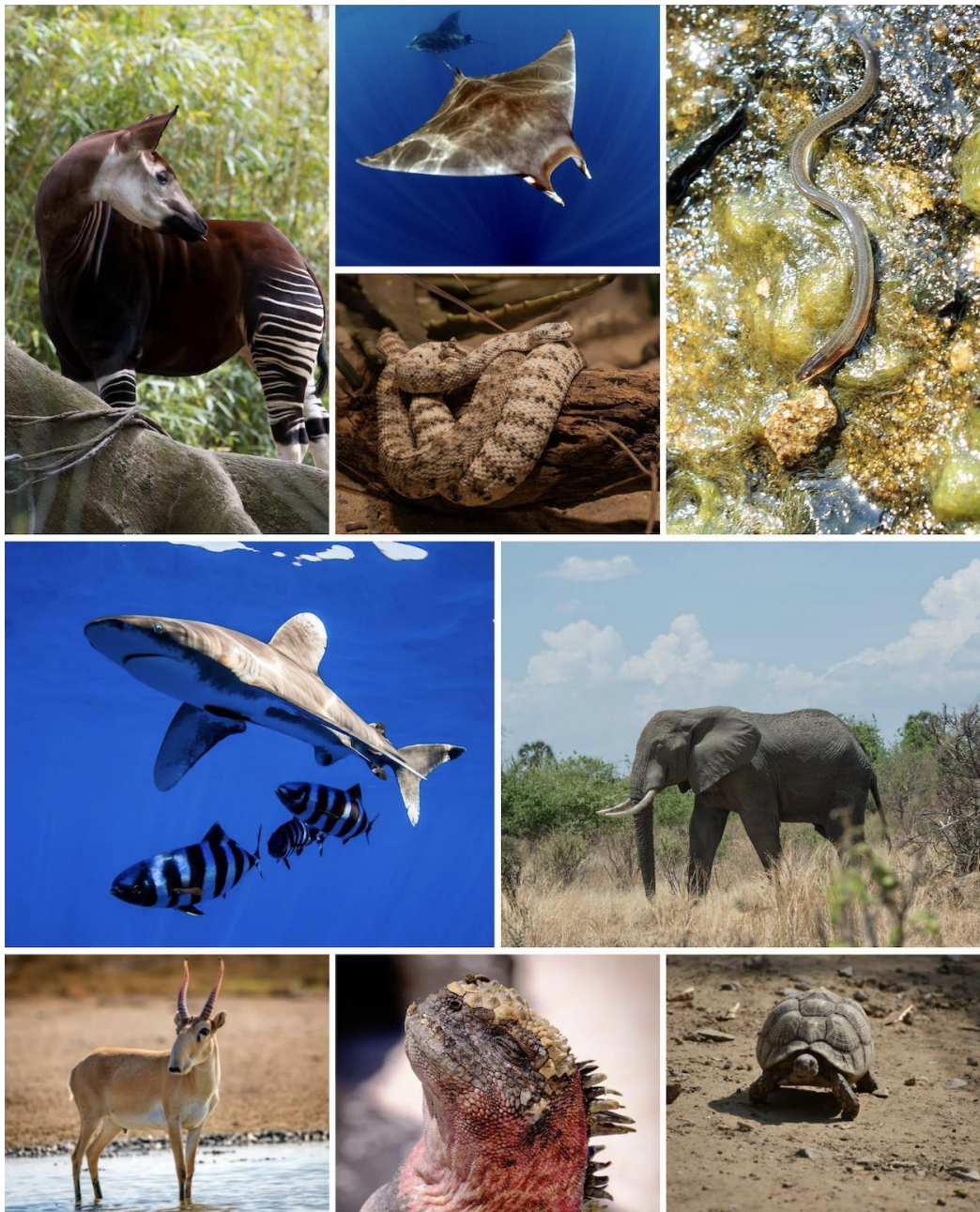


RECOMMENDATIONS FOR CITES COP20

Samarkand, Uzbekistan, 24 November - 05 December 2025



Quick links to contents:

1. [Executive summary of recommendations](#)
2. [Detailed comments: CoP20 working documents](#) (pages 2-7)
3. [Detailed comments: proposals to amend the appendices](#) (pages 7-9)

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	<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> <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>
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.)	<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> <i>Doc. 76.6: WCS supports conclusions reached by African elephant Range States, particularly because they reflect consensus;</i> <i>Doc. 76.7: WCS supports African elephant range States' Communiqué but opposes any language that could allow commercial ivory exports.</i>
77.	Asian big cats (<i>Felidae</i> spp.)	<i>Doc. 77.1: WCS does not support deleting Decisions 18.105 and 18.106 - evidence shows they have not been sufficiently implemented.</i> <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>

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.)	<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> <i>Doc. 79.2: WCS supports draft Decisions, noting the importance of honing the conversion parameters to better understand trade.</i>
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.)	<i>Doc. 85.1: WCS generally supports the draft Decisions, with some recommended edits;</i> <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>
88.	Sharks and rays (<i>Elasmobranchii</i> spp.)	<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> <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>
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	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

38	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>Umbyquyra acuminatum</i> : include in App. II	ADOPT
--------------------	------------	--	-------



WCS.org