NOTIFICATION TO THE PARTIES

No. 2025/102 Geneva, 26 August 2025

CONCERNING:

PROPOSALS TO AMEND APPENDICES I AND II

Provisional assessments by the Secretariat

1. The list of 51 proposals to amend Appendices I and II to be considered at the 20th meeting of the Conference of the Parties (CoP20, Samarkand, 2025) was communicated to the Parties through Notification to the Parties No. 2025/091 of 4 July 2025.

2. The Secretariat has prepared provisional assessments of these proposals in the context of its responsibilities under Article XV, paragraph 1 (a), of the Convention. These provisional assessments are annexed to the present Notification and based on Resolution Conf. 9.24 (Rev. CoP17) on *Criteria for amendment of Appendices I and II* and other pertinent Resolutions of the Conference of the Parties and take full account of Resolution Conf. 5.20 (Rev. CoP 17) on *Guidelines for the Secretariat when making recommendations in accordance with Article XV*.

3. For the most part, these provisional assessments consider only the information presented in the supporting statement provided by the proponent(s). However, where additional information was readily available, this was also considered and is referenced in accordance with Resolution Conf. 5.20 (Rev. CoP17). Any other references cited may be assumed to be drawn from the supporting statements.

4. These provisional assessments are being communicated to the Parties in order to stimulate discussion on the proposals and to encourage further clarification to be provided by proponents where appropriate. In this context, Parties are reminded of the Rules of procedure of the Conference of the Parties, in particular Rule 24, paragraph 2, whereby the Party that has submitted a proposal for amendment of Appendices I and II may, at any time, amend the proposal to reduce its scope or to make it more precise; once a proposal has been amended to reduce its scope, it may not be re-amended to increase the scope again.

5. The provisional assessments are presented at this stage in an unedited form in English only. However, where proposals were submitted in French or Spanish, a translated version of the provisional assessment will be provided in the relevant language.

6. The Secretariat will update these assessments and provide its final recommendations considering comments received from Parties, intergovernmental bodies having a function in relation to marine species and the organizations specified in Resolution Conf. 10.13 (Rev. CoP18) on *Implementation of the Convention for tree species* and taking account of additional information from other sources.

Postal address:
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cites.org

7. The Secretariat reminds Parties, intergovernmental bodies having a function in relation to marine species, and the organizations specified in Resolution Conf. 10.13 (Rev. CoP18) on *Implementation of the Convention for tree species* to submit their comments to the Secretariat as soon as possible and by the latest by **25 September 2025** to info@cites.org with a copy to thea.carroll@un.org with the subject line: *CoP20 - Comments on proposals to amend the Appendices*. The Secretariat will provide in due course its final recommendations to the Parties via Notification and in document CoP20 Doc. 114.1.

Annex

1. *Damaliscus pygargus pygargus* (Bontebok)

   Delete from Appendix II

2. *Gazella dorcas* (Dorcas Gazelle)

   Include in Appendix II

3. *Saiga tatarica* (Saiga)

   Amend the annotation by adding the wording "except for specimens from the population *Saiga tatarica* of Kazakhstan"

4. *Giraffa camelopardalis* (Giraffe)

   Delete the populations of Angola, Botswana, Eswatini, Malawi, Mozambique, Namibia, South Africa and Zimbabwe from Appendix II

5. *Okapia johnstoni* (Okapi)

   Include in Appendix I

6. *Hyaena hyaena* (Striped hyena)

   Include in Appendix I

7. *Arctocephalus townsendi* (Guadalupe Fur Seal)

   Transfer from Appendix I to Appendix II

8. *Monachus tropicalis* (Caribbean Monk seal)

   Delete from Appendix I

9. *Ceratotherium simum simum* (Southern White Rhinoceros)

   Amend the annotation of the population of *Ceratotherium simum simum* of Namibia listed in Appendix II

10. *Diceros bicornis* (South-western black rhinoceros)

    Transfer the population of *Diceros bicornis bicornis* of Namibia from Appendix I to Appendix II with an annotation

11. *Choloepus didactylus* (Linnaeus' two-toed sloth) and *Choloepus hoffmanni* (Hoffman's two-toed sloth)

    Include in Appendix II

12. *Cercocebus chrysogaster* (Golden-bellied Mangabey)

    Transfer from Appendix II to Appendix I

13. *Loxodonta africana* (African Elephant)

    To allow Namibia to trade in registered stocks of raw ivory (whole tusks and pieces) of Namibian origin, owned by the Government of the Republic of Namibia, for commercial purposes with trading partners that have been verified by the CITES Secretariat as having sufficient national legislation and domestic trade controls. This ensures that ivory imported from Namibia will not be re-exported and will be managed following all requirements of Resolution Conf. 10.10 concerning domestic manufacturing and trade. Furthermore, to enable Namibia to achieve full Appendix II status for its elephants, as provided for in Article IV of the Convention, thereby permitting the regulated and legal trade in Namibian elephant products, including ivory.

14. *Loxodonta africana* (African Elephant)

    Amend annotation A10 pertaining to the elephant populations of Botswana, Namibia, South Africa and Zimbabwe

15. *Bycanistes* spp. and *Ceratogymna* spp.(African hornbills)

    Include in Appendix II

16. *Gyps africanus* (White-backed vulture) and *Gyps rueppelli* (Ruppell's vulture)

    Transfer from Appendix II to Appendix I

17. *Falco peregrinus* (Peregrine falcon)

    Transfer from Appendix I to Appendix II

18. *Sporophila maximiliani* (Great-billed seed-finch), *Sporophila angolensis, Sporophila atrirostris, Sporophila crassirostris, Sporophila funereal, Sporophila nuttingi* (seed-finches)

    Include *Sporophila maximiliani* in Appendix I and include *Sporophila angolensis, Sporophila atrirostris, Sporophila crassirostris, Sporophila funerea* and *Sporophila nuttingi* in Appendix II

19. *Caribicus warreni* (Hispaniolan Giant Galliwasp)

    Include in Appendix I

20. *Phyllurus amnicola* (Mount Elliot Leaf-tailed Gecko)

    Include in Appendix II

21. *Phyllurus caudiannulatus* (Ringed Thin-tail Gecko)

    Include in Appendix II

22. *Amblyrhynchus* spp. (Galápagos Marine Iguana)

    Transfer from Appendix II to Appendix I

23. *Conolophus* spp. (Galápagos Land Iguana)

    Transfer from Appendix II to Appendix I

24. *Bitis harenna* (Ethiopian Mountain Adder, Ethiopian Viper) and *Bitis parviocula* (Bale Mountains Adder)

    Include in Appendix I

25. *Crotalus* spp. and *Sistrurus* spp. (Rattlesnakes)

    Include in Appendix II

26. *Kinixys homeana* (Home's Hinged-backed Tortoise)

    Transfer from Appendix II to Appendix I

27. *Pelophylax epeiroticus, Pelophylax lessonae, Pelophylax ridibundus* and *Pelophylax shqipericus*

    Include in Appendix II (Entry into effect of the inclusion in Appendix II would be delayed by 18 months

28. *Carcharhinus longimanus* (Oceanic whitetip shark)

    Transfer from Appendix II to Appendix I

29. *Galeorhinus galeus* (School Shark) and *Mustelus* spp. (Smoothhound)

    Include in Appendix II

30. Mobulidae spp. (Manta rays)

    Transfer from Appendix II to Appendix I

31. *Rhincodon typus* (Whale Shark)

    Transfer from Appendix II to Appendix I

32. *Glaucostegus* spp. (Guitarfishes)

    Add the following annotation "A zero annual export quota for wild-taken specimens traded for commercial purposes"

33. Rhinidae spp. (Wedgefishes)

    Add the following annotation "A zero annual export quota for wild-taken specimens traded for commercial purposes"

34. Centrophoridae spp. (Gulper Sharks)

    Include in Appendix II

35. *Anguilla* spp. (Anguillid eels)

    Include in Appendix II (Entry into effect would be delayed by 18 months)

36. *Actinopyga echinites, Actinopyga lecanora, Actinopyga mauritiana, Actinopyga miliaris, Actinopyga palauensis, Actinopyga varians* (sea cucumbers)

    Include in Appendix II

37. *Holothuria lessoni* (Golden Sandfish)

    Include in Appendix II

38. *Grammostola rosea, Acanthoscurria chacoana, Acanthoscurria insubtilis, Acanthoscurria musculosa, Acanthoscurria theraphosoides, Avicularia hirschii, Avicularia rufa, Avicularia avicularia, Catumiri argentinense, Cyriocosmus berate, Cyriocosmus perezmilesi*

    Include in Appendix II

39. *Haliotis midae* (South African Abalone)

    Include the population of South Africa in Appendix II with the annotation "dried specimens only"

40. *Panax quinquefolius* (American Ginseng)

    Amend annotation #3 to exempt finished products packaged and ready for retail trade of thin-sliced roots derived from artificially propagated plants of *Panax quinquefolius*

41. *Jubaea chilensis* (Chilean palm)

    Include in Appendix I

42. *Beaucarnea glassiana, Beaucarnea hookeri* (Ponytail Palm)

    Include in Appendix II as part of the listing of the genus *Beaucarnea* spp.

43. *Commiphora wightii* (Guggul)

    Include in Appendix II

44. *Euphorbia bupleurifolia* (Bupleurifolia Spurge)

    Transfer from Appendix II to Appendix I

45. *Afzelia bipindensis* (Red Doussié)

    Delete the populations of Cameroon, the Central African Republic, Congo, the Democratic Republic of the Congo, Equatorial Guinea and Gabon from Appendix II

46. *Paubrasilia echinata* (Brazilwood)

    Transfer from Appendix II to Appendix I

47. *Pterocarpus soyauxii* (African Padauk)

    Delete the populations of Angola, Cameroon, the Central African Republic, Congo, the Democratic Republic of the Congo, Equatorial Guinea and Gabon from Appendix II

48. *Aloe bergeriana, Aloe jeppeae, Aloe subspicata, Aloe welwitschii* (Aloes)

    Amend the listing of Aloe spp. in Appendix II

49. *Podocarpus parlatorei* (Parlatore's Podocarp)

    Transfer from Appendix I to Appendix II

50. *Avonia quinaria*

    Transfer from Appendix II to Appendix I

51. *Aloe ferox* and *Euphorbia antisyphilitica*

    Amend annotation #4

Proposal 1

Damaliscus pygargus pygargus (Bontebok)

Proposal: Delete from Appendix II.

Proponent: South Africa

Provisional assessment by the Secretariat

CITES background

Damaliscus pygargus pygargus was included in Appendix I in 1975. It was subsequently transferred to Appendix II in 1981 following a proposal by South Africa to the third meeting of the Conference of the Parties (CoP3; New Delhi, 1981; CoP3 Prop. 20 as *D. dorcas dorcas*).

Purpose and impact of the proposal

The proposal seeks to delete *D. p. pygargus* from the Appendices in accordance with the precautionary measures in Annex 4 of Resolution Conf. 9.24 (Rev. CoP17). If the proposal is adopted, international trade in specimens of this species would no longer be regulated by CITES.

Compliance with listing criteria

The proponents state that the subspecies no longer meets the criteria for inclusion in Appendix II as *per* CITES Resolution Conf. 9.24 (Rev. CoP17) on *Criteria for amendment of Appendices I and II* since it is not threatened by trade. They further state that "Thanks to the dedicated efforts of local farmers, private wildlife industry and conservation authorities, and to a CITES Appendix I listing in 1975 (later transferred to Appendix II in 1981), *D. pygargus pygargus* has made a remarkable recovery. Regulation of trade is no longer needed to avoid the bontebok from becoming eligible for inclusion in Appendix I in the near future, nor is regulation of trade required to ensure that the harvest of specimens from the wild is not reducing the wild population to a level at which its survival might be threatened".

The supporting statement notes that the subspecies is endemic to the Western Cape province of South Africa. The subspecies has recovered from a population low of 17 individuals in the 1930s to an estimated total of 9,819-11,069 individuals today. However, fewer than 2,500 occur in the Western Cape itself (676 or 21% of which are within protected areas) where the limited availability of preferred habitat, due to conversion for agriculture, constrain population growth. The population size in the natural range appears to have stabilized and, given ongoing loss of the original preferred habitat, further increases there seem unlikely.

As a result of translocations, over 70% of the population now occurs in around 240 fragmented populations, mostly on private land, in other South African provinces outside the natural range. The average size of privately owned populations is 33 individuals whilst the average for protected areas is 80. According to the supporting statement, it is the privately owned populations which now drive increases in the total population. However, the supporting statement notes that only 64% of these privately-owned individuals can be considered 'wild' (*sensu* Child *et al*. 2019), reducing the overall total of wild individuals. No information is provided on the estimated area of distribution (or area of occupancy) of the natural range but this is estimated, within the natural range, as 602 km² by the IUCN Red List assessment (made in 2015) with an extent of occurrence of 8,779 km². The species is categorized as Vulnerable in the IUCN Red List and in the *2016 Red list of mammals of South Africa, Swaziland and Lesotho*[1].

According to the supporting statement, the main threats to the subspecies include a) the limited optimal habitat within its natural distribution, b) the absence of a meta-population management plan, c) low

[1] Child MF, Roxburgh L, Do Linh San E, Raimondo D, Davies-Mostert HT, editors. The 2016 Red List of Mammals of South Africa, Swaziland and Lesotho. South African National Biodiversity Institute and Endangered Wildlife Trust, South Africa. Available here and species listings here. Accessed 28 July 2025

genetic variability in the natural range and d) risk of hybridisation with the closely related blesbok (*D. p. phillipsi*). The proposal notes that the latter threat arises directly because of translocations leading to human-mediated mixing of the two subspecies. No estimates are provided as to the number or proportion of hybrids in the total population. The harvest of animals for international trade is not identified as a threat by the proponent or by the IUCN Red List assessment.

The proposal notes that the species is utilized at national level with legal offtake for trophy hunting, ecotourism, live sales at government sanctioned auctions and management removals for ecological or biological reasons. The proponent state that these uses generate revenue for private owners and thus provide a conservation incentive for further population growth and management. The proponent states that around 2090 hunting trophies and 35 live animals were exported between 2010 and 2023. They also state that there is no illegal trade and that *D. p. pygargus* is readily distinguished from *D. p. phillipsi*. However, it is not clear from the supporting statement if hybrids between the two subspecies can be readily distinguished by their phenotypic traits from either subspecies without genetic testing. The Secretariat notes that 15 specimens (including 12 hunting trophies) of *D. p. pygargus* have been seized based on the seizure records in the CITES Illegal Trade Database.

According to the proponent, the subspecies is protected by national legislation which requires permits for activities such as keeping, catching hunting, selling or exporting, there is also a Biodiversity Management Plan for the subspecies adopted in 2019. An online species population database is in preparation which will allow all population and offtake data to be recorded. Game counts are done regularly for protected areas and also by private owners. The risk from hybridisation is being addressed through provincial and industry protocols which require DNA profiling, using validated microsatellites, before individual animals are translocated or exported as a hunting trophy; specimens also have to be micro-chipped. Identified hybrids must be isolated and culled.

The proponent suggests that the above provide sufficient safeguards to ensure that deletion from the Appendices will not lead to over-exploitation or detrimental trade. It is also asserted that the current listing, and stricter measures by importing countries, “unnecessarily impedes private sector involvement in the conservation of bontebok and participation in a meta-population management plan, both of which require sustainable finance”. The proponent evidently regards CITES as an obstacle to effective management of bontebok populations.

The proposed deletion from the Appendices requires that the proposal be assessed to determine whether the subspecies still meets the criteria for inclusion in Appendix II and whether the relevant precautionary measures are met in paragraphs 4 and 5 of Annex 4 to Resolution Conf. 9.24 (Rev. CoP17).

Criterion A in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17) requires that it can be inferred or projected that regulation of trade in the subspecies is necessary to avoid the subspecies becoming eligible to meet the biological criteria for inclusion in Appendix I in the near future. Taken overall, the total population of 9,089-11,069 individuals (recognizing that not all of these can be considered as “wild” *sensu* Child *et al*. 2019 and an unspecified proportion will be hybrids) exceeds the guideline of 5,000 individuals suggested in Annex 5 of Resolution Conf. 9.24 (Rev. CoP17) for a small population of low productivity, the population is also growing. Annex 5 of Resolution Conf. 9.24 (Rev. CoP17) defines the “wild population” as the total number of free-living individuals “within its area of distribution”. In turn, the definition in the same Annex of area of distribution excludes “introductions outside its natural range”. Taking this approach, the total population within its extended natural range (of around 2,500 individuals) could then be considered to be small under criterion A of Annex 1.

With regard to the subsidiary criteria under criterion A of Annex 1 to Resolution Conf. 9.24 (Rev. CoP17), the population in the natural range is stable, not declining, but could be considered to be vulnerable to some intrinsic and extrinsic factors (notably low genetic diversity and hybridization) and subpopulations are typically small and fragmented. The species would not meet criterion C as there is no marked decline and the wild population in the extended natural range is stable nor is a future decline likely. The area of distribution of the wild population (criterion B) could be considered to be restricted, due to the loss of preferred habitat to agriculture. It seems likely that the population within the natural range might always be small, constrained by human activities and vulnerable to intrinsic and extrinsic factors and could, arguably, meet criterion A in Annex 2a because regulation of trade helps to mitigate the risks of

it becoming eligible for Appendix I in the near future. However, the proponent notes the value of the much larger population outside the natural range which provides a significant safeguard for the population in the original range, especially if managed as part of a metapopulation, and that trade is not a threat. At the same time the proponent also notes the ongoing risks of hybridization as the population outside the natural range grows. The IUCN Red List in 2015 also expressed concern about a net flow of individuals from the natural range to game ranches beyond that. These subsidiary risk factors are all, arguably, mitigated by management measures undertaken by South Africa but the absence of an agreed metapopulation plan seems an essential but missing element of those.

With respect to criterion 2a B, the evidence suggests that the management measures adopted by the proponent are likely to be sufficient to ensure that the harvest of specimens from the wild is not reducing the wild population to a level at which its survival might be threatened by continued harvesting or other influences. The population has continued to grow (outside the natural range) under these management measures. There is no indication that these management measures would cease to be applied if the subspecies was removed from the Appendices.

With respect to the precautionary measures in Annex 4 of Resolution Conf. 9.24 (Rev. CoP17), paragraph A 4 of which suggests that no species should be deleted from the Appendices if such deletion would likely result in it qualifying for inclusion in the Appendices in the near future (5-10 years). Based on the management measures identified in the proposal, this seems unlikely and continued growth in the population outside the natural range seems likely to continue. The species has not been subject to recommendations under the provisions of the Review of Significant Trade (paragraph A 5 of Annex 4).

There remains a degree of uncertainty regarding the proportion of the population that are hybrids and those which are pure, and the availability and implementation of an overall plan to maintain genetic diversity within and between the subpopulations. The absence of a metapopulation management plan is identified as a major threat to the subspecies both in the supporting statement and in the IUCN Red List assessment in 2015. Given the fragmented nature of populations and risks from hybridisation and low genetic diversity, such a plan seems to be an essential precautionary measure in support of the removal of the species from the Appendices.

Additional considerations

The proposal if adopted would remove the current split-listing in the Appendices of *D. pygargus* with neither subspecies being included in the Appendices. This is consistent with Annex 3 of Resolution Conf. 9.24 (Rev. CoP17) which advises against split-listings at subspecies level. Deletion from the Appendices is unlikely to cause enforcement problems for other species.

As the sole range State, no consultations were undertaken with other Parties.

Provisional conclusions

Based on the information available at the time of writing, it appears that *Damaliscus pygargus pygargus* does not meet the criteria in Annex 2a A or B of Resolution Conf. 9.24 (Rev. CoP17) for continued inclusion in Appendix II and could meet the precautionary criteria in paragraphs A 4 and A 5 of Annex 4 for its deletion from Appendix II. However, if taking a precautionary approach, it might be in the best interests of the subspecies to retain it in Appendix II until a metapopulation management plan was adopted and implemented.

Note to proponent

Information relating to the progress made to develop and implement a metapopulation management plan will be helpful to inform the final assessment. Furthermore, information on whether the majority of specimens in trade are derived from outside the natural range and any estimate of the population that are considered to be hybrids would also be useful.

Proposal 2

Gazella dorcas (Dorcas gazelle)

Proposal: Include in Appendix II.

Proponents: Benin, Burkina Faso, Mali, Mauritania, Niger, Nigeria, Senegal, Sudan, Tunisia

Provisional assessment by the Secretariat

CITES background

The species was included in Appendix III on 22nd April 1976 at the request of Tunisia and on 12th February 2008 at the request of Algeria.

Algeria proposed the inclusion of *Gazella dorcas* (Dorcas gazelle) in Appendix I to the 14th meeting of the Conference of the Parties (CoP14; The Hague, 2007) (Proposal CoP14 Prop. 11), but the proposal was withdrawn on the basis of consultations with other range States (CoP14 Com. I Rep. 7 (Rev. 1) with additional information shared in an information document CoP14 Inf. 23 (Rev. 2).

Purpose and impact of the proposal

The proposal seeks to include *Gazella dorcas* in Appendix II, in accordance with Article II, paragraph 2(a) of the Convention. If the proposal is adopted, international trade in specimens of this species will be regulated in accordance with the provisions of Article IV of the Convention.

Compliance with listing criteria

The supporting statement suggests that inclusion of *G. dorcas* in Appendix II is in accordance with Article II 2 (a) of the Convention and the Secretariat understand this to also mean in accordance with Annex 2a of Resolution Conf. 9.24 (Rev. CoP17) as no criteria were specified in the proposal or supporting statement. The Secretariat therefore assessed the information provided against criteria A and B in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17).

G. dorcas is a small gazelle that does not require free water as it can meet its water needs by selecting plant foods with high moisture content, according to the supporting statement. It is a flexible browser and grazer, shifting between feeding strategies depending on habitat conditions and food availability and the proponents indicate that it makes seasonal shifts to exploit localized areas with high-quality, moisture-rich forage. It is a species of arid and sub-arid zones with a wide distribution, historically occurring throughout the Sahelo-Saharan region, from the Atlantic Ocean to the Red Sea and from the Mediterranean coast to the southern Sahel and extending into southern Israel, Syria and Jordan (marginal occurrence), as well as the horn of Africa. The species became extinct in Senegal, where it probably only occurred as a vagrant or a seasonal visitor and a captive herd was re-introduced in 1972 with additional reintroductions in 2007. It is possibly extinct in Nigeria, and its status in Burkina Faso is unclear.

According to the supporting statement *G. dorcas* is categorized as Vulnerable in the IUCN Red list based on an 2016 assessment that reported continuing declines over the whole range estimated to have exceeded 30% over the last 15 years (three generations). The proponents state that the population in Africa is less than 10,000 and the decline in numbers is due to hunting, habitat degradation by livestock and drought and illegal trade.

Based on the supporting statement, the largest current populations are in Chad, Niger and countries in the Horn of Africa (Djibouti, Eritrea, Ethiopia and Somalia). Although information on population estimates are provided for some range States in the supporting statement (Morocco: 800-2,000 individuals; Israel: >2,000; Egypt: 1,000-2,000; Niger: 3,000; Ethiopia: 1,000-2,000; Mali: 2,000-2,500; Djibouti: 4,000; no estimates for Algeria, Tunisia and Libya), the information seems dated and does not include population estimates for Chad, Djibouti, Eritrea and Somalia, while the proponents note that the largest populations are found in Chad and the countries in the Horn of Africa.

The Secretariat notes that according to Wacher *et al*., 2022[2], estimated numbers of *G. dorcas* in the study zone in Ouadi Rimé–Ouadi Achim Reserve in Chad range from c. 7,700 to c. 18,000 individuals with the large differences between maximum and minimum numbers corresponding with the movement patterns of the species in this area. The analysis done by Wacher *et al*., 2022 showed a 95% probability of a positive trend (increasing numbers) based on the standardized surveys conducted from 2015 to 2019. According to Wacher *et al*., 2022, a key result of the study is that the central area of the Ouadi Rimé–Ouadi Achim Reserve supports *G. dorcas* at high densities and almost certainly holds the largest protected population globally with no indication of persistent decline.

Hagos *et al.*, 2023[3] collected occurrence data as part of the study on the ecological preferences of the three gazelle species indigenous to Eritrea. In the 55 subregions monitored in the study, *G. dorcas* was absent in 37 and present in 18 and the authors indicated that although the three species of gazelle studies (including *G. dorcas*) still exist in wide parts of Eritrea even though in most subregions, sightings of the species are either null or rare (hard to see). Hagos *et al.*, 2023 also states that although "habitat degradation, chronic armed conflicts, drought and limited conservation actions have led to a serious decline in their abundance as well as shrinkage of their ranges"; the policies and practices adopted by the Eritrean government (including banning of hunting), establishment of protected areas and a national environmental management plan that emphasized community engagement, resulted in "the status of wildlife in the country improving and the revival of the three species of gazelle is now evident".

The supporting statement indicates that the declines in the number of *G. dorcas* are attributed to uncontrolled hunting and especially hunting with firearms and motor vehicles. Droughts and habitat loss and degradation due to expanding agriculture and overgrazing by livestock also contribute to a decline in numbers, according to the proponents.

The species has been listed in Appendix III since 1976. According to the supporting statement, legal trade includes parts and live animals from both captive-bred and wild sources. Live animals account for 94.8% of all exports, with Sudan as the main exporter, followed by Niger. The supporting statement identifies the three main importers as United Arab Emirates (42.7% of all imports), Qatar (15.9% of imports) and Saudi Arabia (14.6%). The Secretariat extracted trade records from the CITES Trade Database on 2nd July 2025 and notes that almost 4,000 live *G. dorcas* were reported as exported between 2000 and 2023 with 49 kg of meat, 10 skins and 73 trophies reported over the same period. Almost 48% of the live specimens in trade were captive bred and 48% were reported as wild specimens. Although most of the exports were for commercial purposes, almost 20% was for personal purposes. The proponents indicate that young *G. dorcas* are caught for the pet trade in some areas in its range. The total quantity of meat reported in trade was low (49 kg between 2000 and 2023), but the proponents indicate that the species is used for wild meat trade in some of the range States.

According to the proponents, national and international illegal trade for parts like horns, meat, skin, whole animals and live animals occurs in many countries. The proponents state that most of the international trade occurs illegally between neighboring countries where hunters/smugglers enter one country to hunt illegally and then cross the border with the carcass to sell its parts and derivatives in markets or online. The Secretariat notes that based on the information in the CITES Illegal Trade Database (accessed on 1st July 2025), five seizures have been reported between 2016 and 2023, including three seizures of live *G. dorcas* involving seven live specimens reported by Niger.

The supporting statement reflects the management measures implemented by the range States and it seems the species is protected or partially protected in most of its range and occurs in protected areas throughout its range. Some range States implemented prohibitions on the hunting and commercial use of *G. dorcas* either completely or in specific areas, some prohibited the hunting of females and in one range State hunting from a vehicle or aircraft is banned.

The proponent indicates that in addition to the Appendix III listing, Northwest African populations of *G.*

[2] Wacher, T., Amin, R., Newby, J., Hatcha, M.H., Abeye, K., Ali, H., Bourtchiakbé, S.Z. and Banlongar, F.N., 2023. Gazelle–livestock interactions and impact of water resource development in the Ouadi Rimé–Ouadi Achim Reserve, Chad. *Oryx*, *57*(2), pp.205-215. Accessed on 20 July 2025.

[3] Hagos, F., Yemane, T., Ibrahim, K.M., Mangiacotti, M. and Sacchi, R., 2023. Combined effects of clime, vegetation, human-related land use and livestock on the distribution of the three indigenous species of gazelle in Eritrea. *Animals*, *13*(9), p.1490.

dorcas are listed in Appendix I of the Convention on the Conservation of Migratory Species of Wild Animals (CMS). The Secretariat notes that all populations of the species are included in the Sahelo-Saharan Megafauna Initiative (including an action plan) adopted at the 14th meeting of the Conference of Parties to CMS.

Information on captive herds in and outside range States is provided in the supporting statement, including information on a large-scale captive management programme for Sahelo-Saharan wildlife in Morocco producing stocks for reintroduction elsewhere in the country. According to the supporting statement *G. dorcas* do well in captivity and are common in privately owned, captive collections in the Middle East.

In summary, based on the information in the supporting statement and the additional information the Secretariat could obtain, it seems *G. dorcas* populations have declined in some parts of its range, with the IUCN Red List assessment estimating these declines having exceeded 30% over the last 15 years (three generations). The primary threat to the species is excessive hunting and although some range States have implemented measures to address these practices, it is not clear if these measures had an impact. The inclusion of the species in Appendix III has enabled the Parties to regulate the international trade under Article V of the Convention with the aim of preventing or restricting the species exploitation, and has provided information on the levels of trade in the species (mostly live specimens and a significant number of specimens in trade reported as captive bred). It seems that targeted interventions are needed to address the excessive hunting of the species and its unclear if the inclusion in Appendix II will assist the range States to do so. Additional updated information on the population status and trends from range States as well as the primary threats the species face in those range States would assist in informing the assessment.

Additional considerations

The proponents consulted range States and the responses received are included in the supporting statement.

The proponent did not provide identification materials, but provides information relating to similar species in the supporting statement.

Provisional conclusions

Based on the information available at the time of writing, there is insufficient information to conclude with certainty that *Gazella dorcas* meets the criteria in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17) for its inclusion in Appendix II.

Note to Parties and proponents

Information from other range States on the status and trends of their populations as well as the primary threats to the species and management measures implemented would help inform the final assessment.

Proposal 3

Saiga tatarica (Saiga antelope)

Proposal: Amend annotation A2 to *Saiga tatarica* to read: "Zero export quota for wild specimens traded for commercial purposes, except for specimens from the population *Saiga tatarica* of Kazakhstan*"*.

Proponent: Republic of Kazakhstan

Provisional assessment by the Secretariat

CITES background

Saiga tatarica has been included in CITES Appendix II since 1995 based on proposals CoP9 Prop. 23 and Prop. 24 considered at the 9th meeting of the Conference of the Parties (CoP9; Fort Lauderdale, 1994). The proposal that was accepted at the time referred to two subspecies, *S. t. tatarica* and *S. t. mongolica*, the latter only occurring in Mongolia. Since 2007 and the adoption at the 14th meeting of the Conference of the Parties (CoP14; The Hague, 2007) of Wilson, D.E. & Reeder, D.M (ed.) (2005) as the principal taxonomic reference for all Mammalia taxa, these former two subspecies have been recognized by the CITES Parties as two distinct species, *Saiga tatarica* and *Saiga borealis*, and they have been listed separately in CITES Appendix II since that time.

At its 18th meeting (CoP18; Geneva, 2019) the Conference of the Parties considered a proposal to transfer *Saiga tatarica* from Appendix II to Appendix I (CoP18 Prop. 2). The proposal was submitted by Mongolia and the United States of America. An amended proposal CoP18 Prop. 2 to include the annotation "A zero export quota for wild specimens traded for commercial purposes" in the Appendix II listing for *Saiga tatarica* and *Saiga borealis* was accepted by consensus (CoP18 Com. I Rec. 10).

The saiga antelope (*Saiga* spp.) has been the subject of dedicated CoP decisions since the 13th meeting of the Conference of the Parties (CoP13; Bangkok, 2004), and of numerous documents and reports to regular meetings of the Standing Committee and the Conference of the Parties. At its 19th meeting (CoP19; Panama City, 2022) the Conference of the Parties considered document CoP19 Doc. 76 and adopted Decisions 19.213 to 19.217 on *Saiga antelope (*Saiga *spp.*). The Standing Committee considered document SC77 Doc. 65 that included an analysis of CITES annual reports and annual illegal trade reports and documents SC78 Doc. 68.1 and SC78 Doc. 68.2 (Rev. 1) submitted by the Republic of Kazakhstan and the Secretariat respectively during the intersessional period. The 20th meeting of the Conference of the Parties (CoP20, Samarkand, 2025) will consider documents CoP20 Doc. 85.1 (Report of the Secretariat) and 85.2 (document by Kazakhstan and the Russian Federation) under the agenda item on Saiga antelope (*Saiga* spp.).

Purpose and impact of the proposal

If the proposal is adopted, international trade in specimens of *Saiga tatarica* from the population of the Republic of Kazakhstan will be regulated in accordance with the provisions of Article IV of the Convention.

Annotation A2: *"*A zero export quota for wild specimens traded for commercial purposes*"*, will remain part of the Appendix II listing for all other populations of *Saiga tatarica* and while trade is regulated in accordance with the provisions of Article IV of the Convention, trade in wild specimens for commercial purposes from populations other than the populations from Kazakhstan cannot be authorized.

The adoption of the proposal will have no impact on existing regulation of trade in specimens of *Saiga borealis*, since this species is listed separately in Appendix II with the same annotation A2.

Compliance with listing criteria

Resolution Conf. 9.24 (Rev. CoP17) on *Criteria for amendment of Appendices I and II* does not contain guidelines for assessing the present proposal relating to a species already included in Appendix II. However, amending this substantive annotation could be considered as analogous to a transfer from

Appendix I to Appendix II for the trade in wild specimens for commercial purposes, for which paragraph 1 g) of Resolution Conf. 11.21 (Rev. CoP19) on *Use of annotations in Appendices I and II* provides that it should be in compliance with the precautionary measures contained in Annex 4 of Resolution Conf. 9.24 (Rev. CoP17). In light of the strict nature of the current annotation, the Secretariat undertook an assessment of the *Saiga tatarica* population in Kazakhstan against the criteria for inclusion in Appendix I.

The Secretariat notes that the proposal in Section A states that Kazakhstan proposes to amend the annotation for *Saiga tatarica* in Appendix II to read as follows: "Zero export quota for wild specimens traded for commercial purposes, except for specimens from the population *Saiga tatarica* of Kazakhstan". In the supporting statement in Section C, Kazakhstan states that "it would appear more appropriate to implement a strictly regulated model for the circulation of finished products manufactured from legally obtained biological materials within the country, while maintaining a ban on the export of raw horns" and "At the same time, the Republic of Kazakhstan is considering an alternative approach to the development of international trade in finished products made from saiga (*Saiga tatarica*) horn. The export of raw materials (unprocessed horns), however, remains strictly prohibited".

Although Kazakhstan considered the aforementioned alternatives allowing trade in finished products only, the Secretariat's understanding is that the proposal to be considered by the Conference of the Parties and therefore the one that informs this provisional assessment is not limited to finished products but is the one specified in Section A.

Kazakhstan reports a significant recovery in its population of *S. tatarica*, attributed to intensive conservation measures established by the Party. After a historic low of 21,000 individuals in 2003, Kazakhstan implemented a wide range of conservation measures and numbers rose steadily to 97,300 individuals in 2010; 102,000 individuals in 2011; and 295,470 individuals in 2015. A decline was experienced in 2015, mainly due to mass mortality events and by 2016 the total saiga population stood at 75,700 individuals. From 2016 to 2024, the population showed consistent annual growth, reaching 2.8 million in April 2024 with the Kazakh saiga population accounting for 99% of the global total population.

The supporting statement includes detailed information relating to the population structure, population trends and geographical trends of the Kazakh population of saiga. Saiga is a highly adaptable and fertile species, facilitating rapid population recovery. Females reach sexual maturity by eight months and typically give birth to twins from their second year of reproduction; 95% of adults and 80% of young females become pregnant annually. According to the proponent, the high fertility levels sustain the population even when the number of males drops to as low as 5%. High population density can lead to mass die-offs from disease outbreaks, though their reproductive potential and conservation efforts support strong recovery.

The range of *S. tatarica* comprises four main populations, three of which are primarily located in Kazakhstan (Betpak-Dala, Ural and Ustyurt). These populations exhibit varying degrees of transboundary movement, with the Betpak-Dala showing the largest migrations, while the Ustyurt population now remains mostly in northern Kazakhstan due to its reduced size and stable resources. The proponent indicates that as the population numbers increase, new territories are reclaimed and in addition to the three main populations in Kazakhstan, two additional sub-populations have formed in the Abay Region (northeast of the country) and the Aktobe Region (in western Kazakhstan). Nine specially protected natural areas play a key role in conservation and restoration of areas that are saiga habitat.

The supporting statement provides information on the population size and trends of *Saiga tatarica* in the Russian Federation, estimated at 40,000 individuals in 2024, as well as on the population of *Saiga borealis* in Mongolia, estimated at 23,251 individuals. The Secretariat notes that the same information was included in Table 1 of the following report: Overview report on Saiga conservation status and saiga MOU implementation of the 5th meeting of the Signatories to the Memorandum of Understanding concerning conservation, restoration and sustainable use of saiga antelope (MOS5, Astana, 2025). Almost all saiga populations have shown an increasing trend since 2021 but the rate of growth varied considerably between populations.

The proponent identifies poaching as the primary threat to *Saiga tatarica.* Poaching mainly targets males and results in skewed sex rations and insufficiencies in reproductivity. Habitat loss and disease transmission from livestock, particularly in Mongolia, further threaten the species, while in Kazakhstan, expanding saiga populations are increasingly coming into conflict with agricultural land use. Mass mortality events linked to disease outbreaks is considered a significant threat, although no major die-offs have occurred since 2015. An analysis of saiga population dynamics since 1980 by the proponent reveals 11 mass mortality events occurring approximately every 3.5 years, with an average loss of 34% of the affected population or 18% of the entire population. In Kazakhstan specialists from the Republican State Enterprise "Production Association “Okhotzooprom”" provide ongoing protection and monitoring of saiga and have an action plan in place for responding to cases of mass mortality. Linear infrastructure such as fences, roads, and railways restrict migration routes, naturally fragment large ranges that are crucial for maintaining viable population sizes, and contribute to the reduction of habitat areas and population numbers.

According to the supporting statement, meat, hides, and horns of the saiga have traditionally been used by hunters in Kazakhstan. Due to the decline in the population in the 1990s, Kazakhstan implemented a moratorium (ban) on saiga hunting with exceptions for scientific purposes in 1999 and extended it six times: in 2001, 2005, 2012, 2015, 2020, and 2023. The proponent asserts that these measures facilitated the recovery of the saiga population in Kazakhstan. A detailed summary of the current national legal instruments used by Kazakhstan to protect saiga and its habitat while creating conditions for the sustainable use of fauna is provided in the supporting statement and includes the regulation of permit procedures, requirements for accounting for rare and endangered species, and procedures for cooperation with environmental and scientific organizations to coordinate efforts to conserve ecosystems and maintain a sustainable balance in the wild.

The supporting statement includes detailed information relating to the rationale for the proposal that includes creating opportunities to mitigate social tensions associated with the conflict between farmers and saiga. According to Kazakhstan, the proposal "will enhance the ecological role of the saiga by creating incentives for its conservation and coexistence within the context of potentially conflicting land uses, particularly agriculture. The possibility of legal trade in wild saiga specimens for commercial purposes will make saiga conservation and management economically viable, benefiting local communities, hunting organizations and land users. Legal trade in wild saiga specimens for commercial purposes will also help prevent poaching and support lawful, scientifically grounded, and officially recognized measures for regulating the saiga population size to reduce conflicts with farmers. Furthermore, sustainable and economically profitable use of the saiga will serve as a strong argument in discussions on infrastructure development and extractive industries, which negatively impact saiga habitats".

With regards to the assessment of compliance with the precautionary measures contained in Annex 4 of Resolution Conf. 9.24 (Rev. CoP17), the proponent does not specify which precautionary measures the proposal is intended to meet but it is presumably subparagraphs A 2 a) ii) of Annex 4 to Resolution Conf. 9.24 (Rev. CoP19) based on the information in the supporting statement.

The proponent indicates that the proposed mechanism to establish a transparent and controlled system for managing the trade in saiga specimens, while minimizing illegal trade and contributing to the conservation of the species, includes the following key elements:

- A mandatory registration and marking system for saiga horns;
- The development of electronic databases to track legal circulation;
- Stricter criminal and administrative liability for illegal trade; and
- Monitoring and research to assess the effectiveness of implemented measures.

The proponent indicates that the system will be state-controlled, annual quotas for international trade will be established and surplus horn will be stored and could serve as reserves in cases of uncontrolled population decline due to natural causes, such as disease or harsh winters. Sustainable supply to the legal market will be provided without the need for excessive harvesting of saiga from the wild.

The Secretariat notes that specific annual export quotas are not proposed as part of the proposal. In terms of paragraph A 2 a) iii) of Resolution Conf. 9.24 (Rev. CoP17) a precautionary measure could be

an export quota as an integral part of an amendment proposal. This measure is however linked to the review process in paragraph B in Annex 4 of Resolution Conf. 9.24 (Rev. CoP17) which is not relevant to *S. tatarica* as the species was not included in Appendix I. Annual export quotas could be established in terms of Resolution Conf. 14.7 (Rev. CoP15) on *Management of nationally established export quotas*. The proponent could provide additional information relating to the process to establish annual quotas for international trade. The Secretariat notes that the trade in specimens of the species could be monitored and corrected where needed under the provisions of Resolution Conf. 12.8 (Rev. CoP18) on the *Review of significant trade in specimens of Appendix-II species.*

According to the proponent, the marking system is the primary element of the control system that will provide the necessary safeguards. The marking system will facilitate the identification of legally acquired horn and the traceability during trade and detailed information relating to this system including the control and management is provided in the supporting statement. Information relating to the marking of processed horn or manufactured products has not been provided. The national stockpile of legally obtained horns currently contains 42,161 horns obtained from population control measures, sustainable use by hunters and captive breeding. The stockpile management system established by Kazakhstan seems comprehensive. The Secretariat notes that information provided by other range States relating to their stockpile management practices is contained in document CoP20 Doc. 85.1.

The proponent reflects on illegal trade in *S. tatarica* and the enforcement efforts of Kazakhstan to address this. The Secretariat extracted data from the CITES Illegal Trade Database on 11th July 2025 for the period 2016 to 2024 (noting that the information for 2024 is incomplete because the deadline for submission of the 2024 Annual Illegal Trade Reports is 31st October 2025). A total of 20,757 horns are reported as seized in Annual Illegal Trade Reports between 2016 and 2023. In document SC78 Doc. 68.2 the Secretariat reported on seizure records between 2016 and 2022. It is noted that in 2023 and 2024 a total of 11,214 horns were seized. Four seizures included large scale seizures of more than 500 kg: one seizure of 3,200 horns by Mongolia (allegedly from Kazakhstan); and three seizures of 3,298, 1,803 and 1,335 horns seized by Russian Federation with country of origin Russian Federation. Kazakhstan reported 7 seizures of saiga horns between 2020 and 2023.

The proponent indicates that horns of seven other hoofed species with morphologically similar characteristics are sold in traditional Chinese markets to compensate for the shortage of saiga horns. It is not clear from the proposal whether horns from *Saiga tatarica* can be distinguished from horn from *Saiga borealis.* Since trade in wild specimens from other populations will not be allowed, the identification of horns, or processed items derived from them, in trade (legal / illegally sourced) should be further elaborated.

In summary, based on the information contained in the supporting document and summarized above, Kazakhstan's wild population of *S. tatarica* does not appear to meet the biological criteria in Annex 1 to Resolution Conf. 9.24 (Rev. CoP17). The wild population is not small, it does not have a restricted area of distribution and there is no marked decline in the population size in the wild. The wild population has rebounded to a record high number, which has facilitated migration and dispersal of the species.

Management measures and controls outlined in the proposal also suggest that these may be sufficient to meet the precautionary measures in Annex 4 of Resolution Conf. 9.24 (Rev. CoP17), specifically in subparagraphs A 2 a) ii) A) and B). Additional information relating to these measures will assist in informing the final assessment to ensure the measures are proportionate to the anticipated risks to the species.

Additional considerations

The Secretariat submitted document CoP20 Doc. 85.1 (Rev.1) on *Saiga antelope (*Saiga *spp.)* and Kazakhstan and the Russian Federation submitted document CoP20 Doc. 85.2 on the same item for consideration at the 20th meeting of the Conference of the Parties (CoP20; Samarkand, 2025).

Document CoP20 Doc. 85.1 includes information on the discussions and outcomes of MOS5, including the main conservation needs in the *Overview Report on Saiga Conservation Status and Saiga MOU Implementation* (Overview Report) in English and Russian. This includes the *Sustainable use of the species in Kazakhstan*. The Medium Term International Work Programme (MTIWP) for 2025 – 2030

includes a section on *Sustainable use and trade* with specific actions to be implemented including on stockpile management, creation of national databases and benefits to local communities.

The Secretariat notes that consultation with range States of *S. tatarica* and *S. borealis* have taken place and the responses received from two range States (Mongolia and Russian Federation) are reflected in section 10 of the supporting statement, including responses from Kazakhstan. Issues raised by range States include the need for detailed information demonstrating the regulatory control systems to be implemented, the method to be used to establish quotas, consideration of processing of horns within Kazakhstan to restrict trade to finished products, regional cooperation, the establishment of an information database and restrictions on the removal of specimens from specific populations. The Secretariat notes the responses provided by the proponent including the continued consideration of maintaining the ban on exports of unprocessed saiga horns with international trade in biologically active supplements and pharmaceutical products. Additional information on the precautionary measures associated with the international trade in finished products derived from saiga horn would be helpful to inform the assessment.

Provisional conclusions

Based on the information available at the time of writing, it appears that the population of *Saiga tatarica* in Kazakhstan would not meet the criteria contained in Annex 1 to Resolution Conf. 9.24 (Rev. CoP17) and, on that basis, would not warrant continued inclusion in the annotation, however, it is not yet clear if all the precautionary measures are met. The species continues to meet criterion B in Annex 2a.

Notes to proponent

Information relating to precautionary measures or safeguards relating to international trade in specimens other than horn, including finished products will be helpful to inform the final assessment.

Furthermore, information on the processes involved in the establishment of annual export quotas will be useful as well as information relating to the means to distinguish between raw horns and derivates (such as finished products) derived from *S. tatarica* from Kazakhstan and other populations of *S. tatarica* and *S. borealis.*

Proposal 4

Giraffa camelopardalis (Giraffe)

Proposal: Delete the populations of Angola, Botswana, Eswatini, Malawi, Mozambique, Namibia, South Africa and Zimbabwe from Appendix II.

Proponents: Namibia, South Africa, United Republic of Tanzania and Zimbabwe

Provisional assessment by the Secretariat

CITES background

Giraffa camelopardalis was included in Appendix II at the 18th meeting of the Conference of the Parties (CoP18; Geneva, 2019; CoP18 Prop. 5). There have been no other proposals for the species. Reservations were placed on the inclusion of the species in Appendix II by Botswana, Democratic Republic of Congo, Eswatini, Namibia, South Africa, United Republic of Tanzania, Zambia and Zimbabwe.

Purpose and impact of the proposal

The proposal seeks to remove from Appendix II the populations of *G. camelopardalis* of Angola, Botswana, Eswatini, Malawi, Mozambique, Namibia, South Africa and Zimbabwe. If the proposal was adopted, trade from these populations would no longer be regulated by the Convention.

Compliance with listing criteria

The proponents state that the specified populations do not meet the criteria for listing in accordance with Article II, paragraph 2 (a), of the Convention and that neither criterion A nor criterion B of Annex 2 a to Resolution Conf. 9.24 (Rev. CoP17) on *Criteria for amendment of Appendices I and II* is met nor either of the criteria in Annex 2 b.

Based on recent taxonomic divisions, the proponents treat the subspecies *G. c. giraffa* (southern giraffe) as a separate species (*G. giraffa*) with two separate subspecies (*G. g. angolensis* and *G. g. giraffa)* and so state that there would then be no split-listing and the provisions of Annex 3 of the same Resolution would be met. As a result, the proponents state that other three threatened species of giraffe (based on recent taxonomic divisions) "would remain included in Appendix II of CITES which would meet the conservation objectives of those range States that believe CITES is a useful legal instrument for protecting their populations of giraffe".

The proponents note that the southern giraffe, has a wide distribution across Southern Africa (nine range States[4]) occupying savanna and wooded landscapes preferentially. The southern giraffe has an estimated population of 68,837 individuals of which approximately 30,005 occur in South Africa. Of the latter, around 16,000 occur within state protected areas with 12,270 alone in Kruger National Park in 2023. The proponents note that the species can be counted by air with a high degree of precision. Of the nine range States, populations trends are increasing in all apart from Namibia where they are stable (at around 14,000 animals) with increases occurring in protected areas and privately-owned game ranches. The species is categorized in the IUCN Red List Assessment (2016) as Vulnerable, which also notes the increasing population sizes of *G. c. angolensis* and *G. c. giraffa* with the subspecies *G. c. angolensis* (occurring in Angola, Botswana and Namibia) categorized in 2018 as Least Concern (note that the standard nomenclature reference for mammals contained in the Annex to Resolution Conf. 12.11 (Rev. CoP19) on *Standard Nomenclature* treats this subspecies as a synonym of *G. c. giraffa*). The proponents state that the southern giraffe is treated as Least Concern on the "IUCN

[4] Angola, Botswana, Eswatini, Malawi, Mozambique, Namibia, South Africa, Zambia, and Zimbabwe

Regional Red List", which presumably refers to the inclusion of *G. c.* giraffa as Least Concern in the *2016 Red List of mammals of South Africa, Swaziland and Lesotho*[5].

The supporting statement notes that the species overall is threatened by habitat loss and fragmentation due to fencing and agriculture, isolating populations and reducing gene flow. Illegal hunting for wild meat or trophies occurs in regions with limited law enforcement.

In Southern Africa, giraffes are used for ecotourism, live trade, trophy hunting, trade in bones and skins, and for meat. Live specimens, hunting trophies and other giraffe parts and derivative are traded internationally and according to the proponents 99.5% of all trade comes from Southern Africa (94% of the specimens in trade originates in South Africa). The supporting statement notes that most hunting trophies originate from South Africa where, between 2010 and 2023, 3,598 animals were hunted by international clients and a further 300 culled or hunted by domestic hunters. Live animals are also traded to zoos or for translocations into nearby range States. Illegal killing is considered small to neglible for domestic use and the proponents state there is no evidence of illegal killing of giraffes for international trade.

The proponents note that the inclusion of giraffe in Appendix II in 2019 has created a range of operational challenges and administrative burdens despite the reservations taken on the listing. The supporting statement notes that the giraffes are a protected species in Angola, Botswana, Eswatini, Nambia, South Africa and Zimbabwe; no information is provided on Malawi or Mozambique. Permits are required for hunting in South Africa with dual management by both private owners and government based on the results of monitoring and within an adaptive management framework. The supporting statement suggests that sufficient measures are in place across all Southern African range States to regulate any harvests to ensure sustainability as evidenced by increasing or stable populations. The proponents further state that the southern giraffe can be readily distinguished by its pelage patterns and by the shape of the cranium. They also suggest that the chances of encountering other species of giraffe in trade from Southern Africa are remote. However, the presence of hybrids between the two subspecies of the southern giraffe has occurred in some areas due to translocations.

It was the view of the Secretariat, in their assessments of proposals to amend Appendices I and II at the 18th meeting of the Conference of the Parties (CoP18, Geneva, 2019), contained in document CoP18 Doc. 105.1 Annex 2, that *G. camelopardalis* did not meet the criteria then for inclusion in Appendix II. In relation to the populations of these eight countries included in the current proposal, the evidence supports a similar conclusion here. The population in these countries is large and growing especially in the range State, South Africa, from which the vast majority of trade is derived. This was the case before the species was included in Appendix II in 2019. The harvest of specimens from the wild is also clearly not reducing the wild populations to levels at which their survival might be threatened by continued harvesting or other influences as outlined in criterion B of Annex 2a of Resolution Conf. 9.24 (Rev. CoP17). Given that the population is large and growing, does not have a restricted area of distribution and is not declining, nor would these populations seem likely to become eligible for inclusion in Appendix I in the near future, even in the absence of the regulation of trade, they would not appear to meet criterion A of Annex 2a of the same Resolution.

Paragraph A 4 of Annex 4 to Resolution Conf. 9.24 (Rev. CoP17) suggests that no species should be deleted from Appendix II if such deletion would be likely to result in it qualifying for inclusion in the Appendices in the near future. Given the current management measures implemented by the Parties, especially those accounting for the majority of trade, it seems unlikely that if these populations were deleted from the Appendices that this would result in them qualifying for inclusion in the Appendices in the near future. Additionally, paragraph A 5 of Annex 4 to Resolution Conf. 9.24 (Rev. CoP17) indicates that no species should be deleted from Appendix II if, within the last two intervals between meetings of the Conference of the Parties, it has been subject to a recommendation under the provisions of the Review of Significant Trade to improve its conservation status. These populations have not been subject to recommendations under the provisions of the Review of Significant Trade in the last two intervals between meetings of the Conference of the Parties.

