Secretariat. Indeed, perhaps the Parties might want to ask for a full financial analysis of the cost savings of moving the Secretariat to either Nairobi, or another country.</p> <p>In this time of financial constraints and diminished government funding, we strongly encourage the Secretariat to only undertake activities directed by the CoP.</p>
<p><u>14. Enhancing the work and efficiency of the Convention through the permanent committees</u></p> <p>This is an important document. Increased workloads and overflowing agendas risk undermining the effectiveness of the Convention, particularly for often-overlooked taxa (e.g., Testudines).</p> <p>While we appreciate the work behind the proposed prioritization matrix, as currently drafted it leaves significant room for subjective interpretation. Key terms lack definitions or thresholds; for example, how “frequently” must a species be traded internationally, or what exactly makes an issue “time-sensitive”? Without clear parameters, scoring is open to a significant degree of discretion. Moreover, all factors are given equal weight, even though some are more directly tied to CITES’ core mandate (e.g., Appendix I species in trade, compliance under Article XIII). The process also lacks transparency on evidence, creating incentives to over-claim: with each box ticked raising the score, there is pressure to stretch claims.</p> <p>As recognized by the document itself, more work is needed to strengthen the tool, especially to:</p> <ul style="list-style-type: none"> • define measurable criteria for each factor (e.g., trade frequency thresholds, explicit urgency indicators). • introduce weighting so factors linked to CITES’ legal obligations carry greater influence. • require evidence for each claimed factor, backed by data or referenced reports, and reviewed by the relevant Committee before scoring; we also recommend allowing observer input before scoring to improve legitimacy; • use a scoring scale rather than binary ticks (e.g., 0–3 points: 0 = not applicable, 3 = high relevance) to capture gradations in importance. <p>Adopting these measures would make the matrix a more objective, evidence-based tool, while ensuring that CoP agendas focus on the issues most critical to the Convention’s effectiveness and core objectives.</p>

15. Role of CITES in reducing risk of future zoonotic disease emergence associated with international wildlife trade

[15.1. Report of the Standing Committee](#)

[15.2. One Health and CITES: Reducing risks to human and animal health associated with trade in CITES-listed species](#)

Background

WCS is pleased to have been a member of the working groups of the Animals and Standing Committees on this issue, and to having been able to share our extensive [One Health work and expertise](#), and [science-based work on pandemic prevention](#) with the group. It is vital that prevention at source (particularly of pathogen spillover from wildlife) of the next outbreak, epidemic, or pandemic of zoonotic origin be addressed at the national as well as multilateral/international levels. We believe that CITES and its implementation have a role to play in this prevention, although there is also much that needs to be done outside the remit of CITES.

This is a matter of great urgency, and there are urgent actions that are critical for governments to take, in order to help prevent another devastating pandemic of zoonotic origin. We must not forget the devastation of COVID-19. We see CITES implementation as part of a necessary trans-sectoral One Health approach, which must include management and regulation of domestic wildlife use, habitat degradation and loss, animal “farming” and handling, markets for live wildlife, and multiple other factors, and by necessity must involve multiple agencies and national authorities. Different factors contribute to pathogen spillovers (and spillback) from wildlife to humans, other wildlife, and livestock. The evidence is clear that wildlife farms/captive breeding facilities, markets (particularly in live and freshly slaughtered animals, and particularly involving birds and mammals) and associated trade (domestic and international) contribute significantly to the risk of pathogen spillover. International wildlife trade is one of these factors, and these issues are highly relevant from a CITES perspective.

We appreciate that many Parties have taken positive steps to address the risk of pathogen spillover from wildlife (farmed and from the wild), but many have not yet taken sufficient action. There has been progress since CoP19, but more is needed. The ongoing work of the Quadripartite (WHO, WOA, UNEP, and FAO) provides important information particularly on the risk of pathogen spillovers. The WOA [Guidelines for Addressing Disease Risks in Wildlife Trade](#) provides guidance to key wildlife trade actors to identify and select pragmatic, flexible, and relevant risk-management strategies, and to ensure their effective implementation. We urge Parties to implement these Guidelines.

We appreciate the adoption by CBD CoP16 of [Decision 16/19](#) which includes a [Global Action Plan for Biodiversity and Health](#) (Action Plan) with actions for mainstreaming biodiversity and health interlinkages in the implementation of the GBF. The Action Plan includes taking biodiversity and health into consideration, using a One Health approach, in implementation of the GBF Targets, including Targets 4, 5 and 9 as particularly relevant in the trade context. The Action Plan has clear recommendations on reducing the risk of pathogen spillover. Since all CITES Parties but one are Parties to the CBD, we urge Parties to endeavour to implement the Action Plan along with their implementation of the GBF.

WCS congratulates the WHO World Health Assembly on its adoption by consensus in May 2025 of the groundbreaking WHO Agreement on Pandemic Prevention, Preparedness, and Response, following three years of intense negotiations. This marks the first time governments have united

behind a plan to prevent, prepare for, and respond to catastrophic pandemics. When governments complete their negotiations of the annex on pathogen access and benefit sharing, planned for mid-2026, the Pandemic Agreement will be open for signature. The Pandemic Agreement obligates its Parties to develop national pandemic prevention and surveillance plans, requiring multisectoral action and community engagement. Critically, the Pandemic Agreement recognizes the need for prevention through upstream interventions, such as safeguarding intact ecosystems and tackling the commercial live wildlife trade. CITES has a role to play in integrating its work with that of the WHO and this important Agreement.

Draft Decisions

The Draft Decisions in Doc. 15.1 (Annex 2) are generally acceptable, although not very ambitious, and we have one suggestion:

- We suggest removing “subject to external budgetary resources” for actions a, b, and c, since these actions by the Secretariat are within their regular work (e.g., updating a webpage, encouraging Parties to implement the WOAHP guidelines) and should not depend on fundraising. For action c, we agree the Secretariat should only engage with the CPW if there are external budgetary resources; we consider this secondary. We see engagement with WOAHP to be of greater priority.

We strongly urge Parties to adopt a Resolution on this issue, for the following reasons:

- WCS recognizes that the Standing Committee’s working group did not reach consensus on the need for a resolution on this issue. However, we are of the view that with more time and discussion, and engagement of a broader diversity of Parties, agreement could be reached. Even if a resolution or text is not the recommendation of the Standing Committee, the final decision is with the Parties themselves, and the CoP.
- WCS is supportive of the science-based recommendations agreed by the Animals Committee, found in Annex 1 of Doc. 15.1, titled, “Effective and Practical Solutions for Reducing Pathogen Spillover Risk in Wildlife Supply Chains and Opportunities for Practical Collaboration”. Their implementation would go a long way towards reducing the risk of pathogen spillover in the live wildlife trade, and thereby reduce the risk of future epidemics or pandemics of zoonotic origin, connected to wildlife trade. It is therefore unfortunate that those recommendations are basically lost in the draft Decisions in Document 15.1. Parties looking for guidance on these issues would look to the CITES website, Decisions, or Resolutions, and not to CoP or Animals Committee documents.
- Decisions expire and are meant to be time-limited; actions to reduce pathogen spillover in wildlife trade are unfortunately not time-limited but rather must be ongoing. It would be more productive for Parties to adopt a Resolution, rather than debate, update, and adopt Decisions at subsequent CoPs (which also is not the point of Decisions).
- Some of the Draft Decisions in Doc. 15.1 are more suitable for Resolution text.
- CITES needs to echo the ambition and actions of CBD, WHO, and other fora, and not ignore its role in this issue.
- We recommend that the Parties welcome the WOAHP Guidelines, CBD Action Plan, and WHO Pandemic Agreement, which is not possible with only Decisions. CITES needs to stand up on these issues (and almost all CITES Parties are Member States or Parties to WOAHP, CBD, and the WHO).

Document 15.2: In conclusion, WCS greatly appreciates the leadership of Senegal in submitting Doc. 15.2, and we strongly urge Parties to ADOPT the draft Resolution in Annex 1. It is well-written and highly collaborative. If the Parties establish a Working Group on this issue at CoP20, WCS offers to join and share our extensive expertise on these issues.

17. World Wildlife Trade Report

WCS remains significantly concerned about the future directions of this report, and the burden it will put on Parties. We appreciate that the draft decisions were agreed by the Standing Committee, as a compromise. However, considering the resource constraints facing the Secretariat and Parties, we urge Parties to reject these draft decisions and shelve further work on this report. As we have stated previously, the organization and content of the previous pilot report does not respond to needs identified by CITES Parties through the Standing Committee or CoP. Producing such a report on a regular basis would further burden CITES structures and resources, and particularly Parties on reporting with information that is not required by the treaty or resolutions. We stress that time, and fundraising for resources, would be better spent on the delivery of the negotiated CITES Strategic Vision, and on enforcement of and compliance with the Convention.

18. CITES and forests

WCS works to conserve forests, tree species, and forest-dependent wildlife in many countries around the world, and we are focused in particular on the conservation and retention of high integrity forests. WCS is highly committed to the conservation of the world's forests, to benefit plant and animal species, ecosystems as a whole, and Indigenous Peoples and local communities whose livelihoods and cultural identification are closely linked with healthy, high integrity forests.

The legal and illegal trade in CITES-listed timber species and other forest plant and animal species have significant implications for their conservation and management. While there appears to be interesting progress since CoP19, forests are far more than trees. CITES is fundamentally a species-based and not an ecosystem-based treaty.

We welcome discussion of implementation of CITES Article IV paragraph 3, and the role of species in their ecosystem, but that is applicable not only to forests, but also to other ecosystems (e.g. savannahs, woodlands, deserts, inland waters, coral reefs, coasts, and the ocean).

As we and others noted during SC78, there are a variety of other multilateral fora considering forests and other ecosystems at that ecosystem scale. In an era of scarce resources to deal with the core, species-focused mandate of CITES, WCS recommends that Parties NOT move forward with the adoption of the draft decisions on *CITES and Forests* contained in Annex 1 at this time.

Capacity-building

20. Capacity building framework

WCS SUPPORTS the recommendations, including on the establishment of an intersessional working group on the development of an integrated capacity-building framework. We particularly look forward to the development of related performance indicators and the monitoring and evaluation tool so that the progress of capacity building efforts can be gauged and priorities identified. Unlike in previous documents (e.g., paragraph 13 in CoP19 Doc. 16 and paragraph 3 g) of SC78 Doc. 21), we recommend that work on performance indicators and the monitoring and evaluation tool is addressed before the development of other framework elements. We believe that having clear

performance indicators from the start will serve as a valuable guide, ensuring that all components are designed to deliver measurable improvements. This will also support the Secretariat and the Parties to effectively evaluate the success of the capacity-building activities that are developed. Initiating this work later could compromise the coherence and measurable impact of the final framework.

21. Compliance Assistance Programme (CAP)

WCS commends the efforts of the Secretariat and the Parties who participated in the CAP, and in general we support the draft decisions. We support the tailored approach of CAP interventions; however, the process would be strengthened by considering input from other stakeholders, such as NGOs, Indigenous Peoples, and local communities to enhance the CAP's relevance and effectiveness and uncovering drivers and root causes of compliance issues that the Management Authorities alone might overlook or not be aware of.

CITES and people

26. CITES Global Youth Network

WCS welcomes this document and supports the amendments proposed under Res. Conf 17.5 (Rev. CoP18) on Youth Engagement. WCS places great value on engaging, empowering and educating young people to support the conservation of wildlife and we were pleased to be able to join the inaugural CITES Global Youth Summit earlier this year and commend Singapore for its support to that event.

Agenda items 27-30: Indigenous Peoples and Local Communities

WCS fully understands, respects, and supports the vital role that Indigenous Peoples (IPs) and local communities (LCs) play in conservation around the world. We fully acknowledge and respect the rights of IPs as enshrined in the UN Declaration on the Rights of Indigenous Peoples (UNDRIP) and the Universal Declaration of Human Rights. Across the planet, WCS collaborates with IPs and LCs to achieve a shared vision for a more secure, inclusive, just, equitable, and resilient future, where wildlife thrives in healthy lands and seas, valued by societies and communities that embrace and benefit from the diversity and integrity of life on earth.

We note that based on these documents, there is a need for clarity in terminology. We strongly recommend that Parties use terminology that is accepted by the United Nations, its subsidiary organizations, and other Multilateral Agreements: Indigenous Peoples and Local Communities. We stress that terms such as “rural communities” or “People Living alongside Species of Wild Fauna and Flora” (which appear in some of these documents) are not accepted in international law and would just create confusion and lack of clarity. If an individual Party wishes to use a new term, that is their right, but in adopting Decisions and Resolutions of the CoP, we recommend continuity of terminology with the UN, UNEP as the body administering CITES, and other Conventions.

WCS believes that it is vital at the local and national level to collaborate with, respect, and include IPs and LCs, as appropriate, in conservation decision-making. Our views on agenda items 27-30, below, build on the above and our human rights-based approach to wildlife conservation.

27. Engagement of indigenous peoples and local communities

WCS is pleased to have been a member of the WG on the “Engagement of Indigenous Peoples and Local Communities”. We thank Canada as Chair and members of the WG for the collaborative dialogue. WCS believes that robust, meaningful engagement with IPs and LCs in the implementation and enforcement of CITES should be undertaken at the national level by Party governments according to their respective legal frameworks. We strongly support the engagement at the national level of IPs and LCs in the implementation and enforcement of CITES, as well as in the delivery of [Target 5](#) of the GBF. Towards that end, we strongly support national-level processes to engage IPs and LCs, and all stakeholders, in CITES processes and meetings, to ensure their voices are well represented.

We support attendance of Indigenous Peoples Organizations at CITES meetings as official observers or on government delegations, as has been the practice at prior meetings of the CoP. We are also supportive of a separate fund being established to facilitate their participation in meetings, only if it is in addition to the Delegates Travel Fund and does not disadvantage in any way any developing country CITES authorities to attend CITES meetings.

We do not object to the revised draft non-binding “*Guidance on consultation with indigenous peoples and local communities on proposals to amend the Appendices*”, in Annex 1 of this document, if it is understood to be entirely optional and non-binding. Some countries do not have or recognize Indigenous Peoples, whilst others have strict legal requirements and treaty obligations. We urge the Parties not to adopt this Guidance through an annex to a Resolution of the CoP, which would make it appear obligatory. The draft guidance has useful elements, but would benefit from further discussion, and should not be seen or used as a barrier to preparation or submission of proposals to amend the CITES Appendices.

We also do not however see the need for draft Decisions 20.AA or 20.BB; we believe each Party can decide whether and how to use this non-binding guidance at the national level, and the limited resources of the Parties and Secretariat should be focused on more core implementation issues. We see no need to amend Resolution Conf. 16.6 (Rev. CoP18) in this regard. Sometimes, it is fine to consider an issue completed and not continue from CoP to CoP. WCS trusts each Party, according to its national legislation and circumstances, to consult relevant IPs, LCs, and indeed all stakeholders on CITES issues.

28. Draft resolution on the creation of an advisory Subcommittee of the Standing Committee of People Living alongside Fauna and Flora species included in the CITES Appendices (PLFF), a related Voluntary Fund, and their procedures (submitted by Zimbabwe)

WCS urges the Parties to REJECT this draft resolution, which we find to be flawed for several reasons. The document suggests creation of an Advisory Sub Committee of the Standing Committee of “People living alongside species of wild fauna and flora included in the CITES Appendices (PLFF)”. We recommend that Parties not adopt this new term, which is ambiguous, confusing, and inconsistent with international law and practice. In many cases, Indigenous Peoples have specific rights under national and international law, independent of their proximity to species of wild fauna and flora, and this terminology may be seen to exclude IPs; there is also a fundamental difference in international law between indigenous people or local people, and Indigenous Peoples.

We agree that it is vital at the local and national level to collaborate with, respect, and include people living alongside fauna and flora. That is not the same as including local people in the CITES decision-making process: as a treaty, decisions are made by sovereign States, the Parties.

We do NOT see the need for an official new advisory subcommittee of the Standing Committee specifically for local communities. CITES is already over-burdened, and that would take away from actions and processes at the national level, as well as core issues of compliance and enforcement. We trust the Parties to consult and engage local communities and IPs within their territories, and their national circumstances.

The text confuses CoP decision-making and somehow advising the Standing Committee. Furthermore, we strongly OPPOSE paragraph 4 (to fund and facilitate preparatory meetings of “people living alongside fauna and flora” representatives to allow for the preparation of common positions before each meeting of the Conference of the Parties or other official meetings under the Convention). We are concerned as to how those representatives would be chosen, and why common positions are needed. Positions at meetings of the CoP are taken by Parties.

We also strongly OPPOSE paragraph 7, which has this proposed advisory subcommittee taking positions on proposals to amend the Appendices. That is NOT the role of the Standing Committee at all, which never takes positions on proposals to amend the Appendices; that is the sole right of Parties as sovereign States.

29. Livelihoods

29.1. Report of the Standing Committee and 29.2. Document by Zambia

WCS is pleased to have been a member of the Working Group (WG) on Livelihoods. We thank Peru and Zambia as co-Chairs and members of the WG for the collaborative dialogue. We strongly agree that it is vital at the local and national level to collaborate with, respect, and include local communities in conservation, and to promote sustainable and equitable livelihoods.

In addition to economic and other livelihood benefits that can accrue to some from effective and equitable implementation of CITES and national legislation, there is a significant risk of harm to local livelihoods and cultural values in the absence of strong governance, or if wildlife exploitation and trade are illegal, or unsustainable, or if they pose a risk of pathogen spillover. There is always an economic benefit to trade, by definition, but it rarely actually accrues significantly and equitably to IPs or LCs. In all too many cases, the commercial exploitation and trade in wildlife provides only marginal economic benefits and undermines the rights, livelihoods, well-being, and socio-cultural values of Indigenous Peoples.

For both documents, there is an underlying assumption by some that the livelihoods of IPs and LCs will always be negatively impacted by CITES restrictions in the marketplace, without considering the potential for undermining alternative worldviews through a focus on markets. Many Indigenous Peoples organizations, for example, have raised concerns in other fora that promoting a market-based approach undermines efforts to resist such an approach, and to protect their cultural integrity and traditional economies. Indeed, perhaps CITES should also discuss how wildlife trade and a market-based approach, and exploitation of certain species for economic gain, potentially undermines the cultural integrity and traditions of Indigenous Peoples.