[5] Child MF, Roxburgh L, Do Linh San E, Raimondo D, Davies-Mostert HT, editors. The 2016 Red List of Mammals of South Africa, Swaziland and Lesotho. South African National Biodiversity Institute and Endangered Wildlife Trust, South Africa. Available here and species listings here. Accessed 28 July 2025.

However, the proposal would create a split-listing. Even under the nomenclature preferred by the proponents (which has not been adopted by Parties), one range State of the proposed *G. giraffa*, Zambia, is not included in the proposal. Zambia is also a range State for a separate subspecies of giraffe, *G. c. tippelskirchi* (O'Connor et al. 2019 [6]). Using the current standard reference for nomenclature, the proposal would delete the populations of eight Parties from the listing in Appendix II of *G. camelopardalis*. Annex 3 to Resolution Conf. 9.24 (Rev. CoP17) states that split-listings that place some populations of a species in the Appendices and the rest outside should not normally be permitted but that split-listings, when they occur, should generally be on the basis of national or regional populations rather than subspecies.

Additional considerations

As noted above, the proponents prefer to use a different taxonomy than that in the standard reference (Wilson and Reeder, 2005) adopted by the Parties in the Annex to Resolution Conf. 12.11 (Rev. CoP19) on *Standard Nomenclature* but do not propose an amendment to this. Any amendments to the Appendices would thus use the currently accepted standard reference. Parties could consider whether there is a need to request the Animals Committee to address the nomenclature matters raised in the supporting statement.

The proponents note that they had consulted the range States for the southern giraffe (*G. c. giraffa*) only but not those for other subspecies even though the inclusion in the Appendices of giraffe is at the species level.

In October 2017, *G. camelopardalis* was listed in Appendix II of the Convention on the Conservation of Migratory Species of Wild Animals.

Provisional conclusions

Based on the information available at the time of writing, it appears that the populations of *Giraffa camelopardalis* in Angola, Botswana, Eswatini, Malawi, Mozambique, Namibia, South Africa and Zimbabwe do not meet the criteria in Annex 2a or 2b of Resolution Conf. 9.24 (Rev. CoP17) for their inclusion in Appendix II.

Their deletion from the Appendices would appear to meet the relevant precautionary measures in Annex 4 of Resolution Conf. 9.24 (Rev. CoP17) but would create a split-listing against the guidance provided in Annex 3 to the same Resolution.

[6] O' Connor D. *et al*. 2019. Updated geographic range maps for giraffe, *Giraffa* spp., throughout sub-Saharan Africa, and implications of changing distributions for conservation. Mammal Review 49, 285-299. Available here.

Proposal 5

Okapia johnstoni (Okapi)

Proposal: Include in Appendix I

Proponent: Democratic Republic of Congo

Provisional assessment by the Secretariat

CITES background

The species is not included in the CITES Appendices. It is the only species in the genus.

Purpose and impact of the proposal

The proposal seeks to include *Okapia johnstoni* in Appendix I, in accordance with Article I of the Convention. If the proposal is adopted, trade in specimens of the species will be regulated in accordance with the provisions of Article III of the Convention.

If *O. johnstoni* is included in Appendix I, operations breeding the species for commercial purposes would need to be registered with the Secretariat in accordance with Resolution Conf. 12.10 (Rev. CoP15) on *Registration of operations that breed Appendix-I animal species in captivity for commercial purposes*.

Compliance with listing criteria

The supporting statement suggests that inclusion of *O. johnstoni* in Appendix I satisfies criteria A i) and B iv) in Annex 1 of Resolution Conf. 9.24 (Rev. CoP17).

Okapia johnstoni, a large member of the family Giraffidae is endemic to the Democratic Republic of the Congo (DRC) where it is found in the tropical forests of central and north-eastern of the DRC. It is a visually striking medium-sized giraffid with a short velvety, chocolate-brown coat, which strongly contrasts with their black and white striped haunches.

According to the supporting statement, the population of *O. johnstoni* was estimated at between 35,000 and 50,000 individuals, based on the first survey data from the Maiko and Okapi Wildlife Reserve (OWR) in the 1990s as well as the known distribution of densities throughout its range. Since then, the population density in OWR has declined by more than 40% between 1995 and 2007, and by 47% between 2008 and 2012 based on the information provided in the supporting statement. The proponent indicates that it is likely that at least 60% of the remaining population of the OWR has been lost and that declines similar to those in OWR have happened in other parts of the species' range or that the species has probably been extirpated from large parts of its range.

The species is rarely observed directly because of its secretive and solitary nature, cryptic markings and dense rainforest habitat. As a result, knowledge on the behaviour and ecology of this species is limited. Based on the information contained in the IUCN Red List Assessment[1], the survey methods used to determine population size are mainly based on dung surveys using distance sampling methodology. Seasonal differences in dung decay rates complicate comparisons between various sets of surveys. The area of occupancy (AOO) is 14,112 km^2, based on a grid of 5.6 x 5.6 km, the size used by most reported surveys, and 450 (3.5%) of 12,764 grid squares with confirmed presence. The AOO figure is however considered likely to be a substantial underestimate according to the information in the IUCN Red List Assessment, because surveys have been conducted in only 1,994 (15.6%) out of 12,764 grid squares so far.

The species reaches sexual maturity at about two years of age, gestation lasts about 14-15 months, one offspring is normally produced and the interbirth interval is two to three years. These reproductive characteristics could result in the species being more vulnerable to exploitation and to extrinsic factors.

The species was categorized in the IUCN Red List as Endangered in 2013 and, although there is no reliable estimate of the current population size, the rate of decline is estimated to have exceeded 50% over three generations (24 years)[7], exceeding the level suggested in Annex 5 to Resolution Conf. 9.24 (Rev.CoP17) as a general guide for a marked recent rate of decline.

Habitat loss due to artisanal and semi-industrial mining in the eastern part of the distribution range and logging and slash-and-burn agriculture in the western part of its distribution pose a threat to the species according to the supporting statement. A recent study by Tatoutchoup (2025)[8] found that artisanal mining is the primary driver of okapi population decline, accounting for 98% of the observed decrease since 2009. The study also identified habitat loss due to logging and wood harvesting as another significant threat. Both threats exacerbate the species vulnerability to illegal killing and human encroachment. Tatoutchoup (2025) notes that the empirical analysis was carried out with a relatively small sample size due to the data's periodicity (annual) and availability and that they relied on a calibration of the okapi population.

According to the supporting statement the five macrozones (OWR, Maiko National Park, Lomani National Park, Virunga-Mont Hoyo and the Rubi-Tele zone) or protected areas in the okapi's range, besides the production forests, are protected by their status as national parks or reserves under the national legislation of the DRC. According to the proponent, these protected areas have management and/or zoning plans that distinguish between zones with multiple uses, making it possible to reduce anthropic pressures. Based on the information provided in the supporting statement, the zoning in OWR has been completed and the strictly protected core area (282,000 ha - 20% of the surface area of OWR), is the area that offers the highest conservation guarantee for the okapi.

The Secretariat notes that the OWR was included in the List of World Heritage in Danger in 1997 and at the 47th session of the World Heritage Committee that took place in July 2025 in Paris, the Committee adopted Decision 47 COM 7A.11 on OWR. This includes a request to the Party to provide further details on plans to capture okapi from the wild to repopulate the okapi breeding station and recalling that the DRC should develop an integrated *in-situ* and *ex-situ* conservation strategy within the framework of the Development and Management Plan for OWR. It seems that confirmation relating to the formalization of the Central Integral Conservation Zone is outstanding.

In addition to the threats posed by habitat loss and artisanal mining, the proponent states that hunting for both domestic and international trade is a main threat to the species. Hunting involves, according to the proponent, targeting the species for wild meat, skin and oil, the latter used for "supposed medicinal properties".

The supporting statement indicates that illegal international trade takes place mainly across the border with Uganda and includes okapi skins, meat, bones and fat. Information relating to seizures in Uganda is provided in the supporting statement as well as information on an investigation done by a local NGO that estimates that products from up to 10 *O. johnstoni* have been crossing the border every month since 2019.

O. johnstoni is a fully protected species in terms of national legislation and according to the supporting statement no specimens may be exported for commercial purposes. The proponents treat the section on legal trade in the supporting statement as not applicable and provide no information on it.

Captive breeding of *O. johnstoni* has been difficult according to the proponent and no commercial captive breeding is taking place, but information relating to successful breeding in zoological gardens is shared. The Secretariat notes that captive breeding also seems to form part of the interventions under the UNESCO World Heritage process. The proponent states that an European breeding program (EEP) coordinated by Antwerp Zoo organizes captive breeding of the okapi. The Secretariat notes that the

[7] Mallon, D., Kümpel, N., Quinn, A., Shurter, S., Lukas, J., Hart, J.A., Mapilanga, J., Beyers, R. & Maisels, F. 2015. *Okapia johnstoni*. *The IUCN Red List of Threatened Species* 2015: e.T15188A51140517. https://dx.doi.org/10.2305/IUCN.UK.2015-4.RLTS.T15188A51140517.en. Accessed on 20 July 2025.

[8] Tatoutchoup, D., 2025. Okapi Survival Threats: A Population Reconstruction and Threat Analysis. *African Journal of Ecology*, *63*(2), p.e70032. Accessed on 20 July 2025

European Association of Zoos and Aquaria (EAZA) published a Best Practice Guidelines for Okapi (*Okapi johnstoni*) in 2024.

Based on the information contained in the supporting statement, the wild population is not small considering the guidance in Annex 5 relating to a small wild population; the species is an endemic but the area of occupancy does not seem to indicate that the wild population has a restricted area of distribution; and although there is no reliable estimate of the current population size, the rate of decline is estimated to have exceeded 50% over three generations (24 years). The species is vulnerable to extrinsic factors, including a decrease in area and quality of habitat due to among others, the artisanal and semi-industrial mining taking place in one of the key areas in its range in DRC.

Provisional conclusions

Based on the information available at the time of writing, *Okapia johnstoni* appears to meet criterion C. ii) of Annex 1 to Resolution Conf. 9.24 (Rev. CP17) for inclusion in Appendix I

Notes to Parties and proponent:

The proponent could consider providing further information relating to the formalization of the protection zone in OWR, the status of the okapi breeding programme and breeding station, the development of an integrated *in-situ* and *ex-situ* conservation strategy within the framework of the Development and Management Plan for OWR, and measures implemented to address the illegal international trade of wild meat, skins and fat between the DRC and Uganda, and the impact of these measures.

Proposal 6

Hyaena hyaena *(*Striped hyena)

Proposal: Include in Appendix I.

Proponents: Israel and Tajikstan

Provisional assessment by the Secretariat

CITES background

Hyaena hyaena was included in Appendix III at the request of Tunisia in 1976 and removed a year later. The species was included in Appendix III again at the request of Pakistan in 2014.

Purpose and impact of the proposal

The proposal seeks to include *H. hyaena* in Appendix I, in accordance with Article II of the Convention. If the proposal is adopted, international trade in specimens of this species will be regulated in accordance with the provisions of Article III of the Convention. The species would also be deleted from Appendix III.

If *H. hyaena* is included in Appendix I, operations breeding the species for commercial purposes would need to be registered with the Secretariat in accordance with Resolution Conf. 12.10 (Rev. CoP15) on *Registration of operations that breed Appendix-I animal species in captivity for commercial purposes*.

Compliance with listing criteria

The supporting statement suggests that inclusion of *Hyena hyaena* in Appendix I satisfies criterion C i) and ii) in Annex 1 to Resolution Conf. 9.24 (Rev. CoP17) on *Criteria for amendment of Appendices I and II*.

The species has an extensive range across north and east Africa, the Middle East and into central Asia and the Indian sub-continent comprising 38 range States with a further nine countries uncertain of its status. It is the only hyena with a range that stretches outside sub-Saharan Africa occupying a wide range of, typically, open habitats.

The species is usually solitary but can occur in pairs or small family groups and occurs at very low densities with large home ranges. The species breeds year-round with litters of 3-4 cubs after a gestation period of about 90 days and both parents may care for the offspring. It is predominantly a scavenger of carrion. In doing so, the proponent notes that it helps to clean the environment and reduce the spread of disease.

The habitat of *H. hyaena* is subject to increasing encroachment by agriculture and the expansion of urban and other development. This not only reduces the space available for the species but also increases human-wildlife conflict.

The global population is estimated to number between 5,000-10,000 individuals but the supporting statement notes that accurate population estimates are challenging and these figures are uncertain with limited monitoring programs in place. The proponents suggest that a precautionary approach is taken and that the lower population estimate should be used. The species is also reportedly declining due to threats outlined below and in some areas has been extirpated and remaining populations are restricted to protected or remote areas. The IUCN Red List categorizes the species globally as Near Threatened and as Vulnerable around the Mediterranean, but the assessments were made in 2014 and 2008 respectively and are noted as needing to be updated. The supporting statement suggests that the species is approaching the threshold to meet the criteria for a global status of Vulnerable with a reduction projected of at least 10% over three generations.

Threats to the species include, as noted above, habitat loss, human-wildlife conflict, direct persecution including by poisoning, and taking for illegal trade in live specimens (cubs) and body parts for medicinal

or other uses. National utilization is extensive with demand for various body parts and derivatives (such as bones, skins, eyes and organs) which can drive illegal hunting and trade. Much of this trade is illegal but the proponents note that this is difficult to monitor and control. Cubs are reportedly captured and sold as pets or for display in zoos and elsewhere. It is not clear how much of this illegal trade is cross-border. The illegal trade is reported by the proponents as having a severe impact on the population. The Secretariat notes that one seizure was recorded in the CITES Illegal Trade Database (reported by Canada) and that the United States indicated in its response to the consultation process that it seized six live specimens and one trophy between 2014 and 2024.

There is limited legal international trade, this includes trade in hunting trophies (predominantly from the United Republic of Tanzania), trade for scientific purposes and trade in live specimens to zoos, some of captive bred origin. The proponents suggest that at least 58 striped hyenas were exported between 2015 and 2024. The Secretariat notes that at least 19 live specimens in trade were recorded as captive bred by exporting countries, but the proponents provide no information on captive breeding in the supporting statement.

According to the supporting statement, the species is protected in many range States, but details are not provided. Other than its inclusion in Appendix III, there are no other international measures. The proponents suggest the species is migratory but this suggestion is not supported by the IUCN Red List assessment.

Conservation and monitoring measures are reported to be lacking in most range States as are initiatives to address issues such as human-wildlife conflict, for example. The only action plan, produced by IUCN in 1998, is now outdated. The large home ranges of the species and that they frequently inhabit human-dominated landscapes makes their conservation more difficult.

The supporting statement notes that two other hyena species (*Crocuta crocuta* and *Parahyaena brunnea)* are broadly similar but does not indicate if these are likely to be in international trade or not and whether parts and derivatives are likely to be readily distinguishable from the species proposed for inclusion in Appendix I. The Secretariat notes that *P. brunnea* was deleted from the Appendices following the 11th meeting of the Conference of the Parties (CoP11, Nairobi, 2000) after first being transferred from Appendix I to II at the ninth meeting of the Conference of the Parties (CoP9, Fort Lauderdale, 1994).

The proposal is based on the species meeting the criteria for a ‘marked decline’ in criterion C i) and ii) of Annex 1 to Resolution Conf. 9.24 (Rev. CoP17). The Secretariat recognizes that there is considerable uncertainty in the data that are available and that it is desirable to gather more quantitative data.

It appears that the species faces a number of different pressures and is experiencing declines and local extirpations across its range. However, few of these declines are quantified. Declines that are quantified for the species are provided by the global IUCN Red List assessment as being close to 10% projected over the following three generations and, for the Mediterranean, a decline at a rate that exceeds 10% in 3 generations with, locally, more severe declines (for example, in Morocco surveys show a decline of >75% between 2000 and 2007). Referring to the guidance on marked decline in Annex 5 to Resolution Conf. 9.24 (Rev. CoP17), a general guideline for a marked recent rate of decline is a percentage of 50% or more in the last 10 years or three generations, which is greater than the decline indicated for *H. hyaena*. However, the guidance in Annex 5 goes on to suggest that if the population is small, then a lower rate of decline may be appropriate (20% over two generations). The lower population estimate for the species (5000 individuals) places it at the upper end of the guidelines in the same Annex for a small population of a low productivity species but, even so, the projected decline would not seem to approach the suggested rate of decline in Annex 5. Based on the information available at the time of writing, it seems difficult to conclude that the species meets the decline criterion.

Additional considerations (including relevant CoP recommendations)

Tajikstan consulted with range States and Parties via Notification to the Parties No. 2025/019; a summary of their responses is contained In Annex 2 to the proposal.

Provisional conclusions

Based on the information available at the time of writing, it appears that *Hyaena hyaena* does not meet the biological criteria in Annex 1 of Resolution Conf. 9.24 (Rev. CoP17) for its inclusion in Appendix I.

Proposal 7

Arctocephalus townsendi (Guadalupe fur seal)

Proposal: Transfer from Appendix I to Appendix II.

Proponents: Mexico and the United States of America

Provisional assessment by the Secretariat

CITES background

A. townsendi was listed in Appendix II in 1975. At the first meeting of the Conference of the Parties (CoP1; Bern, 1976) the proposal to include the genus *Arctocephalus* spp. in Appendix II was adopted. *A. townsendi* was subsequently transferred to Appendix I in 1979 after the second meeting of the Conference of the Parties (CoP2; San José, 1979). It is the only member of the genus included in Appendix I.

This proposal has been prepared by Mexico and the United States of America in the context of Resolution Conf. 14.8 (Rev. CoP19) on *Periodic Review of species included in Appendices I and II*. At its 33rd meeting (AC33; Geneva, 2024), Mexico presented a periodic review of *A. townsendi* recommending the transfer of the species from Appendix I to Appendix II. The Animals Committee agreed that with reference to the criteria in Resolution Conf. 9.24 (Rev. CoP17) on *Criteria for amendment of Appendices I and II*, that it would be appropriate to transfer *A. townsendi* from Appendix I to Appendix II, in accordance with paragraph 3 i) i) of Resolution Conf. 14.8 (Rev. CoP19) (AC33 SR). Mexico and the United States of America, as range States, therefore submitted the proposal for consideration at the present meeting.

Purpose and impact of the proposal

The proposal seeks to transfer *A. townsendi* from Appendix I to Appendix II, in accordance with the precautionary measures in Annex 4 of Resolution Conf. 9.24 (Rev. CoP17) on *Criteria for amendment of Appendices I and II*. If the proposal is adopted, international trade in specimens of this species will be regulated in accordance with the provisions of Article IV of the Convention.

Compliance with listing criteria

Concerning the transfer of the species to Appendix II, the proponent asserts that international trade does not constitute a threat to the species, that it no longer meets the criteria for inclusion in Appendix I and should be transferred from Appendix I to Appendix II in accordance with precautionary measures A 1 and A 2 in Annex 4 to Resolution Conf. 9.24 (Rev. CoP17). The population of the species is not small, is not restricted in its distribution and is not in decline.

Criterion A 1 of Annex 4 to Resolution Conf. 9.24 (Rev. CoP17), however, relates only to removing a species listed in Appendix I from the Appendices. The Secretariat understands that the intention is not to delete the species from the Appendices, but rather to transfer it to Appendix II as part of the higher taxon listing of the genus *Arctocephalus* spp. The proposal notes the species is not in demand in trade and a transfer to Appendix II would not stimulate such trade (criterion A 2 a) i) of Annex 4 to Resolution Conf. 9.24 (Rev. CoP19)) and the relevant enforcement and compliance measures are sufficient to meet the requirements of the Convention (criterion A 2 a) ii) A) and B)), presumably if any such demand were to arise.

The supporting statement reports that *A. townsendi* is distributed along the Pacific coastlines of Mexico and the United States of America with some records from Canada and rarely from Alaska. The species feeds on a diversity of prey in coastal and oceanic waters coming to land to breed, moult or rest. The coastline occupied is typically rugged with numerous coves and other inlets. Animals have a strong fidelity to natal colonies and a long lifespan.

All the breeding colonies are currently in Mexico especially on Guadalupe Island, where 99% of births take place. Recently, the San Benito Archipelago has been re-colonized with births there since 2007

accounting for the remaining 1% (with 59 pups in 2022). An increasing number of other sites are also being used as non-breeding colonies or haul-outs including the Farallón islands near San Francisco, California.

The proposal reports that in the 1920s the species was thought to be extinct due to overexploitation for its skins in the 18th and 19th centuries. A breeding colony was discovered in 1954 and the population of around 200 then has since, with protection in Mexico and the United States of America, shown a dramatic recovery to 34,000 – 44,000 individuals today with an estimated growth rate of 10 – 11% *per annum*. However, as the pre-exploitation population size has been estimated at 100,000 – 200,000 individuals, there seems scope for further population increase and recolonization of former breeding sites in future. The species is categorized as Least Concern in the IUCN Red List (2014).

The proponents report that the main anthropogenic threats to the species include pollution, including from oil spills and ingestion of plastics, entanglement in fishing gear, the presence of invasive alien species on Guadalupe and the related spread of leptospirosis, and the impact of El Niño events affecting food availability causing minor and temporary declines.

The supporting statement also states that there has been very limited international trade since the species was first listed with over half of reported trade being for scientific purposes. Any commercial trade occurred before 1993 or involved pre-Convention specimens. Apart from three live specimens traded from the US to Mexico from 1993 to 1994, all other trade was in parts and derivatives. The supporting statement notes the absence of any substantive evidence of illegal trade. Given existing prohibitions by Mexico and the United States on the capture and trade of marine mammals, and the lack of any national or international market, no commercial trade is foreseen.

The proponents note that Mexico has a Conservation Action Programme for the species and a population monitoring programme. The main breeding site, Guadalupe island is a Biosphere Reserve and all breeding sites in Mexico are in protected areas; the species occurs in protected areas in the United States also. No captive breeding programmes are known.

The proponents state that the existing State and federal legislation and regulations provide adequate protection for the species and no extractive use will be permitted if the species is transferred to Appendix II.

Similar species include, according to the proposal, sea lions (Otariinae) from which *Arctocephalus* species can be distinguished by their hair or underfur. The eight species of *Arctocephalus* in the genus can be distinguished by a range of features but trade in most species is low with the exception of skins of A*. pusillus* which account for 90% of known trade. The proponents provide additional material to aid identification but note that whilst non-experts might find the skins difficult to distinguish they have expertise available to assist with this. No identification material is available for other parts and derivatives that might be traded.

In conclusion, the species does not have a small population, does not have a restricted range (though many individuals are concentrated at a few sites during the breeding season) and is not in decline, indeed it has staged a remarkable recovery. It does not appear to meet the biological criteria in Annex 1 of Resolution Conference 9.24 (Rev. CoP17) for retention in Appendix I. Nor does the species seem to be in demand in trade and the species is protected in its two main range States. Transfer to Appendix II is unlikely to stimulate trade, or cause enforcement problems for, any other species in Appendix I.

Additional considerations

The transfer of this species to Appendix II would mean that all species in the genus *Arctocephalus* would be included in Appendix II. The Animals Committee, at its 33rd meeting (AC33; Geneva, 2024) supported the submission of a proposal to transfer the species from Appendix I to Appendix II.

Provisional conclusions

Based on the information available at the time of writing, it appears that the population of *Arctocephalus townsendii* does not meet the criteria in Annex I of Resolution Conf. 9.24 (Rev. CoP17) for inclusion in

Appendix I; it can be transferred to Appendix II in accordance with the precautionary measures in paragraph A 2 a) i) of Annex 4 to the same Resolution.

Proposal 8

Monachus tropicalis (Caribbean monk seal)

Proposal: Delete from Appendix I.

Proponents: Mexico and the United States of America

Provisional assessment by the Secretariat

CITES background

Monachus tropicalis was included in Appendix I in 1975 as part of a higher taxon listing of *Monachus* spp. which included the two other members of the genus, *M. monachus* (Mediterranean monk seal) and *M. schauinslandi* (Hawaiian monk seal).

This proposal has been prepared by Mexico and the United States of America in the context of Resolution Conf. 14.8 (Rev. CoP19) on *Periodic Review of species included in Appendices I and II*. At its 33rd meeting (AC33; Geneva, 2024; Doc. AC33 SR), and previously at its 27th meeting (AC27; Veracruz, Mexico), the Animals Committee agreed that with reference to the criteria in Resolution Conf. 9.24 (Rev. CoP17) on *Criteria for amendment of Appendices I and II*, that it would be appropriate to delete *M. monachus* from the Appendices, in accordance with paragraph 3 i) i) of Resolution Conf. 14.8 (Rev. CoP19). Mexico and the United States of America, as range States, therefore submitted the proposal for consideration at the present meeting.

Purpose and impact of the proposal

The proposal seeks to delete the extinct species *Monachus tropicalis* from the Appendices in accordance with the precautionary measures in Annex 4 of Resolution Conf. 9.24 (Rev. CoP17). If the proposal is adopted, international trade in specimens of this species would no longer be subject to the provisions of CITES.

Compliance with listing criteria

The proposal aims to delete the extinct species *Monachus tropicalis* from Appendix I as it no longer meets the biological criteria (Annex 1) nor the precautionary criteria for possibly extinct species in Annex 4 D to Resolution Conf. 9.24 (Rev. CoP17) and to include the following note in the Appendices: "*Monachus* spp. (except *Monachus tropicalis* which is extinct and was removed from the Appendices on [insert date])"

The proponents state that the species has not been seen since 1952, long before its inclusion in the Appendices as part of the higher taxon listing of *Monachus* spp. The supporting statement notes that *M. tropicalis* used to occur in the Caribbean and Gulf of Mexico from the tip of Florida to Colombia and Venezuela. The species occupied coastal waters around the mainland, islands, cays and atolls and used sandy or rocky areas for breeding and resting. Their diet is not recorded but probably included fish, cephalopods and crustaceans and predation by the species probably had a major impact on the structure of prey populations and thus on the ecosystem.

The proposal notes that there are limited data on the size of the population prior to exploitation and extinction. However, it is estimated that there might have been from 233,000 – 380,000 individuals in the 17th century distributed between 13 colonies. The species was subject to significant over-exploitation for its blubber leading to a wave of extinction of colonies from the periphery to a core, such that it was already rare by the 19th century. The species was last sighted in 1952 and subsequent searches have failed to find any specimens. It was first categorized in the IUCN Red List as Extinct in 1986 with the latest re-assessment in 2014. Attempts to keep the species in captivity failed.

The proposal notes that there are no current uses of the species and the only recorded trade is of a single record of six pre-Convention specimens traded from the United States of American to Germany

in 2009. There is no documented illegal trade. Specimens of *M. tropicalis* remain in museum collections and might be moved across borders for scientific purposes in future.

The two other extant *Monachus* species are both recorded in trade. The proposal states that there have been 83 records of trade between “1878” (presumably a typographical error for 1978) and 2022, mainly for scientific purposes. These species are similar to *M. tropicalis*, however, the supporting statement notes that trade in “look-alike species” is low and the proponents claim they can be distinguished by pelage and bone features. Whether these differences are sufficient to enable enforcement officers to be able to distinguish between them is unclear.

Most former range States list the species as extinct and, accordingly, there is limited legal protection. In the unlikely event of the species being re-discovered, however, the proposal notes that in Mexico and the United States of America it would be automatically included in legal provisions to protect marine mammals.

As the species is extinct, it does not meet the criteria for continued inclusion in Appendix I. It also seems that the population can be deleted from the Appendices in accordance with the precautionary measures in section D of Annex 4 to Resolution Conf. 9.24 (Rev. CoP17) because the species is unlikely to be affected by trade in the event of its re-discovery (D 1), the deletion would not cause difficulties implementing the Convention (D 3) nor would their removal complicate the interpretation of the Appendices (D 4). The species does appear to resemble extant species included in the Appendices (namely the other *Monachus* species) and, if Parties were to strictly apply the precautionary measure in D 2, the species continued inclusion in the Appendices may be warranted. However, trade in both extant species is very low, strictly regulated and largely restricted to scientific specimens. Deleting *M. tropicalis* from the Appendices would seem to be proportionate to the anticipated risks.

Additional considerations

The proposal recalls that, at its 33rd meeting (AC33; Geneva, 2024), the Animals Committee agreed to submit for adoption by CoP20 a proposed nomenclature update concerning monk seals, now contained in Annex 3 to CoP20 Doc. 110 on *Standard Nomenclature*. If adopted, this would split the genus *Monachus* into two genera: *Monachus* (including *M. monachus* only) and *Neomonachus* (including both *N. tropicalis* and N. *schauinslandi*).

The proponents consulted with the Nomenclature Specialist over any annotation that might be required if the proposal were to be adopted. Their recommendation is to include a reference annotation in the Appendices that reads "*Monachus* spp. (except *Monachus tropicalis* which is extinct and was removed from the Appendices on [*insert date*])". If the revised nomenclature were adopted, then this annotation would refer to *Neomonachus* spp.

Range States were consulted by the proponents when the proposal was originally presented to the Animals Committee at its 27th meeting (AC27; Veracruz, 2024) and through a Notification to the Parties in 2025 (2025/001) and, of the eight that replied, none were opposed to the deletion of this species from the Appendices and some were in support.

Provisional conclusions

Based on the information available at the time of writing, it appears that *Monachus tropicalis* is extinct and is unlikely to be re-discovered. It does not meet the criteria contained in Annex 1 to Resolution Conf. 9.24 (Rev. CoP17) for continued inclusion in Appendix I.

The species appears to meet the precautionary measures in Annex 4 D for the deletion of possibly extinct species from the Appendices.

Proposal 9

Ceratotherium simum simum (Southern white rhinoceros)

Proposal: Amend the annotation of the population of *Ceratotherium simum simum* of Namibia listed in Appendix II.

For the exclusive purpose of allowing international trade in:

a) live animals for in-situ conservation only;

b) hunting trophies; and

c) trade in rhino horn stocks owned by the Government and the Private Landowners originating in the State (excluding seized rhinoceros horn and rhinoceros horns of unknown origin); subject to the following:

   i) only stocks registered with the Government;

   ii) only horns with RhODIS certificates;

   iii) only to trading partners that have been verified by the Secretariat, in consultation with the Standing; Committee, to have sufficient national legislation and domestics trade controls; and

   iv) not before the Secretariat has verified prospective importing countries and the registered stocks.

All other specimens shall be deemed to be specimens of species included in Appendix I, and the trade in them shall be regulated accordingly.

Proponent: Namibia

Provisional assessment by the Secretariat

CITES background

The entire rhinoceros family Rhinocerotidae was included in Appendix I in 1977. The listing was subsequently amended to exclude the subspecies now included in Appendix II, namely the populations of *Ceratotherium simum simum* of South Africa at the ninth meeting of the Conference of the Parties (CoP9; Fort Lauderdale, 1994; CoP9 Prop. 17), Eswatini at the 13th meeting of the Conference of the Parties (CoP13; Bangkok, 2004; CoP13 Prop. 9) and Namibia at the 19th meeting of the Conference of the Parties (CoP19; Panama City, 2022; CoP19 Prop. 2).

The South African population of *C. simum simum* was transferred to Appendix II in 1995 under the following annotation: “For the exclusive purpose of allowing international trade in live animals to appropriate and acceptable destinations and hunting trophies. All other specimens shall be deemed to be specimens of species included in Appendix I and the trade in them shall be regulated accordingly”. In 2004, Eswatini's population was transferred to Appendix II under the same annotation (now annotation A8).

At the 18th meeting of the Conference of the Parties (CoP18; Geneva, 2019) a proposal (CoP18 Prop. 9) was submitted by Namibia with an annotation which would have permitted trade in hunting trophies and in live animals to appropriate and acceptable destinations. That proposal was rejected (CoP18 Com. I Rec. 13 (Rev. 1)). At the 19th meeting of the Conference of the Parties (CoP19; Panama City, 2022) a similar proposal (CoP19 Prop. 2) was submitted by Namibia but it referred to trade in live animals for *in-situ* conservation only and for hunting trophies. During discussions, the proposal was amended to add “and only within the natural and historical range of *Ceratotherium simum* in Africa” and to delete the reference to hunting trophies. The amended proposal was adopted (CoP19 Com. I Rec. 10).

The annotation (A9) adopted at CoP19 in 2022 for Namibia differs from annotation A8 that is part of the Appendix II listing for the populations of Eswatini and South Africa and reads as follows: “The population of Namibia of *Ceratotherium simum simum* is included in Appendix II for the exclusive purpose of allowing international trade in live animals for *in-situ* conservation only, and only within the natural and

historical range of *Ceratotherium simum* in Africa. All other specimens shall be deemed to be specimens of species included in Appendix I and the trade in them shall be regulated accordingly".

At the 17th meeting of the Conference of the Parties (CoP17; Johannesburg, 2016), Parties considered a proposal from Eswatini (CoP17 Prop. 7) to amend the existing annotation on the Appendix-II listing of its *C. s. simum* population, so as to permit a limited and regulated trade in rhinoceros horn, which had been collected in the past from natural deaths, or recovered from poached rhinoceroses, as well as horn to be harvested in a non-lethal way in the future, from a limited number of white rhinoceroses in Eswatini. The proposal was rejected. At both CoP18 (2019) and CoP19 (2022), Parties considered a proposal (CoP18 Prop. 8 and CoP19 Prop. 3 respectively) to remove the existing annotation on the Appendix II listing of *C. s. simum* in Eswatini. These proposals were rejected.

Purpose and impact of the proposal

The proposal seeks to change the current annotation A9 for the population of *Ceratotherium simum simum* from Namibia to remove reference to "and only within the natural and historical range of *Ceratotherium simum* in Africa" for trade in live specimens and to add hunting trophies and rhinoceros horn to the specimens included in the annotation for which trade could be allowed in accordance with Article IV of the Convention and under the conditions set out in the annotation. According to the present annotation, both hunting trophies and rhinoceros horns are "deemed to be specimens of a species in Appendix I and the trade in them shall be regulated accordingly".

Compliance with listing criteria

Resolution Conf. 9.24 (Rev. CoP17) does not contain guidelines for assessing the present proposal. However, amending this substantive annotation could be considered as analogous to a transfer from Appendix I to Appendix II of rhinoceros horn and hunting trophies, for which Resolution Conf. 11.21 (Rev. CoP19) provides that it should be in compliance with the precautionary measures contained in Annex 4 to Resolution Conf. 9.24 (Rev. CoP17).

The supporting statement notes that Namibia has the second largest population (1,500 individuals) of *C. s. simum* outside South Africa arising from an initial reintroduction of 16 animals in 1975. Between 2005 and 2024 the population had grown (including through imports) by 6.7% *per annum*. Even so, the proponent estimate the country has sufficient habitat for 14,000 white rhinoceros, equating to 17% (or 14m ha) of the country. Around 77% of *C. s. simum* inhabit privately-owned land. The subspecies *C. s. simum* is categorized as Near Threatened in the IUCN Red List (2020).

The major threat to the subspecies continues to be illegal killing driven by the high value of rhino horns in illegal trade. The proponent estimates prices on the black market at 20,000 USD per kilogram so that a single horn can command prices of USD 80-120,000. By contrast, according to the proponent, live rhinoceros sell for USD 10,000 and the report contained in Annex 3 to CoP20 Doc. 84 on *Rhinoceroses (Rhinocerotidae* spp*.)* suggests prices of up to USD 19,000. Namibia states that "This disparity spurs illegal hunting, as poachers stand to earn significantly more by killing a rhino than a landowner can realize by selling or conserving it".

The supporting statement suggests that a secondary threat is the rising costs of security to protect rhinos which has led many private owners to relinquish their rhino populations; around 77% of white rhinos currently inhabit privately-owned land. The proponent suggests, as part of their rational for the proposal, that other revenue streams from trophy hunting (averaging 14 hunting trophies *per annum*), tourism and live sales, although valuable to fund conservation efforts, are insufficient to offset the increasing costs. Dehorning is used as a deterrent but results in increasing stocks of rhino horn and the proponent suggests that initiatives like demand reduction have not been effective. The proponent does outline in some detail the potential implications on markets of allowing trade and their need to generate income to provide the resources and incentives for effective rhinoceros conservation. Critically, the proponent notes that the extent to which legal trade in rhino horns might displace illegal trade (estimated at 8 tonnes *per annum*, equivalent to approximately 1,500 rhinos) depends upon the volumes of legal horn available for the market. No estimates are provided in the proposal of the amounts of rhinoceros horn that the proponent could generate annually and details on stocks of rhinoceros horn are only provided in CoP20 Prop. 10, where the proportions of horn derived from the separate species are not

specified. However, the Secretariat understands from the proponent that the stocks of horn referred to in CoP20 Prop.10 refer only to *D. b. bicornis*. The proponent has informed the Secretariat that the stocks of horn derived from *C. s. simum* amount to some 4.3 tonnes in Government ownership and a further 2 tonnes in private ownership. The Secretariat also understands that Namibia has standard operating procedures to guide the management and storage of horns from their recovery in the field to safekeeping at a central storage facility including required steps such as identification to species, unique permanent marking, DNA sampling and other measurements to be taken. These requirements also apply to privately held horns. It might be desirable for the proponent to share information on these stocks and standard operating procedures with Parties to inform their assessments. The Secretariat notes that Namibia submitted reports on rhinoceros horn stockpile, as required in terms of Resolution Conf. 9.14 (Rev. CoP19), on an annual basis since this requirement was included in the resolution at CoP17. The proponent suggests an initial adaptive quota of 200 kg of horn per year to monitor future impacts of trade.

Concerning the precautionary measures in Annex 4 of Resolution Conf. 9.24 (Rev. CoP17), the proponent does not specify which of the measures they suggest the proposal meets. However, Namibia's rhinoceros population is subject to a range of management, legal and other measures which mitigate many risks; these measures include DNA profiling of any specimen that is traded based on information in the RhODIS database, microchipping specimens and marking of horn. The proponent also, by the proposed annotation, provides certain safeguards such as limiting any sales to government-owned stock, only horns with RhODIS certificates, and that the proceeds of any sales will be used exclusively for rhinoceros conservation and community development programmes within or adjacent to rhinoceros range. The report annexed to CoP20 Doc. 84 reports Namibia has made good progress with respect to enforcement with arrests across all levels of poaching-related offences.

An additional element of the proposal is that trade is restricted to "trading partners that have been verified by the Secretariat, in consultation with the Standing Committee, to have sufficient national legislation and domestic trade controls" and for the Secretariat to verify prospective importing countries and registered stocks. However, no information is provided on the criteria by which the Secretariat or Standing Committee are expected to judge whether controls are "sufficient" or not; presumably these would be analogous to the previous sales in ivory, but this is not specified. No indication is provided of the scale or source of any resources that might be required for such verification by the Secretariat.

In the supporting statement, estimates are provided on the volumes of rhinoceros horn currently in illegal trade. However, the proposal does not indicate if horn from Namibia could provide sufficient volumes to displace that trade. The supporting statement also suggests an adaptive pilot phase with an initial export quota of 200 kg of horn per year but this is not part of the amendment to the substantive annotation, nor is it clear how long this initial period is suggested to last for. The possible implications for other range States of legal trade in rhinoceros horn are not considered.

The measures suggested generate uncertainty over elements of the management of the proposed sale of horn. The preamble to Annex 4 of Resolution Conf. 9.24 (Rev. CoP17) states "When considering proposals to amend Appendix I or II, the Parties shall, by virtue of the precautionary approach and in case of uncertainty either as regards the status of a species or the impact of trade on the conservation of a species, act in the best interest of the conservation of the species concerned and adopt measures that are proportionate to the anticipated risks to the species". In this light, the Secretariat notes that there is a need for the proponent to address the uncertainties taking into consideration Annex 4 of Resolution Conf. 9.24 (Rev. CoP17).

With respect to hunting trophies, the number of these exported is currently low and trophy hunting affects only a small proportion of the national population (estimated by the proponent at 0.9% of the population hunted each year and estimated in the report annexed to CoP20 Doc. 84 to be equivalent to 0.5 to 1.3% of the population hunted each year). As also reported in CoP20 Doc. 84, limited selective harvesting, particularly of old, non-breeding males, can also contribute to achieving other conservation goals and generate significant revenue for conservation. Whilst the numbers hunted might possibly increase if the proposal was adopted, the subspecies seems sufficiently well-managed in Namibia to meet the precautionary measures.

Additional considerations

No consultation with other range States appears to have taken place despite the potential implications of the proposal relating to trade in rhino horns for other populations.

The Conference of the Parties will consider document CoP20 Doc. 84 on *Rhinoceroses (Rhinocerotidae* spp.*)* that includes detailed information on the status of rhinoceros, trade dynamics (legal and illegal), stockpiles, incidents of illegal killing (poaching), enforcement issues, conservation management and efforts to reduce illegal use.

Provisional conclusions

When considering the biological criteria for inclusion in Appendix I, the Parties have already determined at CoP19 that they did not consider the population of Namibia to be small, to have a restricted range or to be in decline. Taking a similar approach, the biological criteria for retention in Appendix I do not appear to be met.

Based on the information available at the time of writing**,** the proposed amendment to the substantive annotation for the inclusion of *Ceratotherium simum simum* in Appendix II to permit the sale of rhinoceros horn does not seem to meet sufficiently the precautionary measures set out in paragraph A 2 a) ii) or iii) of Annex 4 to Resolution Conf. 9.24 (Rev. CoP17).

With respect to hunting trophies, Namibia's control measures would seem to be sufficient to meet the precautionary measure A 2 a) ii) of Annex 4 to Resolution Conf. 9.24 (Rev. CoP17).

Notes to Parties and proponents

It would be helpful to understand how the proposed trade in registered rhinoceros horn would be conducted, regulated and enforced, were the proposal to be adopted, to address the uncertainties identified above. This information should include clarification on how the Secretariat, in consultation with the Standing Committee, are expected to verify that trading partners have sufficient national legislation and domestic trade controls. This would allow the Conference of the Parties to determine whether the precautionary measures are adequate to address the anticipated risks to the species.

Proposal 10

Diceros bicornis bicornis (South-western black rhinoceros)

Proposal: Transfer the population of *Diceros bicornis bicornis* of Namibia from Appendix I to Appendix II with the following annotation:

For the exclusive purpose of allowing trade in registered rhinoceros horn, whole or pieces subject to the following:

v) only registered Government-owned stock, originating in the State (excluding seized rhinoceros horn and rhinoceros horns of unknown origin);

vi) only horns with RHODIS certificates;

vii) only to trading partners that have been verified by the Secretariat, in consultation with the Standing Committee, to have sufficient national legislation and domestic trade controls;

viii) not before the Secretariat has verified prospective importing countries and the registered stocks; and

ix) the proceeds of this trade are used exclusively for rhinoceros conservation and community development programmes within or adjacent to the rhinoceros range.

All other specimens shall be deemed to be specimens of species included in Appendix I and the trade in them shall be regulated accordingly

Proponent: Namibia

Provisional assessment by the Secretariat

CITES background

The entire rhinoceros family Rhinocerotidae was included in Appendix I in 1977. The listing was subsequently amended to exclude the subspecies now included in Appendix II, namely the populations of *Ceratotherium simum simum* of South Africa at the ninth meeting of the Conference of the Parties (CoP9; Fort Lauderdale, 1994), Eswatini at the 13th meeting of the Conference of the Parties (CoP13; Bangkok, 2004) and Namibia at the 19th meeting of the Conference of the Parties (CoP19; Panama City, 2022) with annotations A8 (Eswatini and South Africa) and A9 (Namibia) respectively.

At the 13th meeting of the Conference of the Parties (CoP13; Bangkok, 2004), the Parties approved export quotas of five hunting trophies of adult male black rhinoceros (*Diceros bicornis*) from Namibia (the subspecies of black rhinoceros which is the subject of the present proposal is the only one to occur in Namibia) and South Africa through the adoption of Resolution Conf. 13.5 on the *Establishment of export quotas for black rhinoceros hunting trophies*. The Resolution was amended at the 14th and 18th meetings of the Conference of the Parties (CoP14; The Hague, 2007; CoP18; Geneva, 2019). Resolution Conf. 13.5 (Rev. CoP18), paragraph 1 now provides for "an annual export quota of five hunting trophies of adult male black rhinoceros from Namibia and a total number of hunting trophies of adult male black rhinoceros not exceeding 0.5% of the current total black rhinoceros populations in South Africa in the year of the export (equally applied to all three subspecies, i.e. 0.5% of the total population of each of the three subspecies); South Africa will set a minimum science-based threshold for black rhinoceros populations, below which the above quota shall not apply".

Purpose and impact of the proposal

The proposal seeks to transfer *D. b. bicornis* from Appendix I to Appendix II with a substantive annotation limiting trade to rhinoceros horn only, subject to specific conditions. If the proposal is adopted, international trade in specimens of horn of *D. b. bicornis* will be regulated in accordance with the provisions of Article IV of the Convention and the provisions of the proposed annotation. All other specimens would be deemed to be specimens of species included in Appendix I and trade in them regulated in accordance with the provisions of Article III of the Convention.

Compliance with listing criteria

The proponent states that the population does not meet biological criteria A, B or C or any of the subsidiary criteria in Annex 1 to Resolution Conf. 9.24 (Rev. CoP17) and meets precautionary measures A 1 and A 2 a) iii) in Annex 4 to the same Resolution[9].

The proposal seeks to transfer from Appendix I to Appendix II the population of *D. b. bicornis* from Namibia for the exclusive purpose of enabling trade in rhinoceros horn under the provisions of Article IV subject to the provisions of a substantive annotation. The proposal needs to be assessed against the biological criteria contained in Annex 1 to Resolution Conf. 9.24 (Rev. CoP17) and the relevant precautionary measures contained in Annex 4 to the same Resolution.

The supporting statement indicates that Namibia's population of *D. b. bicornis* does not meet the biological criteria for inclusion in Appendix I, contained in Annex I of Resolution Conf. 9.24 (Rev. CoP17). It notes that Namibia holds more than a third of all the black rhinoceros remaining globally. The current (2024) population of *D. b. bicornis* is estimated at 2,098, an increase from 1,021 in 2014 (and a significant recovery from the estimated population of 90 animals in 1967) with an average growth rate over the last 20 years of 3% *per annum*. However, from Figure 1 in the supporting statement, growth would seem to have slowed since 2015 with the population now stable; the report on *African and Asian rhinoceroses - status, conservation and trends*, contained in Annex 3 to CoP20 Doc. 84, suggests a recent minor decline (of 1.2% in Namibia) attributed to drought, illegal killing and natural mortality exceeding births. The full species (*D. bicornis)* is categorized as Critically Endangered in the IUCN Red List (2020) but the subspecies *D. b. bicornis* is categorized as Near Threatened by a 2020 Red List assessment.

Illegal killing for trade in rhinoceros horns continues to be the greatest threat to the species and the proponent notes that the costs of countering this threat far exceed available resources. Information on poaching levels presented in the supporting statement in Figure 2 indicates a high of 91 black rhinoceros illegally killed in 2015 to 60 in 2024, with a low of 38 in 2021 (and 6 in 2013). These figures, by comparison with Figure 11 in the report annexed to CoP20 Doc 84, presumably refer to the entire subspecies and not to illegal killing in Namibia alone. The supporting statement later states that 72 black rhinoceroses have been illegally killed in Namibia since 2014 but a breakdown by year is not provided.

Legal trade in black rhinoceros from Namibia is limited to trophy hunting and authorized exports have been below the quota approved in Resolution Conf. 13.5 (Rev. CoP18). There is no national domestic usage of rhino horn. Details are provided on the rhinoceros horn stockpile but it is not clear if this refers to all rhinoceros horn or just that of *D. b. bicornis*. The proponent also notes that rhinoceros horns are not readily distinguishable between species.

The proponent provides details of Namibia's management of the subspecies, including co-management with the private sector and community conservancies, its metapopulation management strategy, that specimens all belong to the State, and other measures including dehorning and controls on use. The proponent outline in some detail the potential implications on markets of allowing legal trade and their need to generate income to provide the resources and incentives for effective rhinoceros conservation. It is noted that "the funds from the sale of rhino horn are desperately needed to support Namibia's conservation efforts".

In terms of paragraph A in Annex 1 to the Resolution, the current population of 2,098 individuals seems to be small when considered against the guidance provided in Annex 5 of the same Resolution. It is, arguably, also highly vulnerable to some extrinsic factors, such as drought and illegal killing. However, the Parties have agreed to transfer other populations of rhinoceros species (namely *Ceratotherium simum simum*) from Appendix I to Appendix II that have smaller populations than that of *D. b. bicornis*, such as those of Namibia at CoP19 (1,237 in 2023) and Eswatini at CoP13 (61 in 2003). However, in

[9] Proponent referred to precautionary measure A.2.iii) – the Secretariat understood that the proponent refers to precautionary measure A 2 a) iii)

those cases, Parties may have taken into account then, the greater numbers overall of *C. s. simum* (15,750 in 2024, CoP20 Doc. 84) compared with the overall number of *D. b. bicornis* (2,597 in 2024).

The supporting statement states that the species does not have a restricted distribution but does not provide details, other than it occurs in multiple discrete populations and is subject to a metapopulation management strategy. The report annexed to CoP20 Doc. 84 suggests that the subspecies occurs in eight populations in Namibia with a median area of 680 km^2 per locality and a median population size of 28 individuals. The supporting statement further notes that 17% of the land area is in protected areas and 46% is under conservation management or used for wildlife. Regardless, it does not appear that the area of distribution is restricted and so criterion B of Resolution Conf. 9.24 (Rev. CoP17) does not appear to be met. The population has also not suffered a marked decline and has shown a sustained increase over time followed by a more recent period of stability; therefore criterion C does not appear to be met.

Concerning the precautionary measures in Annex 4 of Resolution Conf. 9.24 (Rev. CoP17), the proponent cites precautionary measure A 1, but this refers only to removing a species listed in Appendix I from the Appendices entirely. However, they also refer to the measures contained in paragraph A 2 of the same Annex for the transfer of a species from Appendix I to II, specifically paragraph A 2 a) iii). The proponent also states that the proposal "includes an integral precautionary measure by limiting the scope of trade to a once-off trade in raw horn". However, whilst this is referred to in the proposal on a number of occasions, it is not part of the substantive annotation nor is any further explanation provided about how this "once-off" trade would work in practice nor the likely amounts of horn involved. It differs from the approach suggested separately in CoP20 Prop. 9 for a proposed annual export quota of 200 kg of horn derived from *C. s. simum*.

Namibia's rhinoceros population is subject to a range of management, legal and other measures which mitigate many risks. The proponent also, by the proposed annotation, provides certain safeguards such as limiting any sales to government-owned stock and only horns with 'RHODIS' certificates (no explanation of these is provided but further detail is available in CoP20 Prop. 9), and that the proceeds of any sales will be used exclusively for rhinoceros conservation and community development programmes within or adjacent to rhinoceros range. In the supporting statement, estimates are provided on the volumes of rhinoceros horn currently in illegal trade; additional data on volumes estimated to be in illegal trade are provided in the report annexed to CoP20 Doc.84. Critically, the proponent notes that the extent to which legal trade in rhino horns might displace illegal trade (estimated at 8 tonnes *per annum*, equivalent to approximately 1,500 rhinos) depends upon the volumes of legal horn available for the market. No estimates are provided in the proposal of the amounts of rhinoceros horn that the proponent could generate annually or if these would be sufficient to displace illegal trade. Details on stocks of rhinoceros horn are provided but it is not specified if these are derived from *D. b. bicornis* alone or also include horn derived from *C. s. simum*. However, the Secretariat understands from the proponent that the stocks referred to consist solely of horns derived from *D. b.* bicornis. The Secretariat also understands that Namibia has standard operating procedures to guide the management and storage of horns from their recovery in the field to safekeeping at a central storage facility including required steps such as identification to species, unique permanent marking, DNA sampling and other measurements to be taken. These requirements also apply to privately held horns, where applicable. It might be desirable for the proponent to share information on these standard operating procedures with Parties to inform their assessments. The Secretariat also notes that Namibia submitted reports on rhinoceros horn stockpile, as required in terms of Resolution Conf. 9.14 (Rev. CoP19) on *Conservation of and trade in African and Asian rhinoceroses*, on an annual basis since this requirement was included in the Resolution at CoP17.

The proponent also proposes that trade is restricted to "trading partners that have been verified by the Secretariat, in consultation with the Standing Committee, to have sufficient national legislation and domestic trade controls" and for the Secretariat to verify prospective importing countries and registered stocks. However, no information is provided on the criteria by which the Secretariat or Standing Committee are to determine whether controls are "sufficient" or not; presumably these would be analogous to the previous sales in ivory, and include consideration of the provisions in Resolution Conf. 9.14 (Rev. CoP19) relating to legislation and enforcement controls, but this is not specified. No indication is provided of the scale or source of any resources that might be required for such verification by the Secretariat.

The measures suggested generate uncertainty over the management of the proposed sales. The preamble to Annex 4 of Resolution Conf. 9.24 (Rev. CoP17) states that in cases of uncertainty regarding the impact of trade on a species to act in the best interest of the species and adopt measures that are proportionate to the anticipated risks. In this light, the Secretariat notes that there is a need for the proponent to address the uncertainties taking into consideration Annex 4 of Resolution Conf. 9.24 (Rev. CoP17).

Additional considerations (including relevant CoP recommendations)

No consultations with other range States appear to have taken place despite the potential implications of this proposal for other populations.

The Conference of the Parties will consider document CoP20 Doc. 84 on *Rhinoceroses (Rhinocerotidae* spp.*)* that includes detailed information on the status of rhinoceros, trade dynamics (legal and illegal), stockpiles, incidents of illegal killing (poaching), enforcement issues, conservation management and efforts to reduce illegal use.

Provisional conclusions

Based on the information available at the time of writing, it appears that *Diceros bicornis bicornis* continues to meet the criterion A in Resolution Conf. 9.24 (Rev. CoP17) Annex 1 for its inclusion in Appendix I. The proposed transfer to Appendix II does not seem to meet the precautionary measures set out in paragraph A 2 a) ii) or iii) of Annex 4 to Resolution Conf. 9.24 (Rev. CoP17).

Notes to the proponent

It would be helpful to understand from the proponent how any future trade in registered rhinoceros horn would be conducted, regulated and enforced, if the proposal is adopted. This information should include clarification on how the Secretariat, in consultation with the Standing Committee, are expected to verify that trading partners have sufficient national legislation and domestic trade controls. This would allow the Conference of the Parties to determine whether the precautionary measures are adequate to address the anticipated risks to the species.

Proposal 11

Choloepus didactylus (Linnaeus' two-toed sloth) and ***Choloepus hoffmanni*** (Hoffman's two-toed sloth)

Proposal: Include in Appendix II.

Proponents: Brazil, Costa Rica and Panama

Provisional assessment by the Secretariat

CITES background

Choloepus hoffmanni was included in Appendix III from 1976 until 2019 at the request of Costa Rica.

This is the first time that *Choloepus didactylus* or *Choloepus hoffmanni* have been proposed for inclusion in Appendix II. They represent the only two extant species of two-toed sloths in the family Choloepodidae.

Two species of three-toed sloths (*Bradypus pygmaeus* and *Bradypus variegatus*) were included in CITES Appendix II since 1975.

Purpose and impact of the proposal

The proposal seeks to include *Choloepus hoffmanni* in Appendix II, in accordance with Article II, paragraph 2(a) of the Convention. The proposal also seeks to include *Choloepus didactylus* in Appendix II, in accordance with Article II, paragraph 2(b) of the Convention. If the proposal is adopted, international trade in specimens of these two species will be regulated in accordance with the provisions of Article IV of the Convention.

Compliance with listing criteria

Concerning the inclusion of *Choloepus hoffmanni* in Appendix II, the proponents seek to include *the species* in Appendix II due to increasing threats from illegal trade, particularly for the exotic pet industry, but the supporting statement does not specify which criterion in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17) is met. The Secretariat notes that the proponents included the following under section 11. "Additional remarks" in the supporting statement: "*Choloepus hoffmanni* meets the criteria for inclusion in CITES Appendix II, and its trade should be regulated to avoid any use that might be incompatible with its survival. The international demand for exotic pets is encouraging illegal trade and is having an adverse impact on the wild population of *Choloepus hoffmanni*. International regulation is essential to guarantee sustainable trade, protect the ecosystems which the species inhabits, and prevent a significant decline of the species in its natural habitat". Although this seems to indicate that the proponents refer to criterion B in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17), the Secretariat assessed the proposal against both criteria in Annex 2a.

Choloepus hoffmanni is found in Bolivia, Brazil, Colombia, Costa Rica, Ecuador, Honduras, Nicaragua, Panama, Peru, and the Bolivarian Republic of Venezuela. It has two geographically distinct subpopulations: the northern subpopulation that extends from northern Honduras south to northwestern Ecuador and western Venezuela. The southern subpopulation is found from north-central Peru to far western Brazil (southwestern Amazonas, Rondônia, Acre, and Mato Grosso) and northern Bolivia. While the supporting statement presents some information on population densities and biomass estimations from several areas, it lacks robust population data and there is no overall population estimate and no population monitoring. The proposal does not present population-level declines or demographic trends, though it refers to high juvenile mortality and weak regulatory controls.

Choloepus hoffmanni was most recently assessed by IUCN in 2022 as Least Concern, with a decreasing population trend. The Least Concern assessment justification was "in view of its wide distribution, presumed large population, and its occurrence in a number of protected areas. The species is affected by several threats, especially ongoing deforestation, wildfires, hunting, and illegal trade. It is

unlikely to be declining fast enough to qualify for listing in a threatened category at the global level. However, some subpopulations could potentially be assessed as Near Threatened or Vulnerable".

C. hoffmanni is used for food, and for medicinal, belief-based and ornamental purposes, and animals are sold as pets. Sloths are strictly arboreal (only descending from the treetops once a week to urinate and defecate) and depends on forest cover for their survival, so habitat decline, fragmentation and loss of habitat quality are considered significant threats, as well as illegal trade for national and international pet markets.

The proponents assert that international regulation is necessary for *C. hoffmanni* to prevent increased illegal trafficking and declines in its populations. They note that the international demand for exotic pets promotes illegal trafficking, negatively affecting the wild population. The supporting statement indicates that juvenile sloths are especially vulnerable, often captured and sold in local markets or smuggled internationally. The proponents refer to several reports demonstrating national and international illegal trade from range States to Mexico, the United States of America, Europe, Asian and Middle Eastern countries. Information relating to an increasing trade in live animals via social media platforms is also provided in the supporting statement, but there is no information on which species of sloths this includes. A quick online search by the Secretariat indicates that there are several sites offering sloths for sale at prices in excess of USD 10,000, but the animals in question were indicated to be "captive-raised". The listing under Appendix II is proposed to enable better monitoring of international trade flows, support the implementation of national conservation laws, and enhance international cooperation.

The supporting statement notes that the species was included in Appendix III between 1976 and 2019, during which time data on exports has been collected in the CITES Trade Database. However, the proponents provide very limited information on this trade. They noted that the main exporters of wild specimens are Brazil, Costa Rice, Guyana, Nicaragua, Panama and Peru; direct trade shows 75 live specimens reported by importers and 24 live specimens reported by exporters during this period; and trade is predominantly for scientific and zoological purposes. The supporting statement states that CITES has documented the export of 570 products of *C. hoffmanni* (hair, skin, skulls, specimens, tails) between 2013 and 2017; these products were obtained from confiscated or seized specimens (CITES, 2024a), however, the Secretariat notes that with the exception of one skull (which does not indicate a purpose code) all of this trade was for scientific purposes.

The Secretariat also notes that from data extracted from the CITES Trade Database on 15 July 2025 for the direct exports reported during this period 62 live specimens were reported by importers and 24 live specimens reported by exporters, where the purpose is indicated as confiscated/seized or blank. The purpose and source codes were not always indicated, and specimens are predominantly a mixture of wild, captive bred, confiscated and unknown.

The supporting statement indicates that many range States have national legislation to prohibit or regulate the use of wildlife. Colombia has a *National Strategy for the Prevention and Control of Illegal Trade in Wild Sloth Species* (Moreno *et al.,* 2007) and a *National Program for the Conservation of the Superorder Xenarthra* to establish *in situ* and *ex situ* conservation actions for natural sloth populations that face certain levels of threat and are subject to illegal use and/or exploitation in the country (including *C. hoffmanni*). In the case of Brazil, the export of wildlife will only be allowed for specimens that can be proven to have been bred in captivity in commercial establishments and zoos registered with IBAMA and that are marked at origin, however, no commercial establishment is authorized to breed and sell specimens of *Choloepus* spp.

Concerning the inclusion of *Choloepus didactylus* in Appendix II, the proponents note that this species is found in Bolivia, Brazil, Colombia, Ecuador, French Guiana, Guyana, Peru, Suriname, and the Bolivarian Republic of Venezuela. They indicate that it is traded nationally, but they do not demonstrate that it is traded internationally. *C. didactylus* was also recently assessed by IUCN in 2022 as Least Concern "in view of its wide distribution, presumed large population and its occurrence in a number of protected areas. The species is affected by several threats, especially habitat loss due to wildfires and land use change. However, it is unlikely to be declining fast enough to qualify for listing in a threatened category."

The proponents state that *C. didactylus* is almost identical to *C. hoffmanni*, to the extent that genetic analysis is required in captivity to differentiate between the two species. The most reliable way of

distinguishing between species is by body size and skull morphology, with *C. didactylus* being, on average, a larger animal, however, for juveniles this morphological difference is not obvious. This suggests that customs authorities would not be able to distinguish between the two species, implying that inclusion of *C. didactylus* in Appendix II satisfies criterion A in Annex 2b of Resolution Conf. 9.24 (Rev. CoP17) should *C. hoffmanni* be included in Appendix II.

In summary, based on the available information, it is not possible to determine if *C. hoffmanni* meets either criterion A or criterion B of Annex 2a as it has a widespread distribution, and there is no information to suggest that the population is small or that there is a marked decline. The biological impact of trade is inferred locally rather than range-wide, with the proponents highlighting that the species is under growing pressure from illegal capture and trade of juveniles. These activities appear to target local populations disproportionately, especially near tourist hotspots or forest-edge communities.

Additional considerations

The Brazilian Management Authority sent an official email to all range States requesting additional information on the populations of the proposed species. As of 24 June 2025, responses had been received from Colombia, Costa Rica, France and Honduras and were included in the supporting statement. Colombia indicated that it considers that a CITES listing may not be the best tool available to ensure the conservation of *Choloepus* species. Costa Rica and Honduras indicated their support for the inclusion of both species. France indicated that only *C. didactylus* is present in French Guiana, where the species is protected by national legislation, which prohibits any commercial activity, both nationally and internationally. No seizures or confiscations of any species have been recorded.

The proposal notes that *C. hoffmanni* is kept in several zoos, reproduction of sloths in captivity is considered rare.

Provisional conclusions

Based on the information available at the time of writing, there is insufficient evidence to conclude with certainty that *Choloepus hoffmanni* meets the criteria in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17) for its inclusion in Appendix II.

Should the Parties decide to include *Choloepus hoffmanni* in Appendix II, then *Choloepus didactylus* would also qualify for inclusion under criterion A of Annex 2b of Resolution Conf. 9.24 (Rev. CoP17).

Proposal 12

Cercocebus chrysogaster (Golden-bellied mangabey)

Proposal: Transfer from Appendix II to Appendix I

Proponents: Democratic Republic of the Congo

Provisional assessment by the Secretariat

CITES background

Cercocebus chrysogaster was included in CITES Appendix II in 1977 under the Order listing of Primates spp. (CoP1 Prop. 38). It was formerly considered a subspecies of *Cercocebus agilis* (*Cercocebus agilis chrysogaster*) but was recognized as a separate species following taxonomic changes adopted at the 14th meeting of the Conference of the Parties (CoP14; The Hague, 2007).

There are seven extant species within the genus *Cercocebus*, all of which are included in Appendix II, with the exception of *Cercocebus galeritus*, which has been included in Appendix I since 1975.

Purpose and impact of the proposal

The proposal seeks to transfer *Cercocebus chrysogaster* from Appendix II to Appendix I, which will prohibit international commercial trade in specimens of wild origin. If the proposal is adopted, international trade in specimens of this species will be regulated in accordance with the provisions of Article III of the Convention.

If *Cercocebus chrysogaster* is included in Appendix I, operations breeding the species for commercial purposes would need to be registered with the Secretariat in accordance with Resolution Conf. 12.10 (Rev. CoP15) on *Registration of operations that breed Appendix-I animal species in captivity for commercial purposes*.

Compliance with listing criteria

The supporting statement suggests that inclusion of *Cercocebus chrysogaster* in Appendix I satisfies criterion B i) iii) and iv); and criterion C i) and ii) in Annex 1 of Resolution Conf. 9.24 (Rev. CoP17).

C. chrysogaster is an Old World monkey (i.e. a primate found in the family Cercopithecidae) found in swampy, humid forests south of the Congo River and restricted to the Congo Basin in the Democratic Republic of the Congo (DRC). They are easily distinguished from related species by an orange fur colouring on their anterior side. Their posterior sides are commonly brown, black, white, or gray, or a combination of those fur colours. In the wild they form large, complex social groups ranging from 8 to 30 members. They are polygynandrous, meaning males and females both have multiple mates throughout their lifetimes. They are a low productivity species, typically breeding once a year and with one offspring at a time.The young are weaned in 8 to 9 months (range 7 to 10) and are not fully independent until they are 4 to 5 years old (range 2 to 6). Females reach sexual maturity around 4 to 5 years of age, while males don't mature until 5 to 7 years of age. They are known to share a habitat with bonobos and a comparison study found that they travel greater distances within their home range to feed, significantly further than other *Cercocebus species.*

As referenced in the supporting statement, there are two allopatric populations of *C. chrysogaster*, separated by at least 300 km and habitat connectivity is unlikely to currently exist between these two populations. Although the species has previously been reported to be locally abundant with groups of over 100 individuals, the proponent refers to unpublished data indicating that the largest group size recorded in the one population was 10 individuals. It is possible that population densities vary between the subpopulations. In 2020, the IUCN Red List assessment categorized *Cercocebus chrysogaster* as Endangered, with a decreasing population trend. No population estimate is available, but all known populations are considered to be in decline, and the species range is now considerably smaller than

depicted by Gautier-Hion *et al*. (1999)[10]. Threats include uncontrolled commercial hunting for wild meat that targets the species, and reduction in occupancy due to habitat loss and degradation by logging.

The IUCN Red List assessment determined that “In the past 20 years, at least 32% of the total habitat has been lost, the species has been extirpated from another 7% the total range, and population declines were recorded in 55% of eastern forest block. Thus, the total decline between 1999 and 2019 is estimated at ~40% of the population. In addition, more than 30% of the remaining habitat has been attributed to logging concessions. 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%. This species does not occur in any protected areas and commercial hunting affects all portions of its range, with no evidence that effective controls are likely in the near future”. While the population decline may be evident, it does not appear to meet the 50% guideline for decline in Annex 5 of Resolution Conf. 9.24 (Rev. CoP17) for inclusion in Appendix I, but projected decline is of concern.

The proponent states that although comprehensive estimates of total population size are not available, the restricted distribution of this species and the relatively low densities observed in groups in the LuiKotale region in the Salonga National Park suggest that the overall population is likely to be both relatively small and vulnerable to even low levels of harvest.

The proponent identifies heavy hunting pressure and habitat loss, leading to a decline in range area and occupancy as the main threats to the conservation of *C. chrysogaster.* Other threats include persecution as an agricultural pest, and collection for the pet trade. The species is killed in large numbers for the commercial wild meat trade. Surveys of wild meat markets in 2010 and 2015 indicated a significant decrease in the availability of *C. chrysogaster* carcasses, which may suggest that the species has become scarce.

The supporting statement provides evidence that there is a demand for the species in international trade, including an extract from the CITES Trade database in Table 1 in the statement, showing a total of 198 specimens found in trade. The Secretariat notes that this table also includes re-exports, which may cause some double recording of trade. Trade is reported in wild, captive-bred and seized/confiscated specimens. Almost all trade is in live wild specimens. The data shows a recent increase in international trade with a sharp peak in 2019, followed by a decline during the 2020-2021 coronavirus pandemic and a slight increase since then. In 2018, DRC set an export quota for 300 live *C. chrysogaster*, but the actual trade as reported by DRC that year was 31.

An examination of the CITES Annual Illegal Trade Database (AITR) on 1st August 2025 shows only one reported seizure which could relate to *C. chrysogaster*. The seizure of 4 skulls of *Cercocebus* spp. was reported by the United Kingdom of Great Britain and Northern Ireland in 2017. The supporting statement, however, refers to the seizure of 12 live *C. chrysogaster* at the border between Zambia and Zimbabwe in 2020. These animals were said to be destined for South Africa and overseas.

The proponent claims that given the past and ongoing exploitation of the already drastically depleted wild population, any commercial trade in *C. chrysogaster* poses a serious and grave risk to this highly endangered species.

There is no information on dedicated management plans and the species is not legally protected in DRC, but it is listed in Class B of the African Convention on the Conservation of Nature and Natural Resources, which provides full protection, but the species "may be hunted, killed, captured, or collected under special authorization granted by the competent authority." The proponent indicates that Salonga National Park, where illegal hunting for subsistence and commercial markets remains a significant threat, is the only known protected area where *C. chrysogaster* occurs; however, the species has only been observed in the southern tip, in the LuiKotale region.

In summary, the availability of data is poor, but indications are that *C. chrysogaster* has a restricted distribution, with only two known isolated sites; a low reproductive rate with only one offspring per year;

[10] Gautier-Hion, A., Colyn, M. and Gautier, J.-P. 1999. *Histoire Naturelle des Primates d'Afrique Centrale*. Ecofac, Gabon.

a demand for the species in international trade; an observed and ongoing significant total habitat loss of at least 32% over the past 20 years, and a population decline of approximately 40%. A precautionary approach may be warranted as the current pressures are likely to continue, given that more than 30% of the remaining habitat has been allocated to logging concessions. Therefore, the inferred decline in the species' population over a 30-year period (three generations for this taxon) exceeds 50%.

Additional considerations

The following standard nomenclature reference applies for *Cercocebus*:

> Wilson, D.E. and Reeder, D.M. (Eds.). 2005. *Mammal species of the world, a taxonomic and geographic reference*. 3rd Edition, The Johns Hopkins University Press, Baltimore, Maryland. 2, 142pp.

The supporting statement does not indicate if there are any commercial captive breeding facilities for this species, and it notes that the number of animals held in zoos worldwide also appears to be small.

Provisional conclusions

Based on the information available at the time of writing, *Cercocebus chrysogaster* appears to meet criterion B i), iii) and iv) and criterion C ii) in Annex 1 to Resolution Conf. 9.24 (Rev. CoP17) for its inclusion in Appendix I.

Proposal 13

Loxodonta africana (African elephant)

Proposal: To allow Namibia to trade in registered stocks of raw ivory (whole tusks and pieces) of Namibian origin, owned by the Government of the Republic of Namibia, for commercial purposes with trading partners that have been verified by the CITES Secretariat as having sufficient national legislation and domestic trade controls. This ensures that ivory imported from Namibia will not be re-exported and will be managed following all requirements of Resolution Conf. 10.10 concerning domestic manufacturing and trade. Furthermore, to enable Namibia to achieve full Appendix II status for its elephants, as provided for in Article IV of the Convention, thereby permitting the regulated and legal trade in Namibian elephant products, including ivory.

Proponent: Namibia

Provisional assessment by the Secretariat

CITES background

Loxodonta africana was included in Appendix III in 1976 at the request of Ghana. It was included in Appendix II at the first meeting of the Conference of the Parties (CoP1; Bern, 1976).

At the seventh meeting of the Conference of the Parties (CoP7; Lausanne, 1989), the species was transferred to Appendix I. Subject to complex and detailed annotations, the populations of Botswana, Namibia and Zimbabwe were transferred to Appendix II at the 10th meeting of the Conference of the Parties (CoP10; Harare, 1997), and the population of South Africa was transferred to Appendix II under similar terms at the 11th meeting of the Conference of the Parties (CoP11; Gigiri, 2000). The transfer of these populations from Appendix I to Appendix II took place after an assessment by a Panel of Experts constituted, at the time, under the now repealed Resolution Conf. 10.9 on *Consideration of proposals for the transfer of African elephant populations from Appendix I to Appendix II*.

The annotations to these Appendix-II populations were merged and further amended at the 12th, 13th and 14th meetings of the Conference of the Parties (CoP12; Santiago, 2002; CoP13; Bangkok, 2004 and CoP14; The Hague, 2007). The text of the current annotation (now annotation A10, then annotation 2), agreed at CoP14, has not been amended since.

At the 17th meeting of the Conference of the Parties (CoP17; Johannesburg, 2016), proposals by Namibia (CoP17 Prop. 14) and Namibia and Zimbabwe (CoP17 Prop. 15) to delete annotation 2 to the listing of their respective African elephant populations, were considered and both proposals were rejected. A proposal to transfer the populations of Botswana, Namibia, South Africa and Zimbabwe from Appendix II to Appendix I (CoP17 Prop. 16) was also considered at CoP17 and rejected.

At CoP17, the Conference of the Parties discussed the issue of a decision-making mechanism for a process of trade in ivory, which formed part of annotation 2 to the Appendix-II listing and decided that the mandate to the Standing Committee to develop such a decision-making mechanism for a process of trade in ivory under the auspices of the CoP, in Decision 16.55, should not be extended. The Decision was therefore deleted.

At the 18th meeting of the Conference to the Parties (CoP18; Geneva, 2019) a proposal was submitted by Botswana, Namibia and Zimbabwe to amend annotation 2 by deleting subparagraphs g) iv), v) and vii) and paragraph h) (CoP18 Prop. 11). The proposal was amended during the discussion at CoP18 by inserting two paragraphs g) iv) and g) v) (amended from the originals) in the annotation, as shown in document CoP18 Com. I Rec. 11 (Rev. 1). The amended proposal was rejected by the Conference of the Parties. A proposal to transfer the populations of Botswana, Namibia, South Africa and Zimbabwe from Appendix II to Appendix I (CoP18 Prop. 12) was also rejected.

At the 19th meeting of the Conference of the Parties (CoP19; Panama City, 2022) a proposal (CoP19 Prop. 4) similar to CoP20 Prop. 14 was submitted by Zimbabwe. This sought to amend annotation 2 (now annotation A10) by the deletion of subparagraphs g) iv), g) v), g) vii), and paragraph h), and the

amendment of paragraph e) to enable commercial trade in leather goods for Zimbabwe. The proposal was rejected in Committee I (CoP19 Com. I Rec. 9). After a motion to open the debate in plenary, the proposal was amended to include only the trade in leather goods (paragraph e)) with no further amendments to the annotation, but this was rejected by the Conference of the Parties (CoP19 Plen. Rec. 4 (Rev. 1)). A proposal (CoP19 Prop. 5) to transfer the populations of Botswana, Namibia, South Africa and Zimbabwe from Appendix II to Appendix I was also considered at CoP19 and rejected.

Purpose and impact of the proposal

The present proposal does not seek to change the Appendix in which the Namibian population of African elephant is listed. However, it would have the effect of transferring specified registered stocks of ivory (whole tusks and pieces) of Namibian origin and owned by the Government of Namibia from an Appendix I trade regime to an Appendix II trade regime subject to certain conditions. The proposal would not seem to have an impact on the provisions concerning trade in hunting trophies, live animals, hides, hair, leather goods and ekipas from Namibia, but this is not specified.

With regards to raw ivory and conditions for commercial trade in ivory, the proponent mentions in the Overview section of the supporting statement (section C. 2.), the existing stock of 46,268.30 kg of registered raw ivory (whole tusks and pieces) of Namibian origin, owned by the Government of the Republic of Namibia, which they seek to trade and the verification by the Secretariat of trade partners to ensure they have sufficient national legislation and domestic trade controls. Although the proposal itself in Section A also refers to the verification of trading partners it does not refer to a specific quantity of ivory to be traded and states that the proposal will "enable Namibia to achieve full Appendix II status for its elephants, as provided for in Article IV of the Convention, thereby permitting the regulated and legal trade in Namibian elephant products, including ivory".

Clarification is needed relating to the scope of the proposal and whether it proposes a substantive annotation to form part of the proposed amendment to the Appendix II listing of the African elephant population of Namibia.

Compliance with listing criteria

Resolution Conf. 9.24 (Rev. CoP17) on *Criteria for amendment of Appendices I and II* does not contain guidelines for assessing the present proposal. However, amending this substantive annotation could be considered as analogous to a transfer from Appendix I to Appendix II for certain stocks of raw elephant ivory, for which Resolution Conf. 11.21 (Rev. CoP19) on *Use of annotations in Appendices I and II* provides that it should be in compliance with the precautionary measures contained in Resolution Conf. 9.24 (Rev. CoP17), Annex 4.

The supporting statement notes that the elephant population of Namibia is large (increasing to 25,664 in 2023 from 7,500 in 1995) it does not have a restricted range (estimated at >100,000km^2 in the wet season) and the population is not declining. The proponent indicates that an annual growth rate of 4.4% (from 2013 to 2020) was achieved in some areas.

The Secretariat notes that the African savanna elephant (as *L. africana*) is treated separately by the IUCN Red List assessment (2022) from the African forest elephant (as *L. cyclotis*); *L africana* is categorized in the IUCN Red List assessment as Endangered. However, the assessment notes that "considering the uncertainty of the estimate as communicated in Table 1a in the Supplementary Information and data sparsity issues during the earliest time period as explained, a category of Vulnerable (VU) is plausible".

Illegal killing is not considered as a threat in the supporting statement, the proponent stating that numbers of illegally killed elephants are biologically insignificant and are often the result of human-elephant conflict. By contrast, the absence of regulated trade is considered by the proponent to be the greatest threat to elephants, arising from the fact that elephants are only likely to survive if they are seen as asset by the rural communities with whom they live. The importance of movement corridors and access to the areas within and outside protected areas is also emphasized in the context of the ability of elephants to cope with severe periodic droughts in this generally arid and semi-arid country.

Authorized trade currently includes hunting trophies with a quota of 90 elephants (180 tusks) *per annum* but numbers exported are typically lower. Although the proposal only reflects data on the trophies exported up to 2015, the Secretariat notes that documents SC77 Doc. 63.1 (Rev. 2) and SC78 Doc. 65.1 include an analysis of the legal trade in elephant specimens based on annual reports submitted for 2018 to 2022. Based on the analysis in these documents the number of tusks exported remains below the annual quota established by Namibia. Authorized trade also includes trade in live elephants, hides (skin and skin pieces), hair, leather goods and jewellery (ekipas) (not referred to in the proposal); based on the records in the CITES Trade Database, limited trade is taking place in these specimens, for example, between 2015 and 2023 Namibia reported the export of 37 leather products and 65 skin pieces. Elephants are a "specially protected" species in Namibia and their parts and derivatives are classed as "controlled wildlife products". Permits are required for activities such as hunting, capture, transport and possession of elephants and for trade in elephant parts and derivatives.

Namibia conducted strictly managed authorized trade in raw ivory in 1999 and in 2008 of 19,870 kg (total exported) to China and Japan with the proceeds placed in a dedicated trust fund. The proponent stresses that no animals will be killed to provide ivory. According to the supporting statement, the ivory proposed to be traded is or will be derived from natural mortality and problem animal control. All ivory proposed to be traded will be derived from government-registered and owned stockpiles which, in June 2025, amounted to 44,870.78 kg of ivory derived from the sources referred to above. The Secretariat notes that the proponent also refers in the Overview section (C. 2.) of the supporting statement to a figure of 46,268.3 kg of ivory but the Secretariat understands from the proponent that the correct figure is 44,870.79kg. The proponent commits to re-invest the revenue generated by sales of ivory in their Game Products Trust Fund and will use the proceeds for elephant conservation and community conservation and development programmes, including Namibia's community-based natural resources management system.

The supporting statement notes the difficulties and the high costs of maintaining the quality of stored ivory in Namibia's arid climate. It also provides a summary of control measures related to elephants and any trade in ivory, as urged by Resolution Conf. 10.10 (Rev. CoP19) on *Trade in elephant specimens*, including the marking of individual specimens, the need for all entities wishing to manufacture or trade in goods from elephant parts and derivatives to be registered with the Management Authority, and maintaining comprehensive records of stocks and their origin.

Concerning the precautionary measures contained in Annex 4 to Resolution Conf. 9.24 (Rev. CoP17), the proponent does not specify which precautionary measures the proposal is intended to meet, but it is presumably subparagraphs A 2 a) ii) and iii) of Annex 4 to Resolution Conf. 9.24 (Rev. CoP19). The proponent provides information on a range of controls it takes to its management of elephants and their parts and derivatives in trade. The proponent also refers to future trade in raw ivory from Namibia being managed in accordance with the measures contained in Resolution Conf. 10.10 (Rev. CoP19) on *Trade in elephant specimens* which Parties with domestic ivory markets are urged to implement. The proponent indicates a role for the Secretariat in verifying that prospective trading partners have sufficient legislation and controls in place to meet the requirements of Resolution Conf. 10.10 (Rev. CoP19) and to have measures to prevent the re-export of ivory. No further details are provided of the role envisaged for the Secretariat nor on the source of resources needed to achieve this if, for example, verification missions were required, nor is any specific role for the Standing Committee referred to, unlike the current annotation.

However, it is not clear to the Secretariat that the precautionary safeguards in Annex 4 to Resolution Conf. 9.24 (Rev. CoP17) have been fully addressed. The potential risks of increased illegal killing of elephants or illegal trade in ivory associated with a legal trade in registered government-owned raw ivory stocks, or measures to address these risks, are not elaborated upon in the supporting statement. It is also unclear, if the proposal were adopted, how any future trade in registered government-owned raw ivory would be conducted, regulated and enforced.

The trade in those specimens of African elephant populations included in Appendix II to the Convention is governed by the provisions of annotation A10. Namibia seeks to amend the provisions of that annotation to enable ongoing trade in raw ivory from its population with verified trade partners but precise amendments to the annotation are not specified. The objective of the proponent would appear to require, at a minimum, the deletion of sub-paragaphs g) iv) and g) v) and, given the link to the latter,

paragraph g) vii). However, the stated desire of the proponent to "achieve full Appendix II status" for its elephants could imply the removal of the annotation in its entirety. However, the conditionality that mirrors that in the current annotation would suggest that some form of annotation would be retained – and so "full Appendix II status" would not be achieved with this proposal. The consolidation of the proposed amendments in a clear annotation would provide the clarity needed to enable the Secretariat and the Parties to assess the proposal against the criteria and precautionary measures contained in Resolution Conf. 9.24 (Rev. CoP17).

In the same vein, it is also not clear how this proposal sits alongside the amendments proposed to annotation A10 in CoP20 Prop.14 for which Namibia is also a co-proponent. Some of the amendments proposed here are not consistent with the approach taken in CoP20 Prop. 14.

Additional considerations

The proponent notes that the proposal pertains only to the population of Namibia. No consultation with other Parties that might be affected by this proposed amendment seems to have taken place.

The report on the Monitoring of Illegal Killing of Elephants (MIKE) to be considered by CoP20 (CoP20 Doc. 76.4) indicates a downward trend in the continental Proportion of Illegally Killed Elephants (PIKE) from 2011 to 2024 with no evidence of an increase or decline in the last five years (2020–2024). The unweighted PIKE estimate for Southern Africa in 2024 is 0.25 (range: 0.21–0.30) and is below the average continental PIKE estimate of 0.37 (range: 0.31–0.42) for the same year.

The report on the Elephant Trade Information System (ETIS) to be considered by CoP20 (CoP20 Doc. 76.5) describes several Parties that had relatively high values of the ETIS variables as depicted in the heatmap of Figure 5 (e.g., India, Kenya, Namibia, Malaysia) in document CoP20 Doc. 76.5. The additional exploration of Party-specific trends, the consideration of the ETIS data leading to the relatively high values, and the synthesis of contextual information, did not merit the identification of the Parties as requiring attention under the National Ivory Action Plan (NIAP) process. Namibia, an African elephant range State that appears on the left of the heatmap in document CoP20 Doc. 76.5, had no clear increasing trends or prominence in the total amounts of seized ivory, and seizures were mostly made by the Party with few international illegal trade links.

In addition, at its 33rd meeting (AC33, Geneva, 2024), the Animals Committee agreed to submit for adoption by CoP20 a proposed nomenclature update concerning *Loxodonta africana*, now contained in Annex 3 to CoP20 Doc. 110 on *Standard Nomenclature*. If adopted, this would split the current listing of African elephant into two species, the African forest elephant *L. cyclotis* and the African savanna elephant *L. africana*. However, this change would not affect the populations included in Appendix II and hence not this proposal. Other aspects associated with the proposed nomenclature change are addressed in CoP20 Doc. 113 on *Taxonomy and nomenclature of African elephants (Loxodonta spp.)*.

Provisional conclusions

Based on the information available at the time of writing, it appears that the proposed amendment to the substantive annotation A10 for the populations of *Loxodonta africana* from Namibia to permit the sale of ivory does not seem to meet sufficiently the precautionary measures set out in paragraph A 2 a) ii) or iii) of Annex 4 to Resolution Conf. 9.24 (Rev. CoP17).

Notes to Parties and proponents

The Secretariat notes it would be useful, as permitted by rule 24.2 in the *Rules of Procedure of the Conference of the Parties,* if the proponent could clarify their proposal, without expanding its scope, by providing a precise indication of the amendments they seek to annotation A10, noting that the text of the annotation should not make reference to a Resolution or Decision in line with Resolution Conf. 11.21 (Rev. CoP19).

It would also be helpful to understand how any future trade in registered government-owned raw ivory would be conducted, regulated and enforced, if the proposal is adopted. This would allow the Conference of the Parties to determine whether the precautionary measures are adequate to address

the anticipated risks to the species. A similar situation prevailed when the Parties considered the not dissimilar CoP19 Prop. 4 at the last meeting of the Conference of the Parties.

Proposal 14

Loxodonta africana (African elephant)

Proposal: Amend annotation A10 pertaining to the elephant populations of Botswana, Namibia, South Africa and Zimbabwe to harmonize the conditions of trade in live African elephants (deleted text reflected as ~~strike through~~ and text inserted underlined):

For the exclusive purpose of allowing:

a) trade in hunting trophies for non-commercial purposes;

b) trade in live animals to appropriate and acceptable destinations~~, as defined in Resolution Conf. 11.20 (Rev. CoP18), for Botswana and Zimbabwe and for *in situ* conservation programmes for Namibia and South Africa~~;

c) trade in hides;

d) trade in hair;

e) trade in leather goods ~~for commercial or non-commercial purposes for Botswana, Namibia and South Africa and for non-commercial purposes for Zimbabwe~~;

f) trade for non-commercial purposes in individually marked and certified ekipas incorporated in finished jewellery ~~for non-commercial purposes~~ for Namibia and ivory carvings ~~for non-commercial purposes~~ for Zimbabwe;

g) ~~trade in registered raw ivory (for Botswana, Namibia, South Africa and Zimbabwe, whole tusks and pieces) subject to the following:~~

~~i) only registered government-owned stocks, originating in the State (excluding seized ivory and ivory of unknown origin);~~

~~ii) only to trading partners that have been verified by the Secretariat, in consultation with the Standing Committee, to have sufficient national legislation and domestic trade controls to ensure that the imported ivory will not be re-exported and will be managed in accordance with all requirements of Resolution Conf. 10.10 (Rev. CoP18) concerning domestic manufacturing and trade;~~

~~iii) not before the Secretariat has verified the prospective importing countries and the registered government-owned stocks;~~

~~iv) raw ivory pursuant to the conditional sale of registered government-owned ivory stocks agreed at CoP12, which are 20,000 kg (Botswana), 10,000 kg (Namibia) and 30,000 kg (South Africa);~~

~~v) in addition to the quantities agreed at CoP12, government-owned ivory from Botswana, Namibia, South Africa and Zimbabwe registered by 31 January 2007 and verified by the Secretariat may be traded and dispatched, with the ivory in paragraph g) iv) above, in a single sale per destination under strict supervision of the Secretariat;~~

~~vi) the proceeds of the trade are used exclusively for elephant conservation and community conservation and development Programmes within or adjacent to the elephant range; and~~

~~vii) the additional quantities specified in paragraph g) v) above shall be traded only after the Standing Committee has agreed that the above conditions have been met; and~~

~~h) no further proposals to allow trade in elephant ivory from populations already in Appendix II shall be submitted to the Conference of the Parties for the period from CoP14 and ending nine years from~~

~~the date of the single sale of ivory that is to take place in accordance with provisions in paragraphs g) i), g) ii), g) iii), g) vi) and g) vii). In addition, such further proposals shall be dealt with in accordance with Decisions 16.55 and 14.78 (Rev. CoP16).~~

~~On a proposal from the Secretariat, t~~The Standing Committee can decide to cause this trade to cease partially or completely in the event of non-compliance by exporting or importing countries, or in the case of proven detrimental impacts of the trade on other elephant populations.

All other specimens shall be deemed to be specimens of species included in Appendix I and the trade in them shall be regulated accordingly.

Proponents: Botswana, Cameroon, Côte d'Ivoire, Namibia and Zimbabwe

Provisional assessment by the Secretariat

CITES background

Loxodonta africana was included in Appendix III in 1976 at the request of Ghana. It was included in Appendix II at the first meeting of the Conference of the Parties (CoP1; Bern, 1976).

At the seventh meeting of the Conference of the Parties (CoP7; Lausanne, 1989), the species was transferred to Appendix I.

Subject to complex and detailed annotations, the populations of Botswana, Namibia and Zimbabwe were transferred to Appendix II at the 10th meeting of the Conference of the Parties (CoP10; Harare, 1997), and the population of South Africa was transferred to Appendix II under similar terms at the 11th meeting of the Conference of the Parties (CoP11; Gigiri, 2000). The transfer of these populations from Appendix I to Appendix II took place after an assessment by a Panel of Experts constituted, at the time, under the now repealed Resolution Conf. 10.9 on *Consideration of proposals for the transfer of African elephant populations from Appendix I to Appendix II*.

The annotations to these Appendix-II populations were merged and further amended at the 12th, 13th and 14th meetings of the Conference of the Parties (CoP12; Santiago, 2002; CoP13; Bangkok, 2004 and CoP14; The Hague, 2007). The text of the current annotation (now annotation A10, then annotation 2), agreed at CoP14, has not been amended since.

At the 17th meeting of the Conference of the Parties (CoP17; Johannesburg, 2016), proposals by Namibia (CoP17 Prop. 14) and Namibia and Zimbabwe (CoP17 Prop. 15) to delete annotation 2 to the listing of their respective African elephant populations, were considered and both proposals were rejected. A proposal to transfer the populations of Botswana, Namibia, South Africa and Zimbabwe from Appendix II to Appendix I (CoP17 Prop. 16) was also considered at CoP17 and rejected.

At CoP17, the Conference of the Parties discussed the issue of a decision-making mechanism for a process of trade in ivory, which formed part of annotation 2 to the Appendix-II listing and decided that the mandate to the Standing Committee to develop such a decision-making mechanism for a process of trade in ivory under the auspices of the CoP, in Decision 16.55, should not be extended. The Decision was therefore deleted.

At the 18th meeting of the Conference to the Parties (CoP18; Geneva, 2019) a proposal was submitted by Botswana, Namibia and Zimbabwe to amend annotation 2 by deleting subparagraphs g) iv), v) and vii) and paragraph h) (CoP18 Prop. 11). The proposal was amended during the discussion at CoP18 by inserting two paragraphs g) iv) and g) v) (amended from the originals) in the annotation, as shown in document CoP18 Com. I Rec. 11 (Rev. 1). The amended proposal was rejected by the Conference of the Parties. A proposal to transfer the populations of Botswana, Namibia, South Africa and Zimbabwe from Appendix II to Appendix I (CoP18 Prop. 12) was also rejected.

At the 19th meeting of the Conference of the Parties (CoP19; Panama City, 2022) a proposal (CoP19 Prop. 4), similar to CoP20 Prop. 14, was submitted by Zimbabwe. This sought to amend annotation 2 (now annotation A10) by the deletion of subparagraphs g) iv), g) v), g) vii), and paragraph h), and the amendment of paragraph e) to enable commercial trade in leather goods for Zimbabwe.

The proposal was rejected in Committee I (CoP19 Com. I Rec. 9). After a motion to open the debate in plenary, the proposal was amended to include only the trade in leather goods (paragraph e)) with no further amendments to the annotation, but this was rejected by the Conference of the Parties (CoP19 Plen. Rec. 4 (Rev. 1)). A proposal to transfer the populations of Botswana, Namibia, South Africa and Zimbabwe from Appendix II to Appendix I (CoP19 Prop. 5) was also considered at CoP19 and rejected.

Also at CoP19 (2022), two documents on *Trade in live African elephants* (CoP19 Doc. 66.4.1 and CoP19 Doc. 66.4.2) were submitted. Elements considered during the discussions of these documents included amendments proposed to Resolution Conf. 10.10 (Rev. CoP18) on *Trade in elephant specimens*, proposals relating to a dialogue meeting and two new proposals relating to trade in live elephants presented by Burkina Faso during the meeting. Based on discussions, the proposed amendments to Resolution Conf. 10.10 (Rev. CoP18) were not adopted and Decisions 19.167 and 19.168 on *Trade in live African elephants (Loxodonta africana)* (CoP19 Com. II Rec. 8 (Rev.1)) were adopted. The outcome of the African elephant dialogue meeting is reported on in document CoP20 Doc. 76.6 on the *Results of the African elephant dialogue meeting*.

Purpose and impact of the proposal

The content of this proposal was agreed at the CITES Dialogue Meeting for African elephant range States held in Maun, Botswana from 23 – 26 September 2024 convened under Decision 19.167 on *Trade in live African elephants (Loxodonta africana)*. As stated in the communique on the CITES Dialogue Meeting for African elephant range States in Notification to the Parties No. 2024/111, "the range States agreed to the amendments to Annotation A10 pertaining to the elephant populations of Botswana, Namibia, South Africa and Zimbabwe to harmonize the conditions of trade in live African elephants set out in Annex 2 to the present communiqué". The proposed amendments to annotation A10 contained in CoP20 Prop. 14 reflects the amendments to annotation A10 agreed at the dialogue meeting and presented in Annex 2 to the communiqué.

The proposal seeks to amend annotation A10 to the Appendix II listing of the African elephant (*Loxodonta africana*) populations of Botswana, Namibia, South Africa and Zimbabwe, by deleting paragraphs g) and h) including all their sub-paragraphs pertaining to trade in raw ivory, in their entirety. It is also proposed to amend paragraph b) by deleting all text except the words "trade in live animals to appropriate and acceptable destinations". The proposal also seeks to amend paragraph e) by deleting all text other than the words "trade in leather goods" and paragraph f) to delete the repetitive use of the phrase "for non-commercial purposes" and to move it forward in the sentence so it applies to both ekipas and ivory carvings traded from Namibia and Zimbabwe respectively. Finally, it proposes deleting the text "On a proposal from the Secretariat" from the penultimate paragraph of the annotation.

The adoption of the proposal would result in no change in the provisions regarding trade in hunting trophies, hides and hair. With regard to trade in leather goods, the amendments proposed would enable trade for commercial or non-commercial purposes for all four Parties, thus aligning and simplifying the provisions for the four Parties concerned in line with the mandate in Decision 19.167. With respect to individually marked and certified ekipas from Namibia and ivory carvings from Zimbabwe, the changes are editorial to streamline the text and the regulation of their trade remains unchanged.

Concerning trade in live animals taken from the wild to "appropriate and acceptable" destinations, the supporting statement notes the amendments to Resolution Conf. 11.20 (Rev. CoP19) on *Definition of the term 'appropriate and acceptable destinations'*. The Secretariat notes the reference to "*in situ* conservation programmes" has been included in that definition even though its deleted from the annotation. Reference to "appropriate and acceptable" destinations harmonizes and provides consistency of approach for the four range States and, by removing reference to a Resolution in an annotation, is consistent with the guidance in paragraph 1 b) h) of Resolution Conf. 11.21 (Rev. CoP19) on *Use of annotations in Appendices I and II*. Resolution Conf. 11.20 (Rev. CoP19) remains valid and the definition of appropriate and acceptable destinations is not affected by this proposal.

Concerning ivory, the deletion of paragraphs g) and h) from the annotation, relating to the sale of raw ivory, and the retention of the statement in the annotation that "all other specimens shall be specimens of species included in Appendix I" means that specimens of raw ivory from Botswana, Namibia, South

Africa and Zimbabwe will continue to be treated as if included in Appendix I. Parties seeking to trade in raw ivory for commercial purposes would need to submit an amendment proposal under Article XV of the Convention.

The deletion of the text in the penultimate paragraph requiring the Secretariat to make a proposal to the Standing Committee for the Committee to decide whether to cause "this trade" to cease, means that the Standing Committee could decide to cause this trade to cease partially or completely in the event of non-compliance by exporting or importing countries, or in the case of proven detrimental impacts of the trade on other elephant populations, without the requirement for a proposal to be submitted by the Secretariat to that effect.

The Secretariat is of the understanding that the Standing Committee will be guided by the recommendations on the handling of compliance matters contained in Resolution Conf. 14.3 (Rev. CoP19) on *CITES compliance procedures* to identify and address matters of non-compliance associated with the annotation.

Compliance with listing criteria

The annotation to the Appendix II listing of the African elephant populations of Botswana, Namibia, South Africa and Zimbabwe is considered a substantive annotation and an integral part of the species listing in terms of Resolution Conf. 11.21 (Rev. CoP19). Parties agreed in the Resolution that substantive annotations may be amended only by the Conference of Parties in accordance with Article XV of the Convention.

The proponents note that Parties at CoP19 amended Resolution Conf. 11.21 (Rev. CoP19) to agree not to include references to Decisions or Resolutions in annotations. The deletion of reference to Resolution Conf. 11.20 (Rev. CoP18) in paragraph b) is consistent with that approach. Likewise, paragraphs g) and h) contain references to a Resolution and to Decisions, now superseded. The proposal would remove these references.

The present proposal does not seek to change the Appendix in which the populations of African elephants concerned are listed. It would make a substantive change to the annotation by permitting trade in leather goods for commercial purposes from Zimbabwe, already permitted from the three other Parties. As such specimens are not currently included in the annotation, leather goods from Zimbabwe, traded for commercial purposes, are treated as specimens included in Appendix I; amending this substantive annotation may be seen as analogous to a transfer from Appendix I to Appendix II. The proposal should therefore be evaluated with reference to the criteria in Resolution Conf. 9.24 (Rev. CoP17) on *Criteria for amendment of Appendices I and II* and the precautionary measures stipulated in Annex 4 of that Resolution.

The proposal suggests that the population of elephants in Zimbabwe is not small (estimated at 85,00), they do not have a restricted area of distribution (c82,000 km^2); the population is stable or increasing and is not subject to marked decline. It does not meet the biological criteria for inclusion in Appendix I, a view also reached by the Parties most recently in response to proposal 5 at CoP19 (CoP19 Prop. 5). Management measures and controls outlined in the proposal also suggest that these are sufficient to meet the precautionary measures in Annex 4 of Resolution Conf. 9.24 (Rev. CoP17), specifically in subparagraphs A 2 a) ii) A) and B).

Additional considerations

As noted above, the content of this proposal was agreed by consensus at the CITES Dialogue Meeting for African elephant range States. It was attended by 31 of the 37 African elephant range States. The proposal does not contain any information on consultations with those range States Parties not in attendance at the dialogue meeting.

Based on the revised annotation, no enforcement problems are foreseen. Indeed, by having a consistent approach to trade in Appendix II specimens of African elephant, enforcement is likely to become simpler for the relevant officials.

At its 33rd meeting (AC33, Geneva, 2024), the Animals Committee agreed to submit for adoption by CoP20 a proposed nomenclature update concerning *Loxodonta africana*, now contained in Annex 3 to CoP20 Doc. 110 on *Standard Nomenclature*. If adopted, this would split the current listing of African elephant into two species, the African forest elephant *L. cyclotis* and the African savanna elephant *L. africana*. However, this would not affect the populations included in Appendix II and hence not this proposal. Other aspects associated with the proposed nomenclature change are addressed in CoP20 Doc. 113 on *Taxonomy and nomenclature of African elephants (Loxodonta spp.)*.

Provisional conclusions

The Secretariat welcomes the consensus achieved at the CITES Dialogue Meeting for African elephant range States and the proposals to harmonize and simplify the annotation relating to the trade in those African elephant populations included in Appendix II.

Based on the information available at the time of writing, it appears that proposed amendments to annotation A10 provide a more streamlined, consistent and harmonized approach to the specimens of *Loxodonta africana* that can be traded by Botswana, Namibia, South Africa and Zimbabwe. The approach is consistent with the Decision 19.167 and the terms of reference for the dialogue meeting agreed at the 77th meeting of the Standing Committee (SC77; Geneva, 2023; SC77 Com. 7).

The proposed removal of references to Resolutions and Decisions in the annotation is consistent with the provisions of Resolution Conf. 11.21 (Rev. CoP19).

Finally, based on the information available at the time of writing, it appears that specimens of leather goods traded for commercial purposes derived from the population of *Loxodonta africana* from Zimbabwe can be transferred to Appendix II in accordance with the precautionary measures in subparagraphs A 2 a) ii) A) and B) of Annex 4 to Resolution Conf. 9.24 (Rev. CoP17).

Proposal 15

***Bycanistes* spp. and *Ceratogymna* spp.** (African hornbills)

Proposal: Include in Appendix II.

Proponents: Cameroon, Congo, Gabon, Niger, Nigeria, Senegal, Sierra Leone, Togo

Provisional assessment by the Secretariat

CITES background

These genera have not been the subject of previous proposals to amend the Appendices.

Purpose and impact of the proposal

The proposal seeks to include *Bycanistes* spp. and *Ceratogymna* spp. in Appendix II, in accordance with Article II, paragraph 2 (a) and 2 (b) of the Convention. If the proposal is adopted, international trade in specimens of these genera will be regulated in accordance with the provisions of Article IV of the Convention.

Compliance with listing criteria

The supporting statement suggests that inclusion of *Bycanistes spp.* and *Ceratogymna spp.* in Appendix II satisfies criterion B in Annex 2a and criterion A in Annex 2b of Resolution Conf. 9.24 (Rev. CoP17). The proposal does not specify which species meets which criteria.

These two hornbill genera are endemic to Africa with *Ceratogymna* found in West and Central Africa and *Bycanistes* in West, Central, East and South Africa covering 35 range States. The species are large, sexually dimorphic frugivorous predominantly forest-dwelling species. They have a suite of characteristics which make them vulnerable to over-exploitation and habitat loss. They are monogamous and the female seals herself inside a tree cavity when incubating depending on the male for food. They therefore need large mature trees with such cavities. They occur at low population densities, are long-lived and normally only produce a single fledged chick per nesting attempt and may not breed every year. Their most striking morphological feature is an enlarged casque on the upper mandible and it is this feature which drives the demand in trade. Males have larger casques than females and juveniles lack them. They are important seed dispersers moving tree seeds > 500 m from the parent plant, or even further on occasions, and thus help forest diversity and gene flow.

The species are affected by forest loss with one study finding that a loss of 14% forest cover equated to a decline of around 11–14%. Continued forest loss and declines in habitat quality are expected to continue. Population sizes are poorly known or not quantified but an estimated population size for *C. elata* was 8–9,000 mature individuals. In a study of forest hornbills in Ghana, there were declines in six of eight species, largely attributed to hunting pressure with the largest species being the most affected. The species *C. atrata* has been extirpated in many areas in Cameroon, Congo, and Nigeria, with one species probably extinct in Ghana where populations are generally depleted outside protected areas, even in areas where forests persist. The IUCN Global Red List assessment categorizes *C. elata* (2016) and *B. cylindricus* (2018) as Vulnerable with the remaining species listed as Least Concern. All species except *B. subcylindricus* have declining trends according to the IUCN Red List assessments.

The main threats to the species, after forest loss, fragmentation and degradation, are hunting for wild meat for local consumption mainly and for skulls or casques for trade as curios. Significant numbers of hornbills are recorded in domestic markets. According to the proponents, the domestic demand for wild meat is now being replaced or stimulated by foreign demand for hornbill heads. Data from the United States of America indicate rising trends in imports of specimens (live and parts and derivatives) of both genera with the equivalent of 471 individuals imported from 2012–2023 (200 of these in 2023). Over half of skulls were declared as captive bred which the proponents suggest is likely to be erroneous. A separate study, using different calculations of individuals, found that at least 2,704 hornbills from Asia and Africa were imported into the United States of America between 1999 and 2024, with African hornbills comprising 94% of imports and with the numbers of these increasing over time.