We note that at SC78, no agreement was reached on the proposed amendments to Resolution Conf. 16.6 (Rev. CoP18) or on the draft decisions. We recommend NOT adopting these draft Decisions, and appreciating the work of the Livelihoods Working Group, but not extending it.

WCS agrees that the “Strategies for maximizing the benefits to Indigenous peoples and local communities from trade in CITES-listed species” are interesting, and some Parties may find some elements of the strategies useful at the local and national level, but many go beyond the remit of CITES. For example, recommendations regarding pricing, market management, supply chains, business strategies and opportunities, trade promotion, and access and benefit sharing, are beyond the remit of CITES (and the latter is better addressed in other multilateral fora). Many of the elements of these strategies are relevant to domestic use and trade, but not international trade; as such, they are not relevant to CITES but may warrant consideration at the local and national level, and in the implementation of the GBF.

We therefore recommend that the Parties REJECT amending Reso. Conf. 16.6 (Rev. CoP18) as proposed in Document 29.2, to officially incorporate them into the Resolution and call on Parties to utilize the strategies; rather, we recommend publishing the strategies on the CITES website as non-binding and optional. We also don’t think it is needed, as per Document 29.1, to “note” the strategies.

WCS also opposes and urges Parties to REJECT draft Decisions 20.AA, BB or CC in Document 29.1, on certification and labelling systems for products of CITES-listed species from IPs and LCs. This would be complicated and resource-intensive with no evidence of benefit. In today’s climate of significant resource and capacity constraints, we urge Parties NOT to adopt this work on certification and labelling, which is beyond the CITES mandate.

WCS is skeptical that the use of registered marks of certification and origin will actually help IPs or LCs to benefit from wildlife or wildlife trade; that is not necessarily the case. There is also a significant risk this could increase the risk of fraud along the value chain. In our work with local communities, we encourage the recognition of traditional rights to wildlife, while prioritizing local uses (consumption and cultural practices); risks of fraud, corruption, and lack of benefits to local communities increase significantly when international commercial trade is involved. Rather than highlighting best practices in the draft decisions, we recommend a focus on lessons learned and case studies (positive and negative).

30. Integrating human rights, livelihoods, and food security into the implementation of CITES (submitted by Zimbabwe)

WCS strongly agrees with the importance of human rights, food security, and livelihoods as critical to conservation, and we embrace a human rights-based approach in our field-based conservation work. However, we OPPOSE this document, which confuses human rights with livelihoods or CITES listings, and recommend that Parties REJECT it.

We urge Parties to REJECT operative paragraph 3, “Recommends that Parties undertake, where appropriate, socio-economic impact assessments for proposals to amend the Appendices and for other regulatory measures that may affect Indigenous Peoples and local communities”. This recommendation is inconsistent with both the treaty and Reso. Conf. 9.24 (Rev. CoP17). We are supportive of Parties consideration of socio-economic issues in the implementation of the Convention at the national level, but not in assessment of proposals to amend the Appendices. Indeed, the CoP has repeatedly rejected including socio-economic impact assessments in listing

proposals; those issues are highly relevant at the implementation phase, but not in listing decisions.

We also urge Parties to REJECT paragraph 6; we see no need for a Standing Committee Working Group. All but one of the CITES Parties are Parties to the CBD, where discussion of these issues is more relevant, and is also within the remit and mandate of that Convention. We also urge Parties to REJECT paragraph 7; we consider it beyond the CITES mandate and burdensome for Parties and the Secretariat to require Parties to report on efforts to integrate human rights and food security considerations into national CITES implementation, and to share best practices at future meetings of the CoP.

31. Demand reduction to combat illegal trade

WCS continues to support and implement targeted, evidence-based demand reduction efforts through collaboration with our government partners, including in China under the EU GUARD project alongside UNODC, CITES Secretariat, and our partner NGOs.

While we support the adoption of the *CITES guidance on demand reduction strategies to combat illegal trade in CITES-listed species*, this useful resource and guidance is not the only tool available to support efforts to implement evidence-based, targeted, demand reduction using the latest behavioral science.

There is considerable work being done, in close collaboration with Parties, that is valid and scientifically exceedingly sound but does not necessarily follow the CITES Guidance. This work is often overlooked or under-represented, especially as it may not be included in the current version of the Guidance.

WCS recommends edits to draft Decision 20.AA a) to include other materials on science-based behavior change approaches and recommends similar edits to the other components of the draft Decision to fully acknowledge the value of approaches beyond the guidance.

We believe there would be value in the draft decisions in the Annex being further expanded to include the sharing of experiences in targeted, evidence-based approaches, rather than those specific to the use of the guidance. We also believe there would be value in the Secretariat developing a page on the CITES website dedicated to behavior change approaches, to highlight the CITES guidance while also providing a platform to share other approaches and available tools. This would provide a vehicle for sharing experiences and case studies, including the use of the Guidance but also providing useful examples of other approaches.

It is vital to focus on science-based, measurable behavior change in the design and implementation of demand reduction strategies and plans, and the value of approaches beyond the 5-step approach outlined in the guidance should also be recognized. WCS works with many Parties on such science-based behavior change with a focus on building networks of practitioners with access to a variety of approaches and would be pleased to provide information to such a resource.

We therefore recommend the following amendments to the draft Decision (additions underlined).

Parties are invited to:

- a) share their experience in using the *Guidance for CITES Parties to develop and implement demand reduction strategies to combat illegal trade in CITES-listed species* and other

materials or guidance on science-based behavior-change approaches with other Parties and the Secretariat;

- b) communicate to the Secretariat information on priority species, taxa, or commodities for potential pilot projects that require extrabudgetary resources;
- c) promote science-based behavior change including but not limited to the use of the Guidance by organizing pilot projects and providing support to the potential pilot projects mentioned in paragraph b) above.

Compliance

34. National laws for implementation of the Convention

WCS welcomes the progress reported by the Secretariat and congratulates the increasing number of Parties whose legislation has been assessed as Category 1 under the National Legislation Project (NLP). This is an encouraging sign of greater commitment to CITES implementation.

However, we note that the current NLP criteria represent the four *minimum* requirements for implementation and are relatively narrow in scope. It is important not to overstate these achievements, especially as independent analyses (e.g., Wyatt, 2021^[1]; Wei-Min et al., 2015^[2]) suggest that some Category 1 Parties still present significant legal loopholes. Importantly, under the current set-up, once Parties meet the minimum criteria and achieve Category 1, there is no incentive for them to further improve their legislation. As implementation advances, Parties may wish to reflect on how the NLP could evolve into a more ambitious phase - one that goes beyond minimum criteria and assesses implementation in a more comprehensive manner. While current NLP criteria are drawn directly from the Convention text, Parties may wish to also include a limited number of “core” legislative requirements set out in CITES resolutions. Resolutions represent agreed interpretations of the Convention and, in many cases, provide the only practical means for ensuring that the treaty’s objectives are met in today’s context, which has significantly evolved since the adoption of the Convention (think of online trade as one of many examples). Criteria could be updated to ensure that national legislation:

- penalizes possession of specimens obtained in contravention of the Convention in line with Article VIII (more on this below, see Doc. 37);
- covers all CITES-listed species, terrestrial or marine, including non-native species;
- provides for penalties that are “appropriate” to the nature and gravity of the infringement and “sufficient to address the challenges of controlling legal wildlife trade, investigating illegal wildlife trade and punishing the perpetrators” (in line with Conf. 11.3);
- provides for the confiscation and disposal of illegally traded specimens in line with relevant resolutions, including measures to prevent re-entry into trade (see Conf. 9.9), and appropriate handling of live and dead specimens (see Conf. 10.7 (Rev. CoP15) and Resolution Conf. 9.10 (Rev. CoP15), as well as facilitates asset forfeiture to ensure that criminals do not benefit from the proceeds of their crimes (see Conf. 11.3 (Rev. CoP19));
- establishes a clear, transparent, and enforceable permit system, incorporating essential details from relevant resolutions (e.g., Conf. 12.3 (Rev. CoP16)), such as maximum validity periods, non-transferability, consignment-specific permits, and powers for Management Authorities to revoke, modify or suspend permits;

- explicitly designates "Scientific Authorities *independent* from Management Authorities" (see Conf. 10.3), with their functions and powers clearly set out, and establishes mechanisms for coordination and communication with enforcement agencies.

Parties may also want to consider replacing the current categorization (1, 2, 3) with a more finely calibrated system, for example a transparent scoring system applied to each criterion. WCS remains available to provide more detailed suggestions upon request.

Regarding the updated draft of the *Guidance on the implementation of the Convention in the event of exceptional circumstances that impede the proper functioning of CITES at the national level*: While WCS considers this subject to be out of place in a document on national legislation and might be better addressed separately, we welcome the improvements in this draft. We appreciate that the Secretariat has taken previous feedback into account. At the same time, caution is still needed to ensure that the guidance does not inadvertently create loopholes allowing trade to be conducted in breach of the provisions of the Convention.

^[1] Wyatt, Tanya 2021. Is CITES protecting wildlife? Assessing implementation and compliance.

<https://www.taylorfrancis.com/books/mono/10.4324/9781003007838/cites-protecting-wildlife-tanya-wyatt>

^[2] Wei-Min, Denise Cheong and Lin-Heng Lye. CITES Legislative Implementation: Lessons from and for ASEAN Member States. https://www.worldscientific.com/doi/abs/10.1142/9789814719155_0003

35. Compliance matters

35.1. Implementation of Article XIII and Resolution Conf. 14.3 (Rev. CoP19) on CITES compliance procedures

We note the Secretariat's concern over the increasing volume and complexity of compliance matters they and the Standing Committee are handling – and share a concern that insufficient time and resources risk undermining progress on compliance and enforcement. WCS believe this is in addition to structural gaps undermining compliance with the Convention, which we would summarize as follows:

- lack of a dedicated compliance and enforcement body, which leaves Parties without specialized support and no structured space for national agencies to coordinate on illegal trade;
- lack of a systematic process for identifying and prioritizing non-compliance cases. Currently, issues are raised informally by Parties, the Secretariat, or observers, relying on *ad hoc* reporting rather than structured oversight. Without clear criteria for assessment and escalation, there is no guarantee that the most serious violations receive proper attention;
- prioritization of procedural outputs (e.g., report submissions and legislative updates) over substantive enforcement and conservation outcomes. This is particularly concerning given CITES' reliance on self-reporting, with no independent mechanism to verify the accuracy veracity of Party submissions. As other observers, WCS sees a need for CITES to move beyond checklist compliance (e.g., reports, workshops) to measurable outcomes (e.g., effective management policies) and ultimately to real-world impacts (e.g., species recovery).

We are also concerned about the growing number of Parties and facilities inviting the Secretariat to visit - budgets permitting - as a way to demonstrate compliance. While seemingly cooperative, this

practice risks becoming a form of performative transparency, where showcasing operations replaces genuine accountability, particularly when these missions do not create a safe space for civil society engagement and consultation. It may also divert limited resources away from investigating real concerns toward confirming curated appearances of compliance.

We welcome the draft Compliance Action Plan Template contained in the proposed amendments to Res. Conf 14.3 (Rev. CoP19) but are concerned this prioritizes procedural outputs—such as the completion of a training program, report submissions and legislative updates—over the desired outcomes of those activities. CITES’ reliance on self-reporting, with no independent mechanism to verify the veracity of Party submissions means robust outcome indicators are critical and would propose the template is adjusted to include those.

We agree that the Secretariat should prioritise the proposed mission to India, noting that the concerns raised which instigated this mission potentially affect many CITES Parties. We hope that India will be able to send an invitation to the Secretariat.

For all such missions:

- We urge the Secretariat to engage with other CITES Parties and ICCWC Members to prepare for the mission, determining key questions and issues, and where transparency is needed.
- To ensure the safety and security of NGOs and journalists we recommend an ICCWC member such as UNODC serve as an intermediary in any information sharing from their sources.
- To ensure the mission adequately addresses the issues and concerns raised, the Secretariat should engage with a wide range of stakeholders, ensuring consultation with civil society organizations in the country, beyond any specific discussions or consultations arranged by the Party.

35.2. Review of the National Ivory Action Plans Process

WCS recommends the adoption of the draft decision on *Review of the NIAP process* in Annex 2 of Document 35.2. The only amendment we suggest would be to ensure that this agenda item is considered at both SC81 (2026) and SC82 (2027), to allow for iterative discussion among Parties of a comprehensive report and complex topic. WCS concurs with interventions from members of the Standing Committee during SC78 that the amendments to Reso. Conf. 10.10 (Rev. CoP19) Annex 3 are welcome but not yet comprehensive enough to address the concerns highlighted by the Secretariat’s consultant during the review. Further written consultation with Parties on gaps could be conducted by the Standing Committee.

36. Review of the provisions of Resolution Conf. 17.7 (Rev. CoP19) on Review of trade in animal specimens reported as produced in captivity

WCS is highly supportive of the implementation of Reso. Conf. 17.7 (Rev. CoP19), particularly as regards efforts to identify fraudulent claims that specimens are bred in captivity, and to take action to prevent future such claims. We also see a core element of implementation of this resolution to be consideration of any potential harmful impacts of removal of founder stock from the wild.

We recommend that Parties ADOPT the proposed amendments to paragraphs 2 d) and 2 h) of Resolution Conf. 17.7 (Rev. CoP19).

We support and recommend that Parties ADOPT draft Decision 20.AA, in which the Secretariat is requested to “develop, test and maintain a Captive Breeding tracking and management database as an essential tool for the effective implementation and transparency of the process under Resolution Conf. 17.7 (Rev. CoP19)”. However, we think such a database should be core business and budget and not only dependent on external funding.

37. Possession of specimens of species included in Appendix I

This is a very important issue that deserves attention from CITES Parties. WCS agrees with the Secretariat that, in accordance with Article VIII, national legislation of the Parties should penalize possession of illegally traded specimens of CITES-listed species, including to facilitate enforcement of the prohibition of trade in violation of the Convention. WCS contends that national legislation implementing CITES should prohibit and penalize possession of specimens of CITES-listed species that have been obtained contrary to the Convention, *in addition to* penalizing trade in such specimens. Accepting any different interpretation of Article VIII (i.e., the “either/or” interpretation), would lead to the paradox of Parties to a convention whose very purpose is to regulate international *trade* not being required to penalize the *act of illegal trade* itself. As suggested by the Secretariat, a Party could regulate only possession of and not trade in illegally traded CITES specimens and still reach Category 1 of the National Legislation Project. WCS feels strongly that a similar interpretation would undermine the very purpose of the Convention.

We therefore urge Parties to SUPPORT the recommendations in paragraph 15 of the document, including the proposed amendments to Resolution Conf. 8.4 (Rev. CoP19).

Illegal trade and enforcement

38. Review of Resolution Conf. 11.3 (Rev. CoP19) on Compliance and enforcement

WCS was pleased to participate in the intersessional WG on Resolution Conf. 11.3 (Rev. CoP19). Overall, we support the recommended amendments to the Resolution, especially with regards to tighter Article XIII timeframes and requiring the justification for a lack of response at three months.

On the issue of professional bodies, we regret the lack of support within the WG to direct Parties to meaningfully address it. Current recommendations are largely inspirational and voluntary. Professional bodies, including commercial traders, brokers, transporters, trade associations, and other actors that derive significant profit or other benefits from wildlife trade should indeed be held to standards far higher than those applicable to the general public. This occurs in other high-risk sectors, with professional actors being held to higher standards because of their specialized knowledge and potential to cause harm. In many jurisdictions, for example, lawyers and accountants are subject to professional codes that require them to avoid facilitating illegal activity (e.g., financial crime), with breaches leading to disbarment, loss of licence, or criminal prosecution. Similarly, pharmacies and medical professionals may face higher penalties for illegal handling of narcotics or prescription drugs. We encourage Parties to revisit this important subject in the near future.

39. Enforcement matters

WCS strongly supports the increased focus on anti-corruption measures and financial investigations as critical tools to address wildlife trafficking. We support the recommendations, and suggest the following additions (underlined) to:

Resolution Conf. 17.6 (Rev. CoP19):

4. ENCOURAGES Parties, and especially CITES Management Authorities to:
 - a) ensure that corruption risk mitigation policies and strategies are in place, and regularly updated, to address corruption risks associated with wildlife crime;
 - c) ensure that collaboration mechanisms are in place between CITES management and anti-corruption authorities to facilitate swift and decisive action where corrupt activities are detected, including clear procedures for information sharing and joint investigations;

We encourage the CoP to consider the reference to regular updates to corruption risk mitigation policies and strategies, as these risks can and *do* shift over time. As for point “c”, including references to information sharing and joint investigations provides Parties with a clear direction for how that collaboration can be operationalized.

Decision 19.79 (to become Rev. CoP20):

Subject to external funding, the Secretariat shall work with its partners in the International Consortium on Combating Wildlife Crime (ICWC) and other bodies such as the Financial Action Task Force (FATF) and the Egmont Centre of Financial Intelligence Unit Excellence and Leadership (ECOFEL), to provide Parties with guidance on the measures they can take to combat money laundering associated with wildlife crime, including how they can identify and assess related risk in National Risk Assessments, and to promote the integration of financial crime investigations into the investigation of crimes involving wildlife.

In its 2020 and 2021 reports on money laundering and wildlife/environmental crime, FATF identified priority actions to reduce money laundering risks linked to wildlife trafficking. The foremost is for countries to identify and assess these risks in their National Risk Assessments (NRA) - using relevant experts and data - and implement mitigation measures and allocate resources accordingly. This also applies to countries without significant domestic wildlife resources, which should consider whether they serve as transit points or destinations for laundered funds from wildlife trafficking. While we encourage the Secretariat to align its guidance with all priority actions identified by FATF, the inclusion of wildlife trafficking risks in NRAs is particularly important and should be specifically addressed in the decision, as Parties may lack experience, data, or expertise in integrating wildlife crime into NRAs.

40. Wildlife crime enforcement support in West and Central Africa

WCS supports the draft decisions, although draft Decision 20.CC is “subject to extrabudgetary resources” for the Secretariat to “work with its ICWC partners to continue providing targeted support to Parties in West and Central Africa, to combat wildlife crime”. We disagree that the Secretariat should only assist those Parties if it gets extra resources; that should be core work.