Whilst international trade in the absence of inclusion in CITES Appendices is not necessarily illegal, hornbills are protected in some range States, but the proponents note that 20 of the 35 range States do not formally protect hornbills, some do so partially and only two, Namibia and Senegal, provide full protection. There do not appear to be any specific conservation management measures, population monitoring or international control measures in place for African hornbills. African hornbills occur in protected areas but declines are noted even in these areas.

Captive breeding of the species is reported to be challenging but it has occurred. There is no known commercial captive breeding and all specimens in trade are assumed to be of wild origin.

The proponents note that "sexual dimorphism and age-related variation in casque size, make the identification of cleaned skulls very challenging", especially of females and juveniles. The proposal if adopted is likely to aid enforcement of trade in other hornbill species already included in the Appendices by removing the difficulty of determining whether specimens are of a species included in the Appendices or not. It is suggested in the supporting statement that the earlier listing of Asian hornbill species might have shifted demand to African species. The Secretariat notes that the proposals to include Australasian hornbills in Appendix II to the eighth meeting of the Conference of the Parties (CoP8; Kyoto, 1992) recorded that Afrotropical species were recorded in trade then and that they could only be distinguished from Australasian species with difficulty (e.g. CoP8 Prop. 29). Overall, the proponents suggest that live male individuals of African hornbills can be readily identified to species level and their skulls generally so, but identification of live females and immatures or their skulls to species level may be difficult.

The proponents do not specify which species qualify for inclusion in Appendix II under criterion B of Annex 2a or criterion A of Annex 2b of Resolution Conf. 9.24 (Rev. CoP17), however, it is the understanding of the Secretariat, based on the clarification provided by one of the proponents (Nigeria), that all the species meet both criterion B in Annex 2a and criterion A in Annex 2b. In the view of the proponents, if any species were deemed not to meet the first criterion, the remaining species would still meet Criterion A in Annex 2b, both for their similarity to African hornbills that meet Criterion B in Annex 2a and to the already listed Asian hornbills. Taken collectively it does appear that the two genera of African hornbills are in trade, that this trade is driving hunting pressure on hornbills for their parts and derivatives, and that populations are vulnerable to such removals from the wild, especially in combination with other pressures such as forest loss and hunting for wild meat. It seems that regulation of trade will contribute to ensuring that such harvest is not reducing populations to a level at which their survival might be threatened by continued harvesting or other influences. They thus seem to meet criterion B in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17).

The supporting statement also notes the difficulties for both genera of distinguishing parts and derivatives, especially skulls, to species level, especially for female and juvenile specimens. If the proposal was adopted it seems likely that enforcement officers who encounter specimens of these genera, especially their parts and derivatives, would be unlikely to be able to distinguish between such specimens. It seems that both genera meet criterion A of Annex 2b of Resolution Conf. 9.24 (Rev. CoP17).

Additional considerations

The proponents provides the scientific names of species in these two genera (seven species and seven subspecies) using the standard reference contained in the Annex to Resolution Conf. 12.11 (Rev. CoP19) on *Standard nomenclature*. However, a more recent reference which recognizes two additional species in the genus (making nine species and four subspecies) is used in the supporting statement. No revision to the standard reference is formally proposed and if the proposal were adopted, then nomenclature would follow the standard reference.

The Secretariat notes that CoP20 Doc.110 on *Standard nomenclature* suggests postponing a decision on the adoption of a new standard nomenclature reference for birds whilst the implications are reviewed and the document proposes a new draft Decision to direct the Animals Committee to continue its work towards adoption of an updated standard nomenclature reference for birds, taking into consideration previous work done, as well as the consolidated checklist of birds of the world in preparation.

All range States were consulted and the responses summarized in the proposal.

Provisional conclusions

Based on the information available at the time of writing, it appears that *Bycanistes* spp. and *Ceratogymna* spp. meet criterion B in Annex 2a and would meet criterion A in Annex 2b to Resolution Conf. 9.24 (Rev. CoP17) for their inclusion in Appendix II.

Proposal 16

Gyps africanus (White-backed vulture)

Gyps rueppelli (Ruppell's vulture)

Proposal: Transfer from Appendix II to Appendix I.

Proponents: Benin, Burkina Faso, Burundi, Cameroon, Chad, Congo, Gambia, Guinea, Niger, Nigeria, Senegal, Sierra Leone, Togo

Provisional assessment by the Secretariat

CITES background

Both *Gyps africanus* and *G. rueppelli* were included in Appendix II in 1979, following the second meeting of the Conference of the Parties (CoP2; San José, 1979; CoP2 Prop. 38), as part of the higher taxon listing of Falconiformes.

Purpose and impact of the proposal

The proposal seeks to transfer *G. africanus* and *G. rueppelli* from Appendix II to Appendix I. If the proposal is adopted, international trade in specimens of these species will be regulated in accordance with the provisions of Article III of the Convention.

If *G. africanus* and *G. rueppelli* are included in Appendix I, operations breeding the species for commercial purposes would need to be registered with the Secretariat in accordance with Resolution Conf. 12.10 (Rev. CoP15) on *Registration of operations that breed Appendix-I animal species in captivity for commercial purposes*.

Compliance with listing criteria

The proponents suggest that the transfer of these two species to Appendix I is in accordance with Article II.1 of the Convention and Annex 1 A of the Convention, which the Secretariat understood to mean Annex 1 A of Resolution Conf. 9.24 (Rev. CoP17) on *Criteria for amendment of Appendices I and II*.

The supporting statement notes that both species are widely distributed across Africa occurring in 32 countries (*G. africana*) and 41 countries (*G. rueppelli*) respectively. Both inhabit open areas such as savannas and open woodlands. They are carrion feeders and are primarily dependent on large ungulates and often feed collectively on carcasses. They have very large home ranges and make long foraging flights. Their scavenging contributes to nutrient cycling and limits the spread of disease; in their absence due to declines, other scavengers increase, including feral dogs. They have delayed maturity, long generation lengths and low reproductive rates, making them vulnerable to high mortality rates.

The proponents note that their preferred savanna ecosystems are declining, especially in West Africa. Projected expansion of agricultural land in sub-Saharan Africa is likely to reduce populations. Estimates from the 1990s suggest that *G. rueppelli* had a population size of 22–30,000 mature individuals. *G. africanus* was described as the most abundant vulture in Africa with an estimate of 270,000 individuals in 1992. Recent studies suggest that both species have declined significantly and rapidly by, respectively, 5.8% per year (equivalent to 92.5% over three generations, 43 years) for *G. rueppelli* and by 81% over three generations (around 40 years) for *G. africanus*. As a result, both species are categorized as Critically Endangered in the IUCN Red List (2021). Evidence suggests the declines are particularly severe in West Africa.

Whilst threats to the species include habitat conversion, loss of wild ungulates, the supporting statement identifies the primary threat as poisoning (intentional or unintentional) and hunting for trade in wild meat or vulture body parts and derivatives for belief-based uses. Poisoning is used to kill vultures to trade their body parts or as 'sentinel' poisoning where carcasses are poisoned to kill vultures and so avoid them drawing attention to incidents of illegal killing.

The proponents state that trade in vulture parts has a long history in West Africa with >1,500 vultures traded annually in Nigeria and 1,128–1,692 *G. rueppelli* and 924–1,386 *G. africanus* traded in the region over a six year period (2008-2013). This trade is considered responsible for the near extirpation of the species in Nigeria. Whilst most trade is or was domestic, with the depletion of vulture populations, evidence now suggests a significant cross-border trade taking place in the region with traders sourcing vulture parts and derivatives from neighbouring countries. This trade appears to be taking place without CITES permits and in contravention of national legislation. Legal trade is generally low consisting of live birds, including from captive breeding, bodies, scientific specimens and trophies.

The supporting statement summarizes national legislation which seems to protect vultures in most countries of concern. The two species are also included in Appendix I and II of the Convention of Migratory Species (CMS), to which many range States of the two species are Party; inclusion in Appendix I requires Parties to prohibit the taking of such species. Many relevant Parties are also signatories to the Memorandum of Understanding on the Conservation of Migratory Birds of Prey in Africa and Eurasia (Raptors MOU) and there is a Multi-species Action Plan to Conserve African-Eurasian Vultures (Vulture MsAP) 2017–2029 adopted by the Parties to CMS.

The proponents note that several other *Gyps* species face similar threats and are also likely to be in trade, legal or otherwise. The proponents note the need for identification material to identify vulture parts and derivatives.

The proposal notes captive breeding operations for *G. africanus* in South Africa and releases to the wild from one operation in South Africa. The CITES Trade Database also suggests that *G. rueppelli* is also being bred in captivity in Europe. If the proposal were adopted, the registration under the provisions of Resolution Conf. 12.10 (Rev. CoP15) would be required for any facilities breeding the species for commercial purposes.

The Secretariat notes that these two species are already protected by a range of national and international instruments. Many of the activities detrimentally affecting the species, such as killing, poisoning, trading in domestic markets and trade across borders are illegal and/or should have been covered by permits. In the absence of effective enforcement, it is not immediately clear what difference an Appendix I listing will make to such trade.

The proponents do not specify on which criteria the proposal is based. However, neither *G. africanus* nor *G. rueppelli* seem to have a small population or a restricted area of distribution. They would not therefore meet criteria A or B of Annex 1 to Resolution Conf. 9.24 (Rev. CoP17). However, the proposal provides strong evidence that both species have suffered a marked recent rate of decline that exceeds the guideline provided in Annex 5 of the same Resolution. Moreover, the decline is ongoing and can be inferred and projected based on a continued decrease in the area of habitat, levels of exploitation, and a high vulnerability due to intrinsic factors such as life history traits and to extrinsic factors such as poisoning. The species would thus appear to meet criteria C i) and ii) in Annex 1 to Resolution Conf. 9.24 (Rev. CoP17). Both species are affected by trade.

Additional considerations

Range States were consulted in March 2025 according to the proposal but no responses were received.

The Secretariat notes the need for better identification tools for vulture parts and derivatives suggested in the supporting statement. In CoP20 Doc. 74, the Standing Committee reports on the implementation of Decisions 19.192 to 19.196 on *West African vultures (Accipitridae spp.)* in which the Secretariat note that it has not been possible to find funding to produce such identification materials as directed by Decision 19.194 b). However, the Secretariat remains of the view that identification materials focusing on parts and derivatives of vulture species for use by law enforcement are needed to support enforcement efforts. The Standing Committee recommends the renewal of that Decision amongst others.

In document CoP20 Doc. 74, the Standing Committee also refers to the West African Vulture Conservation Action Plan (WAVCAP) launched in April 2024 by CMS, BirdLife International and IUCN,

in collaboration with West African vulture range States. The WAVCAP focuses on addressing key threats faced by vultures in West Africa, with a focus on reducing the imminent threat posed by belief-based use. The Secretariat notes that several plans have been adopted but implementation of these, including effective implementation and enforcement of CITES provisions, is essential to address some of the key threats faced by these species.

Provisional conclusions

Based on the information available at the time of writing, it appears that *Gyps africanus* and *Gyps rueppelli* meet the criterion C i) and ii) in Annex 1 of Resolution Conf. 9.24 (Rev. CoP17) for their inclusion in Appendix I.

Proposal 17

Falco peregrinus (Peregrine falcon)

Proposal: Transfer from Appendix I to Appendix II.

Proponents: Canada and the United States of America

Provisional assessment by the Secretariat

CITES background

The species *Falco peregrinus* was included in CITES Appendix II in 1975 (with the Family listing Falconidae spp.), while the subspecies *F. p. anatum*, *F. p. peregrinus* and *F. p. tundrius* were included in Appendix I. All subspecies of the *F. peregrinus* were transferred to Appendix I in 1977 after the first meeting of the Conference of the Parties (CoP1; Bern, 1976; CoP1 Prop. 188).

At the 17th Conference of the Parties (CoP17; Johannesburg, 2016) the Parties considered a proposal to transfer the species from Appendix I to Appendix II (CoP17 Prop. 17). The proposal was rejected.

Purpose and impact of the proposal

The proposal aims to transfer *F. peregrinus* from Appendix I to Appendix II, taking account of the precautionary measures in Annex 4 to Resolution Conf. 9.24 (Rev. CoP17). If the proposal is adopted, international trade in specimens of this species will be regulated in accordance with the provisions of Article IV of the Convention.

At present, operations that breed specimens of *F. peregrinus* in captivity for commercial purposes should be registered with the Secretariat under the provisions of Resolution Conf. 12.10 (Rev. CoP15) on the *Registration of operations that breed Appendix-I animal species in captivity for commercial purposes*. However, if this proposal were adopted, Parties would no longer be required to register such captive-breeding operations.

Compliance with listing criteria

Concerning inclusion of *F. peregrinus* in Appendix II, the proponents assert that the species no longer meets the biological criteria for inclusion in Appendix I and should be transferred from Appendix I to Appendix II in accordance with the precautionary measures in Annex 4 of Resolution Conf. 9.24 (Rev. CoP17)

The supporting statement notes that *F. peregrinus* is a very widely distributed species with global populations that are currently either stable or increasing (with a few regional exceptions), and a large population size (estimated at 248,800 to 478,000 mature individuals) with an increasing global trend. Populations in many areas now exceed those before the major declines caused by the use of the pesticide DDT (dichloro-diphenyl-trichloroethane) and increases have also been driven by the colonization by peregrines of urban areas and man-made structures for roosting and nesting. The species has a very large global distribution and occurs in every continent apart from Antarctica. At global scale, populations of *F. peregrinus* are considered secure and have been categorized by the IUCN Red List assessment in 2021 as Least Concern, with the same assessment made for Europe (2020) and for the Mediterranean (2021).

The proposal notes threats still exist from the use of environmental toxins but current levels of DDT use do not seem to be having population level impacts. Other threats include illegal killing, habitat alteration and destruction, illegal take and trade for falconry, power infrastructure and, more recently, highly pathogenic avian influenza.

Specimens of *F. peregrinus* are traded internationally primarily as live birds for falconry, re-introduction or breeding purposes. The trade data analysis presented in the proposal shows that from 2015 to 2024 an average of 1,551 live birds were exported per year from 52 countries over 80% of which were of captive-bred source codes C and D. This trade represents an increase from the 552 live peregrine

falcons which were exported per year between 2010 and 2014, 85% of which were captive-bred (any exports of wild birds were for non-commercial purposes). Some 42 captive-breeding operations in 10 Parties are registered with the Secretariat under the provisions of Resolution Conf. 12.10 (Rev. CoP15), more are in the process of being registered.

Trade of *F. peregrinus* is concentrated among relatively few countries in Europe and North America (major exporters) and the Middle East (major importers). Europe is the top exporter accounting for 82% (11,680 birds) of all exports from 2015-2024 with the Middle East accounting for 92% (12,146) of all imports. Birds are used for falconry purposes or for breeding stock.

The proposal notes that illegal take and trade in *F. peregrinus* for falconry purposes is known to occur but its scale is difficult to assess, with it being particularly problematic in North Africa. Peregrine eggs and juveniles are known to be taken illegally from wild nests to be "fraudulently claimed to be of captive bred origin" with successful prosecutions resulting from the use of DNA evidence. The primary destination for birds of illegal origin, as for those in legal trade, is the Middle East. The proponents state that the levels of illegal trade are low compared with legal trade and not at levels which affect the population status of peregrines.

The proposal notes that Parties who provided information to them suggested that their "national-level controls were robust and effective at protecting wild falcons from overharvest and unsustainable take". Of the countries providing information to the proponents in 2016, the 20 key trading countries indicated that they had effective national controls and legislation in place and that these controls would not be changed if the species were to be transferred to Appendix II. In those countries that permitted wild harvests, juveniles were the preferred age group for harvesting and these were the group whose removal would have the lowest impact on the wild population. The proposal also notes that in the European Union, *F. peregrinus* is included in Annex A of their wildlife trade regulations, equivalent to Appendix I, and that all the European Union member States must implement strict import and export controls for the species.

The proponents suggest a small increase in trade might be expected as a result of a transfer of the species to Appendix II but the market is small and trade is likely to continue to be met by captive-bred specimens. Any trade in specimens of wild origin would be subject to the making of non-detriment findings, which can be monitored and corrected where needed under the provisions of Resolution Conf. 12.8 (Rev. CoP18) on the *Review of significant trade in specimens of Appendix-II species*. Wild populations are said to be resilient to the (legal or illegal) removal of a small (5-20%) percentage of nestlings or juveniles, which are also those most in demand for falconry purposes. The provisions of Resolution Conf. 17.7 (Rev. CoP19) on the *Review of trade in animal specimens reported as produced in captivity* provide a mechanism to monitor and address any concerns arising about trade in specimens derived from captive breeding.

The proposal states hybrid falcons account for around a third of global diurnal raptor trade. These hybrids are often between *F. rusticolus*, *F. cherrug* and *F. peregrinus* (and other *Falco* species) crossed to achieve desired phenotypic traits. Such hybrids can be variable and difficult to distinguish from one of more of their parents. The proponents note that this issue will not be any different if transferred to Appendix II than it is at present. They also note the availability of *The CITES identification guide to falconry species* provided by Environment Canada whose use can be supplemented by DNA testing if required. The use of marking of live birds through closed leg rings and microchipping can help control trade

Overall, it seems that the legal instruments put in place by key trading countries, the trade controls and existing species management and conservation measures, including stricter measures, continue to be effective in conserving and restoring this species and seem likely to remain unchanged if the proposal was adopted.

In summary, the available information shows that *Falco peregrinus* does not meet the biological criteria for its inclusion in Appendix I because the wild population is large and increasing globally, and is extremely widely distributed. The international trade in this species is mostly in live captive-bred specimens for falconry. The levels of trade are relatively small in relation to the population size. In terms of the precautionary measures, it is likely that, if the species were transferred to Appendix II, it would continue to be in demand for commercial trade, but it seems to be sufficiently well managed and

protected in the range States, and in the key trading countries in particular, to ensure that trade would be conducted in compliance with the provisions of the Convention and adequately controlled.

Additional considerations

The proponents note they consulted Parties on an earlier proposal to CoP17. They also invited Parties and others, through Notification to the Parties No. 2024/113, to provide information on the conservation and management of *F. peregrinus* and the effectiveness of legislation and controls. They received 27 responses from range States and eight from non-government organisations.

The Secretariat notes that following the adoption of updated nomenclature for fauna adopted at the 19th meeting of the Conference of the Parties, the former species *F. pelegrinoides* is now considered a subspecies of *F. peregrinus* and is thus subject to this proposal.

Provisional conclusions

Based on the information available at the time of writing, it appears that *Falco peregrinus* no longer meets the criteria in Annex 1 to Resolution Conf. 9.24 (Rev. CoP17) for its inclusion in Appendix I. The population of the species can be transferred to Appendix II in accordance with the precautionary measures in paragraph A 2 a) ii) A) and B) of Annex 4 to Resolution Conf. 9.24 (Rev. CoP17).

Proposal 18

Sporophila maximiliani (Great-billed seed-finch)

Sporophila angolensis (Chestnut-bellied seed-finch), ***Sporophila atrirostris*** (Black-billed seed-finch), ***Sporophila crassirostris*** (Large-billed seed-finch), ***Sporophila funerea*** (Thick-billed seed-finch) and ***Sporophila nuttingi*** (Nicaraguan seed-finch)

Proposal:

Include *Sporophila maximiliani* in Appendix I.

Include *Sporophila angolensis, Sporophila atrirostris, Sporophila crassirostris, Sporophila funerea* and *Sporophila nuttingi* in Appendix II.

Proponent: Brazil

Provisional assessment by the Secretariat

CITES background

These species are not included in the CITES Appendices and have not been the subject of any previous proposals.

Purpose and impact of the proposal

The proposal seeks to include *Sporophila maximiliani* in Appendix I, in accordance with Article I of the Convention. If the proposal is adopted, international trade in specimens of species will be regulated in accordance with the provisions of Article III of the Convention.

If *Sporophila maximiliani* is included in Appendix I, operations breeding the species for commercial purposes would need to be registered with the Secretariat in accordance with Resolution Conf. 12.10 (Rev. CoP15) on *Registration of operations that breed Appendix-I animal species in captivity for commercial purposes*.

The proposal seeks to include *Sporophila angolensis*, *S. atrirostris*, *S. crassirostris*, *S. funerea* and *S. nuttingi* in Appendix II, in accordance with Article II, paragraph 2(b) of the Convention. If the proposal is adopted, international trade in specimens of these species will be regulated in accordance with the provisions of Article IV of the Convention.

Compliance with listing criteria

The supporting statement suggests that the inclusion of *Sporophila maximiliani* in Appendix I satisfies criteria A i) and ii), B i) and iv) and C i) and ii) in Annex 1 of Resolution Conf. 9.24 (Rev. CoP17). The proponent also suggests that inclusion of *Sporophila angolensis, Sporophila atrirostris, Sporophila crassirostris, Sporophila funerea* and *Sporophila nuttingi* in Appendix II meets criterion A in Annex 2b of Resolution Conf. 9.24 (Rev. CoP17).

The proposal notes that *S. maximiliani* is a large granivorous seed-finch found in riparian forests, wetlands and grasslands. It plays a key role in such ecosystems as a seed disperser. It occurs in disjunct populations, one in southern Brazil and northern Bolivia, another in eastern Venezuela, Guyana, Suriname and French Guiana (and possibly Colombia), and in eastern Brazil. There is uncertainty about the species' current presence in Guyana, Suriname and French Guiana.

Although habitat loss and fragmentation affect the species, the proposal indicates that the primary driver of its rapid decline is intense harvesting for the live bird trade. The global population was estimated at 1,000 to 2,499 individuals in 2017. Although once widespread in Brazil, the species is now rare there, with the population estimated at only 250 individuals, with each sub-population numbering no more than 50 mature individuals. Brazil is the only country with reliable recent records. The proposal notes

that more recent studies estimate the global population at fewer than 1,000 mature individuals with fewer than 100 in Brazil. Habitat loss and degradation also contribute to declines. The species is categorized as Endangered in the IUCN Red List (2017) and as Critically Endangered in Brazil.

The proposal identifies the major threat to the species as being from previous and current capture and trade from the wild for the live bird trade. The species is a popular and valuable songbird in captivity in Brazil and elsewhere and is desirable for bird singing tournaments. The market value of birds in Brazil ranges from USD 800-8,000 for specimens from authorized breeding facilities whereas wild-taken specimens in north-eastern Brazil range in price from USD 197 to 3,400. Whilst much of the market is internal, international trade also occurs. Between 2007 and 2025, Brazil exported 291 live birds, mostly to the United States of America with some to Europe, all from registered commercial breeding facilities. There are discrepancies between the data from Brazil and those held by the United States of America suggesting some unauthorized trade and the difficulties of documenting and regulating trade. The supporting statement notes the results of a study for the CITES Secretariat which recorded 'moderate' levels of trade for *S. maximiliani* and the proponent suggests that the impact of even moderate trade can have a high impact on small populations. The Secretariat notes that *S. maximiliani* was identified in a shortlist of 22 species for which international trade may affect their conservation status (Annex 5 of AC33 Doc. 39). No trade in parts and derivatives is recorded.

Although legally sourced birds are available in Brazil, the proposal also notes that laundering of wild-taken birds as captive-bred remains a significant issue with 611 individual birds seized between 2019 and 2024. It is the 27th most seized bird in the country, its rank attributed in the supporting statement to its scarcity rather than limited demand. The ongoing capture of wild individuals undermines efforts to reintroduce the species into the wild. The proposal notes the risk of illegal trade of songbirds across Brazil's northern borders into neighbouring countries.

According to the proposal, Brazilian law prohibits, amongst other things, the taking, handling, and commercialization of all wild specimens of species threatened with extinction. It also forbids the export of wild-taken native species. However, the export of captive-bred specimens from authorized enterprises is permitted. Both commercial and non-commercial breeding are permitted subject to authorizations. Legislation in other range States variously permits the trade in wild-taken specimens subject to various conditions.

According to the supporting statement, significant numbers of *S. maximiliani* are kept and bred in captivity. In Brazil, there are over 41 registered commercial breeding facilities with a combined total of 8,318 individuals in captivity. These facilities, if they wished to trade internationally, would need to be registered with the Secretariat in accordance with Resolution Conf. 12.10 (Rev. CoP15). In addition, over 204,000 birds are kept in captivity by more than 37,000 non-commercial breeders. Many of these birds might have hybridized in captivity with other members of the genus.

Resolution Conf. 9.24 (Rev. CoP17) states that species of which all specimens in trade have been bred in captivity should not be included in the Appendices if there is a negligible probability of trade taking place in specimens of wild origin. Although the numbers available in captivity vastly exceed numbers in the wild, it appears that the risk of wild-take continues and that any such take would be detrimental.

To date, the proposal suggests that there are no conservation plans or targeted government-led projects in any range States. However, a small number of reintroduction projects are underway in Brazil which include using birds of captive-bred origin. The proponent recognizes that the captive breeding is essential to prevent the extinction of the species but reforms are needed to make these more effective. Many captive-bred individuals are not suitable for release or are hybrids.

The proponent notes that identification of *S. maximiliani* is difficult especially for non-experts. Females and juveniles of the species closely resemble other members of the genus; whilst males are more readily distinguished from other members of the genus this is not the case between males of *S. maximiliani* and *S. crassirostris*. The proposal would include five other members of the genus *Sporophila* under criterion A in Annex 2b of Resolution Conf. 9.24 (Rev. CoP17). The proponent notes that these species are likely to be encountered in trade, especially *S. angolensis* and *S. crassirostris*; the Secretariat notes that these two species were also identified in the "long list" of songbirds in trade in Annex 4 to AC33 Doc. 39. The

proposal suggests that molecular tools can be effective in identifying *S. maximilianii* at the species level, but further research is needed.

Based on the information available at the time of writing, it appears that the population of *S. maximiliani* is small (criterion A) and is characterized by an observed and projected decline in the number of individuals (and, probably, the area and quality of habitat) and that surviving subpopulations are also very small. The area of distribution (criterion B) is not quantified in the proposal, but it seems likely to be restricted with the occurrence of *S. maximiliani* at very few locations with an observed or projected decrease in the number of individuals. There has also been a marked decline in the population of the species (criterion C) which has been observed as being ongoing and inferred or projected due to levels or patterns of exploitation. The species is also in trade and such trade has had a detrimental impact on the status of the species.

If the proposal to include *S. maximiliani* in Appendix I was adopted by the Conference of the Parties, It seems that the species *Sporophila angolensis*, *S. atrirostris*, *S. crassirostris*, *S. funerea* and *S. nuttingi* are all difficult to distinguish from one another and from *S. maximiliani*, especially between female and juvenile individuals, such that enforcement officers who encounter a specimens are unlikely to be able to distinguish between them. At least two of these species are in trade.

Additional considerations

The proposal suggests a new standard nomenclature reference (del Hoyo *et al*., 2016) for the species included in this proposal, placing them in the genus *Sporophila*; thus six species of the 41 in the genus *Sporophila* would be included in the Appendices. Currently, the standard reference for birds contained in the Annex to Resolution Conf. 12.11 (Rev. CoP19) on *Standard nomenclature*, places these six species in the genus *Oryzoborus*. if the Conference of the Parties decide to adopt this proposal, the proposed standard reference would need to be added to the Annex of Resolution Conf 12.11 (Rev. CoP19) on *Standard Nomenclature* as applying specifically to the *Sporophila* species.

Brazil consulted range States and their various responses to the proposal are summarized.

No identification guide has been provided or seems to be available.

Provisional conclusions

Based on the information available at the time of writing, it appears that *Sporophila maximiliani* meets criteria A i) and ii), B i) and iv) and C i) in Annex 1 to Resolution Conf. 9.24 (Rev. CoP17) for its inclusion in Appendix I.

It also appears that *Sporophila angolensis*, *S. atrirostris*, *S. crassirostris*, *S. funerea* and *S. nuttingi* to meet criterion A in Annex 2b to Resolution Conf. 9.24 (Rev. CoP17) for their inclusion in Appendix II.

Proposal 19

Caribicus warreni (Hispaniolan giant galliwasp)

Proposal: Include in Appendix I.

Proponent: Dominican Republic

Provisional assessment by the Secretariat

CITES background

This species is not included in the Appendices and has not been subject to a previous proposal.

Purpose and impact of the proposal

The proposal seeks to include *Caribicus warreni* in Appendix I, in accordance with Article I of the Convention. If the proposal is adopted, international trade in specimens of this species will be regulated in accordance with the provisions of Article III of the Convention.

If *C. warreni* is included in Appendix I, operations breeding the species for commercial purposes would need to be registered with the Secretariat in accordance with Resolution Conf. 12.10 (Rev. CoP15) on *Registration of operations that breed Appendix-I animal species in captivity for commercial purposes*.

Compliance with listing criteria

The supporting statement suggests that inclusion of *C. warreni* in Appendix I is in accordance with the provisions of Resolution Conf. 9.24 (Rev. CoP17), Annex I, because the wild population is small and has the following characteristics: A i) There is a known, inferred or expected decline in the number of individuals or in the area and quality of the habitat; and A ii) each of its subpopulations is very small. The proponents also note the wild population has a restricted area of distribution and presents the characteristics mentioned in criterion A.

C. warreni is a lizard endemic to the island of Hispaniola, which comprises Haiti and the Dominican Republic only. It inhabits crevices in rocks and logs in humid cloud and riparian forests. The species is viviparous and females can give birth to up to 20 young; they are long-lived. The species is described in the supporting statement as having a crucial role in the ecosystems it inhabits as a predator of other animals and as a seed disperser.

The supporting statement notes that the species has a limited extent of occurrence extending only to 100 km^2 and an area of occupancy of <10 km^2. There is a continued decline in both of these parameters and in the number of locations and the remaining habitat is increasingly fragmented. It appears that the species is found in a single location in Haiti and although most subpopulations in the Dominican Republic have been lost, one well-studied subpopulation occurs in cloud forest in a protected area (Loma Isabel de Torres National Monument) in the Dominican Republic. This is the only subpopulation that occurs in a protected area and it is estimated to comprise 66 individuals. The species is categorized as Vulnerable in the IUCN Red List assessment done in 2015 and as Critically Endangered in the Red List assessment of the Dominican Republic.

According to the supporting statement, the main threats are habitat loss due to the expansion of agriculture, invasive alien species (especially dogs, cats and ferrets), illegal trade and deliberate killing (local people consider the species incorrectly to be venomous).

Live specimens are recorded in legal trade and, according to the supporting statement, the species is known to have been exported “fairly frequently” from Haiti in the 1990s, these are potentially the origin of specimens in Europe and North America. The proposal notes that there has been no legal trade authorized by the Dominican Republic and the species is not in demand there. The proponents claim that the species is in high demand in trade but the prices quoted in the supporting statement (of up to USD 225) do not suggest very high demand or limited availability. The supporting statement claims

that specimens are frequently offered for sale internationally, especially in the United States of America and that “most of this trade is illegal” but evidence for this latter point is not provided. The supporting statement indicates that there are records of legal trade of the species because, in the 1990s, *C. caribicus* were quite frequently legally exported from Haiti to the United States of America. The supporting statement also refers to a personal communication which states that there are “many ways they could have entered the private sector, both legally and possibly illegally”. The supporting statement notes that more live specimens are offered for sale than occur in the wild population in the protected area referred to above. There seems to be little evidence of targeted take from the wild.

The species is fully protected by the Dominican Republic and the species is only used for scientific purposes, research or breeding for conservation; no commercial use is permitted. The proponents describe a series of controls for trade in CITES and non-CITES specimens. No information is provided on legal or other measures in Haiti. The species is monitored in the single protected area in which it occurs in the Dominican Republic.

Captive breeding for conservation purposes is undertaken by Nashville Zoo (who maintain a studbook) and by the Durrell Institute with approximately 400 offspring produced collectively to F2 generation; there is no captive breeding programme in the Dominican Republic. The proponents state that the species is known to be common in the private sector and at least one individual has bred the species on multiple occasions.

The proposal refers to the two other species in the genus *Caribicus*, both endemic to Hispaniola. The proposal notes that “differences in colour and pattern are notable between them as is their geographical distribution”.

Based on the information available at the time of writing, and in the absence of information from Haiti, it appears, as the proponents state, that *C. warreni* has a small population with an observed or inferred decline in the number of individuals or habitat and with each subpopulation being very small. It would seem to meet criteria A i) and ii) of Annex 1 of Resolution Conf 9.24 (Rev. CoP17). It would seem to also meet criterion B i), iii) and iv) of the same Annex in that it appears to have a restricted area of distribution with fragmentation and occurrence at very few locations, a high vulnerability to extrinsic factors such as invasive alien species, and with an observed and projected decrease in the number of subpopulations, the area and quality of habitat and the number of individuals.

The species is affected by trade with both recorded trade and potential international demand for it. Any take from wild populations for trade would be detrimental. However, there seems to be little evidence of directed wild-take and it seems likely that most specimens offered for sale are from captive breeding, though there may be uncertainty regarding the origin of the founder stock. Inclusion in Appendix I would not seem to address the main threats to the species from habitat loss and invasive alien species.

Additional considerations

The proponents noted that they had not consulted Haiti because it is a non-Party. Information on the status of the species in Haiti, as the only other range State, and any legal and other measures there, would have been desirable if available.

The Secretariat notes that the proponents refer to two other species of *Caribicus* endemic to Hispaniola. If the proposal was adopted, identification materials would be desirable to help enforcement officials distinguish between the species.

Provisional conclusions

Based on the information available at the time of writing, it appears that *Caribicus warreni* meets criteria A i) and ii) and B i), iii) and iv) in Annex 1 to Resolution Conf. 9.24 (Rev. CoP17) for its inclusion in Appendix I.

Proposal 20

Phyllurus amnicola (Mount Elliot leaf-tailed gecko)

Proponent: Australia

Proposal: Include in Appendix II.

Provisional assessment by the Secretariat

CITES background

The species was included in Appendix III at the request of Australia under the genus listing of *Phyllurus* spp., which came into effect on 22nd June 2022.

Purpose and impact of the proposal

The proposal seeks to include *Phyllurus amnicola* in Appendix II, in accordance with Article II, paragraph 2(a) of the Convention. If the proposal is adopted, international trade in specimens of *P. amnicola* will be regulated in accordance with the provisions of Article IV of the Convention.

Compliance with listing criteria

The supporting statement suggests that inclusion of *Phyllurus amnicola* in Appendix II satisfies criteria A and B in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17).

The Mount Elliot leaf-tailed gecko, *P. amnicola*, is an endemic species found in only four discrete localities on and around Mount Elliot and Saddle Mountain in a protected area in the state of Queensland in Australia. The species is narrowly restricted to the rocky rainforest habitats at each of the known localities and although the populations on Mount Elliot have an extensive interconnected area of suitable habitat for connectivity, only a narrow gap in suitable habitat is available between Mount Elliot and the Saddle Mountain population to support dispersal. This gap is significant to current and historical gene flow due to the species limited dispersal capabilities across unsuitable habitat.

The species was only described in the year 2000 by Couper *et al.*, 2000[11] and the population size is currently unknown but the proponent indicates that it is presumed to be at high densities within areas of suitable habitat with the exception of one subpopulation (Western Boulders) where it is found at low density due to the exposed boulder features with little associated rainforest. Little is known about the population structure of *P. amnicola* and the reproductive characteristics. According to the supporting statement *P. amnicola*, like other leaf-tailed geckos are relatively slow-growing and usually reach reproductive size at 2 – 3 years of age. The females may lay only a single clutch per year and two eggs per clutch.

Based on the supporting statement there are no dedicated management plans in place for the species in the wild. There are no captive breeding programs approved under the Queensland Government domestic legislation and the species has not been identified for reintroduction programs at this time.

With regards to threats to the species, the supporting statement indicates that the species natural range occurs within protected areas and it is therefore largely buffered from the threat of fire, but changes in fire regimes have led to changes in fire frequency, timing and intensity that pose a threat to the rainforest patches where the species are found. Any activities that threaten connective pathways for the species risk creating further population fragmentation and increasing its isolation because of the species' limited dispersal capabilities.

[11] Couper, P.J., Schneider, C.J., Hoskin, C.J. and Covacevich, J.A., 2000. Australian leaf-tailed geckos: phylogeny, a new genus, two new species and other new data. *Memoirs of the Queensland Museum, Nature*, *45*(2), pp.253-265. Accessed on 28 July 2025.

The proponent states that poaching from the wild to supply trade is known to occur, with the species appearing for sale on many online platforms and social media groups overseas due to their high desirability among collectors. According to the proponent the species' population is estimated to be in decline following the significant impact on one subpopulation (Alligator Creek) of a single illegal collection event resulting in slow recovery of the population.

The Secretariat notes that according to the IUCN Red List Assessment *P. amnicola* is categorizes as Near Threatened and acknowledging the impact of the illegal collection on the subpopulation in Alligator Creek, the assessment states the following: "The remainder of the range is, however, much less accessible to collectors and, although collection must be considered an ongoing threat, the extent to which the species is at risk is not clear and, in the absence of other threats, it is not thought likely to be at significant risk of extinction".

The species is listed as Vulnerable under Queensland state legislation and recognized as a protected species, the species is prohibited from being kept or traded as pets and is not used for any commercial purposes according to the proponent. Furthermore, commercial export of live native reptiles from Australia is prohibited according to the supporting statement and therefore there is no legal commercial international trade of the species. According to the proponent, the export of live native reptiles from Australia has been regulated from at least 1982 through various legislative provisions and export permits for live Australian reptiles can only be issued for specified non-commercial purposes.

The supporting statement reports that 72 specimens of *P. amnicola* originating from Germany, the Netherlands and the United States of America were traded internationally between 2008 and 2018, with prices initially ranging from 10 to 70 Euros. However, between September 2017 and March 2018, 45 specimens were offered for sale on European online platforms and social media with sale offers posted in several countries and prices rising sharply to 1,250–2,030 Euros per individual. This significant price increase suggests growing commercial value, which may drive international demand and heighten the risk of illegal collection from the wild. The proponent indicates that the presence of online sale advertisements for the species is increasing.

Based on the data contained in the CITES Trade Database, 24 specimens have been recorded in trade with 21 specimens reported as bred in captivity and three specimens born in captivity and most trade taking place between Czechia and Japan.

The proponent indicates that *P. amnicola* is distinguishable from congeneric species by several features including the shape of the tail, with *P. amnicola* having a flared leaf-like tail rather than a long, cylindrical tail shape of the other species in the genus.

In assessing the proposal to include *P. amnicola* in Appendix II based on criteria A and B of Annex 2a of Resolution Conf. 9.24 (Rev. CoP17), the Secretariat considered the following: the wild population size is unknown, and it seems to have a high vulnerability to extrinsic factors (fires and illegal collection impacting some subpopulations); the wild population has a restricted area of distribution and only occurs at very few locations and therefore seems to meet criterion B of Annex 1 of Resolution Conf. 9.24 (Rev. CoP17). With regard to criterion B of Annex 2a, the supporting statement indicates that threats from fires and illegal harvesting (mainly for the international pet trade) results in the species being vulnerable to harvest from the wild for international trade. There is however a prohibition on the export of live native reptiles (with exceptions for research, conservation breeding and educational purposes, but no permits have been issued) and it is not clear whether the proponent intends to authorize trade for commercial purposes in the future.

Additional considerations

The proponents indicate that although the species appear similar to other leaf-tailed geckos, it is distinguishable from congeneric species based on several features including tail shape (flared leaf-like), the presence of prominent spines and its larger size.

Although the proponent states that identification of the species should not pose challenges as live native reptile specimens cannot be exported for commercial purposes from Australia, identification materials

would be helpful to assist enforcement authorities to identify the species, especially if illegally traded, should the proposal be adopted.

Provisional conclusions

Based on the information available at the time of writing, *Phyllurus amnicola* appears to meet criteria A and B in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17) for its inclusion in Appendix II.

Proposal 21

Phyllurus caudiannulatus (Ringed thin-tail gecko)

Proposal: Include in Appendix II.

Proponent: Australia

Provisional assessment by the Secretariat

CITES background

The species was included in Appendix III at the request of Australia under the genus listing of *Phyllurus* spp., which came into effect on 22 June 2022.

Purpose and impact of the proposal

The proposal seeks to include *Phyllurus caudiannulatus* in Appendix II, in accordance with Article II, paragraph 2(a) of the Convention. If the proposal is adopted, international trade in specimens of *P. caudiannulatus* will be regulated in accordance with the provisions of Article IV of the Convention.

Compliance with listing criteria

The proponent states that *P. caudiannulatus* satisfies criteria A and B in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17) for inclusion in Appendix II. According to the supporting statement it is known, or can be inferred or projected, that the regulation of trade in *P. caudiannulatus* is necessary to avoid it becoming eligible for inclusion in Appendix I in the near future; and it is known, or can be inferred or projected, that regulation of trade in the species is required to ensure that the harvest of specimens from the wild is not reducing the wild population to a level at which its survival might be threatened by continued harvesting or other influences.

P. caudiannulatus is an endemic species distinguished from other leaf-tailed gecko by having 5-6 distinct pale to white bands on the original tail which may be cylindrical or slightly leaf-shaped. Regenerated tails generally lack the white banding pattern.

The species has a restricted range in Queensland, Australia with only three known subpopulations in distinct locations within 15 km of one another, but with minimal connectivity and one subpopulations is geographically isolated and believed to be genetically distinct. According to the proponent it may be possible that additional subpopulations have not yet been detected.

According to the supporting statement the limited distribution of the species is inferred to be contracting due to the effects of increased fire frequency, severe weather events driven by climate change and degradation of habitat quality by invasive weeds. Mapping records from 1975 to 2020 indicate that the estimated Area of Occupancy (AOO) may be as low as 20 km^2. The bushfires of 2019-2020 affected 28% of the species' geographic distribution and demonstrated the potential for future bushfire events to impact all three subpopulations.

P. caudiannulatus is difficult to detect in the wild due to its cryptic nature, and insufficient data are available to adequately estimate population numbers. No population monitoring is in place for the species.

The proponent states that there is no published information on the species' reproductive ecology or its longevity in the wild. Observation of captive individuals suggest sexual maturity may not be reached until three to four years of age, depending on environmental conditions and their lifespan and generation length has been estimated at 10 years and 6 years, respectively.

Threats from habitat degradation, climate change, bushfires and illegal harvesting (mainly for the international pet trade) results in the species being vulnerable to any exploitation. Depletion of the population from direct take from the wild risks reducing subpopulations to unviable numbers.

The proponent states that leaf-tailed geckos are prized and highly sought after by collectors due to their unique appearance and rarity. Twenty-seven specimens of ringed thin-tail gecko were reported in trade between 2008 and 2018 from Germany and the United States of America to seven countries at a price of 50 to 500 Euros each. The species has been detected in both the European and American pet markets and identified for sale internationally from 15 online data sources.

P. caudiannulatus is listed as endangered at both national and state levels in Australia and permits are required for scientific research or education, moving the species within, into or out of Queensland and for taking from and or releasing specimens in the wild. The species is not permitted to be kept as pets, but the proponent indicate that it is likely that the species is currently held in private collections in Australia. The proponent furthermore asserts that no permits have been granted for the species to be taken from the wild for the purpose of export. Commercial export of live native reptiles is currently prohibited by Australia's national environmental legislation and according to the supporting statement there is no legal commercial international trade of the species. The proponent states that the export of live reptiles from Australia has been regulated since at least 1982 when exports of live reptiles were only permitted for specific non-commercial purposes. Under the current legislation export permits for live Australian reptiles can only be issued for specified non-commercial purposes (exhibition, conservation breeding, research and education).

As no legal exports of the species have occurred, the individuals available for sale outside of Australia were almost certainly illegally acquired or are the progeny of illegally exported specimens according to the proponent. The Secretariat notes that according to the data in the CITES Trade Database, two captive bred specimens of *P. caudiannulatus* were exported by Czechia to Japan in 2023.

Management of the protected areas in which this species is located is guided by a Management Statement developed by the Queensland Government and although *P. caudiannulatus* has not been specifically identified for protective measures, the species habitats are recognized as a key value and have associated strategic management directions to guide park activities. As the geographic range of the species spreads across National Park, State Forest and adjacent land, management actions require the maintenance of cooperative relationships between Traditional Custodians, landowners and conservation groups.

In assessing the proposal to include *P. caudiannulatus* in Appendix II based on criteria A and B of Annex 2a of Resolution Conf. 9.24 (Rev. CoP17) it seems the species may meet criterion A based on the information provided. The wild populations may be small but there is some uncertainty due to the absence of population estimates and monitoring data, but the species seems to have a high vulnerability to extrinsic factors (bushfires, climate change). Furthermore, the wild population has a restricted area of distribution and only occurs at very few locations and therefore seems to meet criterion B of Annex 1 of Resolution Conf.9.24 (Rev. CoP17). With regard to criterion B, the supporting statement indicates that threats from habitat degradation, climate change, bushfires and illegal harvesting (mainly for the international pet trade) results in the species being vulnerable to harvest from the wild for international trade. There is however a prohibition on the export of live native reptiles (with exceptions for research, conservation breeding and educational purposes, but no permits have been issued) and it is not clear whether the proponent intends to authorize trade for commercial purposes in the future.

Additional considerations

The proponents states that the species is distinguishable from other leaf-tailed geckos by the 5-6 prominent pale to white bands on the tail. However, the supporting statement notes that regenerated tails tends to lack the distinct white banding, and specimens without a tail look very similar to *P. platurus* with the only distinguishable feature being the fact that *P. caudiannulatus* has more spines.

According to the proponents, identification of the species within the genus *Phyllurus* should not pose challenges as live native reptile specimens cannot be exported for commercial purposes from Australia and the non-commercial transfer of Australian native reptile species requires an export permit under Australia's national environmental legislation. Nonetheless, identification materials would be helpful to assist enforcement authorities to identify the species should the proposal be adopted.

Provisional conclusions

Based on the information available at the time of writing, *Phyllurus caudiannulatus* appears to meet criteria A and B in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17) for its inclusion in Appendix II.

Proposal 22

***Amblyrhynchus* spp.** (Galapágos marine iguana)

Proposal: Transfer from Appendix II to Appendix I.

Proponent: Ecuador

Provisional assessment by the Secretariat

CITES background

Amblyrhynchus cristatus was included in Appendix II in 1975.

Purpose and impact of the proposal

The proposal seeks to transfer *Amblyrhynchus* spp., represented by the Galapágos marine iguana (*Amblyrhynchus cristatus*) from Appendix II to Appendix I. If the proposal is adopted, international trade in specimens of *A. cristatus* will be regulated in accordance with the provisions of Article III of the Convention.

If *Amblyrhynchus cristatus* is included in Appendix I, operations breeding the species for commercial purposes would need to be registered with the Secretariat in accordance with Resolution Conf. 12.10 (Rev. CoP15) on *Registration of operations that breed Appendix-I animal species in captivity for commercial purposes*.

Compliance with listing criteria

The supporting statement suggests that the transfer of the genus *Amblyrhynchus* spp., represented by the Galapágos marine iguana (*Amblyrhynchus cristatus*), is in accordance with Article II.1 of the Convention and Annex 1 A of Resolution Conf. 9.24 (Rev. CoP17). The relevant subsidiary criteria are not specified.

Amblyrhynchus cristatus is the only member of the genus *Amblyrhynchus*, it has 11 sub-species. The species is endemic to the Galapágos islands, Ecuador where, generally, each sub-species inhabits different islands. Gene flow is limited between the islands. It is the only lizard that feeds in the marine environment, on algae from rocky shores, where their grazing helps to shape the algal communities. The species is limited to areas close to the shoreline; the proponents do not provide any estimates of area of distribution or occupancy, but this is estimated by the IUCN Red List assessment (2019) as 4,368 km^2.

The supporting statement notes that only general estimates of population size are available and population size is strongly influenced by El Niño events whose warm waters cause algal die-off. The population can drop to as few as 33,000 individuals due to starvation after strong El Niño events followed by increases of up to 350,000 after several years of La Niña conditions. An average mortality of 30-50% is recorded during El Niño events, with extremes of up to 90%. These extreme fluctuations could threaten small sub-populations. The proponents state that only one sub-species has a genetically resilient effective population size and another is close. The IUCN Red List assessment categorizes the species as Vulnerable and estimates an overall extent of decline as 30% over the last four decades. This assessment also suggests that declines are projected to increase in future without significant control of alien invasive species and controls on marine pollution.

Other threats, according to the supporting statement, include predation by invasive alien species, notably by dogs, cats, rats and pigs. The proponents note the species is also affected by intensive tourism, by oil spills and pollution, and by illegal trade. The IUCN Red List assessment does not identify trade as a threat but notes the species is known to be in the pet trade and the recent prosecutions of smuggling cases, whilst any such trade is not significantly reducing the population currently, the entry of the species into the pet trade was recognized as of concern.

The supporting statement notes that Ecuador has never legally exported live specimens of *A. cristatus*. Limited legal trade is recorded in the CITES Trade Database of live captive-bred specimens involving trade between Africa, Europe and Asia but with none originating in Ecuador. The proponents question the legality of the acquisition of the founder stock for such specimens and the claims of captive-bred status.

Illegal trade has been reported with four prosecutions for smuggling iguanas recorded between 2010 and 2015. The proponents state there are only three routes available to take iguanas out of the islands. They further state that individual iguanas can sell for USD 25,000 (suggesting specimens are highly sought after and/or have limited availability or both) and that those involved in the trade prefer juvenile animals to aid their concealment. The impact on populations of such illegal trade is not clear. The species is reportedly difficult to keep in captivity.

The species is protected within Ecuador, the export of endemic species from the Galapágos is prohibited to the mainland or abroad (since 1936 according to Auliya *et al*., 2025); the Secretariat understands from the proponent that the hunting or capture of marine iguanas has been prohibited since 1959. All populations are within the Galapágos National Park and Marine Reserve and control and surveillance measures are in place for these protected areas. Controls are in place at the airports to prevent protected species being taken from the islands.

The supporting statement notes that young and juvenile marine iguanas are difficult to differentiate from other species and genetic analysis has to be used to establish identification with certainty.

The proponent states that *A. cristatus* qualifies for transfer to Appendix I under criterion A of Annex 1 to Resolution Conf. 9.24 (Rev. CoP17) but does not specify which of the subsidiary criteria apply. However, based on the information available at the time of writing, it appears that the wild population, even with its extreme fluctuations and at its lowest point following an extreme El Niño event, is not small (even though some subpopulations would be so). It would not seem to meet criterion A. Although restricted to islands and a narrow fringe of coastal habitat, the area of occupancy, estimated by the IUCN Red List, at over 4,000 km^2 does not seem to be restricted and so would not meet criterion B. Despite the large fluctuations in population size, the overall rate of decline over three generations is estimated at 30%. This rate of decline does not seem to be “marked” based on the guidance in Annex 5 of Resolution Conf. 9.24 (Rev. CoP17).

The species is in trade with the origin of live specimens being uncertain; illegal trade is documented but the population impacts of this seem low.

Additional considerations

The species is the sole member of its genus and is currently included in Appendix II as *Amblyrhynchus cristatus*. As such, it seems unnecessary to transfer *Amblyrhynchus* spp. from Appendix II to Appendix I at the generic level. The proponents suggest this is to ensure that all sub-species are included in the listing. The Secretariat notes that the definition of species in Article 1 a) of the Convention states "*Species" means any species, subspecies, or geographically separate population thereof*". Unless specifically excluded, a reference to a species includes any of its sub-species. The Secretariat also notes the guidance in Annex 3 of Resolution Conf. 9.24 (Rev. CoP17) that states that “if all species of a higher taxon are included in Appendix I or II, they should be included under the name of the higher taxon”. In this case, there is only one species in the genus and it therefore seems unnecessary to include the species under a higher taxon.

The proponents suggest that including the species in Appendix I is necessary to prevent specimens being taken from the wild and to control the trade in specimens claimed to be captive-bred. The Secretariat notes the provisions contained in Resolution Conf. 17.7 (Rev. CoP19) on *Review of trade in animal specimens reported as produced in captivity* as one mechanism to address concerns about such trade.

The Secretariat notes that document CoP20 Doc. 73 on *Trade in threatened endemic species*, submitted by Brazil and Ecuador, raises issues related to this proposal. Parties are invited to note the concerns expressed by the proponent about the legality of specimens of *Amblyrhynchus cristatus*.

reported in trade as being of captive-bred origin and to note the request from Ecuador contained in Notification 2025/063.

The Secretariat also notes that Annex 3 to CoP20 Doc. 49 on *Legal acquisition findings* contains draft guidance on the chain of custody required for demonstrating the legal acquisition of parental/breeding stock.

Provisional conclusions

Based on the information available at the time of writing, it appears that *Amblyrhynchus cristatus* does not appear to meet the criteria in Annex 1 of Resolution Conf. 9.24 (Rev. CoP17) for its inclusion in Appendix I.

Proposal 23

***Conolophus* spp.** (Galapágos land iguanas)

Proposal: Transfer from Appendix II to Appendix I.

Proponent: Ecuador

Provisional assessment by the Secretariat

CITES background

This genus was included in Appendix II in 1975.

Purpose and impact of the proposal

The proposal seeks to transfer *Conolophus* spp. from Appendix II to Appendix I. If the proposal is adopted, international trade in specimens of *Conolophus* spp. will be regulated in accordance with the provisions of Article III of the Convention.

If *Conolophus* spp. are included in Appendix I, operations breeding the species in the genus for commercial purposes would need to be registered with the Secretariat in accordance with Resolution Conf. 12.10 (Rev. CoP15) on *Registration of operations that breed Appendix-I animal species in captivity for commercial purposes*.

Compliance with listing criteria

The supporting statement suggests that the transfer from Appendix II to Appendix I, of the genus *Conolophus* spp., which includes the three species of land iguanas of the Galapágos islands, is in accordance with Article II.1 of the Convention and Annex 1 A of Resolution Conf. 9.24 (Rev. CoP17). The relevant subsidiary criteria are not specified.

The genus *Conolophus* is endemic to the Galapágos islands, Ecuador, and comprises three species. *C. marthae*, *C. pallidus* and *C. subcristatus*. The Secretariat notes that the synonyms provided in section 1.5 of the supporting statement refer to *Amblyrhynchus cristatus*, the subject of proposal CoP20 Prop. 22.

The Galapágos pink iguana *C. marthae* is found only in a single location on Isla Isabela. It is limited to an area of <25 km^2 with a core area of <10 km^2 with a population estimated at just 192 mature individuals. It is categorized as Critically Endangered in the IUCN Red List (2012).

The Santa Fe (or Barrington) land iguana *C. pallidus* has an area of occurrence 24.3 km^2, occurs on the uninhabited Sante Fe island only with a population estimate of 3,500-4,000 mature individuals. It is categorized as Vulnerable in the IUCN Red List (2019).

The Galapágos land iguana *C. subcristatus* is more abundant with an estimated population size of 10,000 mature individuals in 12 fragmented subpopulations with an extent of occurrence estimated by the IUCN Red List assessment (2020) of 9,524 km^2 and an area of occupancy of 540 km^2. However, one recent study (Ortiz-Catedral *et al*., 2023) on Fernandina Island, the only major island free of introduced predators and browsers, found an estimated population size of 45,600 individuals and a density of six males per hectare based on extrapolation from mark-recapture studies. The species has a projected decline during three future generations of 10-15%. It is also categorized as Vulnerable in the IUCN Red List.

The species are herbivorous, typically lay clutches of 5-7 eggs a year, and are considered to be important seed dispersers. The reproductive behaviour and seasonality of reproduction of *C. subcristatus* on the island of Plaza Sur allows hybridisation with marine iguanas *Amblyrhynchus cristatus*.

The main threats to the species come from the impacts of invasive alien species either as predators of adults, eggs and young (dogs, cats, rats, pigs) or as competing herbivores (goats, donkeys, horses) which degrade natural vegetation, compete with iguanas for it and which damage nests. In some locations, some of these invasive species have been controlled or eradicated with signs of recovery in land iguana populations as a result. Volcanic eruptions are a stochastic threat and human activities from roads, pollution, stress from intensive tourism, and illegal trade are other anthropogenic threats.

The supporting statement notes that Ecuador has never legally exported live specimens of *Conolophus* species. Legal trade is recorded in live captive-bred specimens of *C. subcristatus* predominantly with some trade at the genus level and one record of trade in 2010 involving trade in *Conolophus* 'Martha', between Africa, Europe, North America and Asia amongst others, but with none originating in Ecuador. The proponent questions the legality of the acquisition of the founder stock for such specimens and the claims of captive-bred status.

Illegal trade is recorded with four prosecutions for smuggling iguanas recorded between 2010 and 2015. There are, according to the supporting statement, only three routes available to take iguanas out of the islands. The proponent states that individual iguanas can sell for USD 25,000 (suggesting specimens are highly sought after and/or have limited availability or both) and that those involved in the trade prefer juvenile animals to aid their concealment in transit and because they might be more readily accepted as being of captive-bred origin. The impact on populations of such illegal trade is not clear but could be significant for the two scarcer species.

The species is protected within Ecuador, the export of endemic species from the Galapagos is prohibited to the mainland or abroad (since 1936 according to Auliya *et al*., 2025); the Secretariat understands from the proponent that the hunting or capture of iguanas has been prohibited since 1959. All populations are within the Galapagos National Park and Marine Reserve and control and surveillance measures are in place for these protected areas. Controls are in place at the airports to prevent the protected species being taken from the islands. Actions have been taken on some islands to eradicate or control invasive alien species and there have been multiple translocations of iguanas to ensure the survival of some subpopulations and to restore areas affected by alien invasive species. Some animals were derived from a captive breeding programme; this programme is now discontinued.

The proposal notes that young and juvenile iguanas in the genus are difficult to differentiate from other species and genetic analysis has to be used to establish identification with certainty.

The proponent refers to criterion A in Annex 1 to Resolution Conf. 9.24 (Rev. CoP17) under which *Conolophus* spp. qualify for transfer to Appendix I, but does not specify any subsidiary criteria. Each species is individually assessed below against the criteria in Annex 1 to the same Resolution.

Based on the information available at the time of writing, it appears that *C. marthae* has both a small population and a restricted area of distribution. Its only population is very small, it occurs at only a single location and it is vulnerable to intrinsic and extrinsic factors, notably alien invasive species. It seems likely to meet criteria A ii) and v) and B i) and iii) of Annex 1 to Resolution Conf. 9.24 (Rev. CoP17).

C. pallidus also has a restricted area of distribution and occurs on only a single island and is vulnerable to intrinsic and extrinsic factors; it would seem to meet criteria B i) and iii) in the same Annex. The reported population, at 3,500-4,000 mature individuals, is below the value of 5,000 suggested as a guide in the definition of a small population contained in Annex 5 to Resolution Conf. 9.24 (Rev. CoP17). The species would also seem to meet criteria A ii) and v).

C. subcristatus does not seem to have a small population; its estimated area of distribution at 540km^2 although larger than the other two species is arguably restricted and its 13 subpopulations are fragmented and isolated from each other and vulnerable to extrinsic factors, notably from invasive alien species. It does not show a marked decline. Taking a precautionary approach and acting in the best interest of the conservation of the species, it would seem to meet criteria B i) and iii).

The genus is in trade with the origin of live specimens being uncertain, illegal trade is documented but the population impacts of this are uncertain but would be detrimental to the two least abundant species and to any small subpopulations.

Additional considerations

The proponent comments that some authorities suggest that two subpopulations of *C. subcristatus* might merit species status in their own right. If that were the case, such changes would need to be recognized under the provisions of Resolution Conf. 12.11 (Rev. CoP19) on *Standard Nomenclature*.

The proponents suggest that including the species in Appendix I is necessary to prevent specimens being taken from the wild and to control the trade in specimens claimed to be captive-bred. The Secretariat notes the provisions contained in Resolution Conf. 17.7 (Rev. CoP19) on *Review of trade in animal specimens reported as produced in captivity* as one mechanism to address concerns about such trade.

The Secretariat notes that document CoP20 Doc. 73 on *Trade in threatened endemic species*, submitted by Brazil and Ecuador, raises issues related to this proposal. Parties are invited to note the concerns expressed by the proponent about the legality of specimens of *Conolophus* spp. reported in trade as being of captive-bred origin and to note the request from Ecuador contained in Notification 2025/063.

The Secretariat also notes that Annex 3 to CoP20 Doc. 49 on *Legal acquisition findings* contains draft guidance on the chain of custody required for demonstrating the legal acquisition of parental/breeding stock.

Provisional conclusions

Based on the information available at the time of writing, it appears that *Conolophus marthae* and *Conolophus pallidus* meet criteria A ii) and v), and B i) and iii) in Annex 1 to Resolution Conf. 9.24 (Rev. CoP17) and *Conolophus subcristatus* meets criteria B i) and iii) of the same Annex for their inclusion in Appendix I.

Proposal 24

Bitis parviocula (Ethiopian mountain adder) **and *Bitis harenna*** (Bale Mountains adder)

Proposal: Include in Appendix I.

Proponent: Ethiopa

Provisional assessment by the Secretariat

CITES background

This is the first time that *Bitis parviocula* and *Bitis harenna* have been proposed for inclusion in the Appendices.

Purpose and impact of the proposal

The proposal seeks to include *Bitis parviocula* and *Bitis harenna* in Appendix I, in accordance with Article I of the Convention. If the proposal is adopted, trade in specimens of the species will be regulated in accordance with the provisions of Article III of the Convention.

If *Bitis parviocula* and *Bitis harenna* are included in Appendix I, operations breeding the species for commercial purposes would need to be registered with the Secretariat in accordance with Resolution Conf. 12.10 (Rev. CoP15) on *Registration of operations that breed Appendix-I animal species in captivity for commercial purposes*.

Compliance with listing criteria

The supporting statement suggests that inclusion of *Bitis parviocula* and *Bitis harenna* in Appendix I satisfies criteria A i) and v), B i), iii) and iv) and C ii) in Annex 1 to Resolution Conf. 9.24 (Rev. CoP17).

Bitis parviocula and *Bitis harenna* are endemic to Ethiopia and according to the supporting statement these large, venomous, visually attractive and slow-moving snakes are extremely rare in the wild.

The proponent states that *B. parviocula* has a decreasing population trend and has a restricted distribution since it is only found in five locations in the southwest and southeast of the Rift Valley and southern Ethiopia, with an area of occupancy of approximately 20 km^2. The species was categorized in the IUCN Red List as Endangered in 2014.

B. harenna was described as a separate species in 2016 and although it has not been assessed for extinction risk, it has a restricted range. According to the supporting statement it has been recorded at only a single location in the Bale Mountains National Park and its rarity in the wild strongly suggests that the species is extremely vulnerable to extrinsic factors, such as habitat loss and exploitation.

The proponent states that these species are suffering from loss of the extent and quality of natural suitable habitat due to human activities, mainly deforestation and cultivation. The region where *B. parviocula* is found is used intensively for coffee cultivation and it is seen when the coffee fields are cleared during planting or harvesting while the only known precise location for *B. harenna,* the escarpment of the Bale Mountains National Park, is under great anthropogenic pressure due to agriculture and urbanization, exacerbated by Ethiopia facing an ongoing and high human population growth.

Based on the information provided, both *B. parviocula* and *B. harenna* are striking in appearance and highly attractive to reptile pet keepers. The proponent states that due to their restricted distribution and small population sizes, it is highly likely that the survival in the wild of both species is, in addition to the threats associated with the decline in extent and quality of habitat, also threatened by illegal collection for the international pet market.

The proponent states that the exploitation of wild animals has been banned in Ethiopia since 1957 (Penal Code of Ethiopia 1957) and in 2004, national laws concerning wildlife were further strengthened with the Criminal Code of Ethiopia 2004 specifially prohibiting the possession, collection, transport, and export of endemic species such as *B. parviocula* and *B. harenna* and their products without a permit. According to the proponent, no exports of *B. parviocula and B. harenna* from Ethiopia have been permitted. The supporting statement does not include information relating to seizures involving *B. parviocula* and *B. harenna.*

The proponent indicates that since the first documented offer for sale of *B. parviocula* in the United States of America in 2001, a significant number of adult individuals have been offered for sale in both the United States as well as Europe, for prices as high as USD 4,000. *B. harenna* and *B. parviocula* are morphologically similar and *B. harenna* was only described in 2016, it is therefore likely, according to the proponent, that *B. harenna* could have been traded as *B. parviocula,* possibly even unknowingly.

The supporting statement indicates that 24 live individuals of *B. parviocula* were documented in trade in Germany within a 6-month period based on a study referenced. The Secretariat notes that the link to the study by Altherr *et al.* (2020) provided in the reference list in the supporting statement could not be accessed, however, the publication was obtained through the link in the footnote[12]. The proponent provided the Secretariat with supplementary material used in preparing the publication, which contained information on live specimens of *Bitis parviocula* and *Bitis harenna* in trade.

The proponent states that despite no imports from Ethiopia being recorded on the United States Fish and Wildlife Service Law Enforcement Management Information System (LEMIS) database between 2002 and 2021, research on social media platforms reveals that *B. parviocula* specimens continue to be traded in the United States.

The proponent indicates that it is likely that no legal trade in *B. parviocula* exists, and that all such trade involves specimens claimed to be captive-bred, but are wild-caught specimens either smuggled out of Ethiopia or are the F1 progeny of wild-caught gravid individuals. Such trade would include, according to the proponent, the export of 31 live specimens of *B. parviocula* for commercial purposes from Germany and 12 from Slovenia to the United States, all reported as captive-bred (LEMIS 2002 to 2020). The proponent indicates that there is only one reliable report of successful captive breeding of either species and this involved a successful mating of *B. parviocula* at London Zoo in 2021. There is no available information on the breeding of *B. harenna* in captivity. No juveniles have ever been documented in trade and the proponent notes in the supporting statement concerns about the practice to target gravid females in the wild and subsequently offer the young for sale as “captive-bred” once they are born in captivity. As stated by the proponent, these individuals do not meet the definition of ‘bred in captivity’ in Resolution Conf. 10.16 (Rev. CoP19) on *Specimens of animal species bred in captivity.*

According to the supporting statement there is no information available on the population size and structure and geographic trends and the statement does not include any information on management measures, population monitoring and control measures other than the legislative provisions referred to in the assessment.

In assessing the proposal to include *Bitis parviocula* and *Bitis harenna* in Appendix I, based on criteria criteria A i) and v), B i), iii) and iv) and C ii) in Annex 1 of Resolution Conf. 9.24 (Rev. CoP17), it is not clear whether the species may meet criterion A due to the absence of population estimates and monitoring data, but the species seems to have a high vulnerability to extrinsic factors (decline in the extent and quality of the species natural habitat). Furthermore, the wild populations of both species have restricted areas of distribution and only occur at very few locations and therefore seem to meet criterion B i), iii) and iv) in Annex 1 of Resolution Conf. 9.24 (Rev. CoP17). With regard to criterion C, the supporting statement does not provide any information relating to a decline in the populations in the wild, but it is inferred based on the decline in the extent and quality of the species’ habitat. A marked

[12] Altherr, S. and Lameter, K., 2020. The rush for the rare: Reptiles and amphibians in the European pet trade. *Animals*, *10*(11), p.2085. Accessed on 12 July 2025 https://bfn.bsz-bw.de/frontdoor/deliver/index/docId/84/file/Skript_545.pdf

decline cannot be estimated due to the absence of information relating to the population size and the lack of population monitoring.

Provisional conclusions

Based on the limited information available at the time of writing, both species may meet criterion B i), iii) and iv) in Annex 1 to Resolution Conf. 9.24 (Rev. CoP17), but more information is desirable.

Proposal 25

***Crotalus* spp.** (Rattlesnakes)

***Sistrurus* spp.** (Ground rattlesnakes)

Proposal: Include *Crotalus lepidus* and *Crotalus ravus* in Appendix II and include the genera *Crotalus* and *Sistrurus* in Appendix II.

Proponents: Bolivia (Plurinational State of) and Mexico

Provisional assessment by the Secretariat

CITES background

No proposals for the inclusion of *Crotalus ravus* or *C. lepidus* in the Appendices have previously been made.

C. durissus was included in Appendix III in 1987 at the request of Honduras.

Proposals to include *Crotalus horridus* in Appendix II have been considered at the 10th meeting of the Conference of the Parties (CoP 10; Harare, 1997; CoP10 Prop. 63), the 11th meeting of the Conference of the Parties (CoP 11; Nairobi, 2000; CoP11 Prop. 44) and the 19th meeting of the Conference of the Parties CoP19 (CoP19; Panama City, 2022; CoP19 Prop. 21). All the proposals were rejected.

Purpose and impact of the proposal

The proposal seeks to include *Crotalus ravus* and *C. lepidus* in Appendix II, in accordance with Article II, paragraph 2(a) of the Convention and the genera *Crotalus* spp. and *Sistrurus* spp. in accordance with Article II, paragraph 2(b) of the Convention. If the proposal is adopted, international trade in specimens of these genera will be regulated in accordance with the provisions of Article IV of the Convention.

Compliance with listing criteria

The supporting statement suggests that the inclusion of *C. ravus* and *C. lepidus* in Appendix II satisfies criterion B of Annex 2a to Resolution Conf. 9.24 (Rev. CoP17) on *Criteria for the amendment of Appendices I and II* and that the inclusion of *Crotalus* spp. and *Sistrurus* spp. in Appendix II satisfies criterion A of Annex 2b to the same Resolution.

The supporting statement notes that *C. ravus* is a Mexican endemic with a distribution of around 34,000 km^2. *C. lepidus* has a range stretching from the southern United States of America into Mexico with a potential range of 670,000 km^2. Both inhabit ecosystems, such as montane forests and arid and semi-arid areas, that are subject to significant habitat loss due to conversion to agriculture and other uses. The behaviour and/or habitat of the two species, often being found on steep or rugged terrain, make them difficult to observe and study. *C. ravus* was reportedly considered abundant in the 1970s but the proponents state it is now difficult to find and is considered to have a high intrinsic vulnerability due to its restricted distribution, being present in few physiographic units and subject as a venomous species to high human persecution; it is considered threatened in Mexico. C*. lepidus* was considered common in the 1990s but is now included in a list of species subject to special protection in Mexico. Little information is provided on the status of *C. lepidus* in the United States of America. Both species are considered as Least Concern in the IUCN Red List, but the assessment was done in 2007.

The supporting statement recognizes that there are no studies that provide information on population size, structure or trends and estimates of the size of the known range of *C. ravus* (now estimated at <2% of the national territory) were affected by changes to its taxonomy. The proponents state that the species are threatened by direct killing because of their venomous nature, by habitat loss and fragmentation (the primary threat for *C. ravus*), by climate change (again for *C. ravus)* and by collection for trade for curios, food, skins, medicinal and cosmetic products (for which *C. lepidus* is the preferred species) for domestic and international trade.

Authorized legal trade within Mexico is generally limited and primarily involves trade in live specimens derived from captive breeding. However, levels of unauthorized use and trade nationally are much higher and involve mostly wild-caught specimens traded as parts and derivatives; *C. ravus* is reported in the supporting statement as being commonly found in markets in Mexico City. Legal international trade authorized by the CITES Management Authority of Mexico is also limited but trade records from ports, airports and borders record significantly more trade in parts and derivatives of a wide range of *Crotalus* species (and trade at the genus level). International trade in *C. ravus* is mostly of live specimens with that of *C. lepidus* being mostly in medicinal products (dried meat pills, powders). Data from the United States of America, annexed to the proposal, record limited trade in *C. ravus* but more significant trade in *C. lepidus* but the latter is again largely traded as medicinal products with an estimated 218,250 capsules recorded over a period from 2012-2024. No data were provided to estimate how many individual snakes would be required to produce such amounts. Data on illegal trade and on seizures is mostly recorded at the genus level but does identify a wide range of species from both genera being offered for sale. The majority of recorded trade in both *Crotalus* spp. and *Sistrurus* spp. occurs predominantly between Mexico and the United States of America (98.5% of all trade).

The use and conservation of the species in Mexico is regulated by their General Wildlife Law which governs the types of uses that can be carried out. Management is at the scale of Wildlife Conservation Management Units (UMAs or PIMVS). Several of these authorize the captive breeding of both species. Both species also occur in protected areas to varying degrees.

The proponents note that more than 95% of known trade involving *Crotalus* spp. and *Sistrurus* spp. involves parts and derivatives making their identification to species level difficult. A complete specimen is generally required to correctly identify the species.

The available information suggests that the two species proposed for inclusion in Appendix II clearly face a range of threats across their range including habitat loss, climate change and deliberate killing. It is also clear that the two species concerned are in both domestic and international trade. It seems that unauthorized domestic trade and harvest is significantly greater than any legal uses and is, perhaps, greater than that which enters international trade. Trade in live specimens is mostly legal and derived from captive breeding. Many trade records, especially of parts and derivatives, are only recorded to genus level due to the reported difficulties in identification but it is clear that many species other than *C. ravus* and *C. lepidus* are traded. CITES trade data are available for one member of the genus *Crotalus*, *C. durissus* included in Appendix III, which suggests a similar pattern of trade with a limited number of live specimens, scientific samples and medicinal products in trade.

The absence of information for both species on levels of offtake, on population size and trends, and on volumes of trade at species level, make it difficult to conclude that regulation of trade is needed to ensure that the harvest of specimens from the wild is not reducing their wild populations to levels at which their survival might be threatened by continued harvesting or other influences.

Should the meeting of the Conference of the Parties decide that either or both of *C. ravus* and *C. lepidus* should be included in Appendix II under criteria Annex 2 a of Resolution Conf. 9.24 (Rev. CoP17), then in view of the reported difficulty of identifying parts and derivatives to individual species, the inclusion of the genus *Crotalus* (55 species) and *Sistrurus* (three species) for an Appendix II listing may be warranted.

Additional considerations

The proponents recommend, after consultation with the Nomenclature Specialists of the Animals Committee, the adoption of a standard reference (namely an extract from the *The Reptile Database* 2025, 27 June 2025) for the nomenclature of the taxa covered by the proposal. They indicate this does not affect the nomenclature adopted in Resolution Conf. 12.11 (Rev. CoP19) on *Standard nomenclature* for other CITES species. If the Conference of the Parties decide adopt this proposal, the proposed standard reference would need to be added to the Annex of Resolution Conf 12.11 (Rev. CoP19) on *Standard Nomenclature*.

Consultations were undertaken with range States of the two genera and their responses included or summarized in the proposal.

Provisional conclusions

Based on the information available at the time of writing, it appears that *Crotalus ravus* and *Crotalus lepidus* do not meet the criteria in Annex 2 a of Resolution Conf. 9.24 (Rev. CoP17) for their inclusion in Appendix II. As a consequence, *Crotalus* spp. and *Sistrurus* spp. do not meet the criteria in Annex 2 b to the same Resolution for their inclusion in Appendix II.

Proposal 26

Kinixys homeana (Home's hinge-back tortoise)

Proposal: Transfer from Appendix II to I.

Proponents: Cameroon, Guinea, Nigeria and Togo

Provisional assessment by the Secretariat

CITES background

Kinixys homeana has been included in Appendix II since 1975, initially under the genus listing *Kinixys* spp. and currently under the family listing Testudinidae spp.

There is a long history of this species in the Review of Significant Trade (RST) process. *Kinixys homeana* has been included in RST multiple times, reflecting serious concerns about overexploitation and ineffective regulation. It was one of the earliest species flagged under Phase I of the RST in 1992. The concern arose from high levels of export from West African range States, notably Togo and Ghana, with limited information on population status or management. It re-entered the RST process at the 17th meeting of the Animals Committee (AC17; Hanoi, 2001) due to continued high trade volumes, especially in live specimens, with exports from Benin, Nigeria, and Togo remaining unsustainable and largely wild-sourced. Concerns were raised around the lack of reliable population data; weak or absent Non-Detriment Findings (NDFs); and unverified and fraudulent claims of captive breeding. The range States were instructed to establish export quotas, improve reporting, and conduct field assessments. *K. homeana* was selected again due to ongoing concerns about high exports from Nigeria and Togo at the 27th meeting of the Animals Committee (AC27; Veracruz, 2014). At AC27, the Committee considered document AC27 Doc. 12.4 (Rev. 1), which included a detailed review of this species. Benin has been subject to a recommendation to suspend trade in *K. homeana* since February 2016. Most recently, trade in *K. homeana* from Ghana was selected at the 32nd meeting of the Animals Committee (AC32, Geneva, 2023) and retained at the 33rd meeting of the Animals Committee (AC33, Geneva, 2024).

Purpose and impact of the proposal

The proposal seeks to transfer *Kinixys homeana* from Appendix II to Appendix I. If the proposal is adopted, international trade in specimens of this species will be regulated in accordance with the provisions of Article III of the Convention.

If *K. homeana* is included in Appendix I, operations breeding the species for commercial purposes would need to be registered with the Secretariat in accordance with Resolution Conf. 12.10 (Rev. CoP15) on *Registration of operations that breed Appendix-I animal species in captivity for commercial purposes*.

The three species/country combinations under the Review of Significant Trade (Benin, Ghana and Togo) would be removed from the process as commercial trade in the species will no longer be permitted.

Compliance with listing criteria

The supporting statement claims that inclusion of *K. homeana* in Appendix I satisfies criterion A in Annex 1 of Resolution Conf. 9.24 (Rev. CoP17).

The proponents state that *K. homeana* is experiencing a very serious decline over much of its range, due mainly to extensive habitat loss, intensive harvesting for subsistence and traditional medicine, and exploitation for the international market. They suggest that there is clear evidence that wild populations are heavily declining and collapsing throughout the species' range, with cases of extirpation even inside protected areas. Native to West and Central Africa, Species+ indicates that *K. homeana* is found in Benin; Cameroon; Côte d'Ivoire; Equatorial Guinea; Ghana; Liberia; Nigeria; Sierra Leone and Togo, with possible occurrences in the Democratic Republic of the Congo (DRC) and Gabon.

K. homeana is a medium-sized tortoise with a distinctive dark-brown to black carapace with yellowish patterns that can grow up to 22 cm in length. Its hinged shell allows partial closure, offering some level of protection. It is a long-lived and late maturing species (which is typical of tortoises), with a low reproductive rate, producing clutches of 2 to 8 eggs up to two times per year. It is a diurnal and terrestrial species, often found in moist lowland forests, usually below 600 m elevation. Its range is thought to be highly fragmented due to rapid deforestation and habitat conversion. The maximum survival rate in the wild is about 17 years, based on capture-mark-recapture studies. This low maximum detected age, together with the absence of older and larger individuals, which are targeted for meat, indicates population declines and extirpation of larger individuals.

The supporting statement draws much of its content from the IUCN Red List assessment of the species done in 2021, which classified *K. homeana* as Critically Endangered, with a decreasing population trend. Previous assessments were Data Deficient in 1996 and Vulnerable in 2006. Beyond standard habitat management in protected forests, there are limited conservation actions currently being taken to protect *K. homeana* and there is no species-specific management plan for this species.

There is no global estimate of the population size, but a rough estimate of 4.2 million tortoises is presented, which has been calculated based on population density estimates for Nigeria from Luiselli (2003a). With an average density of 0.53 individuals/ha to give 53.33 tortoises/km², and therefore about 500,000 tortoises in all of Nigeria. Applying this method to the whole of this species' range, an estimated total population size for *K. homeana* of at best 4,205,000 tortoises is derived, but the real figure is probably much less given the current fragmentation and exploitation of the forested patches in West Africa. Given this population estimate, *K. homeana* would not be considered a species with a small population size and it would therefore not qualify for inclusion in Appendix I under criterion A.

Nigeria is the country comprising the highest percentage of the indigenous range of *K. homeana*, followed by Cameroon. According to the supporting statement, the entire range of *K. homeana* had a presumed historic indigenous range of about 435,000 km^2 and an extent of occurrence (EOO) of around 867,000 km^2, based on the IUCN Red List assessment. However, the Secretariat has found differing figures concerning the historical and current range of the species. For example, Buhlmann *et al.* (2009)[13] estimated the range to cover 1,825,142 km^2, while Luiselli *et al.* (2006) estimated that in 1992 the range covered approximately 788,843 km^2, while in 2006 the range had reduced to 5 % of this at 9,235 km^2. All estimates appear to indicate, however, that the range has decreased significantly. Though this species has a relatively large theoretical range, available suitable habitat within that extent has been reduced over the last 30 years and is expected to continue to decline.

In the IUCN Red List assessment, global population declines were extrapolated using data from Nigeria as a benchmark. The following assumption were made: 1) the density of tortoises has remained constant in remaining suitable habitats (however, this is unlikely in view of hunting pressures), 2) local hunting pressures have remained constant over the years (also unlikely in view of human population growth from about 35 million in 1959 to approximately 120 million in 2001), and 3) that the suitable habitat for *K. homeana* has declined by at least 90% in the last 45 years based on known habitat loss. Based on the above, it was estimated that in 1960 there were at least 5,000,000 tortoises in Nigeria compared to an estimate of about 500,000 today. This would represent around a 90% decline in suitable habitat in the past 45 years or about three tortoise generations, translating to a decline of roughly 30% per generation of 15 years. Assuming that rates of deforestation and human population growth will continue into the future, it was also estimated that the ongoing population reductions of *K. homeana* would be 30% for each of the past two generation times (30 years) and 30% for the future one generation time of 15 yrs. This marked historical decline in the area of suitable habitat suggests that *K. homeana* may meet criterion C of Annex 1 of Resolution Conf. 9.24 (Rev. CoP17).

Although the calculation above is based solely on the situation in Nigeria, there is evidence that the wild populations of *K. homeana* are heavily declining and collapsing throughout the species' range, with cases of extirpation even inside protected areas, based on a suite of field surveys, long-term capture-mark-recapture studies on single populations, examination of wild meat markets, and interviews with local hunters and sellers, in Cote d'Ivoire, Ghana, Togo, Nigeria, and Cameroon. Field studies outlined

[13] Buhlmann K. A., Akre, T. S. B., Iverson, J. B., Karapatakis, D., Mittermeier, R. A., Georges, A., Rhodin, A. G. J., van Dijk, P. P. and Gibbons, J. W. 2009. . Chelonian Conservation and Biology, 8 (2), p.116–149.

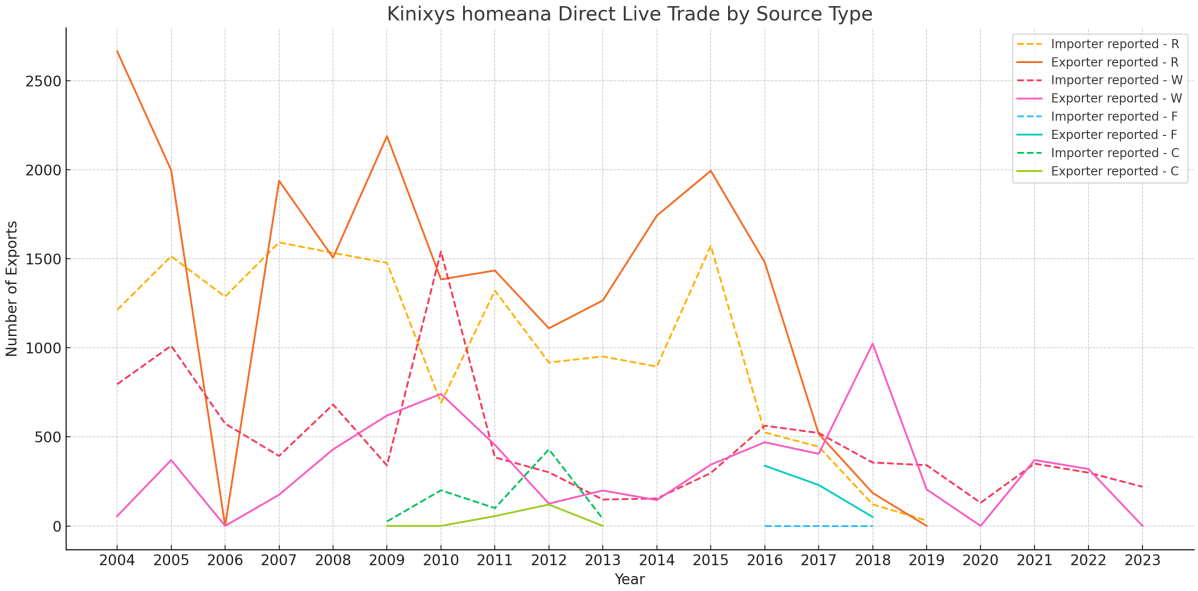
in the supporting statement show very low encounter rates (0.01–0.02 individuals/km² in Nigeria and Ghana). When the proportion of traded quantity decrease in the wild meat markets over a 10 year period is considered as a proxy for equivalent population decreases in the wild, it can be calculated that more than 90% of adult tortoises were extirpated from the Niger Delta territory during this time.

K. homeana is one of the most heavily traded African tortoises, being targeted for the international pet trade (especially in Europe and Asia) and also traditional medicine and for local consumption as wild meat markets. The supporting statement suggests that "bushmeat consumption use (plus any unrecorded illegal exports) is ten times as large as live pet exports". Other identified threats are habitat loss, low reproductive rates, illegal trade and enforcement weaknesses. According to Luiselli *et al*. (2021), the estimated percentage involvement of threats driving this tortoise toward extinction is 50% habitat loss, 40% local consumption as bushmeat, and 10% exploitation for the international pet trade. The species is known to be venerated as a holy animal in some communities of the Niger delta, while in other areas it is actively hunted for trade and consumption.

The supporting statement indicates that from 2000–2020, over 78,000 live specimens were reported in international trade (CITES Trade Database). The primary exporters are Togo, Ghana and Benin and the main importing countries are United States of America, Japan and EU member States. The proponents highlight that "a total of 77% claimed as "captive-bred" are strongly suspected to be wild-sourced in many cases and mortality in transit is extremely high due to stress and poor handling".

The exported animals have variously been declared as originating from the wild, from ranching operations, or captive breeding facilities; however, documentation that ranching or captive breeding facilities operate effectively remains unavailable. Mirroring patterns seen in other legal and illegal wildlife trade, some (or most) of these specimens are likely taken from other countries and exported through Togo, Ghana and Benin. CITES records of net export quantities during the years 1975–2018 document that a total of 114,240 live specimens (mostly ranched until 2017, then switching to wild) were exported: 30,111 live specimens were exported from Benin, 16,076 from Ghana, 64,876 from Togo, and 3,177 from all other countries combined. The levels of trade from Nigeria and Cameroon, which represent the largest area of the species range, during this period have not been significant. Only a single live specimen and 10 seized/confiscated carapaces were reported to have been exported from Nigeria; while the last reported trade in live wild specimens from Cameroon was in 2003. Trade volumes have been stable or increasing over the years according to the proponents with about 86,000 individual *K. homeana* recorded as legal international exports from 1990 to 2020.

The Secretariat produced the following graph based on data extracted from the CITES Trade Database on 30 July 2025. It shows the level of direct trade in live specimens from 2004 to 2023 as reported by exporting and importing Parties broken down into source codes R, W, F and C. It highlights shifting patterns in the use of source codes and an overall decrease in the volume of trade. The impact of the inclusion of the species in the RST process during this period may have had an impact on trade volumes.



Examination of the CITES Annual Illegal Trade Database (AITR) showed seven reported seizures since 2016 when the requirement for the submission of annual illegal trade reports began. These were reported by Spain, the United Kingdom of Great Britain and Northern Ireland and the United States of America. A total of 114 specimens were reported to have been seized, consisting of 105 live specimens and 9 carapaces. The low number of seizures of *K. homeana* may reflect the low prices that they fetch, with online searches indicating that a medium sized adult can be purchased for less than USD 100.

Additional considerations

The supporting statement indicates that consultation letters were sent to range States on 10 April 2025. Cameroon, Guinea, Nigeria, Togo are co-proponents, noting that Nigeria and Cameroon represent the greatest percentage cover of the range. The views of the other range States (Benin, Côte d'Ivoire, Equatorial Guinea, Ghana, Liberia and Sierra Leone) are not known.

Several enforcement issues concerning look-alike species are highlighted in the supporting statement, including the overlapping range and similar coloration and size between *K. homeana* and *K. erosa.* Other species such as *K. belliana* and *K. nogueyi* are sometimes confused with *K. homeana* in trade. Juvenile tortoises are particularly difficult to distinguish and mislabelling and laundering through other *Kinixys* species is frequent. The Secretariat notes that these species are all listed in Appendix II and there are several identification materials available to assist Parties, including the CITES Identification Guide to Tortoises and Freshwater Turtles: Parts, Products and Derivatives in Trade.

Concerning captive breeding, the supporting statement mentions that ex *situ* conservation breeding programs on various *Kinixys* species is ongoing in the United States of America to establish assurance colonies and to better understand behaviour and husbandry. Captive collections such as these can be beneficial. Assurance colonies have been established since 2013 and a studbook has been developed for this species through the Association of Zoos and Aquariums. It is mentioned that since 2013, over 150 *K. homeana* have been produced.

The repeated selection of this species in RST demonstrates ongoing issues with the implementation of the Appendix II listing in several of the range States.

Provisional conclusions

Based on the information available at the time of writing, it appears that *Kinixys homeana* does not meet criterion A, but it may meet criterion C in Annex 1 to Resolution Conf. 9.24 (Rev. CoP17) for its inclusion in Appendix I.

Proposal 27

Pelophylax epeiroticus (Epirus water frog)***, P. lessonae*** (pool frog)***, P. ridibundus*** (marsh frog) and ***P. shqipericus*** (Albanian water frog)

Proposal: Include in Appendix II (Entry into effect of the inclusion in Appendix II would be delayed by 18 months, i.e. until 5 June 2027).

Proponents: European Union, Israel and North Macedonia

Provisional assessment by the Secretariat

CITES background

This is the first time a proposal has been submitted to include *Pelophylax epeiroticus, P. lessonae, P. ridibundus* and *P. shqipericus* in the CITES Appendices.

Purpose and impact of the proposal

The proposal seeks to include *Pelophylax epeiroticus, Pelophylax shqipericus* and *Pelophylax ridibundus* in Appendix II, in accordance with Article II, paragraph 2(a) of the Convention. The proposal also seeks to include *Pelophylax lessonae* in Appendix II, in accordance with Article II, paragraph 2(b) of the Convention. If the proposal is adopted, international trade in specimens of these four species will be regulated in accordance with the provisions of Article IV of the Convention.

The proposal suggests a delayed entry into force of 12 months to allow Parties to develop identification tools and regulatory frameworks.

Compliance with listing criteria

The supporting statement suggests the inclusion of *Pelophylax epeiroticus, Pelophylax ridibundus* and *Pelophylax shqipericus* in Appendix II based on criterion B in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17); and the inclusion of *Pelophylax lessonae* in Appendix II based on criterion A in Annex 2b of the same Resolution.

The proponents state that “three species of the genus *Pelophylax*, namely *P. epeiroticus, P. ridibundus* and *P. shqipericus* are targeted in international trade for human consumption as frogs’ legs, primarily to the European market, and overexploitation is a significant threat”. These three species are endemic to the Balkans and Greece and, according to the supporting statement, are experiencing population declines due to unsustainable harvesting for the international food trade, habitat loss, and pollution. According to the proponents, “*P. ridibundus* is the primary species in trade, but *P. shqipericus* and *P. epeiroticus* are unintentionally collected due to similar appearance and shared habitat”.

Common threats faced by *Pelophylax* species that are identified in the supporting statement include overexploitation for the meat (frog legs) trade; habitat degradation, specifically draining of wetlands; water pollution and urbanization; hybridization, in particular *P. ridibundus*, which dilutes local gene pools; and climate change, causing drying of breeding sites and altered phenology.

Pelophylax shqipericus was included in Annex D of the European Union’s wildlife trade regulations (specifically Council Regulation (EC) No 338/97, through which the EU member States implement CITES) since 2009. Annex D includes species not listed in CITES, but which the EU is concerned about due to rising import volumes or potential impacts on conservation status. These species are subject to import monitoring, even if they are not currently considered threatened. Information obtained through this monitoring system was used in the supporting statement.

The proponents claim that according to the Eurostat Comext database, global imports of frogs’ legs (the Secretariat notes that this covers all species) into the EU for the period 2015–2024 averaged over 160 metric tonnes per year, equivalent to 3.2 million–8.1 million individuals annually, with Türkiye and Albania as the key trading partners.

Trade volumes for *Pelophylax* species are uncertain, and there are no species-specific Harmonized System tariff codes (HS Codes) for any commercial forms of amphibians. The proponents note that "national commodity tariff codes are available that indicate that the amount of material traded (primarily as fresh/chilled/frozen frogs' legs, as well as live specimens) internationally is considerable."

Concerning *P. epeiroticus*, this species is found in western Greece (where it is protected) and marginally into southern Albania. It is a robust species that is adapted to both lentic and lotic waters. In 2023 it was categorized in the IUCN Red List assessment as globally Near Threatened, with a decreasing population trend and the following justification "Its extent of occurrence (EOO) is 25,660 km^2, it occurs in ten or fewer threat-defined locations, and there is continuing decline in the extent and quality of its habitat, thus making the species close to qualifying for Vulnerable under criterion B".

According to the supporting statement, the main threats to this species are the general loss of wetland habitat, water pollution, chemical pollution from agriculture intensification, collection for food (mainly in Greece), dam construction and hydro-power developments. Another potential threat is the fungus *Batrachochytrium dendrobatiditis* (Bd), which has been recently detected in Albania and Greece.

It was previously reported in the 2008 IUCN Red List assessment that the commercial collection of this species for food was a significant threat, and that it was harvested in enormous numbers in Albania. However, the updated assessment indicates that "there is no evidence that this species is collected excessively in Albania, and it is no longer considered to be a major threat (Europe Red List Assessment Workshop September 2019)".

Concerning *P. ridibundus*, this is the most widespread and largest (up to 110 mm) of the four species referred to in the proposal and it is tolerant of a range of habitats. It has a Europe-wide distribution, from Portugal to western Russia and into the Middle East, while it has also been introduced elsewhere (e.g., Malta). It is legally protected in parts of the Balkans, but is still widely exploited. in 2021 it was categorized in the IUCN Red List assessment as Least Concern, with a stable population trend and the following justification "Listed as Least Concern in view of its wide distribution, tolerance of a broad range of habitats and very large population." It was further noted in the assessment that "there are no major threats to this adaptable species. Loss of breeding habitats may lead to localized declines, but it is very resistant to environmental pollution and animals may be found in highly polluted waters (such as chemical or metallurgic pollution) where other amphibian species cannot survive. Severe, or prolonged, droughts may lead to localized population declines of this frog in arid areas."

Concerning *P. shqipericus*, this aquatic species is endemic to Albania and Montenegro, notably Lake Skadar/Shkodra and surrounding floodplains. This relatively small pale green frog (males 40–60 mm) with narrow dorsolateral folds is protected in both countries. In 2023 it was categorized in the IUCN Red List assessment as Vulnerable, with a decreasing population trend and the following justification "because its extent of occurrence (EOO) is 10,387 km^2, its distribution is severely fragmented as a result of wetland habitat fragmentation, and there is continuing decline in the extent and quality of its habitat due to drainage of wetland habitats and aquatic pollution of waterways caused by agrochemical and industrial (including mining) contaminants." The estimated Area of Occupancy (AOO) is determined to be <500 km^2, mainly in populated coastal areas of Albania. The population is inferred to be decreasing due to the decline in the extent and quality of habitat and over-collection for the pet trade and based on the perceived threats a continuing decline in the number of mature individuals is inferred.

The species is considered to be severely fragmented due to the intense anthropogenic alteration of its wetland habitats, including drainage for illegal construction work or for sand extraction. It is not known if the species can successfully adapt to modified habitats, however, based on other species in the genus it is not likely to tolerate extensive changes to its wetland habitats and fragmentation is likely to lead to unviable fragmented subpopulations.

Concerning *P. lessonae*, this species is found Europe-wide, from Portugal to western Russia and into the Middle East. It has also been introduced elsewhere (e.g., Malta). It is protected in most of its EU range under the EU Habitats Directive.

In 2022, *P. lessonae* was categorized in the IUCN Red List assessment as Least Concern with an unknown population trend and the following justification "in view of its wide distribution, tolerance of a broad range of habitats, presumed large population, and because it is unlikely to be declining fast enough to qualify for listing in a threatened category". The species is threatened by habitat loss through agricultural intensification and urbanisation, channelisation of waterbodies, drainage and pollution of wetlands, the introduction of predatory fishes to breeding sites, afforestation and competition with the larger *P. ridibundus*.

According to the supporting statement, all *Pelophylax* species are difficult to distinguish morphologically, especially as processed frog legs are found in mixed shipments. There is evidence of species substitution and ambiguous customs declarations, which undermines enforcement of protections for similar species (including *P. lessonae* and *P. ridibundus*). The proponents are of the view that listing these species will enhance monitoring of the broader frog leg trade and close enforcement loopholes, which are currently exploited by using "green frog" as a generic trade label. There are, however, many more species of *Pelophylax* and it is not clear how the listing might impact them, if they are also in trade and if they can be distinguished from the species that are included in this proposal.

In summary, there seems to be abundant evidence that the trade in frog legs is significant however, much of the trade is inferred and the data presented either refers to "frogs legs" or to *Pelophylax* species based on the origin. Limited availability of species-specific data makes it challenging at this time to determine if a particular species meet the criteria for inclusion in Appendix II. A case could be made for *Pelophylax shqipericus* in light of its conservation status and ongoing trade pressures. While population-level trade data for the other species are more limited, the lookalike criterion A in Annex 2b of Resolution Conf. 9.24 (Rev. CoP17) may be satisfied.

Additional considerations

Document CoP20 Doc. 75 on *Conservation of amphibians* (amphibia *spp.*), reports on the implementation of Decisions 19.197 to 19.199 on *Conservation of amphibians (*Amphibia spp.). This includes the background document entitled *A summary of the status, management and trade in amphibians (Amphibia spp.)* produced in collaboration with the International Union for Conservation of Nature (IUCN) and the IUCN Species Survival Commission Amphibians Specialist Group for discussion during two online technical workshops in 2023. The Secretariat presented the results of the background study, discussions and conclusions from the amphibians workshop in its report to the 33rd meeting of the Animals Committee (AC33; Geneva, 2024) in document AC33 Doc. 32 and its Annex. All documentation considered by the workshop is available on the CITES website (Online workshop on conservation of amphibians).

During the second online workshop the issue of trade in frog legs was discussed and further information can be found in the proceedings of the workshops in information document AC33 Inf. 6. It was reported that over the period 2010-2019, based on Eurostat data from 2021, a total of 40,598 tonnes of frog legs were imported into the EU, which correlates to 814 million to 2 billion individual frogs, depending on their size. Most of these imports originated from Indonesia (74%), Viet Nam (21%), Türkiye (4%) and Albania (1%). Key take-away messages presented at the workshop include the lack of species-specific trade data for frog species; the difficulty in identifying processed frog legs to species level, leading to a high level of mis-labelling; the over exploitation of frog populations in several countries, leading to local or regional declines of targeted populations, and raising concern about an "extinction domino effect"; environmental risks of frog farms and the need for international regulation to ensure sustainability of trade. Participants were informed about a UNEP-WCMC report that collated information on the biology, population status, distribution, trade and management of five *Pelophylax* species from Albania and Türkiye, which are thought to be the major exporters of wild-sourced frogs for the EU market: *P. bedriagae, P. epeiroticus, P. kurtmuelleri, P. ridibundus* and *P. shqipericus*. Three of those species are the subject of the current proposal.

The phylogeny, taxonomy and nomenclature of these frogs has been exceedingly complicated, due to extensive hybridization between taxa and extensive geographic and individual variability in morphology. An extract from Frost (2025), with edits from the nomenclature specialist, is proposed as a standard reference for this genus, which is presented in Annex 1 of the supporting statement.

Provisional conclusions

Based on the information available at the time of writing, there seems to be insufficient information to determine if *Pelophylax epeiroticus, Pelophylax ridibundus* and *Pelophylax shqipericus* meet the criteria in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17) for their inclusion in Appendix II. The proposal may partially meet criterion B of Annex 2a, with the strongest case being for *P. shqipericus.*

If the Parties agree to include *Pelophylax epeiroticus, Pelophylax ridibundus* or *Pelophylax shqipericus*, any of the proposed *Pelophylax* species, including *P. lessonae* may meet the look-alike criterion (criterion A in Annex 2b).

Proposal 28

Carcharhinus longimanus (Oceanic whitetip shark)

Proposal: Transfer from Appendix II to I.

Proponents: Argentina, Bahamas, Brazil, Comoros, Dominican Republic, Ecuador, European Union, Fiji, Gabon, Honduras, Lebanon, Oman, Panama, Samoa, Senegal, Seychelles, Sri Lanka, Sudan, Togo, and the United Kingdom of Great Britain and Northern Ireland

Provisional assessment by the Secretariat

CITES background

Carcharhinus longimanus was included in CITES Appendix II (CoP16 Prop. 42) at the 16th meeting of the Conference of Parties (CoP16; Bangkok, 2013) with entry into effect delayed by 18 months. The listing came into effect on 14th September 2014. The remaining species of Carcharhinidae were included in Appendix II (CoP19 Prop. 37) at the 19th meeting of the Conference of Parties (CoP19; Panama City, 2022) which came into effect on 25th November 2023.

Purpose and impact of the proposal

The proposal seeks to transfer *C. longimanus* from Appendix II to Appendix I. If the proposal is adopted, international trade in specimens of this species will be regulated in accordance with the provisions of Article III of the Convention.

The two species/country combinations under consideration by the Review of Significant Trade (Kenya and Yemen) would be removed from the process as commercial trade in the species will no longer be permitted.

Compliance with listing criteria

The supporting statement suggests that inclusion of *C. longimanus* in Appendix I satisfies criterion C in Annex 1 of Resolution Conf. 9.24 (Rev. CoP17) based on the species experiencing a marked decline in its global population.

C. longimanus is a circumglobal species, inhabiting epipelagic tropical and subtropical waters between 30°N and 35°S. It is known to be highly migratory and is distributed across the Atlantic Ocean, including possibly the Mediterranean, Indian and Pacific Oceans, and therefore has a large number of range States. The species is generally found in the open ocean, on the outer continental shelf, or around oceanic islands in deep water, and has been found at a depth of over 1000 m.

The proponents state that *C. longimanus* has a late age at first maturity, which differs between oceans (Southwest Atlantic: approximately 6-7 year for both sexes; North Pacific: approximately 8.5-8.8 years for females and 6.8-8.9 years for males) and has a small litter size (1 to 14, with an average of six young) with a typical biennial reproductive cycle with 10-12 month gestation period. *C. longimanus* is described in the supporting statement to be a placental viviparous species with litter sizes that are positively correlated with maternal size. The supporting statement states that the maximum intrinsic rate of population increase (r_{max}) is estimated to be 0.126 year^{-1} in the Atlantic and 0.135 year^{-1} in the Pacific and is considered to have a low-intermediate productivity among sharks. In the background document[14] for the technical workshop on *Aquatic species listed in the Appendices*, the species was estimated to have a r_{max} of 0.146 year^{-1} in the Atlantic and 0.178 year^{-1} in the Pacific. Given the

[14] CITES Secretariat (2024). Variability of life history parameters and productivity in elasmobranchs and other commercially exploited aquatic species.

information, the Secretariat considered the *C. longimanus* a low to medium productivity species based on the classifications of Musick (1999)[15].

According to the supporting statement, there are no global population estimates of the species. For population trends, the proponents cite the IUCN Red List assessment (2018), which has estimated a median reduction of 98-100% over three generations, with the highest probability of a greater than 80% reduction. The IUCN Red List assessment used data from six datasets: 1. Standardized catch per unit effort (CPUE) in the Northwest Atlantic (Young *et al*., 2017), 2. Standardized CPUE in the Southwest Atlantic (Tolotti *et al*., 2013), 3. Standardized CPUE in Hawaii (Brodziak and Walsh, 2013); 4. Stock assessment in the Western Central Pacific Ocean (Rice and Harley, 2012); 5. Updated standardized CPUE in the Western Central Pacific Ocean (Rice *et al*., 2015) and 6. Standardized CPUE from the Spanish longline fishery in the Indian Ocean (Ramos-Cartelle *et al*., 2012). The proponents also cite a recent study, which used the same data sets as the IUCN Red List assessment except for one, where the study used a more recent dataset of the stock assessment in the Western Central Pacific Ocean in comparison to the IUCN Red List assessment (Pacoureau *et al*., 2021). The study analyzed the datasets using a different method and concluded that there has been a 75% decline in *C. longimanus* population since 1990.

The proponents report that the population structure of the species is not fully resolved, but various genetic analysis using mitochondrial and nuclear DNA have shown differentiation between the populations in the Western Atlantic and those in the Indo-Pacific. The studies have also shown a possible presence of structuring between Western and Eastern Atlantic sharks.