We support work on wildlife crime enforcement in West and Central Africa, but none of the actions directed to the Secretariat are unique to that region. Perhaps these Decisions, and this effort, should be incorporated into actions under agenda item 39, on enforcement, with specific text in Conf. 17.6 (Rev. CoP19).

41. CITES Big Cats Task Force

Illegal trade continues to be a key threat to Big Cat species. WCS welcomes the efforts of the Parties and Secretariat in convening the CITES Big Cat Task Force in response to decisions 19.92 and 19.93, in Entebbe, Uganda from 24 to 28 April 2023. WCS attended the Task Force meeting and was encouraged by the discussions held at the meeting. WCS is disappointed by the limited response to the Notification to the Parties No. 2023/130 regarding a possible resolution on all big cats. We support the draft Decisions contained in Annex 1 to the CoP20 Doc. 41 and would further encourage all Parties affected by illegal trade in specimens of big cats to not only report on the implementation of the Decision to the Secretariat but also to ensure reporting of incidents of illegal trade involving Big Cats to be included in Party specific reporting on illegal trade.

45. Illegal trade in cheetahs (*Acinonyx jubatus*)

Illegal trade continues in live cheetah cubs, particularly from the critically endangered populations in the Horn of Africa. WCS recommends more explicit actions in the draft decisions, including reference to the supply chain and actions by both range and destination countries and increased efforts to strengthen enforcement and collaboration (additional text underlined):

Proposed revision to draft Decision 20.AA paragraph b:

- b) ensure that adequate resources and capacities to enforce legislation addressing illegal trade in cheetahs are in place and strengthen enforcement and collaboration throughout the supply chain for cheetahs;

Proposed revision to draft Decision 20.BB, Directed to the Secretariat:

- a) The Secretariat shall issue a Notification to source and destination countries in sufficient time ahead of the document deadlines for the 81st and 82nd meetings of the Standing Committee, requesting information on their implementation of Decision 20.AA;
- b) The Secretariat shall report to the Standing Committee at its 81st and 82nd meetings on the implementation of Decision 20.AA, together with any recommendations it may have.

Proposed revision to draft Decision 20.CC, Directed to the Standing Committee:

The Standing Committee, at its 81st and 82nd meetings, shall consider the report of the Secretariat and any reports received under Decisions 20.AA and 20.BB and make recommendations to the Parties by the 21st meeting of the Conference of the Parties, as appropriate, including any actions under Resolution Conf. 14.3 (Rev. CoP19) on compliance procedures.

47. Tortoises and freshwater turtles (Testudines spp.)

47.1. Report of the Standing Committee and of the Secretariat

WCS appreciates the summary from the Standing Committee and Secretariat. We agree strongly with the statement in paragraph 18, that “These developments underline that illegal trade in tortoises and freshwater turtles remains a matter for priority attention”. We welcome the many law enforcement operations and initiatives identifying tortoises and freshwater turtles as priority species that have taken place since CoP19.

We recommend ADOPTION of the draft decisions in Annex 1 to the document, and the proposed amendments to Resolution Conf. 11.9 (Rev. CoP18), in Annex 2 to the document. We do think that the Secretariat’s work with partners in ICCWC to implement activities targeting illegal trade in

these species should not be dependent upon external funding however (as per draft Decision 20.DD para. b).

However, clearly, decisions and resolutions are not enough; the evidence is clear that trafficking in freshwater turtles and tortoises, including those in Appendix I, is rampant and increasing, and reflects insufficient efforts to stem the pet and hobbyist trades driving this trafficking. We urge Parties to take this issue more seriously and elevate the priority of efforts to prevent this illegal trade. Whilst we agree that several Range States, including Madagascar, need to do more, we also believe that consumer States need to do far more as well. There have been many recent reports of seizures and confiscations of illegal shipments of tortoises and freshwater turtles—but sufficient efforts to prevent the poaching and illegal trade, and change consumer behavior, are lacking. We strongly urge a more comprehensive effort to prevent and curb this trade, including stronger enforcement and behavior change efforts to stem demand in the pet and hobbyist trades for these species.

We recommend that Parties take strong action and consider amendments to Reso. Conf. 11.9 (Rev. CoP18) or a Decision to direct the Secretariat to work with UNODC and other partners on a report to the Standing Committee and CoP21 on trafficking in tortoises and freshwater turtles, with clear recommendations and country-specific actions.

47.2. Trade in tortoises and freshwater turtles from Madagascar (EU and Madagascar)

We appreciate this initiative by the EU, working with Madagascar, and we recommend the ADOPTION of the draft decisions in the document, in addition to those on Document 47.1.

Regulation of trade

49. Legal acquisition findings

We welcome the work under this agenda item and call particular attention of Parties to the draft document in Annex 3: “Guidance on the chain of custody required for demonstrating the legal acquisition of the parental breeding stock.” This is a critically important document that addresses several species- or taxon-specific issues highlighted elsewhere in the CoP20 agenda, such as on trade in endemic species (Agenda item 73) and some of the proposals to amend the Appendices (e.g., proposals 22, 23 and 24).

The document states that “...demonstrating the legal acquisition of the parental/breeding stock supposes demonstrating that the specimens constituting the parental/breeding stock have been obtained in accordance with relevant national legislation on the protection of fauna and flora and the provisions of the Convention.” WCS recommends use of the term “founder stock” instead of “parental/breeding stock”, to make it abundantly clear that Management Authorities but ensure that the original founder stock from the wild, and not just parents of subsequent generations, were acquired legally.

There are situations (see <https://conbio.onlinelibrary.wiley.com/doi/10.1111/csp2.13283>) demonstrating that despite successful captive breeding of species, it is not possible for founder stock to have been obtained legally. We believe that standard practices must be developed in accordance with this guidance for Parties to: a) highlight instances where questions about the legality of obtaining founder stock can be documented and discussed; and b) best practice or standards for Parties to use when founder stock was obtained prior to existing documentation. We

stress that if the legal acquisition of founder stock cannot be clearly demonstrated through appropriate documentation, exports should not be allowed.

We have some specific comments on the draft Decisions and proposed amendments to Reso. Conf. 18.7 (rev. CoP19), and we look forward to discussing these at CoP20.

- The Framework flow chart on page 7 (of the English version) is useful for simple situations, but is an over-simplification and not useful for cases of captive-bred animals, endemic species, or other riskier situations. The Guidance needs to clarify that.
- Paragraph 28 of the Guidance is very good, and should be in the Resolution: “Regardless of the method used to establish the traceability and chain of custody, the ultimate objective is to demonstrate that no specimen of the parental/breeding stock of an operation has been obtained in violation of the provisions of the Convention and relevant national laws on the protection of fauna and flora as, in such case, the illegality of these specimens or of the whole parental/breeding stock would pass on to any offspring produced. As a consequence it would not be possible to demonstrate legal acquisition of the parental/breeding stock and hence the offspring could not be traded in compliance with the Convention.”

50. Non-detriment findings

WCS appreciates the work of the Animals and Plants Committees, and the Technical Advisory Group (TAG) on guidance to Parties on the development and issuance of science-based non-detriment findings (NDFs), which is fundamental to the effective implementation of CITES. WCS was able to share its scientific and technical expertise on this issue through the TAG and the International Expert Workshop. WCS works closely with CITES authorities in multiple countries to provide scientific and technical assistance in the issuance of NDFs for marine and terrestrial species.

We support the recommendations in this document, including the draft decisions, with one exception. The Guidance on the issuance of NDFs is very useful, and the survey results in this document are illustrative. We appreciate that the Guidance will be posted to the CITES website, but not included in a Resolution, which would imply they are mandatory. It is vital to guard against the guidelines becoming obligatory, as circumstances, taxa, and situations will vary (e.g., for processes such as the Review of Significant Trade). The simplified assessment has utility but should not be seen as necessarily sufficient. Finally, the issuance of NDFs is fundamental to the implementation of CITES and the work on NDFs by the Secretariat should not be dependent on external funding, and what is proposed is not excessive; as such we recommend the following EDIT to draft Decision 20.AA para c:

- c) ~~subject to external funding~~, prepare draft amendments to the NDF guidance based on advice received from the Animals and Plants Committees and submit the proposed amendments for consideration by the Committees.

51. Non-detriment findings for specimens of Appendix-II species taken from areas beyond national jurisdiction

WCS appreciates the attention of the Parties to the implementation of their scientific obligations relevant to specimens taken in areas beyond national jurisdiction (ABNJ), and we look forward to continuing to collaborate with Parties and the Secretariat to help ensure effective implementation of CITES for such specimens. We appreciate and were pleased to be able to attend the technical

workshop organized by the Secretariat on this issue, in 2024. We also appreciate the detailed, collaborative discussions at Animals Committee meetings on this important issue.

We are concerned that the excellent recommendations in paragraphs 10 and 11 of this document will be lost with the decisions as proposed. We do not agree that the proposed draft Decisions in Document 52 (Introduction from the Sea) will sufficiently assist Parties in making NDFs for specimens taken in ABNJ. We recommend that Parties REQUEST that these elements be included in the NDF Guidance that is published on the CITES website, pursuant to agenda item 50, and the IFS page of the CITES website.

52. Introduction from the sea (IFS)

WCS appreciates the hard work and consensus-building that went into the adoption of Resolution Conf. 14.6 (Rev. CoP16). We recognize that more progress is needed on implementation of this resolution and associated CITES requirements, for specimens taken in areas beyond national jurisdiction (ABNJ). We are not convinced that there has been sufficient analysis to warrant revision of Reso. Conf. 14.6 (Rev. CoP16), beyond some clarifications and updates.

We strongly urge the Parties not to amend the core elements of the resolution, the product of years of debate and final consensus, on when an IFS certificate should be issued versus when an export permit should be issued, for specimens taken in ABNJ.

We thank the Secretariat for the changes made to the "Frequently Asked Questions" on Introduction from the Sea, and for posting it to the [IFS page of the CITES website](#). We recommend making it more prominent there, however. It is a very useful document.

WCS believes that the issues relate to not only understanding by Parties of their obligations relevant to specimens taken in ABNJ, but compliance with those obligations, and enforcement by flag and port States, exporting and importing countries. Rather than focusing on amending Resolution Conf. 14.6 (Rev. CoP16), we recommend an enhanced focus on implementation of the Convention for specimens taken in ABNJ and ensuring compliance—including issuance of appropriate CITES permits or certificates and required findings by Parties whose vessels operate in ABNJ, and enforcement of CITES requirements by Parties.

We support potentially modifying the Annex to the resolution ("*Explanatory Notes*"), but NOT the resolution itself, although technical clarifications in terms of chartering, reference to the new UN Biodiversity Beyond National Jurisdiction (BBNJ) agreement, and minor clarifications and updates could be fine. However, we recommend that Parties not amend the core elements of the resolution on when an IFS certificate should be issued versus when an export permit should be issued, for specimens taken in ABNJ.

56. Electronic systems and information technologies

[56.1. Report of the Standing Committee](#)

WCS recommends that Parties SUPPORT the draft decisions presented here. Electronic CITES permitting systems are a core aspect of reducing opportunities for fraud and misuse of permits and we encourage all Parties to work towards the adoption of the systems

59. Stocks and stockpiles

WCS is generally supportive of the proposed definition of ‘Stockpiles’ to be included in the CITES Glossary. However, we maintain that the word “dead” can be problematic; “dead” can be a challenging term (for example, where parts or derivatives can be obtained from living animals), and would suggest “non-living” instead of “dead.” As an alternative, noting the proposed definition, we could suggest the following amendment (added text in **bold**):

*‘Stockpiles’ refer to any quantity of legally stored dead specimens, including parts and derivatives **of living or dead specimens**, of CITES-listed species held by public or private entities. Specimens included in permanent collections held by scientific institutions for non-commercial purposes or by individuals as personal or household effects, as well as seized or confiscated specimens still under an enforcement procedure, are excluded from the definition. In general, provisions related to stockpiles in CITES Resolutions and Decisions are intended to ensure that these are secured, managed and disposed of in such a way that the specimens would not enter or re-enter illegal trade and for specimens of species listed in Appendix I not to be used commercially.*

Species conservation and trade

72. Identifying information on species at risk of extinction affected by international trade

WCS is pleased to have been a member of the WG on “Species at Risk of Extinction Affected by International Trade” and we thank the United Kingdom as Chair and members of the WG for the collaborative dialogue. We consider it vital that Parties are aware of and consider available scientific data and technical information, including peer-reviewed materials or publications, government reports or reports from other official bodies, scientists, and other stakeholders; this information is vital to ensure species are appropriately listed on the CITES Appendices. Parties’ Scientific Authorities will benefit from information on species potentially in trade that are threatened with extinction or that are in trade and may become threatened if their trade is not effectively regulated.

The draft decisions in the document are in the right direction, but we have some comments and suggestions:

- o We consider the work requested of the Secretariat in this Decision should be within its core budget, as it is core to implementation of the Convention and of the CITES Strategic Vision for Parties to have the best available scientific and technical information on the conservation status of species subject to international trade. Assistance from the Secretariat to Parties to implement the Convention, and these two objectives, should not be contingent upon fundraising efforts. Therefore, we recommend deletion of “subject to external resources” from Draft Decision 20.AA.
- o Most of the information that these decisions relate to is publicly available, particularly in peer review literature, although it may not be easily accessible by all Parties. We strongly oppose limiting access to this information to a restricted area of the CITES website that is accessible to Parties only or limiting the provision of information to Parties. Many scientists, researchers, and IGO and NGO staff engage in significant scientific research that is published in the peer reviewed literature. It is the free and open sharing of scientific and technical information on species in trade that will truly enhance implementation of CITES and listing on its Appendices of species that would benefit.
- o Therefore, we suggest inviting observers, and other scientists and researchers, to submit information to the Secretariat, but not to require it be “through a Party”, since that creates

unnecessary burdens for Parties. Rather, we strongly encourage the open sharing of information; in particular, there is no reason that peer-reviewed papers should not be able to be posted directly. WCS therefore recommends amending these draft decisions to enable observers to provide materials directly to the Secretariat, particularly from the scientific literature, for uploading to the dedicated webpage.

73. Trade in endemic species

WCS welcomes the submission of this document by Brazil and Ecuador and recommends that Parties ADOPT the draft decisions without amendment, though we suggest that draft Decision 20.AA, which we strongly support, may be better in a Resolution, as it is not time-limited.

There is evidence and several peer-reviewed publications highlight the issue of trade in specimens of endemic species from non-range States, that are captive-bred or claimed to be captive-bred, for which legal export of founder stock is not documented. Without such documentation, and verifiable evidence of legal origin of founder stock, including in particular wild-caught specimens, all subsequent captive-bred specimens cannot be legally exported, pursuant to the Convention.

Fauna

76. Elephants (Elephantidae spp.)

76.1. Implementation of Resolution Conf. 10.10 (Rev. CoP19) on Trade in elephant specimens

76.2. Implementing aspects of Resolution Conf. 10.10 (Rev. CoP19) on the closure of domestic ivory markets

76.3. Ivory stocks and stockpiles

WCS appreciates the detailed discussions in Documents 76.1 and 76.2. Both documents discuss the issue of closure of domestic ivory markets and implementation of Decisions and Resolutions of the CoP. Based on all available information, and input from our field programs in Africa and Asia in particular, legal domestic elephant ivory markets contribute to poaching and illegal trade. Accordingly, efforts to close domestic ivory markets continue to be justified and important. Many countries who once had active domestic ivory markets have taken great strides and efforts to close their elephant ivory markets, and it is time for the remaining markets to also close. WCS supports the ongoing work of the MIKE and ETIS Programmes, and also encourages all Parties to continue to work to close domestic ivory markets, to help combat poaching and illegal ivory trade. Many elephant populations are now recovering, and experience reduced poaching; now is not the time to risk undermining the progress that has been made.

Document 76.2 draws attention to the UNODC World Wildlife Crime Report (2024), which found that elephant poaching in Africa and ivory trafficking have declined in recent years, and noted that the shrinking of the global ivory market is linked to the collapse in the price of ivory, and that the decreasing elephant poaching can be seen as the result of a combination of demand and supply interventions. WCS concurs with the report that government policies, such as the closure of key domestic markets, have reduced demand. We agree that the closure of domestic ivory markets, combined with on-the-ground conservation and enforcement efforts, is key to the protection and conservation of elephants.

The country-specific analyses in Doc. 76.2 of the information submitted in response to Notifications 2023/077 and 2024/095 are particularly valuable. We appreciate the reports and responses to these Notifications from 9 Parties (although since the EU is one of those 9, one can

consider it as responses from 36 Parties); however, we agree with the Parties who submitted Doc. 76.2 that it is unfortunate that so few Parties have responded to the Notifications. There are indeed Parties that have taken significant positive legislative and regulatory measures to close their domestic markets but did not respond to the Notifications (e.g. China, including Hong Kong SAR, and Singapore).

Both Documents 76.1 and 76.2 propose renewal of Decisions 18.117, 18.118 and 18.119. We greatly prefer and recommend that Parties renew these Decisions with the additional text proposed in Document 76.2 and not that in 76.1 (which is too limiting). The draft amendments to 18.118 and 18.119 in Document 76.2 include the available ETIS data aggregates for each country or territory, which we consider to be highly valuable; it would be unfortunate to leave those out of these Decisions. We are confident Parties can reconcile these documents and adopt the amendments in 76.2. WCS also recommends adoption of Decisions 20.XX in Document 76.2.

We recommend in addition that these renewed decisions should make a special reference to all Parties included in Category A, B and C of the ETIS report to CoP20 [Nigeria, Mozambique, Viet Nam, the Democratic Republic of the Congo, Angola, United Arab Emirates and China] to ensure their reporting in accordance with ETIS results. Another key approach, in line with the logic of Document 76.2, would be to focus unique recommendations on countries implicated in "out" seizures — those countries implicated in a transnational trade, but where the seizure was not made as a result of domestic enforcement. Rather than defining a legal domestic market, it may make sense for Parties to call on the Secretariat to identify some key criteria around permissions, exemptions and prohibitions against which to standardize the interpretation of "domestic ivory markets"; this may facilitate reporting as envisioned by both the Secretariat's and Parties' proposed approaches.

WCS also recommends that Parties ADOPT the amendments to Reso. Conf. 10.10 (Rev. CoP19) contained in Annex 2 to Document 76.1. We also recommend that Parties adopt the draft decisions included in Document 76.3 Annex 2 as a means of directly encouraging cross-reference to ETIS data and the NIAP process. Each of these elephant-related processes must be integrated and coherent for maximum impact.

76.6. Results of the African elephant dialogue meeting

WCS welcomes the Communique from the CITES Dialogue Meeting for African elephant Range States and we thank Botswana for hosting this meeting, which almost all African elephant Range States were able to attend. We support the conclusions reached by African elephant Range States at the meeting, particularly because they reflect a consensus. We also appreciate the constructive engagement of African Range States through the African Ministerial Conference on the Environment (AMCEN) and its African Group of Negotiators (AGN). WCS works on the conservation of wildlife and wild places across [Africa](#), including in 12 African elephant Range States, and we stand ready to collaborate with our government and other partners to find and implement solutions to the threats facing elephants, their habitats, and local communities.

76.7. Sustainable financing for the African elephant conservation and management

WCS welcomes the Communique issued by African elephant range States and supports its conclusions. The draft decisions submitted by Zimbabwe in Document 76.7 would lead to the convening of a technical workshop — an idea which certainly can continue the conversation. We note, however, that the language "and other means" following "non-commercial disposal" in draft

decision 20.AA paragraph b) leaves the door open to commercial export of ivory, including from stockpiles. WCS would not support this solution to create sustainable financing, as we have articulated in the past that such commercial export would stimulate the market for ivory and drive poaching of elephants and illegal trade in their ivory and undermine the ongoing efforts of governments and communities to combat poaching.

77. Asian big cats (Felidae spp.) [77.1. Implementation of Resolution Conf. 12.5 \(Rev. CoP19\) on Conservation of and trade in tigers and other Appendix-I Asian big cat species](#)

WCS works to protect tigers and other Appendix-I Asian big cat species across their distribution range and in major consumer markets. We welcome the continued attention and efforts to eliminate trade in these species; however, we remain concerned by the level of trade in these species, noting that trade remains a significant factor in the declines of many Asian big cat species. We urge Parties and others to prioritize action and implementation of relevant resolutions and decisions and while we acknowledge the work of the Secretariat in compiling the Document on implementation of Resolution Conf. 12.5 (Rev. CoP19) we do not support the deletion of decisions 18.105 or 18.106. We note that in line with the evidence indicating they have not been sufficiently implemented (18.105: Parties identified in section 3.1.5 of Annex 4 CoP18 Doc. 71.1 to address illegal trade in leopard parts and derivatives; 18.106: Consumer States of tigers and other Asian big cat specimens to take action to end demand) it would be premature to delete these decisions.

[77.2. Asian big cats in captivity](#)

WCS acknowledges the work of the Secretariat in implementing the Decisions and completing missions to the Parties concerned in regard to Asian Big Cats in Captivity. CoP20 Doc. 77.2 outlines the results of the missions undertaken and the visits to 19 facilities keeping tigers in captivity across China, Czechia, Lao People's Democratic Republic, South Africa, Thailand, Viet Nam and United States of America. WCS notes with concern that a number of facilities with large numbers of tigers could not be visited during these missions. WCS also notes with some concern that a number of the edits proposed at SC 77 and 78 to the Recommendations outlined in Annex 1 to CoP20 Doc. 77.2 were not included in the summary record and are not reflected in the draft Decisions presented in CoP20 Doc. 77.2 Annex 2. For example, the use of "facilities that breed large numbers of tigers" is used repeatedly but no indication of the definition of large numbers is provided, leaving the Decisions open to interpretation by Parties.

WCS recommends amending draft Decision 20.AA as follows (additions underlined):

Directed to Parties in whose territories there are captive tiger populations ~~facilities that breed large numbers of tigers and facilities housing large numbers of tigers~~

All Parties in whose territories there are facilities ~~that breed large numbers of tigers and facilities housing large numbers of~~ with captive tigers populations are encouraged to consider taking the following methodical approach to restrict the captive population to a level supportive only to conserving wild tigers ~~regarding these facilities to improve their conservation~~

~~and educational value~~, as well as to put an end to the activities of facilities that do not have conservation ~~and/or~~ educational value, ~~that fail to comply with regulations~~ ~~and~~ pose a risk regarding parts and derivatives from these animals entering illegal trade, in accordance with their domestic legislation:

- a) identify facilities keeping tigers of genetic and conservation value and engage these facilities in internationally recognized coordinated conservation breeding programmes for such animals;
- e) assess the need for rescue centres, sanctuaries, or other disposal measures, including euthanasia, etc. as may be required due to the phase-out of captiveintensive tiger operations not supportive of conserving wild tigers;
- f) review management practices and controls to regulate activities of facilities keeping tigers in captivity to ensure that they are adequate to prevent tiger specimens from entering illegal trade from or through such facilities, including implementation of the strategies, measures and activities in Section 2 of the CITES Big Cats Task Force outcome document in the annex of SC77 Doc 39.3;~~licensing of such facilities, accurate record keeping of individual tigers, regular inspections and well-regulated disposal of tigers that die in captivity and handling of carcasses; and~~

78. Great apes (Hominidae spp.)

78.2. Conservation of and trade in live great apes

WCS welcomes this document from Uganda and strongly SUPPORTS the decisions therein and stands ready to share *information* from our work at source, transit and in demand markets to support Parties and the Task Force.

79. Pangolins (Manis spp.)

79.1. Implementation of Resolution Conf. 17.10 (Rev. CoP19) on Conservation of and trade in pangolins

WCS rejects the Secretariats conclusion that the situation and response by Parties to the illegal trade in pangolins is sufficient to not follow SC78's request to develop time-bound and measurable recommendations directed to Parties.

The IUCN Pangolins Specialist Group report states that:

- A small number of countries account for a high proportion of the illegal trade: Cameroon, China, Mozambique, Nigeria, Republic of Congo, and Vietnam, some of which are already under compliance mechanisms that this can be incorporated into.
- Due to a lack of population monitoring for pangolins across almost all range States, and intelligence gaps - we do not know if the decline in seizures can be attributed to changing modus operandi of trafficking groups, corruption or scarcity in the wild.
- There has been no evidence-based, targeted, measurable, consumer demand reduction efforts in any country where pangolins are consumed.
- Legal domestic markets for pangolins scales in medicines persist in major demand markets.

There are positive indications that the trafficking of pangolin scales has declined in recent years; likely due to disruptions caused by COVID19, regulatory reforms in major consumer countries, and law enforcement responses. We believe that now is a critical time to provide a set of more targeted

recommendations to further disrupt and prevent this illegal trade of this globally threatened Appendix I taxa, and would recommend that Parties request an in-session working group to develop these recommendations to amend the draft Decisions in Annex 2.

We support the proposed amendments to Res. Conf. 17.10 (rev CoP19) in Annex 1.

79.2. Report on Decisions 18.238, 18.239 & 19.200 to 19.204

WCS works to protect pangolins across their distribution range and in major consumer markets. We SUPPORT the draft decisions within this document noting the importance of honing the conversion parameters to better understand trade

81. Jaguars (*Panthera onca*)

The jaguar (*Panthera onca*) is an emblematic species of the Americas, playing a critical role in maintaining ecosystem functionality and holding deep cultural significance, particularly for Indigenous Peoples and local communities across its range. The species continues to face serious threats from habitat loss, conflict, and the growing illegal trade in jaguar parts and derivatives. Across nine jaguar range States in Mesoamerica and South America, WCS works with government and community partners to conserve jaguars and their habitats and to support effective, law-based responses to illegal trade.

Recent peer-reviewed evidence indicates that illegal trade in jaguar parts is widespread across the species' range, with country, and subregion-specific dynamics. Studies by Polisar et al. and de la Torre et al. document persistent demand and trafficking of teeth, skins, and bones, with networks that adapt to enforcement pressure, vary in the actors involved, and present distinct operational challenges across Mesoamerica and South America. These findings underscore the need for range-wide, intelligence-led enforcement, cross-border information-sharing, and targeted preventive actions.

WCS welcomes the progress made since CoP19 in advancing Decisions 19.110 to 19.114, including the development of the situational analysis, the proposal for a modular monitoring system, the proposal for an intergovernmental platform, and the draft range-wide action plan. We also welcome the efforts of Range States, in collaboration with Brazil and Mexico, to prepare a dedicated resolution on the jaguar for consideration at CoP20.

Consistent with discussions at SC78, we strongly support the adoption of a stand-alone resolution on the jaguar, rather than amending Resolution Conf. 12.5 (Rev. CoP19). While there are commonalities among CITES-listed big cats, the jaguar faces regionally specific threats and enforcement challenges that warrant a dedicated resolution.

We encourage Parties to ensure that such a resolution incorporates:

- effective legislation and enforcement measures, including penalties that provide for deprivation of liberty for jaguar-related crimes.
- the establishment of the modular monitoring system to strengthen data, coordination, and response to illegal killing and trade.
- the creation of a CITES–CMS intergovernmental platform with clear governance and coordination mechanisms.
- the implementation of the range-wide action plan with full participation of Indigenous Peoples and local communities; and

- the exploration of sustainable financial mechanisms, including a potential regional fund for jaguar conservation.

Finally, we encourage Parties and partners to support the convening and outcomes of the second Range States meeting in Mexico in September 2025 and to mobilize the resources necessary for the implementation of the resolution and its associated action plan.

83. Songbird trade and conservation management (*Passeriformes* spp.)

WCS commends Parties and all others who worked towards the successful outcomes of the study and workshop on songbirds mandated by Decisions 18.256 to 18.259 on *Songbird trade and conservation management* (*Passeriformes* spp.), as summarized in Document 83. The document proposes that these Decisions be deleted. Given that the impact of the songbird trade on wild species continues to worsen, and that songbird species in trade are greatly under-represented in the CITES Appendices, WCS does not think it is appropriate at this time to delete these Decisions. Significant further action is needed by Parties and others to ensure that songbird trade no longer threatens wild species.

More than a thousand songbird species are in international trade. The report identified that significant trade might negatively impact the wild populations of 548 of those species. This includes 66 species that are threatened with extinction on the IUCN Red List of Threatened Species, of which only 19 are currently listed in a CITES Appendix. Research indicates that much of the trade is unsustainable for individual species, e.g., ^[1]. Further measures are urgently needed, including Parties reporting out on implementation of the recommendations in this document. Strong consideration should also be given to further listing proposals for songbird species threatened by trade.

^[1] Chng, S.C.L., Saaban, S., Wechit, A. and Krishnasamy, K. (2021). Smuggled for its Song: the Trade in Malaysia's Oriental Magpie Robins. TRAFFIC, Southeast Asia Regional Office, Petaling Jaya, Selangor, Malaysia.

84. Rhinoceroses (*Rhinocerotidae* spp.)

WCS welcomes Document 84, which addresses the Resolution Conf. 9.14 (Rev. CoP19), Decisions 18.116, and Decisions 19.115 to 19.122 and contains the report of the CITES Rhinoceros Enforcement Task Force meeting (Annex 2) and the IUCN Species Survival Commission (IUCN SCC) African and Asian Rhino Specialist Groups and TRAFFIC to CoP20 (Annex 3). Both documents provide important insight into actions taken to address continuing poaching of Rhinoceros and the current status and trends of rhino species, as well as data on legal and illegal trade in rhinoceros horn and other products.

We continue to commend the efforts of range States of all rhinoceros species to tackle the ongoing threat of poaching. We are concerned that population estimates provided for African rhino species remain similar to the previous report. While it is encouraging that there has not been a decrease in population estimates the lack of an increase indicates the ongoing threat posed by poaching. We remain concerned by the continued low rate of convictions to arrests for crimes involving Rhinoceros; without successful and meaningful prosecution, arrests and seizures are a minor irritant for traffickers.

We continue to urge all States impacted by crimes involving rhinoceros, poaching, trafficking and sales, to provide all relevant data on illegal killing and trade to ensure datasets are not only

complete but also up to date. We note with some concern that recent emerging trade locations are not highlighted in the documents but understand the constraints of timely data to inform the analysis. We again encourage Parties to require the Secretariat to work with NGOs with extensive in-country experience and knowledge on these issues. This concern is compounded by the note that the current IUCN and TRAFFIC report has been affected by reduced funding and so is already a reduced report.

We urge Parties, including transit States and new emerging markets, to enhance all enforcement activities and efforts to constrict the illegal trade in rhinoceros. WCS supports renewal of Decision 18.116 on illegal markets for rhinoceros horn. We acknowledge the progress made by the Parties identified as those most affected by poaching and illegal trade in rhinoceros horn but are disappointed that no time bound reporting on continued progress is included in the Decisions as Directed to these parties and despite an ongoing threat to rhinoceros populations only Indonesia is recognized in the draft Decisions. Such time bound, directed decisions are key to ensuring important conservation gains are not lost, especially noting recent publications on increasing poaching and illegal trade of rhinoceros horn.

85. Saiga antelope (*Saiga spp.*)

85.1. Report of the Secretariat (Decisions are proposed for revision and not deletion)

85.2. Document by Kazakhstan and the Russian Federation

WCS appreciates efforts by those range and consumer Parties that are working hard to both combat illegal trade in saiga parts and products and implement the current listing and associated annotation. We welcome the efforts of the Parties to implement Decisions 19.213-215 and 19.217 and commend those Parties who provided current and updated information on implementation of these decisions.

WCS believes that far more needs to be done on stockpile management including transparent reporting on stockpiles, in both range and consumer States, from an enforcement and compliance perspective, before any reopening of commercial trade in saiga horns should be contemplated.

We are also concerned about the reported exports and re-exports of saiga specimens using source code O (pre-Convention). Based on available information on stockpiles, it is reasonable to question the existence of specimens that are more than 30 years old now entering trade. This highlights the serious gaps in stockpile management in many range and consumer States.

In general, proposed draft Decisions 19.213 (Rev. CoP20) and 19.214 (Rev. CoP20) are acceptable, with a few suggestions:

- These draft Decisions are directed to range States and “important” consumer and trading countries. We consider that any Parties that consume or trade Saiga parts or derivatives should implement these Decisions (all such Parties are important). The use of the term “important” is subjective and undefined. Therefore, we recommend deleting “important” as follows in draft Decision 19.213 (Rev. CoP20):
*Directed to range States of saiga antelope (*Saiga spp.*) (Kazakhstan, Mongolia, the Russian Federation, Turkmenistan and Uzbekistan), and ~~important~~ consumer and trading countries of saiga parts and derivatives*
- SC78 agreed that range States of the saiga antelope and consumer and trading countries of saiga parts and derivatives should put in place measures to effectively manage saiga specimen stockpiles. Draft Decision 19.213 (Rev. CoP20) paragraph b is insufficiently explicit in that

regard. Stockpile management is more than just internal market controls, as exports and domestic markets are prohibited in many range and consumer States, currently there is a zero quota on exports from the wild, and stockpile management also must include seized/confiscated specimens from enforcement operations. We therefore recommend the following edits:

*b) ... are encouraged to **put in place measures to effectively manage saiga specimen stockpiles and establish internal market controls for saiga parts, including registration of stockpiles, labelling of parts and products, recording of sources of saiga specimens contained in stockpiles, monitoring and control measures and registration of manufacturers and traders.***

- In Draft Decision 19.214 (Rev. CoP20) paragraph c, we accept that Secretariat technical assistance and training can be “subject to the availability of external resources”, but we believe that consulting range and consumer States on their management of their stockpiles should be core and institutionalized business and not dependent on fundraising; we recommend that the draft Decisions be amended accordingly.
- WCS also notes the critical role of national legislation in supporting confiscations, accurate stockpile reporting, monitoring, and management. The lack of a unified system for data collection and management further complicates this issue, potentially leading to inaccurate stockpile estimates. We strongly urge action to promote transparency of reporting, by range and consumer States, particularly of any offtake, stockpiles, etc. We recommend a Decision encouraging legislative reform to ensure accurate stockpile estimates and management across all range and consumer States.

We share the concerns expressed by Kazakhstan and the Russian Federation, and others, on the use of source codes U and O for saiga specimens, but the Secretariat did not refer to this issue in its Draft Decisions. We appreciate that Kazakhstan and the Russian Federation have raised this issue of exports using source code U (unknown origin) in Document 85.2, and we support adoption of draft Decision 20.AA in their document. We concur that source code U should not be used for saiga specimens; we do not believe that it should ever be used for commercial shipments (since if the origin of specimens is unknown, we cannot see how legal acquisition and non-detriment findings can be made).

88. Sharks and rays (Elasmobranchii spp.)

88.1. Report of the Standing Committee

WCS appreciates the extensive work reflected in Doc. 88.1 on the implementation of CITES for sharks and rays which showcases the wide range of work being undertaken to implement the listings of sharks and rays on the CITES Appendices. We generally support the draft decision text prepared by the Secretariat and contained in Annex 2 of the document.

We would like to draw attention to the issue of the feasibility of an adapted Review of Significant Trade (RST) process for sharks and rays, which calls for revising the guidance applied to the RST process for highly mobile marine species. Many of these species, including numerous CITES-listed sharks and rays, have wide ocean-basin or global ranges, yet the current approach captures only a limited number of Parties in the RST process for a given species at any one time, an approach that

is unlikely to be effective or make sense biologically, given that one stock is being exploited by multiple parties simultaneously.

A bespoke approach at a higher taxonomic and broader geographic scope is needed to effectively meet the Convention's obligations for these species, and was discussed and supported in both the Animals Committee and Standing Committee working groups on the subject in the CoP19-20 intercessional period. Therefore, we support the text contained in CoP20 Doc 88.1 Annex 3 that summarizes the Committee recommendations on the subject, and recommend it be adopted as drafted and prioritized as a key implementation step post CoP20.

88.2. Draft decisions on trade, conservation and management of deep-water elasmobranchs

Deep-water sharks and rays, including gulper sharks (*Centrophoridae spp.*), face some of the highest extinction risks among Chondrichthyans due to their extreme biological vulnerability and ongoing exploitation for international trade, particularly for liver oil. CoP20 Doc. 88.2 highlights critical gaps in catch and trade data, as well as the need for targeted management measures. WCS supports listing proposal 34 (a family level listing for gulper sharks) tabled for CoP20, to list this family of incredibly vulnerable sharks on CITES Appendix II.