As the available data for this species are from fisheries operating at the ocean basin level reporting to different tuna Regional Fisheries Management Organizations (tRFMOS), the population trends in the supporting statement were reported at the ocean basin level. The proponents also cite a review paper, which showed that based on studies analyzing various datasets across different ocean basins over time (E Pacific, WC Pacific, SW Atlantic, NW Atlantic and Indian Ocean), the majority found large population declines.

In the Eastern Pacific Ocean, the proponents report that *C. longimanus* catch declined significantly between 1993 to 2008, which is compatible with an 80–95 percent decline from the population levels in the late 1990s (Hall and Roman, 2013).

The proponents report that the Western Central Pacific Ocean is the only ocean basin with stock assessments of the species, both of which showed significant declines, and the 2019 assessment showed that the adult biomass is predicted to be below 5% of unfished levels. The Secretariat notes that a 2025 stock assessment of *C. longimanus* is available from the Western and Central Pacific Fisheries Commision (WCPFC)[16], which is the third comprehensive evaluation of the Western Central Pacific Ocean stock of the species. The 2025 assessment states that “while the stock likely remains severely depleted, the evidence increasingly suggests that the management measures have been sufficient to halt the decline and may now be allowing for the initial stages of recovery”.

The Indian Ocean is described as being the most data-limited ocean basin by the proponents, but various fisheries report CPUE declines of 25 to 40% since the late 1990s. The Secretariat notes the latest published status of the species by IOTC, which shows that the stock is not assessed and therefore the stock status is unknown[17]. The report further states that “there is a paucity of information available on this species in the Indian Ocean and this situation is not expected to improve in the short to medium term”.

The supporting statement provides information from the Northwest Atlantic and South Atlantic, both of which showed around 80% decline based on longline fisheries logbook and observer data. In the Northwest Atlantic, the proponents report that, based on observer data from the United States Northwest Atlantic Pelagic Longline Fishery from 1992 to 2015, a decline is seen from the 1990s to the

[15] Musick, J.A. 1999. Criteria to define extinction risk in marine fishes: The American Fisheries Society Initiative, Fisheries 24:12, 6−14.
[16] WCPFC. 2005. Stock Assessment of Oceanic Whitetip Shark in the Western and Central Pacific Ocean 2025 (WCPFC-SC21-2025/SA-WP-0).
[17] IOTC. https://iotc.org/sites/default/files/content/Stock_status/2024/Engish/IOTC-2024-SC27-ES18_OCSE.pdf

2000s, from which point a relatively stable trend or around a 4% decline is seen in the population. More historic data from the mid 1950s to late 1990s from pelagic tuna longline fisheries showed around 88% decline during the period. For the South Atlantic, the supporting statement reports that analysis of data from 1980 to 2011 shows an 85% decline. In Brazil, the proponents note that the population has "potentially declined", but that one study showed a slight increase in CPUE over a short period (2004-2010), which may be due to changes in fishing practice.

The supporting statement states that the primary threat to *C. longimanus* is overfishing by both industrial and artisanal fisheries and that this is driven by the value of dried fins in the international market. It further states that while the species is no longer a target for industrial fisheries due to various retention bans, the high price for fins encourages illegal retention and sale. For domestic consumption, the proponents note that artisanal catch and local consumption occur in several countries, but that it makes up a small percentage given the rarity of the species.

The supporting statement states that international trade in the species has occurred for decades, primarily driven by demand for their fins used in shark fin soup in Southeast Asia. The proponents report that in Hong Kong Special Administrative Region (SAR) of China, fins sold as being from *C. longimanus* accounted for approximately 1.8% of the shark fin market between 1999 and 2001, which corresponds to an estimated 700,000 individuals (range: 200,000–1,200,000).

The supporting statement includes information from the CITES Trade Database up to 2021, which was presented to the 32nd meeting of the Animals Committee (AC32, Geneva, 2023) for the selection of species for the Review of Significant Trade. The CITES Trade Database accessed in July 2025 includes data up to 2023 and shows that international trade is continuing for the species. For records of trade in fins or dried fins in kilograms from the wild, there has been an increase from 2014 (451 kg) to a peak in 2021 (17,371 kg of fin). In 2022, the records show a total of 11,215 kg of fins and in 2023 the records show 1,050 kg of dried fins.

The proponents report on the illegal trade of the species both through direct evidence of seizures made in Hong Kong SAR of China, Ecuador and the United States of America, and assumptions made through indirect evidence based on DNA analysis of monthly sampling of fins in retail markets of Hong Kong SAR of China. According to the supporting statement, the low levels of international trade in the CITES Trade Database do not march the percentage of *C. longimanus* identified through the monthly samplings at retail markets.

There are 42 records of *C. longimanus* in the CITES Illegal Trade Database (accessed July 2025), which included fins, meat, teeth, skin pieces, bone carvings, medicines, scientific specimens and swim bladders. The scale of seizures was small with the total weight of seized fins between 2016 to 2023 being around 1,300 kg, with the largest single seizure being around 380 kg.

According to the supporting statement, the species is protected in 31 national or territorial jurisdictions and the European Union and a summary is provided in section 7.1. The species was included in Appendix I of CMS in 2020 and transferred from Appendix III to Appendix II of the Specially Protected Areas and Wildlife (SPAW) Protocol under the Cartagena Convention in 2023. The proponents report that all five tRFMOs have adopted measures for the species.

The species is described by the proponents as being morphologically distinct from other sharks in the family Carcharhinidae, which allows all products, except meat, processed fins, and derivatives to be easily identified visually. The proponents report on the availability of rapid DNA testing for identifying meat from other species.

The proposal is based on the species meeting the criteria for a 'marked decline' in criterion C i) and ii) of Annex 1 to Resolution Conf. 9.24 (Rev. CoP17). It appears that *C. longimanus* has undergone a marked decline in the Western and Central Pacific Ocean as evidenced by the recent stock assessment by WCPFC. While there is limited information for the Indian Ocean, genetic studies show that the Indo-Pacific likely consists of a single genetic population. The Atlantic ocean population shows varying levels of decline between assessments. For the global population, the IUCN Red List assessment reports a greater than 80% decline while a recent study showed a 75% decline since 1990s. In terms of inferred

or projected decline, the species exhibits high vulnerability to intrinsic factors including life history traits and behavioral factors. While all tRFMOs have placed restrictions on the species to reduce mortality associated with fisheries, the species is in international trade and the Review of Significant Trade has highlighted the species as warranting further examination. Therefore, a marked decline can be inferred and projected based on levels of exploitation and high intrinsic vulnerability due to life history traits. The species appears to meet criterion C i) and ii) in Annex 1 to Resolution Conf. 9. 24 (Rev. CoP17).

Additional considerations

Range State consultation was carried out through Notification to the Parties No. 2024/134 by Panama and a summary of the responses from 13 Parties, including the European Union, is contained in Annex I of the proposal.

The proponents include information relating to websites that include visual identification tools to identifying fins and the Secretariat notes that several identification materials for the species and its parts are available on the CITES Virtual College.

At the 32nd meeting of the Animals Committee (AC32; Geneva, 2023), Kenya, Senegal, Oman and Yemen were selected under the Review of Significant Trade for *C. longimanus* (AC32 SR). At the 33rd meeting of the Animals Committee (AC33; Geneva, 2024), the species was classified as "action is needed" for Kenya and Yemen, while Senegal and Oman were classified as "less concern" based on a voluntary zero export quota (AC33 SR).

The species was also discussed at the Standing Committee with the 77th meeting of the Standing Committee (SC77; Geneva, 2023) considering document SC77 Doc. 67.1 on *Evidence of continued non-compliant trade of Appendix-II listed shark species (Carcharhinus longimanus)* submitted by the Maldives and the 78th meeting of the Standing Committee (SC78, Geneva, 2025) considering document SC78 Doc. 33.1, which included a summary of actions resulting from a letter from Maldives regarding potential compliance matters related to trade in *C. longimanus.*

The Standing Committee, at SC78, requested the Secretariat to gather information from Indonesia, Kenya, Oman, Senegal, Seychelles, Sri Lanka, and Yemen and report to the 79th meeting of the Standing Committee (SC79, Samarkand, 2025).

The study conducted under Decision 19.223, entitled *Deep dive into shark mismatches* considered the data on *C. longimanus* along with a number of other Elasmobranchii species and the report was presented to AC33 (AC33 Doc. 30).

Provisional conclusions

Based on the information available at the time of writing, it appears that *Carcharhinus longimanus* meets criterion C in Annex 1 of Resolution Conf. 9.24 (Rev. CoP17) for its inclusion in Appendix I.

Proposal 29

Galeorhinus galeus (School shark) and ***Mustelus* spp.** (Smoothhound)

Proposal: Include in Appendix II.

Proponent(s): Brazil, Ecuador, European Union, Panama and Senegal

Provisional assessment by the Secretariat

CITES background

Galeorhinus galeus and *Mustelus* spp. have not previously been proposed for inclusion in any of the CITES Appendices.

G. galeus and various *Mustelus* species were discussed at the 13th, 14th and 15th meetings of the Conference of Parties (CoP13; Bangkok, 2004; CoP13 Doc. 35; CoP14; The Hague, 2007; CoP14 Doc. 59.1; and CoP15; Doha, 2010; CoP15 Doc. 53). They have also been discussed at the 20th, 22nd, 26th, 27th and 28th meetings of the Animals Committee (AC20; Johannesburg, 2004; AC20 WG 8 Doc. 1, AC22; Lima, 2006; AC22 Doc. 17.3; AC22 WG6 Doc. 1; AC26; Dublin, 2012; AC26 WG4 Doc. 1; AC27; Veracruz, 2014; AC27 Doc. 22.1 and AC28; Tel Aviv, 2015; AC28 Doc. 17.1.2).

Purpose and impact of the proposal

The proposal seeks to include *Galeorhinus galeus*, *Mustelus schmitti* and *M. mustelus* in Appendix II, in accordance with Article II, paragraph 2(a) of the Convention and all other species of *Mustelus* spp. (*M. albipinnis, M. andamanensis, M. antarcticus, M. asterias, M. californicus, M. canis, M. dorsalis, M. fasciatus, M. griseus, M. henlei, M. higmani, M. lenticulatus, M. lunulatus, M. manazo, M. mento, M. minicanis, M. mosis, M. norrisi, M. palumbes, M. punctulatus, M. ravidus, M. sinusmexicanus, M. stevensi, M. walkeri, M. whitneyi* and *M. widodoi*) in accordance with Article II, paragraph 2(b) of the Convention.

If the proposal is adopted, international trade in specimens of these taxa will be regulated in accordance with the provisions of Article IV of the Convention.

Based on the supporting statement, if the proposal is adopted, this will add *G. galeus* and 28 species of *Mustelus* to Appendix II.

Compliance with listing criteria

The supporting statement suggests that inclusion of *Galeorhinus galeus*, *Mustelus schmitti* and *M. mustelus* in Appendix II satisfies criterion A in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17) as there has been severe population declines due to unsustainable fisheries, largely driven by demand in international trade for their liver oil, meat and fins.

The supporting statement suggests that inclusion of all other species of *Mustelus* spp. in Appendix II satisfies criteria A and B in Annex 2b of Resolution Conf. 9.24 (Rev. CoP17) as the form in which they are traded, namely meat, dressed carcasses and dried fins, are not easily distinguishable between *G. galeus* and the *Mustelus* species.

G. galeus has the widest distribution among the three species. It has a widespread but patchy distribution across temperate waters in the Atlantic, including the Mediterranean Sea, and Pacific Oceans. *M. mustelus* and *M. schmitti* have non-overlapping distributions on opposite sides of the Atlantic Ocean, with *M. mustelus* occurring in the eastern Atlantic Ocean, including the Mediterranean Sea and *M. schmitti* having the most restricted distribution among the three species in the southwest Atlantic Ocean (from Rio de Janeiro in Brazil to southern Argentina, Puerto Deseado).

According to the proponents *G. galeus* overlaps in distribution with both *M. schmitti* and *M. mustelus*. In addition to having an overlapping range with *G. galeus, M. mustelus* overlaps with other species of *Mustelus* including *M. asteria*, *M. punctulatus* and *M. palumbes*, and *M. schmitti* overlaps with four or five other species of *Mustelus*.

G. galeus, unlike the other two *Mustelus* species, is described by the proponents as a bentho-pelagic species, occurring in shallow inshore water of less than 200 m in depth and in offshore waters of up to 826 m in depth. According to the supporting statement, *M. mustelus* and *M. schmitti* are demersal species and occur in shallow, sandy and muddy habitat with *M. mustelus* usually occurring in waters less than 50 m in depth but occasionally in depths greater than 400 m while *M. schmitti* are found between 2 to 121 m.

According to the proponents, the three species show variation in their biology across their geographic range, but all have conservative life histories with slow growth, late maturity and low reproductive rates. *G. galeus* is reported to be the biggest of the three species growing to a maximum length of nearly 200 cm, while *M. mustelus* females reach 176 cm and *M. schmitti* grows to a maximum length of 90 – 110 cm.

The supporting statement reports that *G. galeus* reproduces every three years with a gestation period of 12 months and average litter size of 20 – 35 pups that vary with maternal size. The proponents report that females mature at 118 – 185 cm (10 – 15 years) and males mature at 107 – 170 cm total length (8 – 10 years), depending on the population, and has an estimated life span of 40 – 60 years with a generation time of 26 years. The life history characteristics of *G. galeus* are presented in Annex 2, Table 2 of the supporting statement.

The proponents report that *M. mustelus* has a litter size ranging from 1 to 25 pups, averaging around 11. Both the size of the litter and size of pups are positively correlated with maternal size, with gestation lasting between 7 and 12 months. The supporting statement reports that females mature at 10 – 12 years at 107 – 124 cm and males mature at 7 – 9 years at 70 – 112 cm total length, with a total life span of 24 years and an estimated generation length of 17.8 years.

The proponents report that *M. schmitti* reproduces annually and has a litter size between 1 – 16, with an average of 4 – 6 following a 11 – 12 months gestation period. The length at maturity is reported to vary by region and latitude ranging from 54 – 70 cm in males and 56 – 79 cm in females.

The supporting statement notes that *G. galeus* has the lowest productivity among the three species with the two smaller species having slightly faster reproductive rates but are still classified as low productivity species. In the background document[18] for the technical workshop on *Aquatic species listed in the Appendices*, *G. galeus* is estimated to have a generation length of between 21.8 to 22.2 years and r_{max} of 0.086 – 0.206, indicating that they have low to medium productivity based on Musick (1999)[19] and *M. mustelus* is estimated to have a generation length of 18.4 years and r_{max} of 0.148 to 0.173, indicating a low to medium productivity species.

The proponents report that no population estimates are available for the three species, but that *G. galeus* and *M. mustelus* shows levels of population structuring within their ranges. The information on population structure for each species based on genetic and/or tagging studies provided in the supporting statement is summarized below:

> ***G. galeus*:** Based on a series of genetic studies, the proponent report that there are up to six distinct subpopulations: 1. Australasia (Australia and New Zealand); 2. northeastern Pacific (west coast of North America from Canada to California); 3. southern Africa (Namibia to South Africa); 4. Northeast Atlantic and the Mediterranean Sea; 5. Southwest Atlantic (Brazil to Argentina); 6. Southeast Pacific (Ecuador to Chile). The species is reported in the supporting

[18] CITES Secretariat (2024). Variability of life history parameters and productivity in elasmobranchs and other commercially exploited aquatic species.
[19] Musick, J.A. 1999. Criteria to define extinction risk in marine fishes: The American Fisheries Society Initiative, Fisheries 24:12, 6−14.

statement to migrate seasonally across long distances within each subpopulation but with little evidence of movement or gene flow between the subpopulations.

***M. mustelus*:** A genetic study based on mitochondrial and microsatellite data cited in the supporting statement showed that there was regional genetic differentiation between three regions (the Mediterranean, west Africa and southern Africa), suggesting that the open ocean may act as a barrier to migration.

***M. schmitti*:** The supporting statement reports that while the population structure has not been fully resolved that there is evidence of at least one distinct demographic unit. The Secretariat notes that the demographic unit was determined based on analysis of mitochondrial DNA that showed no population differentiation between individuals sampled in Rio de la Plata and its Maritime Front (Pereya *et al.*, 2010).

The IUCN Red List assessment of *G. galeus* (2020) and *M. schmitti* (2019) estimated a greater than 80% global reduction in the populations categorizing them as Critically Endangered while *M. mustelus* (2020) has undergone a 50-79% global population reduction categorizing them as Endangered.

Among the three species, *G. galeus* is the most data rich species with regards to population trends, while there is limited information on the two *Mustelus* species. Information on population trends is provided in Annex IV of the supporting statement and species-specific information on the populations and their decline is summarized below. The proponent states that landings of these species have often been reported under common names such as “smooth-hounds”, “houndsharks” and “cazon”, among other names, as the species are morphologically similar and, therefore, there is a lack of species-specific information.

***G. galeus*:** As the species is found in distinct subpopulation across its range the information is presented at the subpopulation level. The Secretariat notes that there are varying degrees of information for the different subpopulations.

- *Atlantic Ocean:* According to the supporting statement, the landings of *G. galeus* decreased from 1,100 t to 225 t between 1982 and 1992. It further states that while the International Council for the Exploration of the Sea (ICES) could not assess the stock or exploitation status of *G. galeus*, in 2023 it advised precautionary annual landings of a maximum of 241 tonnes each year from 2024 – 2027, representing a reduction from the 2005 – 2022 reported annual landings of 340 – 715 tonnes. The supporting statement reports that an exploratory trend analysis by ICES in 2019 using standardized fishery-independent catch per unit effort (CPUE) datasets showed a decline in the CPUE until the early 2000s, followed by a gradual increase coinciding with decreasing commercial landings, however, ICES cautioned that the survey datasets might not fully reflect the true stock status. In the Mediterranean, the proponents report the rarity of the species following historic depletions.
- *West Africa:* No species-specific information provided.

- *Southern Africa:* Based on survey data from 1952 to 2016, the proponents report a decline to 10-14% of pre-exploitation biomass and that records of the species are rare in Namibia and Angola.

- *Southwest Atlantic:* The population in the Southwest Atlantic is reported to have declined, with catch data from Argentina showing a decrease from 40% in 1984 to 2% in 2015. Unpublished data from Argentina, used in the IUCN Red List assessment, showed an annual decline of 5.9%, however, the Secretariat notes that the decline was steep between 1992 to 2003, from which point the population trend is calculated to be stable until 2015.

- *Southeast Pacific:* According to the supporting statement, the species is documented in national data and at landing sites in Chile and Peru, but the only data reported to the FAO is as “smooth-hounds nei”, which also includes other species. The proponents report that *G. galeus* landing in Chile peaked in 1980 at 36 tons, then declined to 6 tons in 1992 with no further reports since 2009.

- *Northeast Pacific:* While there is no information on population declines, the proponents report that over 800,000 individuals were caught between 1937 and 1949 in California, and possibly around

15,600 between 1938 and 1944 in northwest Pacific. The supporting statement cites Fisheries and Ocean Canada in 2012, which estimated that the population has recovered to at least 10% of its historic level. The proponent report that Mexico reports over 70% of the species catch to FAO, but that it only accounts for about 1% of global catch.

- *Australasia:* The species is managed as separate stocks in Australia and New Zealand, however, genetic and tagging studies have shown that they may constitute a single population. The supporting statement states that fishing began in the 1920s targeting mature females but as adult stocks decline, the catch shifted to smaller animals and juvenile catches declined by approximately 80% between 1942 and 1955. The stock in Australia is reported to be overfished with a biomass of 12% of baseline and a rebuilding strategy was released in 2015, which set a recovery timeframe of 66 year to reach 20% of the historical baseline. On the other hand, catch data in New Zealand from 1990 to 2016 showed a 0.5% annual rate of reduction according to the IUCN Red List assessment.

***M. mustelus*:** The proponents report that ICES carries out biennial assessment of *Mustelus* at the genus level and provides a total allowable catch. The Secretariat notes that the latest ICES advice was a total landing of no more than 5,329 tonnes in each of the years 2024 and 2025. The Secretariat notes that 80-90% decline was identified for *M. mustelus* and *M. punctulatus* within the Mediterranean Sea, but that the data were aggregated and so decline could not be quantified solely for *M. mustelus* (Colloca *et al.*, 2017)[20].The supporting statement reports that a stock assessment was conducted for the species in southern Africa, which showed that currently catch level are unsustainable unless annual mortality was reduced from 100-200 t to below 75 t.

***M. schmitti*:** The proponents report that declines have been documented in Argentina, the Bonaerense Costal Ecosystem and in Brazil. In Argentina, the supporting statement reports that the CPUE models show a clear decline between 1992 and 2016 while in the Bonaerense Coastal Ecosystem, the estimated biomass reduction was 50% between 1994 and 2003. The supporting statement states that in Brazil, there was an 85% decline in biomass between 1975 and 1995. The FAO catch data for Uruguay and Argentina is reported by the proponents to show a peak in catches in 1988, followed by a decline to 3,000 tonnes annually since 2017. The Secretariat notes that the Comision Tecnica Mixta del Frente Maritimo (CTMFM) has published a stock status report in 2017 that states that “exploitation levels similar to the average catches of the last 3 years will allow the population biomass to recover to its MSY levels in a period of less than 15 years”.

The main threat reported by the proponents is the slow recovery following historic declines due to their life history traits and continued catch of the species. Other threats reported in the supporting statement are ocean warming and coastal development, which impact the shallow-water nursery ground, as well as bioaccumulation of toxic heavy metals.

The supporting statement reports that the commercial utilization of *G. galeus* liver oil started nearly 100 years ago in southern Africa, for their meat in southwest Atlantic since the 1930s and for their fins and liver oil in California starting in the 19th century and in 1937, respectively. The proponents state that over the last 60 years, as the population of *G. galeus* declined, the utilization and trade has shifted to smaller smoothhound species such as *M. mustelus* and *M. schmitti*. The primary international trade in the species currently is reported by the proponents to be in their meat in fresh-frozen and dried-salted form and the remaining fins enter trade to Asia.

No information is provided by the proponents on illegal trade in the three species.

The supporting statement reports that *G. galeus* is listed in Appendix II of the Convention on Migratory Species (CMS), Annex I of the CMS Memorandum of Understanding on the Conservation of Migratory Sharks and the General Fisheries Commission for the Mediterranean (GFCM) has a recommendation providing full protection for the species. In addition, the proponents report that as a species included in Annex II of the Barcelona Convention, the regulation of *M. mustelus* fisheries in the Mediterranean is

[20] Colloca, F., Enea, M., Ragonese, S. and Di Lorenzo, M., 2017. A century of fishery data documenting the collapse of smooth-hounds (Mustelus spp.) in the Mediterranean Sea. *Aquatic Conservation: Marine and Freshwater Ecosystems*, *27*(6), pp.1145-1155.

encouraged. The two main regional organization involved in the management of the species are ICES for *G. galeus* and *M. mustelus* and CTMFM for *G. galeus* and *M. schmitti*.

In addition to the international regulatory measures, a number of range States and regions have various management measures in place, with a few range States establishing a total allowable catch (TAC) while others have afforded protection for the species. A full summary is provided by the proponents in Annex VI of the supporting statement.

The proposal is based on *G. galeus, M. mustelus* and *M. schmitti* meeting criteria A of Annex 2a and all other species of *Mustelus* meeting criterion A and B of Annex 2b to Resolution Conf. 9.24 (Rev. CoP17).

G. galeus and *M. mustelus* have a long but varied history in commercial exploitation across their wide distribution leading to different levels of decline in their subpopulations. Despite being wide-ranging, the Secretariat notes that genetic and tagging studies have shown that both species have low levels of gene flow between subpopulations and that individuals show high levels of philopatry, which means each subpopulation has its own decline trajectory. For *G. galeus*, there is evidence of population declines in several populations, but not all, and management measures are in place for a number of the populations. However, there is limited information for *M. mustelus* making it challenging to determine the level of population decline of the species.

It appears that despite the declines in population of *M. schmitti* in the past, there is evidence that the population has stabilized and there are management measures in Argentina and CTMFM to ensure that harvest is sustainable and Brazil has a retention ban for the species. Given that the trade in this species is regional and its harvest is regulated by CTMFM, this species does not seem to require regulation under CITES to ensure it will not meet the criteria for Appendix I in the near future.

The morphological similarity and overlapping distribution of *G. galeus* with species of *Mustelus* make it plausible that it may be difficult for enforcement officers to be able to distinguish between the species. The supporting statement also reports that there has been considerable misidentification among the species of *Mustelus* and *G. galeus* with visual identification being challenging and often requiring detailed morphological measures for accurate species identification. Other species of *Mustelus* are commercially fished and there is substantial overlap in the distribution among the *Mustelus* species and *G. galeus.*

Additional considerations

No standard nomenclature for *G. galeus* and *Mustelus* spp. was proposed in the supporting statement. If the proposal was adopted, it would be desirable to propose a standard reference at the earliest opportunity.

The results of range State consultations are summarized in Annex XII of the supporting statement.

Provisional conclusions

Based on the information available at the time of writing, it appears that there is insufficient information to determine if *Galeorhinus galeus* and *Mustelus mustelus* meet criterion A in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17) for their inclusion in Appendix II while it appears that *Mustelus schmitti* does not meet criterion A in Annex 2a of Resolution Conf. 9.24 (Rev. coP17) for its inclusion in Appendix II.

Proposal 30

Mobulidae spp. (Manta and devil rays)

Proposal: Transfer from Appendix II to I.

Proponents: Bahamas, Belize, Brazil, Comoros, Dominican Republic, Ecuador, Fiji, Gabon, Jamaica, Maldives, Panama, Samoa, Senegal, Seychelles, Sudan and Togo

Provisional assessment by the Secretariat

CITES background

The genus *Manta* was included in Appendix II (CoP16 Prop. 46 (Rev. 2) at the 16th meeting of the Conference of Parties (CoP16; Bangkok, 2013) with a delay in entry into effect of 18 months and the genus *Mobula* was included in Appendix II (CoP17 Prop. 44) at the 17th meeting of the Conference of Parties (CoP17; Johannesburg, 2016). Following taxonomic changes adopted at the 19th meeting of the Conference of Parties (CoP19; Panama City, 2022), the genus *Manta* was merged into the genus *Mobula* in 2023.

Purpose and impact of the proposal

The proposal seeks to transfer Mobulidae spp. (*Mobula alfredi, M. birostris, M. tarapacana, M. mobular, M. thurstoni, M. eregoodoo, M. kuhlii, M. hypostoma,* and *M. munkiana*) from Appendix II to Appendix I. If the proposal is adopted, international trade in specimens of this family will be regulated in accordance with the provisions of Article III of the Convention.

The genus/country combination of *Manta* spp./Sri Lanka being considered under the Review of Significant would be removed from the process, as commercial trade in the species will no longer be permitted.

Compliance with listing criteria

The supporting statement suggests that inclusion of Mobulidae spp. in Appendix I satisfies criterion C i) and ii) in Annex 1 of Resolution Conf. 9.24 (Rev. CoP17) as the species has undergone population declines due to unsustainable harvest, some of which enters international trade.

The nine species of Mobulidae are distributed globally in tropical and subtropical waters with *M. birostris, M. tarapacana, M. mobular* and *M. thurstoni* occurring circumglobally in the Atlantic, Pacific and Indian Oceans, while *M. alfredi, M. eregoodoo* and *M. kuhlil* occur in the Indo-West Pacific. *M. hypostoma* is found in the Atlantic Ocean and *M. munkiana* in the Eastern Pacific Ocean. While broadly distributed, the proponents report that the populations of all Mobulidae species are highly fragmented and sparsely distributed within their range.

Mobulidae spp. inhabit a wide range of marine habitats according to the supporting statement, with *M. alfredi* being primarily neritic while *M. birostris, M. mobular, M. thurstoni* and *M. tarapacana* are more oceanic. The supporting statement further reports that while *M. munkiana* prefers shallow coastal waters, *M. hypostoma, M. kuhlii* and *M. eregoodoo* inhabit coastal and continental shelf waters.

All species of the family Mobulidae are aplacental vivaparous and have K-selected traits with the lowest reported fecundity among elasmobranchs according to the proponents. They report that *M. alfredi* matures at around 10 years and reproduces every 2 – 5 years on average with a gestation period of 12 – 13 months, bearing only one pup per pregnancy, which translates to 5 – 15 pups over the lifetime of a female. The proponents report that although detailed life history trait information is lacking for *M. birostris*, it is likely to be similar to *M. alfredi*. The proponents report that the median maximum intrinsic rate of population increase (r_{max}) for *M. mobular* is 0.077 $year^{-1}$. *M. hypostoma, M. kuhlii, M. eregoodoo* and *M. munkiana* are not well studied but the proponents note that they share the same life history traits

as the other larger Mobulidae species. In the background document[21] for the technical workshop on *Aquatic species listed in the Appendices*, *M. mobular* is estimated to have r_{max} of 0.084, indicating that they have low productivity based on Musick (1999)[22]. Based on the information in the supporting statement, the species are all likely to be low productivity species.

The proponents state that mobulid rays migrate across large distances and in-between oceanic and coastal waters. The supporting statement cites tagging studies that have shown large scale movements (500 – 3,800 km) in *M. tarapacana, M. mobular* and *M. alfredi*. Furthermore, the supporting statement states that Mobulidae species form seasonal aggregations in small and large groups (ranging from a few individuals to tens of thousands of individuals) around the world, often related to food sources, courtship, reproduction or other functions. The proponents note that the combination of their predictable migration and aggregation in easily accessible areas make them vulnerable to fisheries.

Based on the supporting statement, the global population estimate for *M. birostris* is around 150,000 individuals and for *M. alfredi* is around 80,000, with each subpopulation being small, mostly around 100 to 2,000 individuals. The proponent report that certain subpopulations are much bigger such as the ones in Maldives with an estimate of 4,901 individuals of *M. alfredi,* and in Ecuador with 22,316 individuals of *M. birostris*. The proponents also state that there is often low connectivity between populations making them vulnerable to local depletion and regional extinction. For all other Mobulidae species, the proponents report that there are no global population estimates, but an aerial survey estimated up to 12,700 *M. mobular* individuals in the northwest Mediterranean Sea.

The proponents report that there is a paucity of population structure information, but genetic and photo-ID studies for *M. alfredi* shows that the species has a small and highly fragmented population. The supporting statement reports that studies of both *M. alfredi* and *M. birostris* aggregations have shown evidence of sexual segregation depending on the location while studies of seasonal aggregations of *M. tarapacana* in the Saint Peter and Saint Paul Archipelago showed size and sexual segregation.

The supporting statement provides population trend information based on three sources: sightings per unit effort (SPUE) data from monitored populations, catch landings data and evidence of depletion. Based on recent studies, the supporting statement concludes that in several locations there has been an up to 99% decline in populations. The proponents shared in Table 1 of the supporting statement species-specific declines from published and unpublished data showing 83-99% decline for *M. birostris,* 99% decline for *M. alfredi,* 87-99% for *M. tarapacana,* 81-98% decline for *M. mobular*, 85-98% for *M. thurstoni*, 78% for *M. eregoodoo*, 81-98% for *M. kuhlii*, 85-98% for *M. munkiana* and 83% for *M. hypostoma*. A summary of species-specific information provided in the supporting statement is shown below.

M. alfredi: The supporting statement provides information from two locations, Tofo, Mozambique, and KwaZulu-Natal Province, South Africa. The Secretariat notes that based on underwater sighting data between 2003 and 2023, Venables *et al.* (2024) estimated a 99% decline in sightings that were attributed to an increase in fisheries mortality. The Secretariat also notes that a 41-year dataset between 1981 and 2021 from KwaZulu-Natal (Carpenter *et al*., 2021), which contained both *M. alfredi* and *M. birostris* data showed that there was an increase in catches until 2000, from which point there was a decline.

M. birostris: The proponents report information from four locations, Costa Rica, the Inter-American Tropical Tuna Commission (IATTC) Convention area, Tofo, Mozambique, and Threspuram, India. The supporting statement reports that an 89% decline was seen for *M. birostris* over a 21-year period from sighting data based on 27,527 dives conducted at 17 sites around Cocos Island in Costa Rica. The underwater sighting study by Venables *et al.* (2024) in Tofo, Mozambique, also reported a 93% decline in sightings for *M. birostris*. A study under review (Chopra *et al.*, 2025) is cited by the proponents to show an 83% decline in landings per registered vessel between 2013 and 2023 in Threspuram, India. The supporting statement also provides a figure of 99% decline between 2010 – 2014 based on data

[21] CITES Secretariat (2024). Variability of life history parameters and productivity in elasmobranchs and other commercially exploited aquatic species.
[22] Musick, J.A. 1999. Criteria to define extinction risk in marine fishes: The American Fisheries Society Initiative, Fisheries 24:12, 6−14.

from the observer program of IATTC of captures of mobulid rays from the tropical tuna purse-seine fishery in the eastern Pacific Ocean. The Secretariat notes that the IATTC observer data ranges from 1993 and 2014 and between 1993 and 2009, the catches ranged between zero and 286 individuals before reaching a peak of 1,169 individuals in 2010.

M. tarapacana: The supporting statement provides information from India, Indonesia, Pakistan and the IATTC Convention area for the species. The proponents report that in Tajung Luar, Indonesia, a comparison of catches between 2001 – 2005 and 2013 – 2014 showed a 99% change while Cilacap showed a 77% decline and Lakamera showed a 75% decline. The supporting statement also references a study on rays caught as bycatch by pelagic gillnets, used for targeting tuna and tuna like species in Pakistan between 2013 and 2018, which showed an 87% decline in landings. The Secretariat notes that the 87% decline in landings was calculated from 17 observations, as the species was reported to be rare (Moazzam, 2008). A study under review (Chopra *et al.*, 2025) is cited by the proponents to show a 92% decline in landings between 2013 and 2023 in Threspuram, India. The supporting statement also provides a figure of 90% decline between 2008 – 2014 based on data from the observer program of IATTC. The Secretariat notes that the IATTC observer data shows no catches of the species between 1993 and 2000 and then steadily increasing to a peak of 316 individuals in 2008 before showing a decline until 2014.

M. mobular: The supporting statement refers to a study on rays caught as bycatch by pelagic gillnets used for targeting tuna and tuna-like species in Pakistan, which showed a 98% decline in landings between 2013 and 2018. The Secretariat notes that this species was commonly observed (on 379 occasions) but shows a decline after 2015 (Moazzam 2008). The proponents report that in Sri Lanka, 62% of males and 83% of females were below the size of maturity and unpublished survey data collected in landing sites showed a decline of 89.3% between 2015 – 2024. The proponents cite a study on landings data in Indonesia that showed a 93% decline between 2015 – 2023 and a study in Peru using national data on landings, which is reported to show an 81% decline between 2015 – 2023. A study under review (Chopra *et al.*, 2025) is cited by the proponents to show an 87% decline in landings between 2013 and 2023 in Threspuram, India.

M. thurstoni: A study under review (Chopra *et al.*, 2025) is cited by the proponents to show an 85% decline in landings between 2013 and 2023 in Threspuram, India. The supporting statement also provides a figure of 90% decline between 2002 – 2014 based on data from the observer program of IATTC. The Secretariat notes that the IATTC observer data shows very low catches of the species between 1993 and 1999 and then around 200 individuals in 2000 and 2001 before reaching a peak in 2002 of 2,143 individuals before showing a decline until 2014.

M. eregoodoo: The supporting statement reports that the number of *M. eregoodoo* caught in trial gillnets from 2016 to 2018 showed a 78% decline, which was calculated based on catching 63 individuals in 2016 – 2017 and only catching 14 individuals in 2017 – 2018. Furthermore, the proponents report that it could be inferred that populations were depleted in Sri Lanka based on unpublished survey data collected in landing sites between 2021 and 2024.

M. kuhlii: The proponents report that it could be inferred that populations were depleted in Sri Lanka based on unpublished survey data collected in landing sites between 2021 and 2024. The supporting statement also cites a study on rays caught as bycatch by pelagic gillnets used for targeting tuna and tuna-like species in Pakistan between 2013 and 2018, which showed a 93% decline. The Secretariat notes that the author states that at the time of data collection, this also included *M. eregoodo* and, after being commonly reported in 2013, no specimen was observed during 2018 (Moazzam, 2008). The Secretariat notes that based on underwater sighting data between 2003 and 2023, Venables *et al*. (2024) estimated an 81% decline in sightings, which was attributed to an increase in fisheries mortality.

M. hypostoma: The supporting statement infers population declines in the species in Senegal based on an article describing the first records of the species in Congolese water and Cameroon based on a

genetic and morphometry study on the species (Humble *et al*., 2025[23]). In addition, the proponents report an 83% decline in the Southeastern USA between 2002 – 2022 based on a paper in review.

M. munkiana: The supporting statement provides a figure of 90% decline between 2008 – 2014 based on data from the observer program of IATTC. The Secretariat notes that the IATTC observer data show no reported catches between 1993 and 2000 and then a steady increase in catches until reaching a peak of 171 in 2008 before declining. A study in Peru using national data on landings, which is reported to show a 98% decline between 2016 – 2023, is cited by the proponents.

The main threats cited in the supporting statement are unsustainable targeted fisheries and bycatch from industrial, large- and small-scale artisanal fleets, with a recent increase in demand for dried gill plates. It presents data from a recent comprehensive review of Mobulidae catch and landings which showed that Mobulidae spp. are targeted and caught as bycatch in at least 85 countries, 77 of which have landings, and that small-vessel fisheries are responsible for 85% of the global catch and 87% of the global mortality. The supporting statement reports that the meat of Mobulidae species is consumed locally in at least 35 countries and territories.

According to the proponents, all commercial use and trade in Mobulidae species are from wild-caught animals. It further states that international trade has expanded worldwide and that prices are higher than a decade ago. The proponents report that historically Mobulidae species were used domestically, primarily for meat and sometimes derivatives, however, in recent decades, there has been an increase in demand for the dried gill plates and has led to an increase in international trade.

According to the supporting statement, the CITES Trade Database only captures a portion of the international trade in Mobulidae species. The proponents cite a study that conducted a global assessment of mobulid meat and gill plate consumption and trade showed that gill plates from Mobulidae species are exported from at least 15 Parties/territories and imported by at least five Parties/territories. As the proponents note in the supporting statement, the CITES Trade Database only shows records of commercial trade from four exporting Parties (three for gill plates and one for a small amount of fins) to two importing Parties/territories. The proponents also report on the increase in online retailers across five platforms in China, while the number of physical retailers offering gill plates declined from 2013 to 2023.

The proposal is based on the species meeting the criteria for a ‘marked decline’ in criterion C i) and ii) of Annex 1 to Resolution Conf. 9.24 (Rev. CoP17). The Secretariat recognizes that the nine species are widely distribution across the world in possibly isolated and fragmented populations and therefore it is not possible to collect sufficient data on all subpopulations of all species.

It appears that certain species and populations of the family Mobulidae have declined, but it is difficult to assess the magnitude and geographic extent of these declines across the wide distribution of the species. Based on the information in the supporting statement and the CITES Trade Database, there is ongoing international trade in the species for gill plates. In terms of inferred or projected decline, the species exhibits high vulnerability to intrinsic factors including life history traits and behavioral factors, therefore their decline may be inferred and projected based on levels of exploitation and high intrinsic vulnerability due to life history traits.

Additional considerations

At the 32nd meeting of the Animals Committee (AC32; Geneva, 2023), *Mobula* spp. for Sri Lanka were selected under the Review of Significant Trade (AC32 SR) and at the 33rd meeting of the Animals Committee (AC33; Geneva, 2024), the genus was classified as “action is needed” for Sri Lanka and recommendations were formulated for implementation by Sri Lanka in the short and long term (AC33 SR). The 78th meeting of the Standing Committee (SC78; Geneva, 2025) agreed to publish a

[23] Humble, E., Boggio-Pasqua, A., Kamla, A.T., Bassos-Hull, K., Bergacker, S., Gose, M.A., Hilbourne, S., Laglbauer, B., Martinez-Lopez, A., Fogwan, C. and Biankeu, C.I., 2025. Genetic and Morphometric Support for the Atlantic Pygmy Devil Ray, Mobula hypostoma (Bancroft, 1831), in the Eastern Atlantic Ocean. *Aquatic Conservation: Marine and Freshwater Ecosystems*, *35*(1), p.e70030.

zero export quota for *Mobula* spp. until Sri Lanka provides information to justify a higher quota to be agreed with the Chair of the Animals Committee (SC78 SR).

Under the current standard nomenclature, the genus *Mobula* is under the family Myliobatidae, however, the nomenclature changes proposed to the 20th meeting of the Conference of Parties (CoP20; Samarkand, 2025) includes them under the family Mobulidae. This proposal uses the standard nomenclature proposed to CoP20 by the Animals Committee.

Range State consultation was carried out through Notification to the Parties No. 2024/133 by Ecuador and a summary of the responses received is represented in section 10 of the supporting statement.

The amendment proposal cites a new “Field Guide to the Manta and Devil Rays of the World” published in 2025, which includes identification keys, key species features, data collection protocol, safe handling and release guidelines, and post-mortem colour change illustrations. An updated mobulid gill plate identification key is also appended to the proposal.

Provisional conclusions

Based on the information available at the time of writing, there is insufficient information to assess if Mobulidae species meet criterion C in Annex 1 of Resolution Conf. 9.24 (Rev. CoP17) for their inclusion in Appendix I.

Proposal 31

Rhincodon typus (Whale shark)

Proposal: Transfer from Appendix II to I.

Proponents: Argentina, Bahamas, Bangladesh, Belize, Comoros, Dominican Republic, Ecuador, Fiji, Gabon, Maldives, Panama, Philippines, Samoa, Senegal, Seychelles, Sri Lanka and Togo

Provisional assessment by the Secretariat

CITES background

A proposal to include *Rhincodon typus* in Appendix II by the United States of America (Prop. 11.47) was considered at the 11th meeting of the Conference of Parties (CoP11; Gigiri, 2000) and was rejected. At the 12th meeting of the Conference of Parties (CoP12; Santiago, 2002), the proposal to include the species in Appendix II by India and the Philippines (CoP12 Prop.35) was adopted and came into force on 13 February 2003.

Purpose and impact of the proposal

The proposal seeks to transfer *R. typus* from Appendix II to Appendix I. If the proposal is adopted, international trade in specimens of this species will be regulated in accordance with the provisions of Article III of the Convention.

Compliance with listing criteria

The supporting statement suggests that inclusion of *R. typus* in Appendix I satisfies criterion C i) and ii) in Annex 1 of Resolution Conf. 9.24 (Rev. CoP17) as the population has undergone a marked decline and is projected to continue declining due to future decreases in area of habitat and quality of habitat due to climate change.

The whale shark (*R. typus*) is a pantropical species inhabiting tropical and warm-temperate waters of the Atlantic, Indian, and Pacific Oceans, typically occurring between 30°N and 35°S latitude. As a highly migratory species with a relatively predictable movement pattern, it is associated with over 110 range States. The proponents report that although generally solitary, *R. typus* is known to aggregate in large numbers at specific sites globally. These aggregations tend to occur in coastal areas and are composed predominately of juvenile males according to the supporting statement.

The proponents note that there is limited information available on the life history and biology of *R. typus*, particularly concerning its reproductive biology, but states that *R. typus* is one of the least biologically productive sharks. The only documented life history parameter is an estimated generation length of approximately 25 years. However, a recent review by Pierce *et al*. (2022), cited in the supporting statement, concluded that the species exhibits slow growth, late maturity, and considerable longevity with the maximum intrinsic rate of population increase (r_{max}) ranging from 0.083 to 0.122 per year. In the background document[24] for the technical workshop on *Aquatic species listed in the Appendices*, the species was estimated to have a generation length of 31.4 years.

The proponents note that to date, only one pregnant female has been documented. This individual was landed and was found to carry 304 embryos, which confirmed that the species was aplacental viviparous. The supporting statement reports that the small size of the pups at birth, combined with their occurrence in open-ocean habitats where predation risk is high, suggests low early-life survivorship. According to a study on asymptotic growth cited in the supporting statement, *R. typus* has growth coefficients of $K = 0.088$ year^{-1} for males and $K = 0.035$ year^{-1} for females. The Secretariat notes that these growth coefficients are based on yearly length measurements of photos/videos taken of individuals of the species at Ningaloo Reef, Australia, a known aggregate site, between 2009 and 2019.

[24] CITES Secretariat (2024). Variability of life history parameters and productivity in elasmobranchs and other commercially exploited aquatic species.

Based on a global genetic study, the proponents report that there are two separate populations of *R. typus* in the Atlantic and the Indo-Pacific with high connectivity within each ocean basin. While the IUCN Red List assessment (2016) cited by the proponents estimate that 75% of the global population is distributed in the Indo-Pacific and the remaining 25% in the Atlantic, a more recent study estimated a global distribution of effective population size to be 63% in the Indo-Pacific and 37% in the Atlantic (Yagishita, Ikeguchi and Matsumoto, 2020[25]).

There are no reliable population estimates for this species, but the proponents state that there was a minimum of 12,355 individuals as of January 2021 identified from the global database of *R. typus* sighting photos taken from researchers and the public (Wildbook for Whale Sharks). The Wildbook for Whale Sharks, is now called, Sharkbook, and lists 24,198 identified sharks as of July 2025 (sharkbook.ai; Levenson et al. 2015[26]). This number is not representative of the entire population as the individual identification is from photos and the majority of the photos are likely to be derived from known aggregations of the species.

The supporting statement reports on two effective population size estimates from two separate genetics studies, however, the Secretariat notes that these were calculated using mutation rates for distantly related sharks as the mutation rates are unknown for *R. typus* and the authors state that they are provisional (Schmidt et al., 2009 and Castro et al., 2007).

The supporting statement, based on the IUCN Red List assessment indicates that *R. typus* populations are inferred to have declined by an estimated 63% in the Indo-Pacific and by over 30% in the Atlantic over three generations (75 years). Combining the data from both populations, the IUCN Red List assessment infers that the global population has likely declined by over 50% in the last three generations. The information used in the supporting statement for population trends are indices of abundance and levels of exploitation. The information on population trends is from the 1990s to 2010s and there does not seem to be any recent information on population trends of the species.

Information relating to the population of *R. typus* in the Atlantic: The supporting statement shares information on sightings per unit effort in three locations, off western Africa, Belize and the Azores to infer the decline of the Atlantic population. The proponents cite data from tuna purse-seine logbooks in the central-east Atlantic (1980–2010) to demonstrate a decline in the populations, however, the authors of the study on the Atlantic population state that they "found no evidence for a temporal trend in whale shark occurrence in the Atlantic". The supporting statement also provides data from surveys at Gladden Spit, Belize (1998–2003), which showed a decline in the last two years of survey, which was confirmed to be ongoing until 2016 by personal communications, even though the reason for the decline was not evident. In contrast, sightings in the Azores increased from 2008 onward, based on 16 years of data, and were attributed to changing environmental conditions.

Information relating to the population of *R. typus* in the Indo-Pacific: The supporting statement presents Indo-Pacific population trend data based on purse seine observer records, catch and landing data, diver reported sightings, and market-based sources. Several datasets cited in the supporting statement, including those from Taiwan, Province of China, the Western and Central Pacific, the Philippines, and the Andaman Sea, indicate decline in catch rates or sighting frequency, however, the underlying causes remain unclear, and it is uncertain whether these trends persisted beyond the periods of data collection. In the northern Mozambique Channel, both increases and decreases in sightings have been observed during the study period.

The proponents state that the main threats for *R. typus* include fisheries catch, bycatch, vessel strike, habitat loss and climate change. The supporting statement indicates that direct catch and bycatch have been documented from many range States, including in southern China (in the 2010s), and Oman and Haiti confirmed through personal communications. However, much of the data provided are from 2010s and it is unclear if directed catch and bycatch of the species is still ongoing. The proponents report that

[25] Yagishita, N., Ikeguchi, S.I. and Matsumoto, R., 2020. Re-estimation of genetic population structure and demographic history of the whale shark (Rhincodon typus) with additional japanese samples, inferred from mitochondrial DNA Sequences. *Pacific Science*, *74*(1), pp.31-47.
[26] J. Levenson, S. Gero, J. Van Oast, and J. Holmberg. 2015. Flukebook: a cloud-based photo-identification analysis tools for marine mammal research. Accessible at: https://www.flukebook.org

the only known targeted fishery of the species to have existed in the Atlantic Ocean was in Cuba until the fishery was banned in 1991. In the Pacific Ocean, the proponents report that small-scale seasonal harpoon fishery in India landed the species for liver oil until the species became protected in 2001. Furthermore, the proponents report that fishers in the Maldives harvested 20-30 individuals per year for oil until the fishery was banned in 1995.

Based on the information provided by the proponents, there appears to be minimal documented utilization in the past five years, with the only recent information being from Bangladesh between 2016 and 2023, where five individuals of the *R. typus* were landed, all of which were immature, and in Java, Indonesia, where 38 landings were documented between 2019 and 2022.

As noted in the supporting statement, the majority of the records of *R. typus* in the CITES Trade Database are for scientific purposes, followed by educational, circus or travelling exhibition and zoo purposes. Only one record of commercial trade of wild specimens is recorded in the Trade Database from 2015, which was of one specimen.

Vessel strikes were also cited by the proponents as a concern for *R. typus* as they routinely feed at the surface and may overlap with shipping lanes. According to the supporting statement, propeller injuries are commonly recorded during monitoring programs, and while mortality events are rarely reported, it states that it is difficult to document, as *R. typus* will typically sink upon death.

It appears that a growing threat for *R. typus* is climate change and the resulting loss of core habitat. The proponents state that climate change will lead to a >50% core habitat area loss within some national waters by 2100, with geographic shifts of over 1000 km (around 12km year^{-1}). This is predicted to move habitat suitability into current range-edge areas, which will increase the co-occurrence of *R. typus* with large ships. This contraction and poleward shift are likely to reduce habitat area and quality, according to the proponents.

The proponents list various examples of illegal trade in the species, including import for processing for their liver oil and fins and exporting, illegally retained specimens of *R. typus* on a vessel and shark fins for sale in seafood markets. There are only two records included in the CITES Illegal Trade Database between 2016 and 2023 of a small amount of meat and skin.

The supporting statement notes that there are national or territory-level protection measures for the species across its range and notes several range States that have marine protected areas where no shark fishing is allowed. The proponents also share a list of several range States that also have national regulations to ensure that *R. typus* are not harassed by tourism vessels. The species was listed in Appendix II of the Convention on Migratory Species in 2002 and included in its Appendix I in 2018. Furthermore, the supporting statement reports that several Regional Fisheries Management Organizations have adopted measures prohibiting the setting of purse seines on a school of tuna associated with whale sharks by the Western and Central Pacific Fisheries Commission (WCPFC) in 2012, the Inter-American Tropical Tuna Commission (IATTC) in 2013 and the Indian Ocean Tuna Commission (IOTC) in 2013. The Secretariat notes that the International Commission for the Conservation of Atlantic Tunas also adopted measures in 2023.

The proposal is based on the species meeting the criteria for a ‘marked decline’ in criterion C i) and ii) of Annex 1 to Resolution Conf. 9.24 (Rev. CoP17). The Secretariat recognizes that there is a lack of information on global population trends and considerable uncertainty in the data that are available. The Secretariat notes that it is desirable to gather more recent information.

It appears that *R. typus* may have declined in certain localities, but it is unclear to what extent or what has caused these, while in other localities sightings have increased during the study periods. The global IUCN Red List assessment quantifies the decline to be greater than 50% over the last 75 years based on the declines calculated for the two populations, Atlantic (population reduction of greater than 30%) and Indo-Pacific (population reduction of 63%), but the assessment was published in 2016 and there appears to be a lack of recent information on the species population trends. The habitat of the species is projected to be impacted by climate change with a projected decrease in their core habitat and a poleward push to range-edge areas, which may put the species in the path of shipping vessels. However, it is again difficult to quantify the impact this habitat shift will have on the populations of the species.

There is limited international trade in *R. typus* with only one record in the CITES Trade Database for commercial purposes since its listing in Appendix II in 2002. Therefore, the Secretariat does not consider *R. typus* to be a commercially exploited aquatic species.

Additional considerations

Range State consultation was carried out through Notification to the Parties No. 2024/118 by Maldives and a summary of the responses is contained in Annex I of the proposal.

Provisional conclusions

Based on the information available at the time of writing, there is insufficient information to determine if *Rhincodon typus* meets criterion C in Annex 1 to Resolution Conf. 9.24 (Rev. CoP17) for its inclusion in Appendix I.

Proposal 32

***Glaucostegus* spp.** (Giant guitarfish)

Proposal: Add the following annotation "a zero annual export quota for wild-taken specimens traded for commercial purposes" to the *Glaucostegus* spp. listing in Appendix II.