Paired to that listing, the adoption of the draft decisions in Annex 1 to CoP20 Doc. 88.2, which set out a pathway to improve monitoring, strengthen species-specific reporting, and enhance collaboration with fisheries bodies will be helpful in implementing the listing, and so halt further declines and promote recovery of deep-water elasmobranch populations; we recommend their adoption.

102. Considering the 'look-alike' criterion Annex 2B A of Resolution Conf. 9.24 (Rev. CoP17) on Criteria for amendment of Appendices I and II (UK)

In this document, the UK raises issues regarding the listing of species on Appendix II, pursuant to Article II paragraph 2 (b) of the Convention, in accordance with the criteria in Resolution Conf. 9.24 (Rev. CoP17) Annex 2b, which states:

Species may be included in Appendix II in accordance with Article II, paragraph 2 (b), if **either one** of the following criteria is met:

- A. The specimens of the species in the form in which they are traded resemble specimens of a species included in Appendix II under the provisions of Article II, paragraph 2 (a), or in Appendix I, so that enforcement officers who encounter specimens of CITES-listed species are unlikely to be able to distinguish between them; or
- B. There are compelling reasons other than those given in criterion A above to ensure that effective control of trade in currently listed species is achieved.

Paragraph B of Annex 2b of Reso. Conf. 9.24 (Rev. CoP17) is rarely used, and the UK document addresses paragraph A. There is however a long-standing precedent whereby Parties have included entire genera, families, or orders in Appendix II, in accordance with paragraph 2 (b) of Article II of the Convention. That has worked well, particularly for Customs and enforcement officers, who otherwise would have to have far greater wildlife taxonomic and identification expertise.

The document claims that “the principles for listing a species under criterion A of Annex 2b of Res. Conf. 9.24 (Rev. CoP17), i.e. as a look-alike, are ambiguous”. We disagree; rather, we consider the criteria in Annex 2b of the aforementioned resolution to be wisely flexible. That paragraph was debated and agreed by consensus at CoP9 in 1994, 31 years ago, and was

intentionally flexible; it has never been amended, and has indeed stood the test of time, practice, and precedent.

The requirements for implementation of Article IV of the Convention are the same, whether a species was included pursuant to Article II paragraph 2a or 2b. That was a wise decision of the original drafters of the Convention, as a species' status can change rapidly, and irrespective of why a species was listed in the first place, compliance with the Convention necessitates both a non-detriment and legal acquisition finding before issuance of an export permit.

In the previous 50 years and 19 meetings of the CoP, the Parties to CITES have adopted dozens of proposals using paragraph 2b of Article II, and have implemented those listings. There is no need to assess how Parties have interpreted or implemented those listings—the decisions, resolutions, and proposals adopted by the CoP attest to the utility of said listings.

We respect the concerns of the UK, but we do not consider the proposed Decisions in this document, or the process envisaged, to be needed; it would be a significant burden and workload for Parties; the Animals, Plants, and Standing Committees; and the Secretariat, even with some external funding (external funding doesn't lighten the load of the Committees or CoP).

We therefore recommend that Parties REJECT these draft Decisions.

113. Taxonomy and nomenclature of African elephants (*Loxodonta* spp.)

WCS recognizes that the science is clear that there are two species of African elephant: the African savanna elephant (*Loxodonta africana*), and the African forest elephant (*Loxodonta cyclotis*). Any of the 3 options in paragraphs 25-30 of the document would accomplish recognition of that by CITES.

WCS recommends that the SC endorse Option B – namely, a nomenclatural change in the CITES Appendices to now list *Loxodonta* spp. (replacing *Loxodonta africana* with *Loxodonta* spp.), although we consider Option C to also be acceptable. We believe that Options B and C are the appropriate change for now, given the original intent of the listings as adopted by CITES Parties, as well as the implementation of CITES for parts and derivatives such as elephant ivory that are addressed through several ongoing CITES processes. We believe that these options (A, B, or C) are not a substantive change, do not change the scope of the listings in the Appendices, the relevant annotations are unchanged, and there is no change in the level of protection or Appendix of any population.

Option A could lead to greater disruption to the functioning of CITES at present and could create additional burdens for Parties in implementation. We disagree with the claim in paragraph 27 that Option B would cause confusion, as there already exist several genus-level listings in the CITES Appendices. We are sympathetic, however, to the concern that Options B and C do not clarify the recognition of *L. cyclotis*, and suggest a note in the Appendices accordingly. For some taxa listed at the genus level, there is always the chance that a new species will be discovered; that is certainly not the case for African elephants.

Therefore, we recommend that Parties endorse either option B or C, in addition to supporting draft Decision 20.AA and the draft amendments to Resolution Conf. 10.10 (Rev. CoP19).

Detailed Comments: Proposals to amend the Appendices

Note: Links subject to change based on new versions uploaded to CITES website.

Fauna	
3	<p>Proposed by: Kazakhstan</p> <p>Summary: Amend Appendix II annotation for <i>Saiga tatarica</i> to allow commercial exports from the population in Kazakhstan.</p> <p>WCS recommendation: REJECT</p> <p>The saiga antelope (<i>Saiga tatarica</i>) inhabits the open steppe/grassland habitats of Central Asia in nomadic herds (up to 1,000 individuals) and undertakes irregular seasonal migrations (including between range States). Saiga is assessed as Near Threatened, extreme population fluctuations (see below) could quite plausibly re-categorize the species as Vulnerable, Endangered, or even Least Concern in the short term. Saiga populations are Endangered in Mongolia and elsewhere across their range^[1].</p> <p>Uncontrolled hunting for horns and meat caused the first major decline in saiga in the early 20th century. In the mid 1970's the chief cause of decline in numbers of the Betpak dala population was overhunting when 345,000 animals on average were killed legally annually^[1]. A surge in poaching for the horns of the males following the break-up of the former USSR in the late 1980s-early 1990s also led to a catastrophic fall in saiga numbers. Selective hunting of males and subsequent distortion of the sex ratio further affected reproduction by heavily skewing the sex ratio. Evidence from Russia indicated that selective harvesting had left a skewed population containing few adult males, many females without young, and the population close to reproductive collapse^[2]. Anti-poaching measures have since been implemented, along with education programmes, training for customs and border officials, and action in end-user countries, resulting in a reduction in poaching and trade. However, seizures still occur. This situation is entirely dependent on stringent enforcement, and the current zero quota; any relaxation of existing efforts can be expected to cause an upsurge in illegal killing and trade.</p> <p>Furthermore, although saiga populations have increased in Kazakhstan, we remain concerned about the lack of a saiga antelope national management plan in the country and transparent reporting, including on proposed offtakes, science-based quotas, adaptive management, stockpile management, and efforts to ensure that offtake is based on science and not pressures from either horn traders or <i>ad hoc</i> possibilities of the meat processing industry.</p> <p>Populations are subject to extreme fluctuations due to anthropogenic (poaching, legal over-harvesting, fast expanding land conversion to agriculture and linear infrastructure development). Among the natural causes, winter <i>dzhuts</i> have been devastating in the past as well as infectious agents whose occurrence in large herds makes them liable to large-scale die-offs. Four major disease outbreaks since 2010 have caused mass mortality events (MME). The most severe outbreak caused the death of over 200,000 saiga in the Betpak dala population in Kazakhstan over the course of only three weeks in May 2015. The cause of this outbreak (and the suspected cause in the earlier two) has been shown to be haemorrhagic septicaemia caused by the bacterium <i>Pasteurella multocida</i>. The most recent MME occurred in the Mongolian saiga population in early 2017, caused by peste de petits ruminants (PPR), when an estimated 54% of the population died.</p>

PPR is relatively new to the region, but is still spreading through Central Asia, posing a threat to all saiga populations. *Pasteurella* is endemic in saiga, and the high lethal levels of mortality implicated in the Kazakhstan MMEs are believed to have been triggered by environmental conditions including abnormally high humidity and temperature. Warm and wet climatic conditions are expected to increase in frequency due to the effects of recorded and predicted climate change. Given the saiga's inherent vulnerability to disease, likely exacerbated by climate-related and environmental stressors in the future, and the expanding interface between domestic livestock and saiga across their global range which increases the risks of disease transfer, the risk of disease outbreaks causing significant mortality remains very high. The most severe recent MME killed around 80% of one population in Kazakhstan in 2015. Using an 11-year (three generation) window starting in 2020, a new disease outbreak on the same scale and resulting in the same level of mortality in the largest current population (>1M), would result in a reduction of the global population of 52%. A less lethal outbreak could cause a population reduction of 30–50%. This therefore leads us to call for precaution, and to recommend that Parties oppose lifting the zero quota at this time.

The saiga's Green Status is assessed as Largely Depleted, and although the Recovery Score has improved since 2021, it has a High Conservation Dependence; if conservation actions such as habitat protections and antipoaching efforts were to stop, it is expected that the species' status would deteriorate over a 10-year period^[3].

Given the vulnerability of the species to large population fluctuations, with major declines due to over-hunting primarily for the horns, and disease-triggered MMEs, the species' future and continued recovery can only be assured by developing a science-based population-scale management plan and control schemes prior to the implementation of any offtake of saiga populations. Without these basic measures developed and in place, lifting the ban on international trade in saiga antelopes would be extremely risky. In addition, stockpile management is weak in both range and consumer States, and any opening of trade should not be considered by CITES Parties until the stockpile management systems cross the species range and in the major consumer States are operational and transparent.

Allowing sales of specimens from Kazakhstan would create major enforcement challenges since it is impossible for enforcement officials to easily distinguish between horns from different geographic origins. Not allowing sales of this species from any part of its range will help ensure that international commercial trade will not contribute to further declines, will support ongoing recoveries, and will help range and consumer Parties combat any illegal trade whereby parts of newly hunted saiga are laundered through stockpiles.

We therefore strongly urge Parties to REJECT the proposal by Kazakhstan to amend the annotation for *Saiga tatarica* to allow for trade in wild specimens from Kazakhstan.

^[1] IUCN SSC Antelope Specialist Group. 2023. *Saiga tatarica*. *The IUCN Red List of Threatened Species* 2023: e.T19832A233712210. <https://dx.doi.org/10.2305/IUCN.UK.2023-1.RLTS.T19832A233712210.en>. Accessed on 05 August 2025.

^[2] Milner-Gulland, E. J., Bukreeva, O. M., Coulson, T., Lushchekina, A. A., Kholodova, M. V., Bekenov, A. B. and Grachev, Iu. A. 2003. Reproductive collapse in saiga antelope harems. *Nature* 422: 135.

^[3] Milner-Gulland, E. & Mallon, D.P. 2024. *Saiga tatarica* (Green Status assessment). *The IUCN Red List of Threatened Species* 2024: e.T19832A1983220251.

	<p>^[1] Bekenova, A .B., Grachev, I. U. and E. J. Milner-Gulland. 1998. The ecology and management of the saiga antelope in Kazakhstan. <i>Mammal Review</i> 28(1): 1-52.</p>
4	<p>Proposed by: Namibia, South Africa, United Republic of Tanzania, Zimbabwe</p> <p>Summary: remove southern giraffe (<i>Giraffa giraffa</i>) populations in eight countries from Appendix II. Other populations would remain in Appendix II.</p> <p>WCS recommendation: REJECT</p> <p>WCS applauds the efforts of Angola, Botswana, Eswatini, Malawi, Mozambique, Namibia, South Africa and Zimbabwe to conserve their populations of the giraffe (<i>Giraffa camelopardalis</i>). We oppose, however, the proposal to exclude their populations from the Appendix II listing. Giraffe populations across Africa as a whole are not secure; the last range-wide assessment was in 2016, amended in 2018, and estimated a decline of 36-40% over three generations^[1]. While some giraffe populations are stable or increasing, others are declining. Giraffe populations across their range in Africa are scattered and fragmented with different growth trajectories and threats, but the species trend reveals an overall large decline in numbers.</p> <p>As stated in Annex 3 (“Special cases”) of the CITES Criteria in Resolution Conf. 9.24 (Rev. CoP17), CITES strongly discourages split listing, which would be the result of excluding the southern African populations of giraffe from Appendix II. Annex 3 of the resolution states, “Split-listings that place some populations of a species in the Appendices, and the rest outside the Appendices, should normally not be permitted”. This is due to the enforcement problems it creates. It is highly challenging for enforcement officials to readily distinguish between parts from different giraffe subspecies and countries, and a split listing with some populations not even on the Appendices would pose significant enforcement challenges.</p> <p>Retaining all populations of <i>Giraffa camelopardalis</i> on Appendix II does not ban international trade in giraffe products from any country, or the issuance of export permits for hunting trophies. It requires Parties to ensure that all trade is legal and sustainable, and to contribute to monitoring of the international trade in giraffe specimens.</p> <p>Hence, we strongly urge Parties to REJECT the proposal to exclude the <i>Giraffa camelopardalis</i> populations of Angola, Botswana, Eswatini, Malawi, Mozambique, Namibia, South Africa and Zimbabwe from the Appendix II listing.</p> <p>^[1] Muller, Z., Bercovitch, F., Brand, R., Brown, D., Brown, M., Bolger, D., Carter, K., Deacon, F., Doherty, J.B., Fennessy, J., Fennessy, S., Hussein, A.A., Lee, D., Marais, A., Strauss, M., Tutchings, A. & Wube, T. 2018. <i>Giraffa camelopardalis</i> (amended version of 2016 assessment). <i>The IUCN Red List of Threatened Species</i> 2018: e.T9194A136266699. https://dx.doi.org/10.2305/IUCN.UK.2016-3.RLTS.T9194A136266699.en.</p>
5	<p>Proposed by: Democratic Republic of the Congo</p> <p>Summary: Include <i>Okapia johnstoni</i> (Okapi) in Appendix I</p> <p>WCS recommendation: ADOPT</p> <p>WCS appreciates and supports this proposal to include the Okapi (<i>Okapia johnstoni</i>) in Appendix I. The proposal makes it clear that the Okapi qualifies for inclusion in Appendix I in accordance with Article II, paragraph 1 of the Convention, and several criteria in Resolution Conf. 9.24 (Rev. CoP17), Annex1. Specifically, <i>Okapia johnstoni</i> meets the Appendix I criteria in accordance with Annex 1, paragraph A (i), as the wild population is small and is characterized</p>

	<p>by an observed decline in the number of individuals and the area and quality of habitat; and in accordance with paragraph B (iv), as the wild population has a restricted area of distribution and is characterized by an observed decrease in the area of distribution and the area and quality of habitat.</p> <p>The Okapi is endemic to the Democratic Republic of the Congo, and is protected at the national level. The Okapi is a symbol of national pride in the DRC, as well as a flagship species of the Ituri forest, and of great importance to Indigenous communities. In spite of this protection and government efforts, and in addition to threats to its habitat, there is an increasing threat from cross-border trafficking of products, mainly Okapi skins, meat, bones and fat. Therefore, the Okapi clearly qualifies for inclusion on Appendix I, which will aid enforcement and help protect this Endangered species. WCS strongly urges Parties to SUPPORT this proposal.</p>
6	<p>Proposed by: Israel, Tajikistan</p> <p>Summary: <i>Hyaena hyaena</i> (Striped Hyaena) to Appendix I</p> <p>WCS recommendation: ADOPT</p> <p>WCS supports the inclusion of the striped hyena (<i>Hyaena hyaena</i>) in Appendix I in accordance with Resolution Conf. 9.24 (Rev. CoP17), Article II paragraph 1 and Resolution Conf. 9.24 (Rev. CoP17) Annex 1 paragraph C (a marked decline in the population size in the wild).</p> <p>The IUCN Red List of Threatened Species lists the species as Near Threatened and decreasing, but it was last assessed 11 years ago; the Mediterranean population was listed by IUCN as Vulnerable and decreasing, but was last assessed 17 years ago.</p> <p>The striped hyena faces significant threats, including habitat loss and degradation (due to multiple factors, including urbanization, infrastructure development, and agricultural expansion), prey depletion, human-wildlife conflict, direct persecution and illegal trade. Trade includes the use of body parts in traditional medicine and ritual practices, sport-hunted trophies, and live animals for the pet trade and unregulated zoos. Legal trade is limited, and there is increasing evidence of illegal trade, particularly in body parts, and cubs for display and as exotic pets, as outlined in the proposal.</p> <p>Although the global population is estimated to be about 5,000 mature individuals, that is not a current estimate and populations are difficult to assess, and their low population densities and large home ranges make the striped hyena particularly vulnerable to exploitation. The species is found in North and East Africa, the Middle East, the Caucasus, Central Asia and the Indian subcontinent; their distribution is however exceedingly fragmented and patchy, particularly in North Africa and the Middle East, and many subpopulations exist only in small, isolated groups.</p> <p>WCS appreciates the broad consultation with NGOs and Range States as indicated in the proposal, with no Range State expressing opposition and several expressing support. Appendix I listing for the striped hyena will provide the highest level of international protection, control the trade in the species, promote enforcement measures, and help ensure recovery of the species. We recommend that Parties SUPPORT this proposal.</p>

**9
&
10**

9 and 10: Proposed by: Namibia

- **Proposal 9:** *Ceratotherium simum simum* (Southern White Rhinoceros): amend the annotation to allow trade in live animals for in-situ conservation, hunting trophies, and rhino horn stockpiles, with certain restrictions
- **Proposal 10:** *Diceros bicornis* (Southern Black Rhinoceros): amend the annotation to allow trade in rhino horn stockpiles, with certain restrictions

WCS recommendation: **REJECT**

Namibia proposes to amend the Appendix II Annotation of the population of the southern white rhino (*Ceratotherium simum simum*) in Namibia to allow international trade in: live animals for in-situ conservation, hunting trophies, and rhino horn stocks owned by the Government and private landowners, with certain restrictions on the latter; and to transfer of the population of southern black rhino (*Diceros bicornis bicornis*) of Namibia from Appendix I to Appendix II to allow a one-off sale in registered rhinoceros horn from current stockpiles, with certain restrictions. We have combined our comments here on both proposals, to avoid duplication.

Proposal 9 claims that potential revenues from the sale of southern white rhino horns will allow private landowners to provide security for their animals as a key reason for removing the Annotation and allowing commercial trade, and proposal 10 claims that proceeds of trade in black rhino horns would be used exclusively for rhino conservation and community development programmes within or adjacent to the rhinos' range. However, the use of funds from any wildlife trade is not a factor in CITES listing criteria (as per Reso. Conf. 9.24 (Rev. CoP17)), nor do the documents provide clear evidence of these claims or details of a system to ensure funds raised are used solely for this purpose.

The high poaching threat for all species of rhinos continues, with involvement of organised international criminal syndicates ^[1]. All efforts must be made to counter the trafficking (including poaching) for rhino horn, and to disrupt the organized criminal networks benefiting from it. WCS believes that legalizing rhino horn trade from Namibia would exacerbate rather than solve the problem, by stimulating demand, undermining enforcement efforts in other rhino range States, facilitating laundering of illegal horn through "legal" sales, and undermining enforcement and market control measures in consumer States.

Additionally, use of rhino horn now includes not only treatments for cancer and associated illnesses but also non-traditional preparations. If any or all of these uses grow in popularity, demand could escalate if the stigma associated with illegality is removed. The documents make claims in relation to the benefits of allowing such trade, many of which are not supported by recent evidence (e.g. the current value of rhino horn, the scale of current demand and the ability of stockpiles to meet this demand, the key market for rhino horn being TCM).

Furthermore, many Asian consumer States have made significant progress in reducing demand and altering consumer behavior through evidence-based, targeted behavior change interventions, alongside improved enforcement and prosecutions. These efforts would be undermined by opening legal international rhino trade.

The proposals fail to outline a system for transparent trade, including traceability of horn and efforts to prevent illegal horn from entering the subsequent legal trade chains. Previously identified consumer states also have existing national legislation which would prevent the international trade of rhino horn.

	<p>WCS commends Namibia's success and contributions to the conservation of rhinos and acknowledges the increasing costs of protection for this species in the face of once again growing poaching pressures. However, application of the precautionary principle suggests that legalizing any trade in rhino horn without further understanding of the potential impact on demand is dangerous. Demand-reduction and market control initiatives have been successful in curtailing markets for rhino horn. Such initiatives, more effective law enforcement throughout the trade chain, efforts to disrupt the criminal networks involved, and to combat the corruption driving this trade, present the best hope for ending the poaching crisis of all species of rhinos across Africa and Asia. Opening a legal market in horns from Namibia would undermine all these efforts.</p> <p>Therefore, WCS strongly recommends that Parties REJECT Namibia's proposals. However, with the overall decline in international funding for conservation in Africa from some sectors, we also strongly encourage the international community to support rhino conservation in Namibia and elsewhere.</p> <p>^[1] CITES CoP18 Doc. 83.1 Annex 2</p>
<p>11</p>	<p>Proposed by: Brazil, Costa Rica, Panama</p> <p>Summary: <i>Choloepus didactylus</i> (Southern Two-toed Sloth) and <i>Choloepus hoffmanni</i> (Northern Two-toed Sloth): include in Appendix II</p> <p>WCS recommendation: ADOPT</p> <p>Based on the extensive information in the proposal and our field expertise across the region, WCS agrees that <i>Choloepus hoffmanni</i> and <i>Choloepus didactylus</i> qualify for inclusion in Appendix II, and we urge Parties to SUPPORT this proposal.</p> <p><i>Choloepus hoffmanni</i> occurs in Bolivia, Brazil, Colombia, Costa Rica, Ecuador, Honduras, Nicaragua, Panama, Peru and Venezuela; <i>C. didactylus</i> occurs in Bolivia, Brazil, Colombia, Ecuador, French Guiana, Guyana, Peru, Suriname and Venezuela. IUCN considers that <i>Choloepus hoffmanni</i> is in decline, with some subpopulations experiencing drastic declines (e.g. those in Colombia, Central America, Bolivia and Brazil). There is significant information and evidence of international trade as a threat to the species, particularly but not exclusively for pet markets, and tourist interactions (such as for selfies).</p> <p>Although habitat loss is a significant threat to the species, illegal trade occurs in practically all range States (Colombia, Peru, Ecuador, Brazil, Honduras, Costa Rica, Panama, Nicaragua, Bolivia), with trafficking both within the region and to non-range States, including Mexico, the United States, and Europe, Asia and the Middle East. Considering that Illegal trade has increased over the past several years, the species meets the criteria in Resolution Conf. 9.24 (Rev. CoP17), Annex 2a, for inclusion in Appendix II.</p> <p><i>Choloepus didactylus</i> is traded at a national and international level in the various countries it inhabits. The species cannot easily be differentiated from <i>C. hoffmanni</i>, even in live individuals, such that Customs authorities would be unable to differentiate between the two species without DNA analyses. Therefore, the species meets the criteria for inclusion in Appendix II, pursuant to Resolution Conf. 9.14 (Rev. CoP17), Annex 2b.</p> <p>WCS recommends that Parties ADOPT this proposal.</p>

<p>12</p>	<p>Proposed by: Democratic Republic of the Congo</p> <p>Summary: <i>Cercocebus chrysogaster</i> (Golden-bellied Mangabey): transfer from Appendix II to Appendix I</p> <p>WCS recommendation: ADOPT</p> <p><i>Cercocebus chrysogaster</i> is Endangered on the IUCN Red List of Threatened species², and is an endemic species, known to occur only in two discrete patches in DRC. The IUCN Red List for the species states, “<i>With population reduction and habitat loss continuing into the foreseeable future, it is suspected that the population decline over a period of 30 years (three generations for this taxon) will exceed 50%.</i>” Habitat conversion and loss, and mining, further threaten the species, in addition to trade pressures. WCS concurs that the species qualifies for inclusion in Appendix I pursuant to both CITES Article I and Reso. Conf. 9.24 (Rev. CoP17), Annex 1, paragraphs B and C, as per the proposal from the DRC; it likely also qualifies pursuant to Annex 1, paragraph A of the resolution.</p> <p>In addition to the species’ Endangered status, there is indeed evidence of the threat of international trade. The recently published Action Plan for mandrills and mangabeys (Dempsey et al 2024^[1]) states for this species, “<i>The illegal pet trade likely also poses a substantial threat: captive animals are seen frequently (e.g., 21 live individuals encountered in early 2003 alone) in both the western and eastern populations, and for sale on the streets in Kinshasa. A shipment of eleven individuals being smuggled to South Africa was confiscated in 2021, indicating that the pet trade extends internationally.</i>” A recent Mongabay article says “<i>In September 2020, Zimbabwean officials made one of the largest known confiscations of illegally traded primates in Africa. They seized 25 juvenile monkeys being smuggled from the DRC to South Africa, including a dozen golden-bellied mangabeys.</i>”</p> <p>WCS recommends that Parties SUPPORT this proposal to transfer the species to Appendix I.</p> <p>^[1] Dempsey, A., Fernández, D., McCabe, G., Abernethy, K., Abwe, E. E., Gonedelé Bi, S., Kivai, S. M., Ngoubangoye, B., Maisels, F., Matsuda Goodwin, R., McGraw, W. S., McLester, E., ter Meulen, T., & Oates, J.F., Paddock, C. L., Savantoglou, A., Wiafe, E. D. (2024). <i>Cercocebus and Mandrillus conservation action plan 2024-2028</i>. Gland, Switzerland (Pages 21-24)</p> <p>²Hart, J.A. & Thompson, J. 2020. <i>Cercocebus chrysogaster</i>. <i>The IUCN Red List of Threatened Species</i> 2020: e.T4207A17956177. https://dx.doi.org/10.2305/IUCN.UK.2020-2.RLTS.T4207A17956177.en. Accessed on 11 August 2025.</p>
<p>13</p>	<p>Proposed by: Namibia</p> <p>Summary: allow Namibia to trade in registered stocks of raw ivory of <i>Loxodonta africana</i> (African Savannah Elephant), under certain conditions.</p> <p>WCS recommendation: REJECT</p> <p>Namibia proposes to trade an existing stock of 46,268.30 kg of registered raw ivory (whole tusks and pieces). WCS commends Namibia on strong management of its elephant populations. However, even though the latest MIKE (CoP20 Doc. 76.4) and ETIS (CoP20 Doc. 76.5) reports show significant and encouraging declines in PIKE scores and ivory seizures in recent years, illegal ivory trade continues, with the ETIS report showing a slight uptick in number of transactions involving large shipments (≥ 100 kg) and worked ivory between 2021 and 2023, and China showing a significant increase in illegal activity relating to small worked ivory since its national ivory ban was enacted on 31 December 2017.</p> <p>The recent report by the United Nations Office on Drugs and Crime^[1] suggests that although elephant poaching in Africa and ivory trafficking have declined in recent years linked to</p>

	<p>increased enforcement on the ground, the closure of key domestic markets, and the collapse in the price of ivory, reversals are always possible. The report notes that the closure of domestic ivory markets is effective for protection of elephants from poaching, and that this initiative should be continued and developed further. WCS agrees, and congratulates all the countries that have closed their domestic ivory markets.</p> <p>Hence, WCS recommends that Parties REJECT this proposal. WCS does not support any reopening or legalization of international commercial trade in elephant ivory for multiple reasons, including because: a) it cannot be sufficiently regulated, monitored, or enforced to prevent laundering of illegal ivory; and b) it would undoubtedly stimulate demand. Furthermore, important steps have been taken to close domestic ivory markets in multiple countries, including China (including Hong Kong SAR), the EU, the United Kingdom, Singapore, and the United States. All of these are in accordance with Resolution Conf. 10.10 (Rev. CoP17). It is clear that the international community is not seeking to further support domestic and/or international ivory trade, and we urge the Parties to continue in that regard.</p> <p>^[1] World Wildlife Crime Report 2024. UNODC. https://www.unodc.org/documents/data-and-analysis/wildlife/2024/Wildlife2024_Final.pdf</p>
14	<p>Proposed by: Botswana, Cameroon, Côte d'Ivoire, Namibia, Zimbabwe</p> <p>Summary: amend Annotation A10 pertaining to the elephants <i>Loxodonta africana</i> (African Savannah Elephant) populations of Botswana, Namibia, South Africa and Zimbabwe to harmonize the conditions of trade in live African elephants, for selected purposes</p> <p>WCS recommendation: ADOPT</p> <p>As discussed under agenda item 76, WCS welcomes the Communique from the CITES Dialogue Meeting for African elephant Range States in September 2024 and we thank Botswana for hosting this meeting, which almost all African elephant Range States were able to attend. We support the conclusions reached by African elephant Range States at the meeting, particularly because they reflect a consensus. We recommend that Parties SUPPORT the draft amendments to Annotation 10 of the CITES Appendices, because it was agreed by consensus of Range States, but also because it retains the prohibition on any international commercial ivory trade.</p> <p>WCS works on the conservation of wildlife and wild places across Africa, including in 12 African elephant Range States, and we stand ready to collaborate with our government and other partners to find and implement solutions to the threats facing elephants, their habitats, and local communities.</p>
15	<p>Proposed by: Cameroon, Congo, Gabon, Niger, Nigeria, Senegal, Sierra Leone, Togo</p> <p>Summary: <i>Bycanistes</i> spp. and <i>Ceratogymna</i> spp. (African hornbills): Include in Appendix II</p> <p>WCS recommendation: ADOPT</p> <p>We welcome the proposal from these eight range States to include two genera of African hornbill species (<i>Bycanistes</i> spp. and <i>Ceratogymna</i> spp.; nine species in total) on Appendix II and urge CoP20 to adopt this proposal.</p> <p>The text of this proposal clearly documents a longstanding international trade in these species, using data from importing countries such as the United States that have additional reporting requirements in place. As noted in the proposal, these data on trade volumes are complemented by research on the species' "slow life history characteristics, unique mating</p>

	<p>strategies, and near-ubiquitous assessment of declining population numbers” within these genera. Robust implementation of an Appendix II listing will improve regulation and oversight to slow the ongoing decline of these species.</p> <p>WCS field teams working in parts of the range for these species have reported anecdotal declines in the audible presence of these species since at least 2007.</p> <p>Furthermore, continued declines in populations of Asian hornbill species, including the Critically Endangered helmeted hornbill (<i>Rhinoplax vigil</i>) and increased rarity of CITES-listed specimens currently in trade represent a present and potentially increasing threat to African hornbill species. Weak scrutiny within CITES of the implementation of Resolution Conf. 17.11 on <i>Conservation of, and trade in, helmeted hornbill</i> - including weak follow-up from a working document tabled at the 74th meeting of the Standing Committee , continues to allow for exploitation of critically endangered species and the stimulation of trade in casques that present an ongoing threat to African hornbill species.</p> <p>The Appendix II listing of these species will more consistently regulate the trade in the casques of hornbill species and systematically address a complex, growing, and highly diffuse trade in these increasingly endangered species.</p>
16	<p>Proposed by: Benin, Burkina Faso, Burundi, Cameroon, Chad, Congo, Gambia, Guinea, Niger, Nigeria, Senegal, Sierra Leone, Togo</p> <p>Summary: <i>Gyps africanus</i> (White-backed vulture) and <i>Gyps rueppelli</i> (Rüppell’s vulture), transfer from Appendix II to I</p> <p>WCS recommendation: ADOPT</p> <p>WCS appreciates the initiative of Benin, Burkina Faso, Burundi, Cameroon, Chad, Congo, Gambia, Guinea, Niger, Nigeria, Senegal, Sierra Leone, and Togo in submitting this proposal to transfer <i>Gyps africanus</i> and <i>Gyps rueppelli</i> to Appendix I.</p> <p><i>Gyps africanus</i> and <i>Gyps rueppelli</i> are both listed as Critically Endangered on the IUCN Red List of Threatened Species. According to the IUCN Red List, <i>G. africanus</i> has experienced a population decline of 63-89% over three generations (39.6 years), and <i>Gyps rueppelli</i> has declined 88-98% over three generations (43.3 years). There is no doubt that both species qualify biologically for transfer to Appendix I. They are also ecologically vital, in that as scavengers they contribute to nutrient cycling and limit the spread of pathogens and diseases.</p> <p>Although both species face multiple threats, including intentional poisoning and accidental poisoning with diclofenac, habitat loss and conversion, and reduction in ungulate populations, they are also subject to increasing international trade, particularly through trade in their heads and other body parts for fetish, belief-based, medicinal, wild meat, and related uses. Although there is significant domestic trade (legal and illegal), there is increasing international cross-border trade as well, most of which is illegal. We note that both species are listed on Appendix I (and II) of the Convention on the Conservation of Migratory Species of Wild Animals (CMS), which prohibits all take from the wild; the majority of Range States are CMS Parties.</p> <p>Therefore, WCS urges Parties to SUPPORT this proposal.</p>

17 **Proposed by:** Canada, United States of America

Summary: *Falco peregrinus*: transfer from Appendix I to Appendix II

WCS recommendation: **AMEND**

WCS appreciates the detailed proposal from Canada and the U.S. The IUCN Red List of Threatened Species has assessed the peregrine falcon as a species of 'Least Concern' globally with an increasing population trend. WCS agrees that the species qualifies for transfer from Appendix I to II, as on a global basis it no longer qualifies for inclusion in Appendix I.

However, WCS is concerned about increasing spread and cases of Highly Pathogenic Avian Influenza (HPAI), and its impact on wild populations of the peregrine falcon. HPAI poses a significant mortality threat to birds in the wild. The HPAI virus is known to have recently (within the last few years) led to repeated mass mortality events among wild birds, including the peregrine falcon. WCS believes it is important, from a precautionary perspective, to be cautious at this time.

It appears that the more coastal populations of peregrine falcon are declining, and this is thought to be due to the fact that they hunt migratory birds (e.g., waterfowl, gulls, shorebirds) that are prone to HPAI. Available data on the threat of HPAI are likely deficient due to the well-known gaps in wildlife health surveillance (e.g., Machalaba C, et al.^[1]), but that is no reason to ignore the threat of HPAI.

In Europe, significant mortalities of peregrine falcons occurred in 2016-2017 and 2020-2023, years of major HPAI virus outbreaks. In particular, the highest rates of bird mortality and HPAI virus infection were reported in 2023; over 80% (28/32) of the tested birds were positive for HPAI H5 virus, and researchers concluded that HPAI represents a serious threat to peregrine falcon population in the Netherlands, and, in combination with anthropogenic factors, may contribute to the decline of this species (Caliendo, V, et al.^[2]). In the U.S., significant decreases in populations were found recently, and are believed to be due to HPAI (^[3]; ^[4]; Varland, D, et al.^[5]; Hsueh CS, et al.^[6]). Research in South America also highlights the risk of HPAI (Castro-Sanguinetti G.R., et al.^[7]).

In conclusion, although the HPAI issues may not impact the qualification of the species for transfer from Appendix I to II, in terms of the status of the global population, there is a significant risk that HPAI will impact some wild populations. As such, we believe that caution is necessary, and the continued restrictions on commercial trade in wild populations should continue. We also call the attention of CITES Parties to the work on HPAI of WOAHP (<https://www.woah.org/en/disease/avian-influenza/>) and CMS (through the work of its Scientific Council, particularly its Scientific Task Force on Avian Influenza and Wild Birds (<https://www.cms.int/en/workinggroup/scientific-task-force-avian-influenza-and-wild-birds>)). Independent of changes to the listing in the Appendices on the peregrine falcon, we encourage Parties to fully consider issues relevant to HPAI in the issuance of CITES findings and permits.