Proponent(s): Bangladesh, Benin, Brazil, Burkina Faso, Burundi, Cabo Verde, Central African Republic, Comoros, Congo, Gabon, Gambia, Guinea, Guinea-Bissau, Maldives, Mali, Niger, Nigeria, Panama, Sierra Leone, Sudan and Togo

Provisional assessment by the Secretariat

CITES background

The genus *Glaucostegus* was included in Appendix II (CoP18 Prop. 43) at the 18th meeting of the Conference of Parties (CoP18; Geneva, 2019).

Purpose and impact of the proposal

The proposal seeks to include the annotation "a zero annual export quota for wild-taken specimens traded for commercial purposes" to the *Glaucostegus* spp. listing in Appendix II.

If the proposal is adopted, international trade in specimens of *Glaucostegus* spp. will continue to be regulated in accordance with the provisions of Article IV of the Convention, except that no commercial trade will be permitted for wild specimens.

Compliance with listing criteria

Resolution Conf. 9.24 (Rev. CoP17) does not contain guidelines for assessing the present proposal. However, the effect of adding this substantive annotation could be considered as analogous to a transfer from Appendix II to Appendix I of the genus *Glaucostegus*; the Secretariat has thus assessed the proposal against the criteria contained in Annex 1 to Resolution Conf. 9.24 (Rev. CoP17).

According to the supporting statement, the genus *Glaucostegus*, commonly called giant guitarfish, has experienced rapid recent declines of 80% or more over the past three generations. The proponents further state that "these declines meet the CITES Appendix I listing criteria under Resolution Conf 9.24 (Rev. CoP17) Annex 1 paragraph C, and a zero quota is the bare minimum needed to prevent commercial trade driving further declines". Therefore, the Secretariat assessed the proposal specifically against criterion C in Annex 1 of Resolution Conf. 9.24 (Rev. CoP17).

The nine species of *Glaucostegus* are distributed globally across Africa, the Mediterranean, Indian Ocean and Indo-West Pacific. According to the supporting statement, *G. cemiculus* is distributed along the eastern Atlantic from Portugal to Angola, including the Mediterranean Sea, while *G. halavi* is found in the Indian Ocean, Persian Gulf and Arabian and Red Seas. *G. granulatus*, *G. younholeei, G. obtusus, G. thouin* and *G. typus* have overlapping distributions that range between the Indian Ocean and the Indo-west Pacific.

The proponents report that the genus is largely coastal and is known to migrate seasonally to inshore coastal habitats for reproduction. Species-specific information on habitat is provided in the supporting statements for *G. cemiculatus*, a subtropical coastal species found on sandy bottoms near coastlines and known to move inshore for mating and parturition. The proponents report that *G. granulatus* is also found on sandy bottoms from the coast to mid-continental shelf at a maximum depth of 120 m while *G. halavi* and *G. typus* are found close to shore to depths up to 100 m and *G. obtusus and G. thuoin* are found close to shore in depths up to 60 m. *G. youholeei* is a newly described species as of 2021 and the proponents report that no species-specific habitat information available. The proponents state the inshore and shallow depth occurrence of *Glaucostegus* spp. renders them particularly vulnerable to exploitation.

Due to the lack of biological information about *Glaucostegus* species, the proponents based the assessment of their life history traits on those of the genetically closest relatives, sawfishes (Pristidae spp.), , stating that it can be assumed that *Glaucostegus* species, similar to sawfishes, are also slow growing, with late maturity and very low productivity. Based on a study on *R. cemiculus* in Tunisian waters, the supporting statement reports that females mature later than males but grow larger with fecundity being correlated with total length (Capape and Zaouali, 1994). The Secretariat notes that the study also reports that *G. cemiculus* are an aplacental viviparous species with a possible maximum gestational period of eight months and that females probably have one litter per year, which ranges from 5 to 12 young. The previous amendment proposal submitted to CoP18 (CoP18 Prop. 43), includes more details on the life history traits of *G. cemiculus* and *C. granulatus*. Based on the information in the supporting statement and information in White et al. (2014), the Secretariat infers that species of *Glaucostegus* have low to medium productivity.

According to the supporting statement, there are no global population estimates for any species of *Glaucostegus.* The proponents report that there is a lack of species-specific data as catches have historically been recorded at the genus or multi-family level making it difficult to determine population decline at the species level, however, they report that the latest IUCN Red List assessment (2018), which only became available after the genus listing in Appendix II, re-assessed all species to be Critically Endangered based on inference that populations have declined 80% over the last three generations.

The Secretariat notes that the IUCN Red List assessments for *Glaucostegus* spp. and Rhinidae spp. are based on five datasets:

1. Landings of “giant guitarfish” between 1997 – 2016 from Iran (FAO, 2018), which likely includes all rhinids and glaucostegids occurring locally;

2. Landings of “rhinobatid” between 1993 – 2011 from Pakistan, which likely includes all rhinids, glaucostegdis and rhinobatids occurring locally (unpublished data);

3. Catch rate data for myliobatoid rays (stringrays, eagle rays, butterfly rays, and devil rays) between 1990-2004 from western India, which does not include wedgefishes or guitarfishes (Raje and Zacharia, 2009);

4. Landings of “guitarfishes” between 2002-2006 from eastern India, which was reported to include two species of *Glaucostegus*, but inferred to include several others along with Rhinidiae species (Mohanraj et al., 2009); and

5. Landings of “whitespotted wedgefishes” between 2005 – 2015 from Indonesia, which likely includes all locally occurring rhinids (DGCF 2015, 2017).

The decline trends based on these datasets were considered representative for all *Glaucostegus* and Rhinidae species in the IUCN Red List assessment based on overlapping distribution, habitat and susceptibility to capture in the same fishing gear.

In the supporting statement, there is only species-specific information for population declines for *G. cemiculus* and *G. granulatus*. The supporting statement notes that there are no species-specific time-series data available due to the lack of species-specific reporting and taxonomic and identification issues. To supplement the data, the proponents include data of “groupings” that may include rhinids, glaucostegids and rhinobatids (as included in the IUCN Red List assessment). A summary of information provided of each species in the supporting statement is provided below with additional clarification from the original source, where possible, and an assessment against the criteria.

- *G. cemiculus:* For the Atlantic Ocean, data is provided from two countries – Senegal and Ghana. Landings in Senegal are reported to have declined from 4,050 t in 1998 to 821 t in 2005 (80% in 7 years) based on unpublished data. The supporting statement, citing a study on surveys with fishers in Ghana, report that 71% of fishers estimate an 80-90% decline in catches. The Secretariat notes that according to the study, the estimated decline in catches was for both *G. cemiculus* and

Rhinobatos rhinobatos (Seidu et al. 2022). However, a different study by Seidu et al. (2022a)[27] in western Ghana based on local ecological knowledge, from bottom-set gillnet fishers (data based on interviews with 33 fishers), also reports a perceived decline in *G. cemiculus* catches from 1980s to 2000s, which stayed low into the 2020s. For the Mediterranean Sea, the supporting statement cites a number of sources that report that the species is no longer found in the northern Mediterranean but that there is evidence of the species in the southern Mediterranean. The Secretariat notes that a decline in the population of the species has occurred, but there is insufficient evidence to determine if it has undergone marked decline across its range.

- *G. granulatus:* The proponents report that based on research trawl surveys in the United Arab Emirates, *C. granulatus* went from being the most captured species in 2002-2003 to not being recorded in similar surveys in 2016. The Secretariat notes that this information is from unpublished data by E. Grandcourt, Environment Agency - Abu Dhabi, and without further information, it is difficult to determine if the species has undergone marked decline.

- *G. halavi:* No species-specific information provided.

- *G. obtusus:* No species-specific information provided.

- *G. thouin:* No species-specific information provided.

- *G. typus:* No species-specific information provided.

- *G. younholeei:* According to the supporting statement, this species was previously considered as *G. granulatus* and so, given the similar life history and fishing pressures, was categorized as Critically Endangered by the IUCN Red List assessment due to an estimated decline of over 80% across its range. Even inferring from information on *G. granulatus*, the Secretariat notes that there is insufficient information to determine if the species has undergone marked decline.

Glaucostegus spp.: The supporting statement provides information on population trends of *Glaucostegus* species based on aggregated data that likely includes not only *Glaucostegus* spp., but also Rhinidae spp. and Rhinobatidae spp. information. The highly aggregated nature of the data makes it difficult to assess the level of decline for species of *Glaucostegus*. A short summary of the information provided is included but excludes information from western India and Indonesia, as the datasets did not include any *Glaucostegus* species. The Secretariat notes that while population decline has likely occurred, it is difficult to determine from the country-specific information below if the reduction in landings was directly attributed to population declines and if these reductions were specifically for *Glaucostegus* species.

- *Pakistan*: The supporting statement reports on unpublished landing data from Pakistan for 1993 – 2011 for “rhinobatid” category showing a 72% (1999 to 2011) and 81% (1994 – 2011) decrease in landings in two provinces. The rhinobatid category, according to the proponents, likely includes all rhinids, glaucostegids and rhinobatids including *C. granulatus, G. halavi* and *G. obtusus*.

- *Iran*: Landing data from Iran between 1997 – 2016 for ‘giant guitarfish’, which according to the proponents likely includes all rhinids, glaucostegids occurring locally, including *G. granulatus* and *G. halavi*, decreased by 66% based on FAO Fishstat Capture Production Database. While the supporting statement includes *G. obtusus* and *G. typus*, the supplementary file of the IUCN Red List does not include these two species in the data.

- *India*: Data from eastern India (Chennai, Tamill Nadu), between 2002-2006, showed an 86% decline in landings of guitarfishes, which the study reports as including *C. granulatus* and *G. obtusus* as well as *Rhinobatus ancylostoma* and *R. djiddensis*. The proponents note that the landing data in this study likely also included *G. typus* and *G. thouin*.

[27] Seidu, I., Brobbey, L.K., Danquah, E., Oppong, S.K., Van Beuningen, D. and Dulvy, N.K., 2022. Local ecological knowledge, catch characteristics, and evidence of elasmobranch depletions in Western Ghana artisanal fisheries. *Human Ecology*, *50*(6), pp.1007-1022.

The primary threats listed by the proponents for the genus are unmanaged and unregulated fisheries and trade. The supporting statement reports that species of *Glaucostegus* are under heavy fishing pressure, driven by high value of fins. Furthermore, the proponents state that habitat loss and degradation are a concern for giant guitarfish which are all inshore and bottom dwelling species.

Domestic consumption of giant guitarfish meat is noted by the proponents with *G. cemiculus* being consumed locally in West Africa and *G. granulatus* and *G. obtusus* being consumed in Bangladesh. The proponents report that the fins are exported to Asian and European markets, which drives retention of the species when caught.

The supporting statement includes information from the CITES Trade Database up to 2021, which was presented to the 32nd meeting of the Animals Committee (AC32, Geneva, 2023) for selection of species for the Review of Significant Trade. The CITES Trade Database, accessed in July 2025, includes data up to 2023 and shows that international trade is continuing for the genus and is primarily in dried fins (93,696 kg), followed by skins (63,172 kg), fins (52,417 kg) and bones (21,906 kg). The main species in trade are *G. cemiculus*, followed by *G. typus* and smaller volumes of *G. halavi, G. thouin, G. granulatus* and *G. obtusus*. The top exporters are Indonesia for *G. typus* and *Glaucostegus* spp, and *G. thouin* followed by Senegal for *G. cemiculus*. The Secretariat notes that a substantial amount of the trade recorded in the CITES Trade Database is reported at the genus level, rendering it difficult to get resolution of the species-specific trade.

The proponents share results of a market surveys in Hong Kong, Special Administrative Region (SAR) of China, which has found that giant guitarfish fins make up around 0.16% of fins at the market. Based on the study (Cardenosa, 2024), the Secretariat notes that G*. cemiculus* was found 22 times in the fin trimming survey, which accounted for 14% of the fins from the study, and *G. granulatus* was found once in the fin trimming survey, representing 1% of the fins from the study. Samples identified at the genus level of *Glaucostegus* were also found once in the fin trimming survey, making up 1% of the fins from the study.

The supporting statement provides information on seizures by Hong Kong, SAR of China, which totalled over 5,118 kg of fins of *Glaucostegus* species, with the majority of that being from 2021. There are two records of *Glaucostegus* spp. in the CITES Illegal Trade Database (accessed July 2025), which included one body of *G. cemiculus* and 0.45 kg of meat reported at the genus level.

For national measures, the proponents note that few legal instruments exist that apply specific to giant guitarfish, but report varying degrees of protection afforded the group of species in Bangladesh, Israel and Pakistan as well as wider bans on exports or fishing of sharks in Sudan, Saudi Arabia and United Arab Emirates. The proponents further note that marine protected areas in Mauritania and Guinea-Bissau that may provide refuge for the species.

For international measures, the proponents report that *G. cemiculus* has been identified by the Mediterranean Action Plan as part of a priority group of species that is highly threatened and the species is also included on Annex II of the Specially Protected Areas and Biological Diversity Protocol for the Mediterranean under the Barcelona Convention. Furthermore, the proponents share that European Union (EU) vessels are prohibited from fishing for guitarfish in EU waters of the International Council for the Exploration of the Sea (ICES) across several subregions.

The Secretariat recognizes that there is a paucity of data on population trends and that the majority of information available is aggregated with other *Glaucostegus* spp. or with Rhinidae spp. and Rhinobatidae spp. The proposal is based on the species meeting the criteria for a ‘marked decline’ in Criterion C. i) and ii) of Annex 1 to Resolution Conf. 9.24 (Rev. CoP17).

It appears that while *Glaucostegus* spp. may have declined in certain localities across their range, the extent of any such decline is unclear. Since the proposal to list the species in 2019, updated IUCN Red List assessments were published but there does not appear to be new information on the species or on population trends for any of the species in the genus. There are species-specific data for two species, *G. cemiculus* and *G. granulatus*, and aggregated data for other *Glaucostegus* species, that show that there may be declines in the populations, however, there is insufficient information to show that the nine species of giant guitarfish meet the criteria for Appendix I by having undergone a marked decline or to

infer or project a marked declined based on habitat, patterns of exploitation, vulnerability or decreasing recruitment.

Since listing in Appendix II, there are records of international trade in *G. cemiculus* and *G. typus* and smaller volumes of *G. halavi, G granulatus, G. thouin* and *G. obtusus* but a substantial amount of the trade reported is at the genus level. The Secretariat notes that if there are concerns that trade derived from specific populations of these species is detrimental to the survival of the species, mechanisms exist within CITES to address the issues, such as through the Review of Significant Trade process, established by the Conference of the Parties to ensure that trade in Appendix II species is being conducted sustainably and in accordance with Article IV of the Convention, and to identify remedial action where it is needed, or through compliance cases.

Additional considerations

Under the current CITES standard nomenclature, the genus *Glaucostegus* includes nine species. The nomenclature changes proposed to the 20th meeting of the Conference of Parties (CoP20, Samarkand, 2025) synonymizes *G. petiti* with *G. cemiculus,* synonymizes *G. microphthalmos* with *G. typus,* removes *G. spinosus* as a valid species and includes a new species *G. younholeei*. This proposal uses the standard nomenclature proposed to CoP20 by the Animals Committee.

No information on consultation with range States is provided in the supporting statement.

The supporting statement provides an excerpt from identification materials entitled *Wedgefishes and Giant guitarfishes.*

Provisional conclusions

Based on the information available at the time of writing, there is insufficient information to determine if the genus *Glaucostegus* meets criterion C in Annex 1 to Resolution Conf. 9.24 (Rev. CoP17) and therefore does not merit the addition of the proposed annotation.

Proposal 33

Rhinidae spp. (Wedgefish)

Proposal: Add the following annotation "A zero annual export quota for wild-taken specimens traded for commercial purposes" to the Rhinidae spp. listing in Appendix II.

Proponent(s): 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 and Togo

Provisional assessment by the Secretariat

CITES background

The family Rhinidae was included in Appendix II (CoP18 Prop. 44) at the 18th meeting of the Conference of Parties (CoP18; Geneva, 2019).

Purpose and impact of the proposal

The proposal seeks to include the annotation "a zero annual export quota for wild-taken specimens traded for commercial purposes" to the Rhinidae spp. listing in Appendix II.

If the proposal is adopted, international trade in specimens of Rhinidae spp. will continue to be regulated in accordance with the provisions of Article IV of the Convention, except that no commercial trade will be permitted for wild specimens.

Compliance with listing criteria

Resolution Conf. 9.24 (Rev. CoP17) does not contain guidelines for assessing the present proposal. However, the effect of adding this substantive annotation could be considered as analogous to a transfer from Appendix II to Appendix I of the family Rhinidae; the Secretariat has thus assessed the proposal against the criteria contained in Annex 1 to Resolution Conf. 9.24 (Rev. CoP17).

The family Rhinidae, commonly called wedgefish, according to the supporting statement, have experienced rapid recent declines of 80% or more in some regions due to overfishing driven by trade. The proponents further state that "these declines meet the CITES Appendix I listing criteria under Resolution Conf 9.24 (Rev. CoP17) Annex 1 paragraph C, and a zero quota is the bare minimum needed to prevent commercial trade driving further declines". Therefore, the Secretariat assessed the proposal specifically against criterion C in Annex 1 of Resolution Conf. 9.24 (Rev. CoP17).

According to the supporting statement, the species in the family Rhinidae are found in warm temperate to tropical coastal waters and rarely occur in depths greater than 400 m. The species have a wide range across the eastern Atlantic and into the Western Indian Ocean, and extending into the Pacific Ocean, and the proponents report that each species' ranges were only defined in 2016 due to difficulties in identification. All the species of the family are described by the proponents to be bottom-dwellers that inhabit shallow bays, estuaries and coastal coral reefs and feed on benthic invertebrates, crustaceans and small bottom-dwelling fish.

The proponents note that there is limited information on the life-history traits of the species, but that the species are lecithotrophic viviparous species. The supporting statement reports that the litter size is known for *R. australiae* (7-19 per litter with an average of 14), *R. djiddensis* (4 per litter), *R. luebberti* (2-5 per litter) and *Rhina anclostoma* (2-11 per litter). The Secretariat notes that there is no information on the reproductive periodicity of the species. The supporting statement reports that the generation length is estimated to be 10 or 15 years for all species. The proponents report a growth rate of *R. australiae* at 0.08 year^{-1}. Based on the information in the supporting statement and information in White *et al*. (2014) and D'Alberto *et al*. (2024), the Secretariat infers that species of Rhinidae have low to medium productivity.

The proponents report that while there are no data available to determine population size of any species in the Rhinidae family, the IUCN Red List assessment (2019) concluded that 10 of the 11 Rhinidae species have experienced greater than 80% population reduction over the last three generations and categorized them as Critically Endangered (*R. palpebratus* was the exception and categorized as Near Threatened).

The Secretariat notes that the IUCN Red List assessments for *Glaucostegus* spp. and Rhinidae spp. are based on five datasets:

1. Landings of "giant guitarfish" between 1997 – 2016 in Iran (FAO, 2018), which likely includes all rhinids and glaucostegids occurring locally;

2. Landings of "rhinobatid" between 1993 – 2011 in Pakistan, which likely includes all rhinids, glaucostegdis and rhinobatids occurring locally (unpublished data);

3. Catch rate data for myliobatoid rays (stingrays, eagle rays, butterfly rays, and devil rays) between 1990-2004 in western India, which does not include wedgefishes or guitarfishes (Raje and Zacharia, 2009);

4. Landings of "guitarfishes" between 2002-2006 in eastern India, which were reported to include two species of Glaucostegus, but inferred to include several others along with Rhinidae species (Mohanraj et al., 2009); and

5. Landings of "whitespotted wedgefishes" between 2005 – 2015 in Indonesia, which likely includes all locally occurring rhinids (DGCF 2015, 2017).

The decline trends based on these datasets were considered representative for all *Glaucostegus* and Rhinidae species in the IUCN Red List assessment based on overlapping distribution, habitat and susceptibility to capture in the same fishing gear.

In the supporting statement, there is only species-specific information for population decline for *R. djiddensis* and anecdotal information about *R. cooki*, *R. mononoke* and *R. palpebratus*. The proponents report that there are no species-specific time-series data available, which is due to the lack of species-specific reporting and taxonomic and identification issues. To supplement the data, the proponents include data of "groupings" that may include rhinids, glaucostegids and rhinobatids. A summary of information for each species is provided below. The Secretariat notes that there is insufficient information to determine if the species have undergone marked declines.

- *Rhina ancylostomus:* No species-specific information provided.

- *Rhynchobatus. australiae*: No species-specific information provided.

- *R. cooki:* The proponent report that only a few records have been documented for the species – one was observed in a fish market in Singapore and six records were identified on social media posts.

- *R. djiddensis*: The supporting statement cites a study that analyzed data from two independent long-term (37 and 40 years) time-series catch data from South Africa, which showed a significant decline between 1977 and 2017, equating to a 65.1% decline over three generations.

- *R. immaculatus*: No species-specific information provided.

- *R. laevis*: No species-specific information provided.

- *R. luebberti*: No species-specific information provided.

- *R. mononoke:* The species was described in 2021 and is endemic to southern Japan. Information on its decline is inferred from general catch of sharks and rays in Japan as well as records at fish markets.

- *R. palpebratus:* The proponents reports that the species has not been recorded in recent landing site surveys in Thailand based on personal communications.

- *R. springeri*: No species-specific information provided.

- *Rhynchorhina. mauritaniensis:* No species-specific information provided.

Rhinidae spp.: The supporting statement provides information on population trends of Rhinidae species based on aggregated data that likely includes not only Rhinidae spp., but also *Glaucostegus* spp. and *Rhinobatidae* spp. information. The highly aggregated nature of the data makes it difficult to assess the level of decline for species of Rhinidae. The Secretariat notes that while population decline has likely occurred, it is difficult to determine from the country-specific information below if the reduction in landings was directly attributed to population declines and if these reductions were specifically for Rhinidae species.

- *Indonesia:* Landing data from Indonesia of wedgefishes and giant guitarfishes showed an 88% decline, which likely includes *Rhina ancylostoma, R. australiae, R. cooki, R. palpebratus,* and *R. springeri*, but may also include glaucostegids.

- *Pakistan:* The supporting statement reports on unpublished landing data from Pakistan for 1993 – 2011 for "rhinobatid' category showing a 72% (1999 to 2011) and 81% (1994 – 2011) decrease in landings in two provinces. The rhinobatid category, according to the proponents, likely includes all rhinids, glaucostegids and rhinobatids that occur locally.

- *Iran:* Landing data from Iran between 1997 – 2016 for 'giant guitarfish', which according to the proponents likely includes all rhinids, glaucostegids occurring locally, including *Rhina ancylostoma, Rhynchobatus australiae, R. dijiddensis, R. laevis* as well as *Glaucostegus granulatus* and *G. halavi*, decreased by 66% based on FAO Fishstat Capture Production Database. While the supporting statement includes *G. obtusus* and *G. typus,* the supplementary file of the IUCN Red List does not include these two species in the data.

- *India:* The landing data from Chennai, Tamill Nadu, India, between 2002-2006 showed an 86% decline in landings of guitarfishes, which the study reports as including *Rhina ancylostoma* and *R. djiddensis*, however, the IUCN Red List Assessments notes that *R. dijiddensis* does not occur in the region and therefore most likely *R. australiae* and *R. laevis* are the landed species. The 'guitarfishes' category also includes *G. granulatus, G. obtusus, G. typus* and *G. thouin*.

According to the supporting statement, the primary threat to the species is unsustainable and unregulated fisheries mortality, as these species are caught both by artisanal and industrial fisheries as targeted catch and as bycatch. The proponents report that the species' inshore habitat and susceptibility to multiple gear types, coupled with their range, including some of the world's most heavily fished coastal regions, make them particularly vulnerable to harvest.

Based on the support statement, the high value for their fins drives the targeted fisheries and retention when caught as bycatch. The proponents state that "international trade is likely the ultimate driver of unsustainable fishing" as wedgefish are retained rather than released due to the high value of the fins. Unlike the fins, meat is reported to be consumed locally. Based on the information in the supporting statement, Rhinidae species were found in retail markets in Hong Kong Special Administrative Region (SAR) of China and were among the top 20 most commonly found species. Furthermore, the proponents report on a study in Singapore where of 106 products labelled as shark, 17% were of *R. australiae.*

The supporting statement includes information from the CITES Trade Database up to 2021, which was presented to the 32nd meeting of the Animals Committee (AC32; Geneva, 2023). The CITES Trade Database access in July 2025 includes data up to 2023 and shows that international trade is occurring primary in fins (135,936 kg of fins, 126,654 kg of dried fins and over 6,600 fins – the Secretariat notes that prior to SC74, 'fins' was used for both dried and wet fins) followed by bones with 44,041 kg exported. The most commonly traded species was *R. australiae* (dried fins, 36,158 dried fins and 47,126 kg fins, 31,819 kg of bones and 22383 kg skins kg), followed by *R. luebberti* (63,196 kg of fin dried).

The proponents share results of a market survey in Hong Kong, SAR of China, which has found that wedgefishes represent around 0.97% of all trimming sampled.

The proponent reports that not all international trade is reported in the annual trade reports and that there may be mislabelling of products as non-CITES-listed species. The supporting statement includes information on the confiscation of Rhinidae fins to showcase the existence of illegal trade, the seizures were identified as “rhinidae/glaucostegus species”, *Rhina* species, *Rhynchobatus* species or Rhinidae species. There are eight records of Rhinidae spp. in the CITES Illegal Trade Database (accessed July 2025), which included a small number or amount of medicines, powder, fins, skulls, bodies, bones and one live specimen.

One of the species, *R. australiae*, is listed in Appendix II of Convention on Migratory Species (CMS) since 2017, and in 2018, *R. australiae, R. djiddensis*, and *R. laevis* were included in the CMS Memorandum of Understanding on the Conservation of Migratory Sharks.

Based on the supporting statement, there are limited data to infer estimates of population decline for all 10 species of the family Rhinidae.

The Secretariat recognizes that there is a paucity of data on population trends and that the majority of information available is aggregated with other Rhinidae spp. or with *Glaucostegus* spp. and Rhinobatidae spp. The proposal is based on the species meeting the criteria for a ‘marked decline’ in Criterion C. i) and ii) of Annex 1 to Resolution Conf. 9.24 (Rev. CoP17).

It appears that while Rhinidae spp. may have declined in certain localities across their range, the extent of any such decline is unclear. There is species-specific data or information for four species, and aggregated data for other Rhinidae species, that show that there may be declines in the populations, however, there is insufficient information to show that the ten species of wedgefishes meet the criteria for Appendix I by having undergone marked decline or to infer or project marked declined based on habitat, patterns of exploitation, vulnerability or decreasing recruitment.

Since listing in Appendix II, there are records of international trade in almost all species of Rhinidae: *R. australiae, R. luebberti, R. springeri, R. djiddensis, Rhina ancylostomus, Rhynchobatus laevis* and small amounts of *R. palpebratus*. The Secretariat notes that if there are concerns that trade derived from specific populations of these species is detrimental to the survival of the species, mechanisms exist within CITES to address the issues such as the Review of Significant Trade process established by the Conference of the Parties to ensure that trade in Appendix II species is being conducted sustainably and in accordance with Article IV of the Convention, and to identify remedial action where it is needed or through compliance cases.

Additional considerations

While under the current standard nomenclature, the family Rhinidae includes 10 species, the nomenclature changes proposed to the 20th meeting of the Conference of the Parties (CoP20; Samarkand, 2025) include a new species *Rhynchobatus mononoke*. This proposal uses the standard nomenclature proposed to CoP20 by the Animals Committee.

No information on consultation with range States is provided in the supporting statement.

Two sources of identification guides for Rhinidae species are provided in the supporting statement.

Provisional conclusions

Based on the information available at the time of writing, there is insufficient information to determine if the family Rhinidae meet criterion C of Annex 1 to Resolution Conf. 9.24 (Rev. CoP17) and, therefore, do not merit the addition of the proposed annotation.

Proposal 34

Centrophoridae spp. (Gulper sharks)

Proposal: Inclusion in Appendix II.

Proponent(s): Brazil, Comoros, Dominican Republic, Ecuador, European Union, Lebanon, Nigeria, Panama, Senegal, Syrian Arab Republic and the United Kingdom of Great Britain and Northern Ireland

Provisional assessment by the Secretariat

CITES background

While none of the species of Centrophoridae have previously been proposed for listing in the CITES Appendices, various species of Centrophoridae have been discussed at the 20th, 23rd, 25th, 26th, 28th and 33rd meetings of the Animals Committee (AC20; Johannesburg, 2004; AC20 WG 8 Doc. 1; AC23; Geneva, 2008; AC23 Doc. 15.2; AC25; Geneva, 2011; AC25 Inf. 7; AC26; Geneva, 2012; AC26 Doc. 16.2 and its Annex by Australia; AC28; Tel Aviv, 2015; AC28 Doc. 17.1.2; AC33; Geneva, 2024; AC33 SR) and at the 13th and 14th meeting of the Conference of Parties (CoP13; Bangkok, 2004; CoP13 Doc. 35; CoP14; the Hague, 2007; CoP14 Doc. 59.1). Further details are also provided in the supporting statement.

Purpose and impact of the proposal

The proposal seeks to include *Centrophorus atromarginatus* and *C. granulosus* in Appendix II, in accordance with Article II paragraph 2(a) of the Convention and all other species of Centrophoridae spp. (*C. harrissoni, C. isodon, C. lesliei, C. longipinnis, C. lusitanicus, C. moluccensis, C. seychellorum, C. squamosus, C. tessellatus, C. uyato, C. westraliensis, Deania calceus, D. profundorum,* and *D. quadrispinosa* and any other putative species within the family Centrophoridae) in accordance with Article II paragraph 2(b) of the Convention. If the proposal is adopted, international trade in specimens of the family Centrophoridae will be regulated in accordance with the provisions of Article IV of the Convention.

Based on the suggested standard nomenclature by the proponents, this will add 13 species of *Centrophorus* and 3 species of *Deania* in Appendix II, if the proposal is adopted.

Compliance with listing criteria

The supporting statement suggests that inclusion of *C. atromarginatus* and *C. granulosus* in Appendix II satisfies criterion A and B in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17) and that inclusion of all other species of Centrophoridae spp. in Appendix II satisfies criterion A in Annex 2b of Resolution Conf. 9.24 (Rev. CoP17).

C. granulosus is more widely distributed than *C. atromarginatus* and has a patchy but global distribution across the Atlantic and Indo-Pacific Oceans with close to 80 range States and may also occur in areas beyond national jurisdiction. *C. atromarginatus* occurs in the Northwest and Western Central Pacific, and the Eastern and Western Indian Oceans making, China, India, Indonesia, Japan, Oman, Papua New Guinea, Somalia, Sri Lanka, , and possibly Pakistan, range States.

The proponents report that Centrophoridae species are mostly deepwater species and *C. atromarginatus* is described in the supporting statement to associate with the seafloor on the upper continental slope at depths of 100–540 m while *C. granulosus* is known to occur on or near the seafloor on continental and insular shelves and slopes at depths of 50-1,500 m (possibly down to 2,307 m), but mostly from 300-1,100 m.

Both species are viviparous and known to have very low biological productivity according to the information cited in the supporting state, including slow growth rate, later age-at-maturity, higher longevity and lower population growth rate than most shark species from shelf and pelagic habitats.

C. atromarginatus is reported to have 1-2 pups per litter, but usually one, with size-at-birth being 28-36 cm, and with an estimated reproductive periodicity of 2-3 years based on other *Centrophorus* species. The supporting statement reports that the species has a maximum size of 99 cm and a length at maturity of 56 cm for males and 75 cm for females.

More information is known about *C. granulosus*, which has 4-11 pups, usually 4-6 pups, with size-at-birth of 30-47 cm and with a two-year reproductive cycle. The proponents note that pregnant females of the species segregate from the population and inhabit shallower and/or warmer waters. The supporting statement reports that the species has a maximum size of 176 cm and the males mature at 111 cm and females at 143 cm. As the age of maturity is not known, the proponents infer that it may be similar to a congener, *C. uyato,* with around 8.5 years for males and 16.5 years for females. The growth rate (k) is estimated to be k = 0.17 $year^{-1}$ and k = 0.096 $year^{-1}$ for males and females, respectively, based on studies cited in the supporting statement. The generation length is not known for either species but inferred to be 28 years from other species.

The proponents report that there is no information on population size for the two species and that population structure is unknown. The supporting statement notes that the IUCN Red List assessment estimated a greater than 80% global decline for *C. atromarginatus* (2019) as it was targeted in nearly all of its restricted range and a 50-80% global decline for *C. granulosus* (2024) as it has some refuge in deeper water beyond the range of fishing gear.

Due to taxonomic uncertainty and difficulty in identification, much of the data on the species are reported under a generic category in catch and landing data. The proponents provide information from 13 datasets across their range and report population information at the species level, if available, and if not, species are inferred based on known occurrence of Centrophoridae species. Species-specific information as well as aggregate information is briefly summarized below with an assessment.

***C. atromarginatus*:** The only species-specific information cited in the supporting statement is for *C. atromarginatus* in Taiwan, Province of China. The Secretariat notes that the decline is inferred from the comparison of abundance of the species in market surveys in April-May 1988 to later visits to the same market, which did not yield many records (Ebert *et al.* 2013[28]). The publication did not provide any more quantitative information to determine the extent of decline of the species.

***C. granulosus*:** The supporting statement provides information from the Gulf of Mexico and Portugal. The Secretariat notes that the information from the Gulf of Mexico is based on unpublished data on catch per unit effort (CPUE) from 2011-2018 (individual/hour/50 hooks), which showed a peak in abundance index in 2012 at around 0.28, but a low abundance index of around 0.1 in 2011 and between 2015 to 2018 and of around 0.05 between 2013 - 2015. The Secretariat further notes that the data from Portugal shows landing data from 1986 to 2017, which shows a substantial decrease from 1993 until 2012, but the authors suggest that the decline in landing is attributed to the end of the fisheries agreement between the European Union and northern African countries, where the species used to be caught (Aves *et al*., 2020). Based on these data, it is difficult to determine whether declines are due to a decline in the population or the change in fishing area due to the end of a fisheries agreement.

***Centrophorus* spp.:** A wide range of datasets are cited in the supporting statement for the genus *Centrophorus* in the Indo-Pacific, Pacific Ocean, Indian Ocean and Atlantic Ocean. The Secretariat notes that it is likely that species of the genus have undergone decline in some of these localities, but it is difficult to assess the extent of the decline or attribute the decline in data to the decline in the two species.

Indo-Pacific: Two studies in Indonesia are cited by the supporting statement from East Nusa Tenggara (Samusamu and Dharmadi, 2017) and Lombok (unpublished data) as well as total catch information from the Indonesian National Shark Data Collection Program. The data from Indonesia includes landing, catch and CPUE data for *Centrophorus* species, which is inferred to include *C. atromarginatus* and *C. granulosus* along with others based on the location of catch and known distribution of the species.

[28] Ebert, D.A., White, W.T., Ho, H.C., Last, P.R., Nakaya, K., Seret, B., Straube, N., Naylor, G.J. and De Carvalho, M.R., 2013. An annotated checklist of the chondrichthyans of Taiwan. *Zootaxa*, *3752*(1), pp.279-386.

Pacific Ocean: The supporting statement includes information from Taiwan, Province of China, and the Philippines. The available data in Taiwan, Province of China, are of "all combined shark species" from fisheries in Taiwan, Province of China, and while the information isn't species-specific, the proponents note that the information is "informative for suspecting the possible level of decline" of *C. granulosus*. The proponents report that *Centrophorus* spp. were targeted in the Philippines for liver oil and based on annual exports of shark liver oil calculate an 87% decline (336 t in 1980, which declined to 45 t in 1993). The proponents infer that it is possible that *C. granulosus* is included in the group of species that were targeted in the Philippines.

Indian Ocean: Information from Maldives, India, South Andaman Island, and Sri Lanka are cited in the supporting statement. All available datasets are at the genus level, however, *C. granulosus* for Maldives, *C. atromarginatus* and *C. granulosus* for India, Andaman Islands and Sri Lanka are inferred to be included in the datasets by the proponents. A concise summary is provided below:

- For Maldives, two sets of liver oil exports, one between 1980 and 2006 (Figure 3 in the supporting statement) and the second between 1982 to 2002 from Kyne and Simpfendorfer (2007), show the trends of targeted fishery for *Centrophorus* for their liver oil (peak in 1982-1984 followed by a decline). The Secretariat notes that in Ali (2015), catch data of gulper sharks is reported between 1980 and 1996, which shows similar trends as the liver oil exports (peak in 1982-1984, followed by a decline). The proponents report *C. granulosus* was the most common species taken in the fishery.

- According to the supporting statement, in India the fishery for *Centrophorus* species started in 2002, which peaked in 2007 then declined until 2011. The proponents report that while the species composition for this fishery is unknown, *C. atromarginatus* was reported and based on distribution, it could have included *C. granulosus* among others.

- The proponents also report a decline in mean CPUE of *C. granulosus* (reported as *C. acus* in the study and *Squalus megalops*) based on weekly observations of landings between 1988-1992. The supporting statement states that CPUE peaked in mid-1988 and declined until 1992, but the Secretariat notes that the beginning and the end of the time series saw comparable levels of CPUE (Soundararajan and Roy 2004).

- The supporting statement reports that the decrease in vessels in targeted gulper shark fishery in Sri Lanka between 1980-2019 (30 to two) can be seen as a proxy for suspected populations decline in *Centrophorus* spp., which likely included *C. atromarginatus*, *C. granulosus* among others.

Atlantic Ocean: The study published on fishery of Mauritania states that catch of "squalid sharks" declined from 158 tons in 1992 to 22 tonnes in 2001 (Fernandez *et al*., 2005). The Secretariat notes that these "squalid sharks" include *C. granulosus* and *C. squamosus*, *Deania calceus* and *D. profundorum* but also nine other species of different families. As the supporting statement notes, this weight may be an underestimation as not all sharks were landed whole but in processed form, and the causes for the decline were not apparent, and could be attributed to changes in trawl depth imposed in 1995, loss of economic value, and over-exploitation of the fisheries in the area.

The main threats listed by the proponents are unregulated and unmonitored deepwater industrial and artisanal target and bycatch fisheries to meet the demand for their liver oil. According to the supporting statement. the two species are caught in trawl, longline, gillnet and demersal hook-and-line fisheries and targeted fisheries exist in several range States. The proponents report that due to their conservative life history traits, fisheries have collapsed over a short period of time due to depletion of stock.

Other threats included in the supporting statement are resource extraction in deepwater habitats such as mining, as well as marine debris and pollution. Climate change is also noted by the proponents as a threat as it has been shown to influence distribution of deepwater sharks.

The species in Centrophoridae are reported to have the highest value shark liver oil due to its high percentage of squalene. The supporting statement notes that squalene is the international traded product extracted from shark liver oil and it has been in high demand for use in cosmetics (65%),

pharmaceuticals (20%), food (10%) and other applications (5%). Despite the availability of synthetic and plant-based squalene, the proponents report that squalene from shark liver is still in demand.

The supporting statement reports that exports of liver oil peaked in 1985 at 992 t, then fluctuated until the early 1990s, from which the export has stayed between 50-200 t until 2017 at which point no export was recorded for two years before increasing again to 10 t in 2020. The proponents note that global trade value of exports follow a similar trend to the export volumes. The information by the supporting statement shows that since the original peak demand in mid 1980s, even though the levels have decreased considerably, there has been smaller peaks since then, indicating ongoing trade and demand for liver oil. The proponent noted that since there is no regulation on the trade in these species, nearly all trade is legal in nature.

The supporting statement reports that no national legislation specific to the two species could be found, but that in Australia, *C. harrissoni, C. uyato* and *C. moluccensis* are strictly managed and monitored to halt their decline and support their recovery.

For international measures, the proponents report on varying levels of regulation and protected by OSPAR in the Northeast Atlantic, North East Atlantic Fisheries Commission (NEAFC), Fisheries Commission for the East Central Atlantic (CEFAC), Southern Indian Ocean Fisheries Agreement (SIOFA), South East Atlantic Fisheries Organisation (SEAFO), South Pacific Regional Fisheries Management Organisation (SPRFMO) and the Barcelona Convention.

According to the supporting statement, the species within the genus *Centrophorus* are difficult to distinguish visually and their overlapping ranges have led them to be reported as *Centrophorus* spp. rather than at the species level. While the species of the genus *Deania* can be morphologically distinguished from the genus *Centrophorus*, the two genera co-occur and their liver oil and meat cannot be distinguished visually and their fins are difficult to identify.

The proposal is based on *C. atromarginatus* and *C. granulosus* meeting criteria A and B of Annex 2a and all other species of Centrophoridae meeting criterion A of Annex 2b to Resolution Conf. 9.24 (Rev. CoP17). The proponents report that *C. atromarginatus* and *C. granulosus* have undergone overexploitation for international liver oil trade leading to substantial population declines in large parts of their range. The Secretariat recognizes that while there are some species-specific data for *C. atromarginatus* and *C. granulosus* and several datasets at a higher taxonomic level, it is difficult to determine the extent of decline across the species' range.

Based on the information provided in the supporting statement, trade continues to be on-going for the species mainly driven by demand for their liver oil. It appears that even though it is not possible to quantify the population declines to determine if the two species meet criterion A of Annex 2a, substantial populations declines are likely to have occurred in parts of their geographic range in the past. Given the lack of management and regulation of the harvest of gulper sharks throughout much of their range and the low productivity of the species, it seems that regulation of trade may contribute to ensuring that harvest is not reducing populations to levels at which their survival might be threatened by continued harvesting or other influences, therefore meeting criterion B of Annex 2a.

The supporting statement also notes the morphological similarity between the species in the family, which makes them difficult to visually identify, especially for their parts and derivatives, which are the main products in trade. It appears likely that all other species of Centrophoridae would meet criterion A of Annex 2b of Resolution Conf. 9.24 (Rev. CoP17).

Additional considerations

The supporting statement includes in Annex 3 a standard reference for the family Centrophoridae from Eschmeyer's Catalog of Fishes: Genera, Species, References (Frikeck, R., Eschmeyer, W. N. & Van Der Laan, R. (eds.), 2025).

At its 33rd meeting (AC33; Geneva, 2024), the Animals Committee noted that previous meetings of the Animals Committee has identified gulper sharks (Centrophoridae spp.) as species of concern and

invited the Secretariat to issue a Notification to the Parties inviting Parties and organizations to provide information on catches of, and trade in, gulper sharks (Centrophoridae spp.) and their products, as well as conservation measures to protect these species. The Secretariat issued Notification to the Parties No. 2024/088 to gather information and issued Notification to the Parties No. 2024/123 to share the responses received from 10 Parties and one organization.

The United Kingdom of Great Britain and Northern Ireland and the European Union consulted range State through Notification to the Parties No. 2025/066. A summary of the responses received from 11 Parties is provided by the proponents in section 10 of the proposal.

The United Kingdom of Great Britain and Northern Ireland submitted document CoP20 Doc. 88.2 on *Draft decisions on trade, conservation and management of deep-water elasmobranchs* for consideration at the 20th meeting of the Conference of the Parties (CoP20, Samarkand, 2025). The draft decisions aim to address the challenges related to the conservation of and international trade in deep-water elasmobranchs.

Provisional conclusions

Based on the information available at the time of writing, there is insufficient information to assess if *Centrophorus atromarginatus* and *Centrophorus granulosus* meet criterion A in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17) for its inclusion in Appendix II.

Proposal 35

Anguilla spp. (Anguillid eels)

Proposal: Include in Appendix II (Entry into effect would be delayed by 18 months, i.e. until 5 June 2027.

Proponents: European Union, Honduras and Panama

Provisional assessment by the Secretariat

CITES background

Anguilla anguilla (European eel) was included in Appendix II at the 14th meeting of the Conference of the Parties (CoP14; The Hague, 2007) and the listing came into force on 13 March 2009.

Since *A. anguilla was* included in Appendix II, it has been the subject of several dedicated CoP Decisions that included questionnaires issued through Notifications to the Parties, an international technical workshop, documents and reports to regular meetings of the Animals Committee, Standing Committee and the Conference of the Parties, which are detailed below.

At its 17th meeting (CoP17; Johannesburg, 2016), the Conference of the Parties adopted Decisions 17.186-17.189 on *eels* (Anguilla spp.). A report on the implementation of these Decisions was made to the 30th meeting of the Animals Committee (AC30; Geneva, 2018) in document AC30 Doc. 18.1. Annex 1 of that document contained a report on "Implementation of the CITES Appendix II listing of European eel (*Anguilla anguilla*)"; Annex 2 contained a report on "Status of non-CITES listed anguilid eels"; and Annex 3 contained the report from the international technical workshop on eels (*Anguilla spp.)* held in London in April 2018. At AC30, Canada, the Dominican Republic, and the United States of America presented a report of the workshop of range States of the American eel, which can be found in document AC30 Doc. 18.2. The implementation of Decisions 17.186-17.189 was also reported to the 70th meeting of the Standing Committee (SC70; Sochi, 2018) in document SC70 Doc. 45.

At its 18th meeting (CoP18; Geneva, 2019), the Conference of the Parties considered document CoP19 Doc. 76 and adopted Decisions 18.190 to 18.193 on *Eels* (Anguilla spp.). The implementation of these Decisions was considered at the 31st meeting of the Animals Committee (AC31; online, 2021) in document AC31 Doc. 22 and its addendum; and the 74th meeting of the Standing Committee (SC74, Lyon, 2021) in documents SC74 Doc. 64.1 and SC74 Doc. 64.2. At its 75th meeting (SC75; Panama City, 2019), the Standing Committee considered document SC75 Doc. 12 and agreed on a set of recommendations concerning illegal trade in European eel (see SC75 Summary Record).

At its 19th meeting (CoP19; Panama City, 2022) the Conference of the Parties considered document CoP19 Doc. 61 and adopted Decisions 19.218 to 19.221 on *Eels* (Anguilla *spp*.). The implementation of these Decisions was considered at the 32nd and 33rd meetings of the Animals Committee (AC32; Geneva, 2023; AC33; Geneva, 2024) in documents AC32 Doc. 36 and AC33 Doc. 40 respectively; and at 77th and 78th meetings of the Standing Committee (SC77; Geneva, 2024; SC78; Geneva, 2025) in documents SC77 Doc. 66, SC78 Doc. 69.1 and 69.2.

The 20th meeting of the Conference of the Parties (CoP20, Samarkand, 2025) will consider document CoP20 Doc. 87 on *eels (*Anguilla *spp.)*, which reports on the implementation of Decisions 19.218 to 19.221, and invites the CoP to consider a set of draft decisions on eels (*Anguilla* spp.) and a draft Resolution on *Trade, conservation and management of anguillid eel species (*Anguilla *spp.).*

On 29 July 2025 the Secretariat received a request from the Dominican Republic to include *Anguilla rostrata* in Appendix III.

Purpose and impact of the proposal

The proposal seeks to include the genus *Anguilla* spp. in Appendix II, in accordance with Article II of the Convention. The proposal seeks to include *Anguilla japonica* and *Anguilla rostrata* under paragraph 2(a) and all currently non-CITES listed anguillid eels under paragraph 2(b) of the Convention.

If the proposal is adopted, international trade in specimens of this genus will be regulated in accordance with the provisions of Article IV of the Convention.

Compliance with listing criteria

The supporting statement suggests that inclusion of *A. japonica* and *A. rostrata* in Appendix II satisfies criterion B in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17). The proponents claim that like *A. anguilla*, *A. japonica* and *A. rostrata* have experienced significant recruitment declines over past decades. The supporting statement furthermore suggests that inclusion of all non-CITES-listed species of anguillid eels in Appendix II satisfies criterion A in Annex 2b of Resolution Conf. 9.24 (Rev. CoP17).

The proponents seek to include *A. japonica* and *A. rostrata* in Appendix II of CITES, along with all non-listed species of the genus *Anguilla*, due to high trade volumes and significant declines in wild populations. Both *A. japonica* and *A. rostrata* have been categorized as Endangered in the IUCN Red List assessment in 2018 and 2020 respectively, with an estimated 50% decline in abundance across their ranges. Increasing international demand, particularly for aquaculture in East Asia, is placing unsustainable pressure on wild stocks. Illegal and unregulated trade, fueled by enforcement gaps and mislabeling of species, further exacerbates the situation. The proposal argues that inclusion of the entire genus in Appendix II will close enforcement gaps and ensure better monitoring, especially as juvenile and processed eels are difficult to distinguish morphologically.

Anguillids are often referred to as 'freshwater eels', however, it is known that they can exhibit inter-habitat migration and that some may stay in estuaries, lagoons and coastal waters, rarely, if ever, entering freshwater. All share four life stages: leptocephalus (larva), glass eel (juvenile), elver (pigmented juvenile), and adult (yellow/silver eel). Anguillids are enigmatic species with complicated life histories. All are catadromous, meaning that they live in freshwater or coastal habitats but migrate to the ocean to spawn. Anguillid eels only reproduce once (semelparous) and then they die afterwards. No spawning of any *Anguilla* species has ever been directly observed in the wild. While all are considered panmictic species, *A. anguilla* and *A. rostrata* both spawn in the Sargasso Sea (but at slightly different times and depths); while *A. japonica* spawns in the Western Pacific near the Mariana Islands. All use ocean currents (e.g., Gulf Stream, Kuroshio Current) for passive transport to continental habitats. They are capable of thousands of kilometers of migration, guided by geomagnetic and olfactory cues. These species are all long-lived, slow-growing, late-maturing, which makes recovery from overexploitation slow.

The supporting statement identifies the main threats to anguillid eels as overexploitation, with large volumes of glass eels harvested to seed aquaculture in Asia (especially Japan and China); illegal trade (particularly in *A. anguilla*); habitat loss and barriers, with dams and river obstructions preventing upstream migration of elvers and downstream migration of silver eels; predation; disease (e.g. Japanese eel endothelial cells-infecting virus (JEECV); parasites (e.g. the nematode *Anguillicola crassus*); and climate change, which can alter ocean currents and temperature, impacting larval drift and spawning success.

The proponents focus on *A. japonica* and *A. rostrata,* as they are both temperate species, like *A. anguilla*, and are commonly found in similar trade routes. They claim that unsustainable fishing of *A. japonica* glass eels to stock farming facilities on a national/international scale may constitute a major threat to the population. As referenced in the supporting statement, Shiraishi and Crook (2015) note that farms meet over 90% of global demand for eel products and all seed for farms come from the wild stock. As referenced in the supporting statement, Gollock *et al.*, (2018) noted that declines in *A. japonica* have driven aquaculture facilities to source glass eels of other species from elsewhere in Asia (e.g. *A. bicolor* and *A. marmorata*), Europe (*A. anguilla*) and the Americas (*A. rostrata*) (Han *et al.,* 2002). However, high demand for *A. japonica* persists resulting in dramatic increases in price in recent years (Fisheries Agency of Japan 2019a). In addition, ongoing illegal fishing and trade, mainly in glass eels, makes it difficult to evaluate the true impact of exploitation on the species (Gollock *et al.*, 2018).

The Secretariat notes that the complex life history traits, coupled with the limited information available to infer abundance trends, pose particular challenges in making stock assessments and in applying the listing criteria for *Anguilla* species. Data time series on glass eel recruitment, stock biomass and silver

eel escapement can all be used to help determine population status and trends, but this information is not collected systematically and across the range, so proxies are often used to determine patterns.

***Anguilla japonica*:** This species was categorized as Endangered, with a decreasing population trend in the IUCN Red List assessment in 2018. The data sets used in the IUCN Red List assessment analysis were as follows: Ministry of Agriculture, Forest and Fisheries (MAFF) compiled glass eel data (Japan), Catch Per Unit Effort (CPUE) (catch/fisherman) data sets collected from nine Japanese prefectures (Chiba, Aichi, Tokushima, Oita, Kagoshima, Shizuoka, Mie, Kochi, and Miyazaki). Based on this available data for glass, yellow and silver eels, it was estimated that this species has declined in abundance across its range by at least 50% over the last 24 years (about three generations). Glass eel catch in these prefectures accounted for 70.5% of the entire reported glass eel catch in Japan in 2018 fishing season (November 2017 to October 2018).