In conclusion, WCS recommends that the proponent Parties consider amending their proposal, to transfer the species to Appendix II with an annotation with a zero quota on international trade in wild-caught individuals. There is ample precedent for that in CITES. At CoP21, the Parties could consider a proposal to remove the zero quota, based on several more years of study on the impacts of HPAI on wild populations, while alleviating some of the

	<p>administrative hurdles for Appendix I captive-bred specimens. An Appendix II listing with a zero quota from the wild would allow trade in captive-bred birds (which would have more veterinary controls and management), while removing the need to continue to register facilities. We recognize that 14 countries have 52 facilities registered with the Secretariat to export captive-bred peregrine falcons for commercial purposes, and the species is readily bred in captivity.</p> <p>^[1] Machalaba C, et al, Gaps in health security related to wildlife and environment affecting pandemic prevention and preparedness, 2007-2020. Bull World Health Organ. 2021 May 1;99(5):342-350B. doi: 10.2471/BLT.20.272690. Epub 2021 Mar 2. PMID: 33958822; PMCID: PMC8061663</p> <p>^[2] Caliendo, V, et al. Highly Pathogenic Avian Influenza Contributes to the Population Decline of the Peregrine Falcon (<i>Falco peregrinus</i>) in The Netherlands. Viruses. 2024 Dec 27;17(1):24. doi: 10.3390/v17010024. PMID: 39861813; PMCID: PMC11768999</p> <p>^[3] http://www.earthspan.foundation/research/</p> <p>^[4] https://www.audubon.org/magazine/why-are-peregrine-falcon-numbers-falling-united-states-again</p> <p>^[5] Varland, D, et al, Estimated Annual Abundance of Migratory Peale's Peregrine Falcons in Coastal Washington, USA, Journal of Raptor Research, 59(3), 1-16, 1 July 2025</p> <p>^[6] Hsueh, CS, et al., Histopathologic Features and Viral Antigen Distribution of H5N1 Highly Pathogenic Avian Influenza Virus Clade 2.3.4.4b from the 2022-2023 Outbreak in Iowa Wild Birds. Avian Dis. 2024 Sep;68(3):272-281. doi: 10.1637/aviandiseases-D-23-00085. PMID: 39400223</p> <p>^[7] Castro-Sanguinetti GR, et al, Highly pathogenic avian influenza virus H5N1 clade 2.3.4.4b from Peru forms a monophyletic group with Chilean isolates in South America. Sci Rep. 2024 Feb 13;14(1):3635. doi: 10.1038/s41598-024-54072-2. PMID: 38351134; PMCID: PMC10864398</p>
18	<p>Proposed by: Brazil</p> <p>Summary: Include <i>Sporophila maximiliani</i> in Appendix I and include <i>Sporophila angolensis</i>, <i>Sporophila atrirostris</i>, <i>Sporophila crassirostris</i>, <i>Sporophila funerea</i> and <i>Sporophila nuttingi</i> in Appendix II</p> <p>WCS recommendation: ADOPT</p> <p>WCS supports the proposal to include <i>Sporophila maximiliani</i> in Appendix I. Although the overall distribution of the species is quite large, it is highly disjunct with many small populations each of less than 250 mature individuals. The total population in Brazil is probably only about 250 mature individuals, with less than 50 in each subpopulation. The total population in the wild is probably less than 2,500 mature individuals, and it is listed as Endangered on the IUCN Red List of Threatened Species. It is declining rapidly, with the main threat being capture for the cage bird trade, compounded by habitat loss and degradation.</p> <p>WCS also supports the proposal to include <i>Sporophila angolensis</i>, <i>Sporophila atrirostris</i>, <i>Sporophila crassirostris</i>, <i>Sporophila funerea</i> and <i>Sporophila nuttingi</i> in Appendix II, under Article II Annex 2(b) of the Convention. All five of these species strongly resemble <i>S. maximiliani</i>, making it extremely difficult for enforcement officers to distinguish between them hence making trade regulation challenging.</p> <p>Therefore, WCS recommends that Parties SUPPORT this proposal.</p>
22	<p>Proposed by: Ecuador</p> <p>Summary: <i>Amblyrhynchus</i> spp. (Galápagos marine iguana), transfer from Appendix II to I</p> <p>WCS recommendation: ADOPT</p> <p>WCS strongly supports the proposal to transfer the Galápagos marine iguana (<i>Amblyrhynchus cristatus</i>) from CITES Appendix II to I, pursuant to Article II.1 of the Convention and Annex 1 of Resolution Conf. 9.24 (Rev. CoP17). <i>Amblyrhynchus cristatus</i> is an iconic endemic of the</p>

	<p>Galápagos Islands of Ecuador, and exemplifies unique and irreplaceable ecological and evolutionary significance.</p> <p>Although Ecuador has not authorized any exports of live <i>Amblyrhynchus cristatus</i>, there is significant evidence of illegal trade, particularly involving juveniles, often laundered as captive-bred animals in third countries including Uganda and Mali. In addition to the threat of illegal trade (for the pet/hobbyist/collector market), the species is experiencing significant threats from climate change, invasive species (and predation by invasive species), and marine pollution.</p> <p>Relevant to Annex 1 of Reso. Conf. 9.24 (Rev. CoP17): Subpopulations of the species are genetically isolated, with many having critically low effective population sizes; and recent studies suggest significant population declines in several colonies</p> <p>A 2025 peer-reviewed study (Auliya et al., 2025^[1]) documents fraudulent captive-breeding claims, questionable origin of founder/breeding stock from non-range countries, and ongoing laundering of wild-caught individuals as captive-bred, facilitated by the questionable issuance of CITES export permits by some Management Authorities.</p> <p>The species is fully protected under Ecuadorian law and inhabits the Galápagos National Park and Marine Reserve, both UNESCO World Heritage Sites. We appreciate that Ecuador raised concerns about the laundering of illegally sourced individuals of this species, at the CITES Standing Committee, and has also raised legitimate concerns in CoP20 document 73, which WCS also strongly supports.</p> <p>For the above reasons, and because we are convinced that Appendix I listing is critical to ensure the conservation of this iconic species, WCS urges Parties to ADOPT this proposal.</p> <p>^[1] https://www.sciencedirect.com/science/article/pii/S0006320725001417</p>
23	<p>Proposed by: Ecuador</p> <p>Summary: <i>Conolophus</i> spp. (Galápagos land iguanas): transfer from Appendix II to I</p> <p>WCS recommendation: ADOPT</p> <p>WCS strongly supports the proposal to transfer the Galápagos land iguanas (<i>Conolophus</i> spp.) from CITES Appendix II to I, pursuant to Article II, paragraph 1 of the Convention and Annex 1 of Resolution Conf. 9.24 (Rev. CoP17).</p> <p>These iguanas are iconic endemics of the Galápagos Islands, and, like the marine iguana, have unique and irreplaceable ecological and evolutionary significance. The genus <i>Conolophus</i> includes three endemic species: <i>C. subcristatus</i>, <i>C. pallidus</i>, and <i>C. marthae</i>. <i>C. marthae</i> is listed as Critically Endangered on the IUCN Red List of Threatened Species; <i>C. pallidus</i> and <i>C. subcristatus</i> are listed as Vulnerable, and declining.</p> <p>Although Ecuador has not authorized any exports of live <i>Conolophus</i>, there is significant evidence of illegal trade, particularly involving hatchlings and juveniles, often laundered as captive-bred animals in third countries. In addition to the threat of illegal trade (for the pet/hobbyist/collector market), the species is experiencing significant threats from climate change, invasive species, habitat degradation, over-tourism, and other human disturbances.</p>

	<p>Relevant to Annex 1 of Reso. Conf. 9.24 (Rev. CoP17): These three species are found in isolated, small genetically isolated subpopulations, and are declining in several of those subpopulations.</p> <p>A 2025 peer-reviewed study (Auliya et al., 2025^[1]) documents fraudulent captive-breeding claims, questionable origin of founder/breeding stock from non-range countries, and ongoing laundering of wild-caught individuals as captive-bred, facilitated by the questionable issuance of CITES export permits by some Management Authorities.</p> <p>We note that Ecuador raised concerns about the laundering of illegally sourced individuals of these species, at the CITES Standing Committee, and has also raised legitimate concerns in CoP20 document 73, which WCS also strongly supports.</p> <p>For the above reasons, in accordance with the Precautionary Principle, and because we are convinced that an Appendix I listing is critical to ensure the conservation of these iconic species, WCS urges Parties to ADOPT this proposal.</p> <p>^[1] https://www.sciencedirect.com/science/article/pii/S0006320725001417</p>
25	<p>Proposed by: Bolivia, Mexico</p> <p>Summary: <i>Crotalus</i> spp. (rattlesnakes), <i>Sistrurus</i> spp. (massasaguas): Include in Appendix II</p> <p>WCS recommendation: ADOPT</p> <p>WCS supports the proposal to include <i>Crotalus lepidus</i> and <i>Crotalus ravus</i> in Appendix II, in accordance with Article II paragraph 2a of the Convention and Resolution Conf. 9.24 (Rev.CoP17) Annex 2a, and the inclusion of all species in the genera <i>Crotalus</i> and <i>Sistrurus</i> in Appendix II in accordance with Annex 2b criterion A of the resolution, and Article II paragraph 2b of the Convention.</p> <p><i>Crotalus ravus</i> is listed as Threatened on the IUCN Red List of Threatened Species, and is found in international trade; <i>Crotalus lepidus</i> is also found in legal and illegal international trade. It is vital to ensure that the trade in both species is legal and sustainable; their trade needs to be subject to strict regulation to avoid utilization incompatible with their survival, and as such they qualify for inclusion in Appendix II.</p> <p>We consider it necessary and prudent to include the genera <i>Crotalus</i> and <i>Sistrurus</i>, since specimens found in international trade (extracts, derivatives, skins, clothing, and live animals) are difficult to identify to the species level. According to the proposal, 28 species in both genera are reported in international trade for commercial purposes. Inclusion of both genera on Appendix II will promote effective regulation and monitoring of international trade, and will significantly aid Customs and Enforcement authorities (including reducing the need to handle venomous animals).</p> <p>WCS recommends that Parties ADOPT this proposal.</p>
26	<p>Proposed by: Cameroon, Guinea, Nigeria, Togo</p> <p>Summary: <i>Kinixys homeana</i> (Home's hinge-backed tortoise): Transfer from Appendix II to I</p> <p>WCS recommendation: ADOPT</p> <p>WCS welcomes the proposal from Cameroon, Guinea, Nigeria, and Togo to transfer <i>Kinixys homeana</i> from Appendix II to I, and we recommend that Parties ADOPT the proposal without</p>

	<p>amendment. The species is listed as Critically Endangered on the IUCN Red List of Threatened Species^[1], and is identified as one of the world's most endangered species of tortoises and freshwater turtles^[2]. Additionally, illegally traded specimens of <i>Kinixys homeana</i> have appeared in recent seizures and are part of criminal proceedings in Asian countries.</p> <p>^[1] Luiselli, L., Agyekumhene, A., Akani, G.C., Allman, P., Diagne, T., Eniang, E.A., Mifsud, D.A., Petrozzi, F. & Segniagbeto, G.H. 2021. <i>Kinixys homeana</i>. <i>The IUCN Red List of Threatened Species</i> 2021: e.T11003A18341580. https://dx.doi.org/10.2305/IUCN.UK.2021-2.RLTS.T11003A18341580.en. [Accessed on 22 August 2025].</p> <p>^[2] TCC (Turtle Conservation Coalition): Stanford, C.B.; Rhodin, A.; Van Dijk, P.P.; Blanck, T.; Goode, E.; Hudson, R.; Walde, A.; Gray, J.; Mittermeier, R.; Pérez, Vivian (Eds). (2025). <i>Turtles in Trouble: The World's Most Endangered Tortoises and Freshwater Turtles</i>. Ojai, CA: IUCN SSCT tortoise and Freshwater Turtle Specialist Group, Turtle Conservancy, Turtle Survival Alliance, Turtle Conservation Fund, Re:wild, and Chelonian Research Foundation, 77 pp. Available from: https://www.researchgate.net/publication/393884746_TCC_2025_Turtles-in-Trouble_The_Worlds_Most_Endangered_Tortoise_and_Freshwater_Turtles#fullTextFileContent [accessed Aug 22 2025].</p>
	<p>Overarching shark and ray listing position (proposals 28-34)</p> <p>Recent science shows that we are quickly approaching a conservation tipping point for sharks and rays. We are running out of time to enact and enforce management that will prevent widespread extinctions, as the vast majority of sharks and rays that interact with fisheries and whose products enter international trade are already threatened and in rapid decline throughout much of the world.</p> <p>We now know that 37% of shark and ray species are threatened with extinction, the second highest threatened percentage among vertebrate groups on the planet (Dulvy et al 2021). That percentage doubles when one looks at species found in the international shark trade. Seventy percent of species found in the global trade in shark fins are threatened with extinction, according to the IUCN Red List criteria, demonstrating trade as a significant driver in pushing species towards extinction (Dulvy et al 2021, Cardeñosa et al 2024). Pelagic sharks (species of sharks found on the high seas) have declined over 70% in only a 50-year period (Pacoureau et al 2021) and reef shark populations were found to be functionally extinct on 20% of coral reefs surveyed globally (MacNeil et al 2020).</p> <p>With the trade in shark and ray products still driving these declines, but over 90% of the shark fin trade and all of the ray gill trade now listed on the CITES Appendices (Cardeñosa et al 2024). CITES CoP20 needs to ensure that listed species are being appropriately managed and that for the most vulnerable species the pressure of commercial trade is removed. Simultaneously it is essential that any ongoing trade in non-listed species and products (such as shark oil and meat) is brought under CITES control.</p> <p>Note: the following are the citations given in the discussions regarding Proposals 28-34:</p> <ul style="list-style-type: none"> • Cardeñosa, D., Fields, A., Abercrombie, D., Feldheim, K., Shea, S.K.H. and Chapman, D.D. 2017. A multiplex PCR mini-barcode assay to identify processed shark products in the global trade. <i>PLOS ONE</i> 12(10), e0185368. • Cardeñosa, D., et al. (2022). <i>Genetic identification reveals illegal trade of oceanic whitetip shark fins</i>. <i>Conservation Genetics</i>, 23(1), 133–147. • Cardeñosa, D., et al. (2024). <i>Status of CITES-listed shark and ray species in the fin trade</i>. <i>Conservation Science and Practice</i>, In Review. • Carpenter M, Parker D, Dicken ML, Griffiths CL (2023) Multi-decade catches of manta rays (<i>Mobula alfredi</i>, <i>M. birostris</i>) from South Africa reveal significant decline. <i>Front Mar Sci</i> 10:1128819. https://doi.org/10.3389/FMARS.2023.1128819 • Dulvy, Nicholas K. et al. (2014). <i>Extinction risk and conservation of the world's sharks and rays</i>. <i>eLife</i>, 3:e00590. • Dulvy, Nicholas K. et al (2021) <i>Current Biology</i>, Volume 31, Issue 21, 4773 - 4787.e8

	<ul style="list-style-type: none"> Ebert, D.A., Dando, M. and Fowler, S.F. 2021. <i>Sharks of the World</i>. A complete guide. Princeton University Press, New Jersey. Fernando D, Stewart JD (2021) High bycatch rates of manta and devil rays in the "small-scale" artisanal fisheries of Sri Lanka. PeerJ 9. https://doi.org/10.7717/PEERJ.11994 Fields et al 2018: https://pubmed.ncbi.nlm.nih.gov/29077226/ Finucci, B., et al. (2020a). <i>Deepwater shark conservation in a changing ocean</i>. <i>Frontiers in Marine Science</i>, 7, 580. Finucci, B., Pacoureau, N., Rigby, C.L., Matsushiba, J.H., Faure-Beaulieu, N., Sherman, C.S., et al. 2024. Fishing for oil and meat drives irreversible defaunation of deepwater sharks and rays. <i>Science</i>, 383(6687), 1135–1141. Hau, C. Y. L., Wong, C. T. M., and Shea K. H. S. (2018). <i>Kingfins: Extensive market survey of CITES-listed shark and shark-like batoid fins in Sheung Wan, the Hong Kong SAR major dried seafood market</i>. BLOOM Association Hong Kong. Kyne, P. M., et al. (2019). <i>The thin edge of the wedge: extremely high extinction risk in wedgefishes and giant guitarfishes</i>. <i>Aquatic Conservation</i>, 29(10), 1558–1571. MacNeil, M. A., et al. (2020). <i>Global status and conservation potential of reef sharks</i>. <i>Nature</i>, 583(7818), 801–806. Pacoureau, N., et al. (2021). <i>Half a century of global decline in oceanic sharks and rays</i>. <i>Nature</i>, 589, 567–571. Palacios, M. D., Trejo-Ramírez, A., Velázquez-Hernández, S., Huesca-Mayorga, S. A., Stewart, J. D., Cronin, M. R., & Croll, D. A. (2024). Reproductive behavior, seasonality, and distribution of three devil ray species (<i>Mobula mobular</i>, <i>M. thurstoni</i>, and <i>M. munkiana</i>) in the Southern Gulf of California, Mexico. <i>Marine Biology</i>, 171(1), 12. Rigby, C.L., Ebert, D.A. and Herman, K. 2020. <i>Centrophorus atromarginatus</i>. <i>The IUCN Red List of Threatened Species</i> 2020: e.T161384A124474968. https://dx.doi.org/10.2305/IUCN.UK.2020-3.RLTS.T161384A124474968.en. Rowat, D., et al. (2021). <i>Whale shark trade: forensic tracking and policy solutions</i>. <i>Endangered Species Research</i>, 46, 195–206. Shea, K. H., et al. (2025). <i>Retail analysis of illegal whale shark products in seafood supply chains</i>. <i>Marine Policy</i>, In Review. Venables, S. K., Rohner, C. A., Flam, A. L., Pierce, S. J., & Marshall, A. D. (2024). Persistent declines in sightings of manta and devil rays (Mobulidae) at a global hotspot in southern Mozambique. <i>Environmental Biology of Fishes</i>, 1–17. Walker, T.I., Rigby, C.L., Pacoureau, N., Ellis, J., Kulka, D.W., Chiaramonte, G.E. & Herman, K. 2020. <i>Galeorhinus galeus</i>. <i>The IUCN Red List of Threatened Species</i> 2020: e.T39352A2907336. https://dx.doi.org/10.2305/IUCN.UK.2020-2.RLTS.T39352A2907336.en (Accessed: 23 June 2024). Womersley, T., et al. (2024). <i>Projected impacts of climate change on whale shark distribution</i>. <i>Global Change Biology</i>, In Press.
28	<p>Proposed by: Argentina, Bahamas, Brazil, Comoros, Dominican Republic, Ecuador, European Union, Fiji, Gabon, Honduras, Lebanon, Oman, Panama, Samoa, Senegal, Seychelles, Sri Lanka, Sudan, Togo, United Kingdom</p> <p>Summary: <i>Carcharhinus longimanus</i> (Oceanic whitetip shark): transfer from Appendix II to I</p> <p>WCS recommendation: ADOPT</p> <p>The oceanic whitetip shark was once among the most abundant large vertebrates found in the open ocean – but it is now all but gone, removed from its former key ecological role and assessed by IUCN as Critically Endangered with extinction, the worlds most threatened open ocean shark species.</p> <p>The species was listed on CITES Appendix II in 2013 and is one of the most protected shark species globally on paper via high seas fisheries bodies’ bans on capture; however, in reality, it remains heavily exploited with ongoing catch and trade documented globally.</p> <p>High value fins from as many as 36,216 individual oceanic whitetip sharks were traded illegally through Hong Kong SAR during the three years from 2015-2017, compared with only ~11,815 individuals accounted for in the CITES trade database over this period (SC77 Doc 67.1)</p>

	<p>Genetic studies of the shark fin trade (Cardeñosa et al 2022; 2024) show that there are 70 times more Oceanic whitetip fins in the Hong Kong markets than the trade database records suggest, indicating that more than 95% of trade in the species is illegal.</p> <p>This incredibly worrying level of legal and illegal trade in a Critically Endangered species that has been subject to declines of >80% in the last three generations and is still declining, is clearly of great concern and fully justifies the transfer of the species to CITES Appendix I, to reduce trade pressure to the lowest level possible. WCS strongly urges Parties to ADOPT this proposal.</p>
29	<p>Proposed by: Brazil, Ecuador, European Union, Panama, Senegal</p> <p>Summary: inclusion of the School Shark (<i>Galeorhinus galeus</i>), Patagonian Narrownose Smoothhound (<i>Mustelus schmitti</i>), and the Common Smoothhound (<i>Mustelus mustelus</i>) in CITES Appendix II</p> <p>WCS recommendation: ADOPT</p> <p>The Tope shark (<i>Galeorhinus galeus</i>) and Smoothhound sharks (genus <i>Mustelus</i>), are members of family Triakidae (the houndsharks), small to medium-sized coastal sharks that have been targeted for their meat, fins and oil since before records began. Meat is the most valuable product from these species today and makes up as much as 10% of the global international trade in shark meat - with fins a valued byproduct. Many of these species, particularly the Critically Endangered Tope shark, are highly vulnerable to overfishing due to their slow growth and late maturity, high levels of endemism, and genetic isolation of sub-populations. There are many examples of Tope fishery collapse being followed by targeting and serial depletion of the largest species of <i>Mustelus</i> in the same fishing grounds, including <i>M. mustelus</i> (Endangered) in the east Atlantic, and <i>M. schmitti</i> (Critically Endangered) in the southwest.</p> <p>Houndshark species are often grouped in landings and traded under generic or misapplied names, making monitoring, stock assessments, and enforcement difficult. They are typically labeled as “small shark”, “houndshark”, “gatuzo”, or “cazón” at landing sites and as traded products. Three seriously threatened species that are a major component of international trade in meat and fins—<i>G. galeus</i>, <i>M. mustelus</i>, and <i>M. schmitti</i>—are proposed for listing in CITES Appendix II, with all other <i>Mustelus</i> species proposed under Article II, paragraph 2(b). This will fill a major regulatory gap in the management of the international shark meat trade (Walker et. al, 2020), and WCS recommends that Parties ADOPT the proposal.</p>
30	<p>Proposed by: Bahamas, Belize, Brazil, Comoros, Dominican Republic, Ecuador, Fiji, Gabon, Jamaica, Maldives, Panama, Samoa, Senegal, Seychelles, Sudan, Togo</p> <p>Summary: Mobulidae spp. (Mobula rays): Transfer from Appendix II to Appendix I</p> <p>WCS recommendation: ADOPT</p> <p>The nine mobulids (manta and mobula rays) are extremely biologically vulnerable due to their conservative life history traits including slow growth, late maturation, and low fecundity. After reaching maturity at an average of 10 years, they typically give birth to only one pup every 2-3 years.</p> <p>Due to their conservative biology, and ongoing trade demand for their gills that are used in medicinal tonics in East Asia, seven of the nine species in the family are assessed as Endangered on the IUCN Red List of threatened species, making them among the most threatened of all shark and ray families.</p>

	<p>The two species of manta rays were listed on CITES Appendix II in 2013, and the rest of the family added in 2016. Despite these listings, persistent population declines of up to 92% have continued (Fernando & Stewart, 2021; Carpenter et al., 2023; Venables et al. 2024).</p> <p>In the decade since listing on Appendix II, trade in mobulid gill plates has not been effectively regulated or limited to sustainable levels, coupled with growing levels of illegal trade not being reported to CITES (Palacios et al 2024). With their conservative biology they cannot withstand commercial trade at significant levels, and ongoing legal and illegal trade must end to give them a chance of recovery. WCS recommends that Parties ADOPT this proposal.</p>
31	<p>Proposed by: Argentina, Bahamas, Bangladesh, Belize, Comoros, Dominican Republic, Ecuador, Fiji, Gabon, Maldives, Panama, Philippines, Samoa, Senegal, Seychelles, Sri Lanka, Togo</p> <p>Summary: <i>Rhincodon typus</i> (Whale Shark): Transfer from Appendix II to Appendix I</p> <p>WCS recommendation: ADOPT</p> <p>The whale shark was one of original CITES shark Appendix II listings over 20 years ago, but the species has declined from Vulnerable to Endangered on the IUCN red list over that time – the species needs the stronger protection Appendix I listing can offer. The species is the world’s largest fish and draws huge attention as an ecotourism species, particularly in the Global South, making its conservation an economic priority.</p> <p>Despite widescale national protections for the species globally, there is growing evidence that fins are still illegally traded into shark fin trade hubs such as Hong Kong, and sold as display items for seafood retail stores and restaurants due to their large size (Rowat et al. 2021, Shea et al 2025).</p> <p>Illegal trade is a factor in continued whale shark declines, but climate change is reducing their feeding and breeding habitats, and forcing them into areas where more are likely to be killed via fisheries bycatch and ship strikes. Both of these sources of mortality are driving declines, are a major threat to their survival, and should be factored into considerations for an Appendix I listing that is clearly justified (Womersley et al 2024).</p> <p>Appendix I listing criteria go beyond just trade impacts, and the wider impacts on this species must be considered, especially in the face of this new research, which highlights how severe climate change impacts will be on a species so important to livelihoods in the Global South. The Convention text does not require that trade be the main threat to a species for listing on Appendix I, but rather that trade must be subject to strict regulation “in order not to endanger further their survival” (emphasis added). Given the concerns outlined in this recent peer reviewed science, an Appendix I listing is needed to remove any remaining commercial trade threat, while this species faces existential threats from climate change, in addition to threats from trade.</p>
32	<p>Proposed by: Bangladesh, Benin, Brazil, Burkina Faso, Burundi, Cabo Verde, Central African Republic, Comoros, Congo, Gabon, Guinea, Guinea-Bissau, Maldives, Mali, Niger, Nigeria, Panama, Sierra Leone, Sudan, Togo</p> <p>Summary: <i>Glaucostegus</i> spp. (Guitarfishes): Add the annotation "A zero annual export quota for wild-taken specimens traded for commercial purposes"</p> <p>WCS recommendation: ADOPT</p>

	<p>The wedgefish and giant guitarfish have been identified as the most threatened families of all chondrichthyans (sharks, rays, and chimaeras) globally (Dulvy et al 2014, Kyne et al 2019). All but one of the 18 species in these two families are now known to be Critically Endangered – the last step before extinction – with declines driven by the unsustainable trade in their high value fins. This information was only available after the species were listed on Appendix II in 2019, and demonstrates that stronger measures are urgently needed.</p> <p>Wedgefish and giant guitarfish fins sell for as much as USD \$680 at first point of sale (Jabado, 2018) and as much as \$USD 964/kg in trade hubs (Hau et al., 2018); this is the highest value recorded for any fin type (Fields et al. 2018). This value drives continued overfishing, and thereby additional declines globally, thus threatening the survival of wild populations.</p> <p>Sampling of shark fin trade markets in Hong Kong found that wedgefish were relatively common (Fields et al. 2018, Cardeñosa et al. 2022, Cardeñosa et al 2024, Chapman et al., in press) and present in markets at levels higher than those reported to CITES.</p> <p>With new science showing that these are the most threatened of all sharks and rays, coupled with evidence of ongoing unsustainable and illegal trade, a zero quota that will temporarily halt commercial trade is needed now, to allow populations to recover to a level where sustainable trade could be possible. WCS recommends that Parties ADOPT this proposal.</p>
33	<p>Proposed by: Bangladesh, Benin, Brazil, Burkina Faso, Burundi, Central African Republic, Comoros, Congo, Gabon, Gambia, Guinea, Guinea-Bissau, Maldives, Mali, Niger, Nigeria, Panama, Senegal, Sierra Leone, Sudan, Togo</p> <p>Summary: Rhinidae spp. (Wedgefishes): Add the annotation "A zero annual export quota for wild-taken specimens traded for commercial purposes"</p> <p>WCS recommendation: ADOPT</p> <p>See the discussion above under proposal 32 – these families are often caught and traded together. WCS recommends that Parties ADOPT this proposal.</p>
34	<p>Proposed by: Brazil, Comoros, Dominican Republic, Ecuador, European Union, Lebanon, Nigeria, Panama, Senegal, Syria, United Kingdom</p> <p>Summary: Centrophoridae spp. (Gulper sharks): Include in Appendix II</p> <p>WCS recommendation: ADOPT</p> <p>Gulper sharks are caught and traded for their high value liver oil. This unregulated trade has led to population declines of greater than 80% in significant parts of their range, with several species in the gulper shark family already assessed as Critically Endangered with extinction (Finucci et al. 2020a, Rigby et al. 2020).</p> <p>The oil from gulper shark livers, known as squalene, is used in cosmetics (e.g., sunscreens, facial oil, lipsticks), pharmaceuticals (e.g., vaccine adjuvants, anti-ageing and omega-3 supplements) (Cardeñosa et al. 2017, Ebert et al. 2021).</p> <p>Like many animals that inhabit the deep ocean, gulper shark species have extremely slow life histories –as few as one pup per litter, with one litter every 2–3 years, and as such any exploitation of these species needs to be incredibly carefully monitored and controlled, if it</p>

	<p>isn't to lead to rapid population crashes that have been documented for these species around the world.</p> <p>Gulper sharks have the highest value liver oil of all sharks and consequently they are targeted and increasingly retained from bycatch for the trade (Finucci et al. 2024). Without CITES listings, there are no limits or controls to prevent overexploitation of these slow growing species.</p> <p>Identification of species within the gulper shark family is challenging, especially in their traded form, necessitating a family level listing to allow Customs officials to easily identify shipments of gulper shark oil.</p> <p>Given their incredible biological vulnerability, the value of their liver oil in international trade and the lack of any form of trade regulation make a CITES Appendix II listing for the gulper shark family the bare minimum action needed at CITES CoP20, and WCS recommends that Parties ADOPT this proposal.</p>
35	<p>Proposed by: European Union, Honduras, Panama</p> <p>Summary: <i>Anguilla</i> spp. (Eels): Include in Appendix II (entry into effect to be delayed by 18 months, i.e. until 5 June 2027.)</p> <p>WCS recommendation: ADOPT</p> <p>WCS welcomes the proposal from the European Union, Honduras, and Panama to include all <i>Anguilla</i> spp. on Appendix II, with an 18-month delay before entry into effect.</p> <p>The proposal focuses on the IUCN Red List Endangered American and Japanese eel species (the European eel, <i>A. anguilla</i>, is Critically Endangered and already on Appendix II), with all other (currently un-listed) Anguillid species to be included on App. II as well by 'similarity of appearance.' We believe this approach to be appropriate; declines in American and Japanese eels are well documented in the proposal, and eel species are impossible to distinguish in the form that they are traded (glass eels and elvers).</p> <p>As with other species proposed for inclusion in Appendix II, it is difficult to fully analyze the existing international trade. However, the data that we do have on trade through countries like the United States does indicate a complex global trade in multiple species as part of a chain of serial depletion for consumption as food in key markets.</p> <p>With respect to the American eel, specifically: In 2023, the United States Atlantic States Marine Fisheries Commission undertook an externally peer-reviewed benchmark Stock Assessment for American eel, which represents the best information available coastwide status for this species (ASMFC 2023). The 2023 assessment concluded that although the stock remains "depleted" (as was also the status in the 2012 and 2017 stock assessments), the yellow eel population continues to decline despite coastwide management efforts and recommended further reduction in yellow eel landings.</p> <p>FAO data suggest ongoing declines in reported <i>A. rostrata</i> capture production (by weight) from the US and Canada since 1975 (CITES 2022, p. 30), although it is unclear to what extent this represents population and/or market declines – or a shift to targeting more lucrative glass eels, as catch production data by life history stage are lacking. Despite this decline, a 2022 report to</p>

the CITES Standing Committee acknowledged a “boom” in *A. rostrata* glass eel harvesting in Caribbean countries, particularly Haiti and Dominican Republic (CITES 2022). Shiraishi and Kaifu (2024) report that East Asian imports (largely through Hong Kong) of glass eels and elvers from the Americas increased from 2 mt in 2004 to 157 mt in 2022, including 100.6 mt from Haiti, 43.4 mt from Canada, 12.7 mt from the US, and 0.2 mt from Dominican Republic. However, these trade statistics and trends are further complicated by poor customs data on domestic exports vs re-exports from the Caribbean through the US and Canada. A CITES Appendix II listing for *A. rostrata* would facilitate retention and tracking of such statistics.

Within CITES, the European eel *A. anguilla* was included in CITES Appendix II at CoP14 and entered into effect in March 2009. Since December 2010, the EU has banned all exports and imports of *A. anguilla*, due to conservation concerns, although imports into East Asia are still reported (Richards et al. 2020; CITES 2022). However, the primary geographies and species composition of eel trade in East Asia have shifted since the EU ban, with live eel fry from the Americas (presumably *A. rostrata*) accounting for an increasing proportion (by weight) of the imports since 2010 (CITES 2022, Fig 3) but many acknowledged gaps remain.

This increasing demand, coupled with exceptionally high (albeit fluctuating) prices paid for eel fry, are driving IUU fishing and illegal trade of *A. rostrata* (Shiraishi and Kaifu 2024). For example, in the US in 2019, USFWS’s [Operation Broken Glass](#) led to the arrests of 21 individuals engaged in illegal fishing, interstate transport, and export of elvers worth more than \$5 million. In another [case](#), US importers falsely labelled illegal imports of European eel *A. anguilla* meat worth more than \$160 million as *A. rostrata*. Canada is also facing increasing management and enforcement issues of their legal *A. rostrata* glass eel fishery (CITES 2022). In 2020, due to conservation concerns and a rise in illegal fishing activity, Canada prohibited the sale of glass eels and elvers. The elver fishery in 2024 closed under Canada’s Fisheries Act and Maritime Provinces Fishery Regulations. Yet between mid-March and mid-May, 2024, 149 arrests for illegal elver fishing have been made and more than 200 kg of elvers seized.

Driven by unprecedented demand, 89% of all live eel fry imports into East Asia in 2022 came from the Americas, suggesting that *A. rostrata* may now be the most heavily exploited *Anguilla* species in the world (Shiraishi and Kaifu 2024). Assessing the impacts of this growing international exploitation is complicated by significant challenges in traceability by life history stage, lack of management in some source countries, illegal fishing, and illegal trade. All available indicators of global population status of American eel (e.g., Endangered and declining IUCN Red List status, ASMFC’s “depleted,” historic low and declining status along the US Atlantic Coast) suggest the need for more aggressive management and monitoring of international trade. We believe that these recent status reviews clearly demonstrate that *Anguilla rostrata* meets the criteria for inclusion in CITES Appendix II, pursuant to Annex 2a of Resolution Conf. 9.24 (Rev. CoP17).

38	<p>Proposed by: Argentina, Bolivia, Panama</p> <p>Summary: <i>Acanthoscurria chacoana</i>, <i>Acanthoscurria insubtilis</i>, <i>Acanthoscurria musculosa</i>, <i>Acanthoscurria theraphosoides</i>, <i>Avicularia hirschii</i>, <i>Avicularia rufa</i>, <i>Avicularia avicularia</i>, <i>Catumiri argentinense</i>, <i>Cyriocosmus berate</i>, <i>Cyriocosmus perezilesi</i>, <i>Grammostola rosea</i>, <i>Haplotremus albipes</i>, <i>Holothele longipes</i>, <i>Pamphobeteus antinous</i>, <i>Umbyquyra acuminatum</i> (tarantulas): Include in Appendix II</p> <p>WCS recommendation: ADOPT</p> <p>WCS supports this proposal from Argentina, Bolivia, and Panama, to include the tarantula <i>Grammostola rosea</i> in CITES Appendix II pursuant to Article II 2a of the Convention, and to include 14 addition species of tarantulas of the genera <i>Acanthoscurria</i>, <i>Avicularia</i>, <i>Catumiri</i>, <i>Cyriocosmus</i>, <i>Haplotremus</i>, <i>Holothele</i>, <i>Pamphobeteus</i> and <i>Umbyquyra</i> pursuant to Article II 2b of the Convention.</p> <p>These tarantulas represent yet another taxon subject to unsustainable and often illegal trade for the international pet trade, as tarantulas are sought after by hobbyists and collectors due to their novelty and often their rarity. Tarantulas (Theraphosidae) generally have a K-selected life history strategy, with slow growth, low reproductive rates, late sexual maturity, high female longevity (decades), and limited geographic ranges, which leads to significant vulnerability to over-exploitation. Tarantula populations face significant threats in addition to trade including habitat loss and degradation, agricultural expansion, and fires.</p> <p>Range States for tarantulas face critical challenges, with many of their native tarantulas present in trade. Including these species in Appendix II will assist with cooperation and regulation of international trade. There is significant uncertainty about the sustainability of current trade in these species, and thus CITES regulation is vital to prevent over-exploitation and ensure that future trade is legal and compatible with the survival of the species.</p> <p>None of the species are CITES-listed, so their international trade is not subject to formal regulation under the Convention, and data are limited. The proposal provides strong evidence of significant international trade in these species, driven by the exotic pet market and largely supplied by specimens collected directly from the wild. All fifteen of the proposed species have been confirmed to be present in international trade, particularly through online platforms. Species identification is challenging, particularly for trade in individuals less than one year old, and listing on Appendix II of all 15 species will assist Customs officials.</p> <p>CITES Appendix II listing is a necessary measure to regulate and manage trade in these species, and ensure that it does not threaten their survival in the wild. Lack of full scientific certainty should not be used as a pretext for postponing measures to prevent serious or irreversible losses, and listing now could prevent one or more of these species from qualifying for Appendix I in the future.</p>
-----------	---



[WCS.org](https://www.wcs.org)