The IUCN Red List assessment acknowledges, however, that the quality and quantity of data is disproportionate across the species' range, with the most extensive data sets coming from Japan. In brackish water areas of Japan, where naturally-recruited wild eels are dominant, declining trends have been observed in yellow and silver eel catch per unit effort (CPUE) data. As referenced in the supporting statement, Kaifu *et al.* (2018b), conducted a regression analysis that showed silver eel catches in the Okayama prefecture in Japan decreased 99.0% in 13 years (2002–2015), and long-line and set-net CPUEs of naturally-recruited wild yellow eel in the same prefecture also decreased 79.6% and 79.5%, respectively, in 13 years (2003–2016). Glass eel data gathered from nine prefectures in Japan indicated CPUE has declined by 47.2% over three generations. However, the available data relating to *A. japonica* is predominantly from freshwater, where stocking can occur and it is not clear how this is factored into the assessment.

The supporting statement indicates that to-date, there is only one published stock assessment study of *A. japonica* by Tanaka *et al.* (2014), which estimated stock size through 'exploitable' (yellow and silver) eel CPUE for Japanese inland waters, glass eel CPUE in Japan, and an age- and sex-structured model. Results from this study estimated that stock size of individuals aged ≥1 year had recovered since 1990, from less than 10,000 tonnes to 18,700 tonnes in 2010, equating to 24% of the carrying capacity.

The proponents note that there has been some progress towards implementing conservation and management interventions within the species' range. Co-operation between Japan, China and Taiwan, Province of China in relation to improving the status of the Japanese eel started in 2012. This co-operation aimed to establish strengthened fisheries management as well as introducing traceability schemes. In September 2014, a 'Joint Statement' was adopted by mainland China, Taiwan, Province of China, Japan, and the Republic of Korea, for the conservation and management of the Japanese eel, through a restriction on the amount of wild-caught glass eels that can be used in aquaculture production. In 2013, the Japanese eel was assessed as 'Endangered' on the Japanese Red List (published by the Ministry of Environment), based on the catch data of inland eels, which indicated a 72–92% decline in the species over three generations (12–45 years). However, the data only considered eels in inland waters, i.e. rivers/lakes, and it is estimated that 56–86% of Japanese eels remain in estuarine/saline waters throughout their lives. The capture of silver eels was prohibited or restricted in ten prefectures in Japan, with the intention of preserving spawning eels in these areas.

As referenced in the supporting statement, unsustainable fishing of *A. japonica* glass eels to stock farming facilities on a national/international scale may constitute a major threat to the population. The proponents indicate that Shiraishi and Crook (2015) noted that farms meet over 90% of global demand for eel products and all seed for farms come from the wild stock. Furthermore, declines in *A. japonica* have driven culture facilities to source glass eels of other species from elsewhere in Asia (e.g. *A. bicolor* and *A. marmorata*), Europe (*A. anguilla*) and the Americas (*A. rostrata*) (Han *et al.*, 2002, Gollock *et al.*, 2018). However, the threat from unsustainable fishing persists, as *A. japonica* remains the preferred species in East Asia, and the species of choice for consumption in Japan (Shiraishi and Crook, 2015). High demand for *A. japonica* glass eels has resulted in dramatic increases in price in recent years (Fisheries Agency of Japan, 2019a). In addition, ongoing illegal fishing and trade, mainly in glass eels, makes it difficult to evaluate the true impact of exploitation on the species (Gollock *et al.*, 2018).

***Anguilla rostrata*:** This species was categorized as Endangered with a stable population trend in the IUCN Red List assessment in 2020. Overall, 38 datasets were collated from the Atlantic States Marine Fisheries Commission (ASMFC) American Eel Stock Assessment (ASMFC, 2017), from the compilation of abundance indices assembled by Cairns (2020), and in communication with relevant researchers, to conduct the Red List assessment. The IUCN Red List assessment estimated that the American Eel abundance has declined by approximately 50% over three generations. However, the majority of available data for this species relates to glass eel recruitment, and the relationships between recruitment, yellow eel populations, silver eel escapement and spawner stock biomass are poorly understood. Data are only available from certain parts of the species' range and data from the Central America and the Caribbean and those associated with the Gulf of Mexico are particularly sparse. The assessment notes that a precautionary approach was taken, so "it was deemed appropriate for the American Eel to remain within the Endangered category based on the majority of datasets exhibiting declining trends and falling within a Threatened category, the declines being more severe in data spanning two generation lengths, and dramatic increases in catch and export of juveniles across the range over the last decades". The assessment notes that it did not include a more recent ASMFC stock assessment, which is now available, and will be incorporated into a future version of the Red List.

Twenty-three datasets were used in the analysis for glass eels/young yellow eels. Seventeen of these were from the United States of America and six from Canada. Sixteen of the datasets showed a declining trend, ranging between ~3% and ~98% when projected over three generations. The remaining seven showed an increase over the period of three generations. Available data suggests that some areas exhibited declining trends, some appeared stable, and others were increasing, but on average, there were downward trends in both recruitment (~26% decline in recruitment over three generations) and continental populations over the period of three generation lengths (36 years).

Fifteen datasets were used in the analysis for yellow eels, eleven from the United States and four from Canada. Over a period of three generations, eleven of the datasets showed declining trends, between ~9% and ~99%. Increasing trends were seen in four of the datasets. Overall, the average across the datasets projected over three generations indicated there had been a ~78% decline in yellow eels. No data were available from the southern part of the range.

There are few silver eel datasets available for analysis, and only one was found to have current, continuous data that extended for more than one generation length. Analysis indicated a slight increasing trend over the period of three generations; however, part of the series is not representative of natural escapement because the watercourse was subject to restocking prior to the measurement period.

The supporting statement references the ASMFC 2012 Benchmark Stock Assessment for American Eel, in which nearly 100 fishery-dependent and independent United States data sources representing several life stages and geographical and temporal scales were evaluated. Both fishery-dependent and independent data sources were used because they were considered better for describing life history characteristics and abundance trends of eels on either a coast-wide or regional basis. An update to the ASMFC assessment occurred in 2017, which stated, after statistical analyses, "Compared to ASMFC 2012, there are more significantly downward trends in indices…". Stable, but historically low, landings coupled with a trend analysis assessed the American Eel along the United States Atlantic Coast as 'depleted' (ASMFC 2017).

According to a regional assessment and status report by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC), eel abundance has seen significant declines in the 50 years leading up to 2012. COSEWIC assessed the Canadian population that receives recruitment at the northernmost part of the species' range as 'Threatened' (COSEWIC 2012). Commercial landings and fishery independent indices were described to have been stable since around 2000, however at low levels of abundance. A downward trend in some surveys was detailed to be of concern for the recovery of the Canadian population.

A similar suite of threats as outlined for *A. japonica* is identified in the supporting statement for *A. rostrata*, however, due to the decline in the availability of European and Japanese Eel, a dramatic increase in demand for, and exploitation and trade of glass eels to supply East Asian farms has been observed over the last two decades. This is supported by the findings in the report on "Status of non-

CITES listed anguillid eels"; presented to the Animals Committee in Annex 3 of document AC30 Doc. 18.1. According to East Asian Customs data, imports of juvenile American Eel from across the species' range increased 20-fold between 2004 and 2020 (from ~2 t to ~40 t). An increase in trade from the Caribbean since 2012 has been particularly pronounced, and an associated "boom" in glass eel fishing has been reported from Cuba, the Dominican Republic and Haiti).

In Canada, there are national and provincial initiatives focused on improving the status of the species (e.g. Cairns *et al.* 2014). In 2015, the United States Fish and Wildlife Service (USFWS) determined that the American Eel population was stable but at low levels and did not meet the stringent criteria for listing under the United States Endangered Species Act (ESA). Nonetheless, for the species' long-term stability, the agency recommended continuing efforts to maintain healthy habitats, monitor harvest levels, and improve river passage for migrating eels. A biological species report was published to support the status review, which concluded the species to be depleted from historical levels, but with the current abundance trend considered stable. In 2017, the ASMFC concluded that, like 2012, the American Eel remains "depleted". Furthermore, analyses found more significant downward trends in indices from 2017 when compared to 2012 (ASMFC, 2017). Management of the species in the southern part of the range is less advanced, though some countries do have measures relating to fisheries in place. There is, however, little co-ordination of management across the species range.

The proponents highlight that global trade in *Anguilla* species is one of the most economically valuable and conservation-sensitive wildlife trades. It primarily centers on juvenile "glass eels" for aquaculture, with major trade routes from Europe and North America to East Asia. The trade is estimated to be worth hundreds of millions of USD annually, with glass eel prices exceeding USD 5,000 – USD10,000/kg, making them one of the most valuable wildlife commodities per gram. Over 46 tonnes/year of *A. anguilla* are estimated to be trafficked illegally from Europe to Asia. Despite its scale, this trade is poorly monitored, highly vulnerable to laundering, and a key driver of population declines in several species.

Analyses on international trade in non-CITES listed species is difficult, as much of the data collected is not species specific. For example, there are four global Harmonized System (HS) codes that relate to eels (live eels "*Anguilla* spp."; fresh or chilled eels "*Anguilla* spp."; frozen eels "*Anguilla* spp."; and prepared or preserved eels whole or in pieces (excl. minced)"), but they do not distinguish between species or life stages and the geographic origin is used to infer the species. Regionally, some Parties use national codes to record customs imports that does identify the commodity to species level. The supporting statement highlights a recent analysis of customs import data from East Asia (Shiraishi & Kaifu, 2024), which observed a decline in imports of live eel fry from Europe and North Africa (assumed to correspond to *A. anguilla*) over the period 2004–2010, after which imports from the Americas (assumed to correspond to *A. rostrata*) increased.

Non-CITES listed anguillid eels: Concerning the inclusion of all non-CITES listed species of the genus *Anguilla* in Appendix II, it appears that all species may meet criterion A in Annex 2b of Resolution Conf. 9.24 (Rev. CoP17) for the following reasons. LEMIS data presented in the supporting statement confirms that several other species of *Anguilla* are in trade besides *A. anguilla, A. japonica* and *A. rostrata*, including *A. australis, A. bengalensis, A. bicolor, A. marmorata* and *A. mossambica.* The proponents highlight that all anguillid eel species are morphologically similar, with juveniles (glass eels/elvers) and processed products requiring molecular methods for accurate identification, which is currently unfeasible for routine border inspections. Hybridization and similar morphology further complicate species identification in juvenile stages. Genetic testing in seized shipments has shown that illegally caught *A. anguilla* is often laundered through legal shipments of *A. rostrata* or *A. japonica*. Several examples of documented trade substitutions are presented. In addition, multiple *Anguilla* species are commonly mixed in the same shipments, demonstrating that look-alike substitution and misidentification are a real enforcement problem. Only *A. anguilla* is CITES-listed, so other anguillid species are not covered by standard international trade reporting mechanisms. Customs declarations often lack sufficient detail or are deliberately vague.

The report *Status of non-CITES listed anguillid eels* concluded that "Trade data analyses of *Anguilla* spp. over the last 10 years shows that there were substantial shifts in trade patterns relating to live eels, especially juveniles. In some cases, this trade has shifted to species/populations that are poorly understood and where there is little fisheries management to ensure off-take is both legal and sustainable. Considering that several populations of *Anguilla* spp. are reported to have declined over

recent decades, and *A. japonica* and *A. rostrata* are both currently listed as Endangered on the IUCN Red List of Threatened Species, it is of urgent necessity to adapt management and conservation measures in a regionally and/or globally co-ordinated manner to ensure sustainable use of Anguilla species into the future."

In summary, both *A. japonica* and *A. rostrata* have recently been categorized as Endangered in the IUCN Red List assessment, with an estimated 50% decline in abundance across their ranges. While *A. japonica* has a decreasing population trend, *A. rostrata* is assessed as stable. The lack of reliable datasets and the complex life history of anguillid eels is challenging and a level of precaution has been applied to these determinations. Neither species seem to have a small population or a restricted area of distribution. Population declines can be inferred and projected based on a continued decrease in the area of habitat, levels of exploitation and a high intrinsic vulnerability due to life history traits. Both species are affected by trade and there is clearly an ongoing demand for anguillid eels, particularly in glass eels. Shifting trade patterns occur between different species of *Anguilla* depending on *a*vailability, consumer demand and enforcement intensity. The Appendix II listing of *A. anguilla* has been undermined by illegal trade, mislabeling, and species identification challenges particularly in their juvenile stage and processed forms. The proponents express the view that inclusion of the entire genus in Appendix II will close enforcement gaps and ensure better monitoring of the global trade.

Additional considerations

Section 1.4 of the supporting statement notes that the adoption of Proposal 35 would include the adoption of its Annex 1 as the nomenclature standard reference for the genus *Anguilla*. Annex 1 is an updated version of the draft fish checklist reviewed by the Animals Committee at its 33rd meeting (Annex 1 of document AC33 Doc.48). The nomenclature specialist for fauna has confirmed that three updated taxonomic placements were made following a review of available taxonomic literature and databases and consultation with anguillid eel specialists to elucidate the most appropriate taxonomic status for three poorly-known taxa: the taxa *labiata*, *nebulosa* and *pacifica*. Should Proposal 35 be adopted, it would be appropriate to integrate this updated Anguillid eel taxonomy and nomenclature in the proposed updated Checklist of CITES-relevant fishes by replacing the Anguillid eel section in the proposed Checklist with Annex 1 of Proposal 35.

With regards to captive breeding of the species, while artificial maturation and fertilisation of *A. rostrata* and *A. anguilla* have been achieved, the life cycles of both species have not yet been closed in captivity. The life cycle of *A. japonica* has been successfully closed in captivity and Japan's Fisheries Agency has reported substantial progress towards developing technologies for commercial-scale production, but it is currently not logistically or economically viable on a large scale. Captive breeding of anguillid eels on a commercial scale has not yet been achieved, therefore aquaculture systems remain reliant on offtake of juveniles (glass eels and elvers) from the wild.

The Convention on the Conservation of Migratory Species of Wild Animals (CMS) is in the process of elaborating an Action Plan for *A. anguilla.* The species was added to CMS Appendix II at the 11th meeting of the Conference of the Parties to CMS (COP11; Ecuador, 2014).

When reviewing this proposal, Parties may wish to consider document CoP20 Doc. 87 on *Eels* (Anguilla *spp.).*

Provisional conclusions

Based on the information available at the time of writing, there is insufficient evidence to determine whether *Anguilla japonica* or *Anguilla rostrata* meet the criteria in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17) for inclusion in Appendix II.

However, all of the non-CITES listed *Anguilla* species, including *Anguilla japonica* and *Anguilla rostrata*, would appear to meet criterion A in Annex 2b of Resolution Conf. 9.24 (Rev. CoP17) for their inclusion in Appendix II for lookalike reasons with *Anguilla anguilla.*

Note to Parties:

Information from range States of *A. japonica* and *A. rostrata* on population status assessments, levels of trade (national and international) and monitoring programmes would help to inform the final assessment.

Information on methods of identification, both morphological and technological, used to distinguish different species of anguillid eels would also be useful. For technological methods, details on the application, cost, accessibility, accuracy rates and the life stages or products to which they can be applied would be helpful.

Proposal 36

Actinopyga echinites, A. mauritiana, A. miliaris, A. varians, A. lecanora* and *A. palauensis (sea cucumbers)

Proposal: Include in Appendix II.

Proponent: European Union

Provisional assessment by the Secretariat

CITES background

Sea cucumbers have been discussed at several meetings of the Conference of the Parties. At the 12th meeting of the Conference of the Parties (CoP12; Santiago, 2002) the United States of America submitted working document CoP12 Doc.45, which summarized information available at that time on the biology of, and international trade in, sea cucumbers (families Holothuridae and Stichopodidae) and argued that they may qualify for listing under CITES Appendix II. The lack of information on which species were being traded, and the identification of species, were considered challenges. Trade in sea cucumbers was further discussed at the 13th, 14th, 15th and 16th meetings of the Conference of the Parties (CoP13; Bangkok, 2004, document CoP13 Doc. 37.1; CoP14; The Hague, 2007, document CoP14 Doc. 62; CoP15; Doha, 2010, document CoP15 Doc. 7.2.1; CoP16; Bangkok, 2013, document CoP16 Doc. 64 (Rev. 1).

Isostichopus fuscus was included in CITES Appendix III by Ecuador in 2003.

At the 18th meeting of the Conference of the Parties (CoP18; Geneva, 2019), *Holothuria nobilis, Holothuria fuscogilva* and *Holothuria whitmaei* were included in Appendix II and at the 19th meeting of the Conference of the Parties (CoP19; Panama City, 2022), *Thelenota* spp. (*T. ananas, T. anax,* and *T. rubralineata*) were also included in Appendix II.

Purpose and impact of the proposal

The proposal seeks to include *Actinopyga echinites*, *A. mauritiana*, *A. miliaris* and *A. varians* in Appendix II, in accordance with Article II, paragraph 2(a) of the Convention and *A. lecanora* and *A. palauensis* in accordance with Article II, paragraph 2(b). If the proposal is adopted, international trade in specimens of these species will be regulated in accordance with the provisions of Article IV of the Convention.

Compliance with listing criteria

The supporting statement claims that inclusion of *Actinopyga echinites*, *A. mauritiana*, *A. miliaris* and *A. varians* in Appendix II satisfies criterion B in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17) and that *A. lecanora* and *A. palauensis* be included in Appendix II based on criterion A of Annex 2b of Resolution Conf. 9.24 (Rev. CoP17).

The proponent indicates that the adoption of this proposal would also include the adoption of the proposed CITES Standard Reference for *Actinopyga* spp. provided in Annex 1 to CoP20 Prop 36. The proposed Standard Reference is a supplement to the *Taxonomic Checklist of selected Sea Cucumber taxa relevant to CITES following CoP19* extracted from the World Register of Marine Species (WoRMS) accessed 5 June 2025, with edits from the nomenclature specialist of the Animals Committee.
The proponent notes that due to the split of the *A. mauritiana* species complex into *A. varians* (Pacific form) and *A. mauritiana* (Indian Ocean form), references in the literature to *A. mauritiana* in the Pacific were assumed to pertain to *A. varians*.

A. echinites, *A. mauritiana*, *A. miliaris*, and *A. varians* are sea cucumbers of medium commercial value and among the key target fisheries across the Indian and Pacific Oceans. The harvest pressure on these species increased in recent decades due to the depletion of high commercial value species and the ongoing demand for bêche-de-mer. According to the supporting statement they are overfished in some areas, with mixed evidence of recovery despite fishery closures in several countries.

Information on the global population size of *Actinopyga echinites*, *A. mauritiana*, *A. miliaris*, and *A. varians* is not available, and species-specific information on generation length, growth rates, and fecundity is limited or inferred from related taxa. Metrics used to estimate productivity are variable and long-term standardized surveys have not been conducted across much of these species' ranges. According to the proponent, inferences of population trends therefore rely on site-specific surveys with no comprehensive or systematic monitoring programmes for these species that could be identified.

The species have separate sexes and are iteroparous (*reproduce more than once during their lifetime*), with some studies suggesting an annual reproductive cycle for *A. echinites* and *A. mauritiana*. Sea cucumber reproduction is density dependent (as broadcast spawners), with fertilization and recruitment rates lower at reduced densities. Bell et al. (2008) explain the risks to sea cucumbers posed by overfishing: "reducing population densities to the point where reproductive success trails behind natural mortality (known as depensation or the 'Allee effect'). Once this happens, conventional management measures alone, such as closed seasons/areas, size limits and gear restrictions, will usually fail to repair the damage. A different suite of active management interventions must be considered to restore the spawning biomass".

There is a lack of reliable time-series population data available and some data sources seem outdated. The proponent inferred densities and declines from several site-specific studies. Based on the supporting statement and sources referenced, brief summaries are provided for each of the four species proposed for inclusion in Appendix II in terms of criterion B in Annex 2 a of Resolution Conf. 9.24 (Rev. CoP17):

a) ***Actinopyga echinites*** has a wide distribution across western and central Pacific, Asia, Africa and the Indian Ocean and lives in shallow waters, mostly on flats (reefs and seagrass beds) down to 10 m depth (Purcell et al., 2023). It can live for more than 12 years and mature individuals have an average length of 20 cm with a weight ranging from 200 to 300 g. It is a species of high potential fecundity and early sexual maturity. Natural mortality (*M*) was determined for some populations at 0.64/year (New Caledonia) and ~2.6/year (Sri Lanka). It was categorized in the IUCN Red List as Vulnerable in 2013 but the assessment needs updating. Estimates of decline included in the IUCN Red List Assessment are based on a number of quantitative and qualitative studies; populations were estimated to be depleted and declined by more than 60-90% in at least 50% of its range and the species was considered overexploited in at least 40% of its range although exact declines were difficult to estimate. At the time of the assessment (2013), global declines were estimated to be between 30-40% based on estimates of depletion and over-exploitation across its range. Better and more quantitative data were needed to better estimate the impact of fishing on this species. No reference density was available for *A. echinites*. The mean population densities contained in the supporting statement as well as decreases in densities are based on data derived from standalone surveys as well as repeat surveys in some countries:

   Indian ocean:

   - Seychelles – The estimated stock and population density of *A. echinites* between 2003 and 2004 in Mahé and Amirantes Plateaus, representing an area 48 305 km^2 was 1154 tonnes and 0.64 ind./ha**.** Combined density estimates for *A. echinites*, *A. miliaris* and *A. palauensis* (combined due to identification issues) found that densities for these species were lower in 2021–2022 (~2.5 ind./ha) compared to 2004 (~3.5 ind./ha) (difference was not statistically significant).

   - Egypt – Consistent decreases in density of *A. echinites* were recorded between 2000 and 2016 with the species densities decreasing from 2,450 to 240 ind/ha.

   - Madagascar – A density of 25 ind./ha was recorded for *A. echinites* in 2008.

   - Réunion (France) – The mean density of *A. echinites* was 290 ± 94.1 ind./ha (2014).

Pacific ocean:

- Indonesia – A 17-year series of repeated line surveys in North Sulawesi from 1993–2010 recorded a single observation of *A. echinites* in 1994 and the species was not recorded in any of the twelve subsequent surveys (the species may have been extirpated); South Sumatra, *A. echinites* and *A. varians* were found at "low densities;

- New Caledonia (France) – La Grande Terre sea cucumber fishery: average densities in the species 'preferred' habitat across fifty reef sites (reef flats) was 9.35 ind./ha for *A. echinites* in 2007. In La Foa, South Province, New Caledonia (France), in 2021, *A. echinites* was found at an average density of 16.14 ind./ha (range 6.64 to 25.11 ind./ha);

- Fiji – High densities of *A. echinites* were recorded in 2003, however by 2009, no *A. echinites* were recorded and the species was considered to be at a critical level of depletion;

- Philippines – The mean population density in Cabgan Island, Surigao del Sur in March-August 2021 was 1,572 ± 225 ind./ha estimated from a shallow seagrass bed station, and 1,389 ± 178 ind./ha in a station established at deep algal flats; and

- Papua New Guinea – Density estimates varied considerably from less than 0.1 ind./ha in East New Britain province to 1,800 ind./ha in Central province.

b) ***Actinopyga mauritiana*** is found across the islands of the western Indian Ocean, on exposed shallow outer reefs, reef crests as well as in reef lagoons and sometimes in sea grass beds, with depth of occurrence from 0 – 5 m^2. It is a large species that can grow up to 35 cm with an average weight of 400 g (Red sea: 23 and 22 cm for females and males respectively). It is a species of high potential fecundity and early sexual maturity. It was categorized in the IUCN Red List as Vulnerable in 2013 but the assessment needs updating. Estimates of decline included in the IUCN Red List Assessment is based on a number of quantitative and qualitative studies, populations were estimated to be depleted and declined by more than 60-90% in at least 60% of its range over the past 50 years and was considered overexploited in at least 25% of its range although exact declines are difficult to estimate. At the time of the assessment global declines were therefore estimated to be between 30%-40% based on estimates of depletion and overexploitation across its range. Better and more quantitative data are needed to better estimate the impact of fishing on this species. The mean population densities contained in the supporting statement as well as decreases in densities are based on data derived from the following:

- Egypt – Consistent decreases in density of *A. mauritiana* were recorded between 2000 and 2016 with the species entirely absent in 2016 surveys despite records of 2,610 ind/ha in 2000. A comparison of *A. mauritiana* densities between 2004 and 2014 at six sites along the Egyptian Red Sea coast reported 612 ind/ha in 2004, declining to 7.5 ind/ha in 2014. A study reported in 2022 indicated a low densities of *A. mauritiana* (160 ind/ha) in seagrass beds in the northern Red Sea, which was attributed to overfishing.

- Eritrea – transect data used to calculate a population density of 35 individuals of this species per hectare in near shore waters (Kalaeb et al., 2008)[29].

c) ***A. miliaris*** is widely distributed throughout the Indo-Pacific and is commonly found between 0 and 10 m deep on sandy beds and intertidal areas. It grows to an average length of 25 cm and an average fresh weight of 400g. In the western central Pacific region, it is found mostly on reef flats of fringing reefs and lagoon-islet reefs between 0 and 12 m depth and in the African and Indian Ocean region, it prefers reef flats and seagrass beds over coral substrate up to 20 m and it does not bury[2]. It was categorized in the IUCN Red List as Vulnerable in 2013 but the assessment needs updating. Estimates of decline included in the IUCN Red List Assessment is based on a number of quantitative and qualitative studies, populations were estimated to be depleted and declined by more than 60-90% in at least 50% of its range since the 1960s, and is considered overexploited in at least 40% of its range although exact declines are difficult to estimate. At the time of the

[29] Kalaeb, T., Ghirmay, D., Semere, Y. and Yohannes, F., 2008. Status and preliminary assessment of the sea cucumber fishery in Eritrea. *BECHE-DE-MER*, p.8. Accessed on 30 July 2025.

assessment global declines were therefore estimated to be between 30%-40% based on estimates of depletion and overexploitation across its range. Better and more quantitative data are needed to better estimate the impact of fishing on this species. The mean population densities contained in the supporting statement as well as decreases in densities are based on data derived from standalone surveys as well as repeat surveys in some countries.

Indian Ocean

- Egypt – Consistent decreases in density of *A. miliaris* were recorded between 2000 and 2016 with the species decreasing from 2,160 to 370 ind/ha. A study reported in 2022 indicated a low densities of *A. miliaris* (80 ind/ha) in seagrass beds in the northern Red Sea, which was attributed to overfishing.

- Eritrea – transect data was used to calculate a population density of 157.5 individuals of this species per hectare in near shore waters (Kalaeb et al., 2008[5]).

- Kenya – In reefs in southern Kena, *A. miliaris* has a density of 0.75 ± 0.5 ind/ha (2007).

- Seychelles – The estimated stock and population density of *A. miliaris* between 2003 and 2004 in Mahé and Amirantes Plateaus, representing an area 48 305 km^2 was 4,980 tonnes and 1.09 ind./ha. A combined density estimate for *A. echinites*, *A. miliaris* and *A. palauensis* (combined due to identification issues), found that densities for these species were lower in 2021–2022 (~2.5 ind./ha) compared to 2004 (~3.5 ind./ha), however this difference was not statistically significant.

Pacific Ocean

- Fiji – Moderate densities of *A. miliaris* were recorded in 2003, however by 2009, no *A. miliaris* were recorded.

- Tonga – In Ha'apai, densities of *A. miliaris* at reef benthos transect stations declined from 16.37 ± 11.80 ind./ha in 2014 to no individuals observed in 2016.

- New Caledonia (France) – In the La Grande Terre sea cucumber fishery populations of *A. varians* and *A. miliaris* were reported to be "low to very low at most localities" in 2007, but with a small number of dense breeding populations. Average densities in the *A. miliaris* 'preferred' habitat was 3.78 ind./ha in lagoons (*A. miliaris*) (2007). In 1981, the average density of this species was 600 individuals per hectare and in 2006-2007 in preferred habitat the average density was 87 individuals per hectares.

- Palau – A joint CPUE for *Actinopyga miliaris* and *A. echinites* in Palau showed 68.2 sea cucumbers.diver/hour.

- Papua New Guinea – Density estimates ranged from 0.1 ind./ha in Milne Bay Province to 57 ind./ha in Oro.

- Vanuatu – There was a relatively high abundance of this species (785 ind./ha) in 1987.

d) ***A. varians*** is a large reef-associated sea cucumber with an average fresh length from 20 – 40 cm and an average fresh weight from 300 to 700 g. It prefers outer-reef flats and fringing reefs, in reef crest habitats it is generally found in 1 – 3 m depth and is occasionally found in seagrass beds, attached to coral stones[2]. It was categorized in the IUCN Red List as Data Deficient in 2013 but the assessment needs updating. According to the IUCN Red List Assessment there is little to no information available on its population status, habitat, ecology, major threats, or conservation measures occurring to this species. More research is needed in all of these areas. The proponents indicated that the assessment doesn't appear to reflect taxonomic revisions that recognize *A. varians* as representing the former Pacific population of *A. mauritiana*; consequently, the assessment of *A. mauritiana* as Vulnerable effectively includes *A. varians*. The mean population

densities contained in the supporting statement as well as decreases in densities are based on data derived from surveys in some countries:

- New Caledonia (France) – Average densities in the species 'preferred' habitat was 8.12 ind./ha in 2007.

- Commonwealth of the Northern Mariana Islands (CNMI) (United States of America) – a survey to determine recovery of *A. varians* following a fishing moratorium implemented after harvesting in 1995–1997 found that populations increased from an estimated 32,977 in 1997 to 250,578 in 2006, with size structures indicating a fully recovered population.

- Papua New Guinea – Density estimates ranged from 0.1 ind./ha in Milne Bay Province to 38.7 ind./ha in Madang (publication referenced by proponent refers to *A. mauritiana* but interpreted as *A. varians*).

The species proposed to be included in Appendix II based on criterion A in Annex 2 b of Resolution Conf. 9.24 (Rev. CoP17), *A. lecanora* and *A. palauensis,* were categorized as Data deficient and Least concern respectively.

In addition to overfishing, the primary threat to sea cucumbers, the supporting statement reflects on other threats to sea cucumbers, including changes in ocean temperatures and pH caused by climate change that negatively impact the species, and the accumulation of contaminants and heavy metals consumed as part of the sediment and organic matter from the ocean floor.

The majority of sea cucumbers are harvested for export, primarily driven by international demand for bêche-de-mer, with an estimated three million fishers involved globally. The trade is largely supplied by small-scale tropical fisheries that provide vital livelihoods for coastal communities. While most harvesting targets export markets, subsistence and domestic use are also significant, particularly in the Western Central Pacific and parts of the Indian Ocean. Four fisheries—located in the Cook Islands, Samoa, Guam, and Nauru—are reported to operate solely for subsistence.

There are no reliable global estimates of *Actinopyga* species volumes in international trade, as most sea cucumber catch and trade data are not reported to the species level. The proponent used data from an analysis of FAO capture production data for sea cucumbers, the Harmonized System tariff codes (HS Codes) for commercial forms of all Holothuridae and information from the US Fish and Wildlife Service Law Enforcement Management Information System (LEMIS) and other sources to discuss the level and trends in international trade as well as price data. The analysis of FAO capture production data found that global sea cucumber capture peaked at 62,000 tonnes in 2018, with a drop to ~45,000–50,000 tonnes in 2020–2021, likely due to COVID-19 disruptions. However, these FAO-reported figures must be interpreted cautiously, as they may reflect dried weights and exclude significant illegal or unreported fishing.

Based on data for four HS6 codes for sea cucumber products extracted from the UN Comtrade database for the period 2015 to 2024, global (re-)exports under relevant HS codes by *Actinopyga* range States totaled 52,734 tonnes, led by Indonesia (24%) and Malaysia (21%). Importer-reported trade was significantly higher (90,403 tonnes), with key importers including Viet Nam, Japan, and China.

According to the LEMIS data spanning 2009–2024 provided to the proponent by USFWS, the following trade was included in the supporting statement:

- *A. echinites:* Direct import of 4,597 kg meat, 87% imported from Taiwan Province of China, and 120 kg bodies from Fiji. Indirect trade included 8,266 kg *A. echinites* bodies, the majority of which were re-exported via Hong Kong SAR of China, with the origin of the trade reported as Mozambique (53%) and Japan (46%).

- *A. mauritiana* (likely another species, because exporting countries were not range States for the species): Direct import of 4,889 kg meat, 357 kg bodies, and 470 kg unspecified products.

- *A. miliaris*: Direct import of 2,946 kg bodies (99% from Fiji) and 291 kg meat (69% from Indonesia). Indirect trade of 201 *A. miliaris* "shell product" imported from Indonesia and re-exported Singapore and 165 kg bodies imported from India via Spain.

- Direct trade was also reported in lookalike species, including 506 kg *A. lecanora* meat (92% from Indonesia) and 335 kg bodies from Viet Nam, and 99 kg *A. palauensis* meat and 35 kg bodies imported from Australia.

The illegal trade in sea cucumbers is pervasive according to the proponent and spans the entire supply chain, fueled by strong international demand and compounded by challenges in species identification and complex trade networks. According to the supporting statement seizure data from 2015–2021 indicate that at least 92 tonnes were confiscated across 23 countries, though actual volumes are likely underreported. Despite the lack of species-specific reporting, *Actinopyga* spp. are likely involved according to the proponent due to the common practice of bulk trading and product mislabeling.

Management measures for sea cucumber fisheries introduced by countries are discussed in the supporting statement and include prohibitions on harvest (moratoria), limited licenses, seasonal closures, effort and gear restriction, quotas, rotational fishing zones, minimum size limits, fleet controls, rotational harvest strategies and TAC limits. A global analysis of sea cucumber fishers referred to by the proponents found that 39% of sea cucumber fisheries were under moratoria on fishing or exports; 39% practiced gear restrictions; 34% applied size limits; 28% applied catch quotas; 22% applied fleet controls; and 5% practiced rotational harvest strategies.

The proponent points out that limited aquaculture for these species has been developed, meaning that trade is currently and will continue to rely on wild populations for the long-term and there are few tangible prospects for populations to be restocked by captive-release programs in the near future.

According to the proponent, given the high degree of morphological plasticity and intraspecific variation for the aforementioned species, and similarities to other species in the genus, it is necessary to include two species, *A. lecanora* and *A. palauensis*, in Appendix II under Criterion A of Annex 2b of Resolution Conf. 9.24 (Rev. CoP17). Identification guides exist for dry and live forms, including the recently developed sea cucumber identification guide by Di Simone *et al*. (2022), but the proponents state that several *Actinopyga* species could be misidentified with one another in the absence of good training. The species ID guide for Australia's Torres Strait fishery indicates that *A. echinites* can be confused with *A. mauritiana* and *A. miliaris*, and that in turn, *A. miliaris* can be confused with *A. spinea* and *A. palauensis.* It seems *A. spinea* can be distinguished at the harvest stage. *A. mauritiana* is frequently identified as *A. varians*, as the designation of the Pacific variant of *A. mauritiana* as *A. varians* is not universal in the scientific literature or in management plans. The proponent only mentions one incident of misidentification of *A. lecanora* and it seems it has some unique characteristics that may enable the species to be correctly identified with the necessary training.

Based on the biological vulnerability of *Actinopyga echinites*, *A. mauritiana, A. miliaris* and *A. varians* to harvest, inferences relating to declines driven by international trade, and demand that is expected to increase, the species appear to meet criterion B of Annex 2a of Resolution Conf. 9.24 (Rev. CoP17) for inclusion in Appendix II. The Secretariat has concerns about the lack of quantitative information on the species, including species-specific information on generation length, growth rates, and fecundity as well as densities. In addition, the lack of long-term standardized surveys to monitor the species and the impact of management measures are also of concern. At its 22nd meeting of the Animals Committee (AC22; Lima, 2006) the Animals Committee adopted recommendations relating to the development of regional management strategies to manage sea cucumbers; the development of a standardized approach to collect and report on fisheries and trade data, including species specific data; and increasing significantly basic biological and ecological research and stock assessments particularly for species of high conservation concern (the Secretariat notes that *A. echinites, A. miliaris, A. mauritania* were identified as species of concern in certain countries of its range). Almost two decades later, data on these species are still limited.

Based on the information available it seems *Actinopyga echinites*, *A. mauritiana, A. miliaris* and *A. varians* could be look-alike species for each other. Although there are similarities between these species and *A. lecanora* and *A. palauensis*, identification materials are available that demonstrate the differences between the species, and it seems enforcement officers who encounter specimens of

CITES-listed species are likely to be able to distinguish between them provided they receive the necessary training.

Additional considerations (including relevant CoP recommendations)

At its 20th meeting (CoP20, Samarkand, 2025), the Conference of the Parties will consider document CoP20 Doc. 90 on *Conservation of and trade in sea cucumbers* that includes information relating to CITES discussions on sea cucumbers and proposes draft decisions for consideration by the Parties.

Details relating to consultation process is provided in an Annex to the supporting statement.

Provisional conclusions

Based on the information available at the time of writing, it appears that *Actinopyga echinites*, *Actinopyga mauritiana*, *Actinopyga miliaris* and *Actinopyga varians* meet criterion B in Annex 2a in Resolution Conf. 9.24 (Rev. CoP17) for their inclusion in Appendix II. It appears that *Actinopyga lecanora* and *Actinopyga palauensis* do not meet criterion A in Annex 2b of Resolution Conf. 9.24 (Rev. CoP17).

Proposal 37

Holothuria lessoni (Golden sandfish)

Proposal: Include in Appendix II.

Proponent: European Union

Provisional assessment by the Secretariat

CITES background

This is the first time that this species has been proposed for inclusion in the Appendices.

Sea cucumbers have been discussed at several meetings of the Conference of the Parties. At the 12th meeting of the Conference of the Parties (CoP12; Santiago, 2002), the United States of America submitted working document CoP12 Doc.45, which summarized information available at that time on the biology of, and international trade in sea cucumbers (families Holothuridae and Stichopodidae) and argued that they may qualify for listing under CITES Appendix II. The lack of information on which species were being traded and the identification of species were considered challenges. Trade in sea cucumbers was further discussed at the 13th, 14th, 15th, 16th meetings of the Conference of the Parties (CoP13; Bangkok, 2004, document CoP13 Doc. 37.1; CoP14; The Hague, 2007, document CoP14 Doc. 62; CoP15; Doha, 2010, document CoP15 Doc. 7.2.1; CoP16; Bangkok, 2013, document CoP16 Doc. 64 (Rev. 1).

Isostichopus fuscus has been included in CITES Appendix III by Ecuador since 2003.

At the 18th meeting of the Conference of the Parties (CoP18; Geneva, 2019), *Holothuria nobilis, Holothuria fuscogilva* and *Holothuria whitmaei* were included in Appendix II and at the 19th meeting of the Conference of the Parties (CoP19; Panama City, 2022), *Thelenota* spp. (*T. ananas, T. anax,* and *T. rubralineata*) were included in Appendix II.

Purpose and impact of the proposal

The proposal seeks to include *Holothuria lessoni* in Appendix II, in accordance with Article II, paragraph 2(a) of the Convention. If the proposal is adopted, international trade in specimens of this species will be regulated in accordance with the provisions of Article IV of the Convention.

Compliance with listing criteria

The supporting statement states that inclusion of *Holothuria lessoni* in Appendix II satisfies criterion B of Annex 2 a of Resolution Conf. 9.24 (Rev. CoP17).

Holothuria lessoni is a large Indo-Pacific sea cucumber (average fresh length 30 cm) that plays a vital ecological role in maintaining coral reef ecosystems, contributing to nutrient recycling, sediment bioturbation, and buffering against ocean acidification. It is key species in bêche-de-mer fisheries, valued at an average of USD 503 per kg (dried) in retail markets in the Hong Kong SAR of China, making it one of the most valuable tropical sea cucumber species[30].

There is no global population size estimate for *H. lessoni*. Time series data on densities of *H. lessoni* available at local or national levels, such as data from New Caledonia (France), were used as proxies by the proponent to illustrate the impact of harvest for trade on *H. lessoni.*

H. lessoni was previously considered as *H. scabra* var. *versicolor* but was identified as a distinct species on the basis of a molecular study by Massin *et al*. (2009) that provided taxonomic clarification. The IUCN Red List categorization of *H. lessoni* is Endangered (2010) based on the assessment of *H. scabra* which has an estimated 50% decline over the past 50 years due to unsustainable harvest. Given that

[30] Purcell, S.W., Lovatelli, A., Gonzalez Wanguemert, M., Solis Marin, F.A., Samyn, Y. and Conand, C., 2023. *Commercially important sea cucumbers of the world*. Food & Agriculture Org. Accessed on 2 July 2025.

H. lessoni is targeted similarly to *H. scabra* but is larger, rarer and could be more valuable, it was estimated that *H. lessoni* has declined at least 50% throughout its global range over the past 30–50 years.

According to the supporting statement, the species susceptibility to overfishing is linked to its occurrence in shallow, accessible water habitats, long lifespan (approximately 15 years) and slow recovery despite moderate-high productivity. Once depleted, populations are vulnerable to the Allee effect, where low densities hinder reproductive success.

The species is exploited across multiple countries and was "widely reported as over-exploited" in a 2023 FAO review referred to in the supporting statement. Fisheries targeting *H. lessoni* often follow "boom and bust" cycles, with intense harvesting followed by collapse. Population declines have been recorded in New Caledonia, Fiji, Vanuatu, and Tonga, with local extirpation reported at Ashmore Reef, Eastern Torres Strait (Australia), Efate (Vanuatu), and parts of Fiji. Low densities have also been documented in Indonesia, Seychelles, and Solomon Islands.

Although most sea cucumber catch and trade data are not species-specific, available exporter-reported data are included in the supporting statement indicating that *H. lessoni* continues to be harvested and exported by multiple range States. Indonesia reported exports of 93,050 kg from 2017–2020, primarily to China, Hong Kong SAR of China and Singapore, and established a harvest quota of 350,000 individuals in 2021. In 2022, Solomon Islands exported 2,095 kg, while Seychelles established a Total Allowable Catch of 100,000 individuals for the 2022–2023 fishing season, with 8,933 individuals reportedly harvested.

The proponent provides information relating to some national-level restrictions that are in place for the harvest and trade of *H. lessoni* including fishing moratoria or other managements measures such as licensing, gear restrictions, quotas, harvest size limits, spatial and temporal closures and the establishment of marine reserves within the species range. According to the supporting statement, the effectiveness of these measures seems to vary, there are concerns about illegal fishing within marine protected areas that appears to be widespread and there is uncertainty about the efficacy of other measures such as spatial and temporal sea cucumber fishery closures.

According to the proponent, illegal harvest and trade of sea cucumbers are widespread, driven by high demand and compounded by the challenges of species-level identification and the complexity of trade routes. Although no specific reports on illegal trade in *H. lessoni* could be located by the proponent, information contained in a TRAFFIC report on a rapid assessment of online trade in sea cucumber and fish maw in Malaysia and Singapore referenced by the proponent, indicate that an estimated 92 tonnes of sea cucumbers were seized globally from 204 incidents between 2015 and 2021. The Secretariat extracted data relating to the seizures of CITES listed *Holothuria* species from the CITES Illegal Trade Database on 30 July 2025. Fifty seizures were recorded in the database between 2020 to 2023 with a total mass of more than 3.6 tonnes.

According to the proponent there has been a growing interest in the aquaculture and captive breeding of *H. lessoni* to meet market demand and alleviate pressure on natural stocks; reference is made to various initiatives by countries including the development of hatchery technology for the species in Australia that produced > 300,000 juveniles from 18 females in 2004-5 for restocking to the wild.

The supporting statement includes information relating to the identification of the species and specimens in trade. This includes an explanation of the characteristics that could be used to distinguish between *H. lessoni* and *H. scabra* (such as differences in colour, body wrinkles, papillae). The identification guide referred to by the proponent, Di Simone *et al.*, 2022, is available on the CITES website and indicates that although the processed forms of the two species can be similar, the body wrinkles of *H. scabra* are still clear in the processed form.

In summary, based on the information provided in the supporting statement *H. lessoni* experienced an estimated global population decline of >50% over the past 30–50 years, it is biologically vulnerable to harvest, and there is evidence of decline across multiple sites, as well as records of extirpation at some locations, driven by the international trade for the continued demand for bêche-de-mer.

Additional considerations

At its 20th meeting (CoP20, Samarkand, 2025), the Conference of the Parties will consider document CoP20 Doc. 90 on *Conservation of and trade in sea cucumbers* that includes information relating to previous CITES discussions on sea cucumbers and that proposes draft decisions for consideration by the Parties.

Details of consultations with Parties by the proponent are provided in an Annex to the supporting statement.

Provisional conclusions

Based on the information available at the time of writing, it appears that *Holothuria lessoni* meets criterion B in Annex 2a to Resolution Conf. 9.24 (Rev. CoP17) for its inclusion in Appendix II.

Proposal 38

Grammostola rosea, Acanthoscurria chacoana, Acanthoscurria insubtilis, Acanthoscurria musculosa, Acanthoscurria theraphosoides, Avicularia hirschii, Avicularia rufa, Avicularia avicularia, Catumiri argentinense, Cyriocosmus bertae, Cyriocosmus perezmilesi, Hapalotremus albipes, Holothele longipes, Pamphobeteus antinous **and** ***Umbyquyra acuminatum*** (Tarantulas)

Proposal: Inclusion in Appendix II.

Proponents: Argentina, Bolivia (Plurinational State of) and Panama

Provisional assessment by the Secretariat

CITES background

This is the first time a proposal has been submitted to include the following 15 species of tarantulas that belong to the family Theraphosidae in the Appendices: *Grammostola rosea, Acanthoscurria chacoana, Acanthoscurria insubtilis, Acanthoscurria musculosa, Acanthoscurria theraphosoides, Avicularia hirschii, Avicularia rufa, Avicularia avicularia, Catumiri argentinense, Cyriocosmus bertae, Cyriocosmus perezmilesi, Hapalotremus albipes, Holothele longipes, Pamphobeteus antinous* and *Umbyquyra acuminatum*.

There are several species of Theraphosidae currently included in Appendix II, including *Aphonopelma pallidum, Brachypelma* spp.*, Sericopelma angustum, S. embrithes* and *Tliltocatl* spp., which were all included in 1995; while *Poecilotheria* spp. were included in 2019.

Another species of the Theraphosidae, *Caribena versicolor*, was included in Appendix III in January 2023 at the request of the European Union.

Purpose and impact of the proposal

The proposal seeks to include *Grammostola rosea* in Appendix II, in accordance with Article II, paragraph 2(a) of the Convention. The proposal also seeks to include *Acanthoscurria chacoana, Acanthoscurria insubtilis, Acanthoscurria musculosa, Acanthoscurria theraphosoides, Avicularia hirschii, Avicularia rufa, Avicularia avicularia, Catumiri argentinense, Cyriocosmus bertae, Cyriocosmus perezmilesi, Hapalotremus albipes, Holothele longipes, Pamphobeteus antinous* and *Umbyquyra acuminatum* in Appendix II, in accordance with Article II, paragraph 2(b) of the Convention. If the proposal is adopted, international trade in specimens of these species will be regulated in accordance with the provisions of Article IV of the Convention.

Compliance with listing criteria

The supporting statement suggests that inclusion of *Grammostela rosea* in Appendix II satisfies Annex 2a of Resolution Conf. 9.24 (Rev. CoP17) but does not state which of the criteria it meets, so the Secretariat has assessed it against both criterion A and B.

The supporting statement suggests that inclusion of *Acanthoscurria chacoana, A. insubtilis, A. musculosa, A. theraphosoides, Avicularia hirschii, A. rufa, A. avicularia, Catumiri argentinense, Cyriocosmus bertae, C. perezmilesi, Hapalotremus albipes, Holothele longipes, Pamphobeteus antinous* and *Umbyquyra acuminatum* in Appendix II satisfies Annex 2b of Resolution Conf. 9.24 (Rev. CoP17), implying that they meet criterion A for look-alike reasons.

According to the proponents, all 15 species listed in the proposal are native to South America, particularly concentrated in megadiverse countries such as Bolivia (which is home to all 15 species); Brazil; Argentina; Chile; Peru; Paraguay; Colombia, Ecuador, Venezuela, and Guyanas (for some *Avicularia* and *Holothele* spp.). *C. perezmilesi*, *H. albipes* are endemic to Bolivia, while several others have narrow, overlapping ranges across Andean and Amazonian biomes. Despite being rarely studied, these species are characterized by highly restricted geographic ranges, often limited to specific habitats

like Atlantic Forest fragments or isolated islands, making them especially vulnerable to habitat loss and overcollection.

According to the supporting statement, tarantulas generally display a K-selected life strategy, with slow growth, late sexual maturity, and high female longevity (in excess of 20 years), while males live much shorter lives (2-10 years, 1–2 years post-maturity). Data concerning fecundity is inconsistent, but they can produce from dozens to in excess of 1,000 eggs depending on the species. *G. rosea* has two mating seasons and is thought to lay between 50 to 200 eggs. These traits imply a low intrinsic capacity for population recovery in the face of disturbances such as extraction for commercial purposes.

Tarantulas are notable for sexual dimorphism (distinct difference in size or appearance between the sexes of an animal in addition to the sexual organs themselves). Coloration ranges from cryptic to vivid (pink, red, copper), which makes them attractive for the pet trade. Tarantulas act as predators in terrestrial ecosystems and help to control insect populations. They are also important prey for vertebrates and due to their sensitivity to disturbance they can be useful indicator species.

The natural habitat of *G. rosea* is the high desert and scrub regions of northern Chile, Bolivia, and Argentina. The species usually digs small burrows or finds abandoned reptile or rodent burrows to live in. According to the supporting statement, the population size of *G. rosea* is unknown, there are no formal population assessments or IUCN Red List assessments for any of the species referred to in the proposal. It is inferred that the populations of *G. rosea* are likely declining due to overcollection and habitat loss. In Chile, it is projected that there has been a habitat reduction of >30% over three generations (~18 years). These habitats have often been disturbed by human activity, industrialization and urbanization, making exact distribution of the species harder to pinpoint.

G. rosea is a venomous spider. However, its main defense mechanism against predators is the urticating hairs located on its abdomen. These hairs are released by the spider brushing them off its back with its leg, which occurs when the spider feels threatened.

Much of the information presented in the supporting statement pertains to arachnids or tarantulas in general, rather than being species-specific. There is no information on the population status (size, structure or trends) presented for any of the species referred to in the proposal. In Chile, the species is listed as “Vulnerable” under national hunting law since 2015, but there does not appear to be any specific management plans, targeted studies or population monitoring programmes in place for any of the species in the proposal.

The proponents identify the main threats to *G. rosea* as habitat loss (agriculture, fire, grazing, deforestation, and urbanization, especially in Bolivia and Chile); high demand in the exotic pet trade (around 89% of traded individuals are thought to be wild-caught); climate change and pollution; and illegal trade (which is exacerbated by use of taxonomic synonyms and challenges in identifying juveniles).

Tarantulas are sought after for their unique coloration and docile behavior, and all 15 species are in demand in the pet trade, as documented in Annex 2 of the supporting statement. The supporting statement claims that over 600,000 individuals from the genus *Grammostola* have been traded internationally, but no time period is provided for this figure.

The supporting statement focuses on *G. rosea* as the most commonly traded species internationally, asserting that it meets the trade criterion under Annex 2a of Resolution Conf. 9.24 (Rev. CoP17) due to growing international demand and minimal management oversight. The proponents report that according to data from United States Fish and Wildlife Service (USFWS) Law Enforcement Management Information System (LEMIS), from 2016–2020, 20,317 specimens of *G. rosea* (including synonyms like *G. porteri*) and *Grammostola* spp. were traded by the United States alone, of which 19,597 were imported and 1,720 were exported; and of these, 8,456, or 43%, were identified only to the genus level. In those years, 11,093 specimens were captive bred, 9,424 were wild, and another 800 were of unknown origin). The proponents also indicated that 72,096 specimens of *Grammostola spathulata* (another synonym of *G. rosea*), were imported to the United States. It is estimated that 89% of traded individuals are wild-caught and captive breeding is rare.

Marshall *et al*. (2022), as referenced in the supporting statement, assert that accurate identification, trade monitoring, differentiation between wild and captive bred specimens, and the use of synonyms suggest that synonyms may be used to misrepresent species' origins in trade, particularly for popular species. Furthermore, species identification is extremely difficult and nearly impossible when trade involves specimens younger than one year (1–2 cm), and it is even difficult when trade involves adults of different species, especially if synonyms are used in documentation or when dealing with customs authorities who are not tarantula experts.

The supporting statement highlights examples of seizures of tarantula species, several of which are in species already listed in CITES. A study conducted in the Philippines on the tarantula trade in Facebook groups between 2020 and 2022 documented the trade of several species included in this proposal. Specifically, the following individuals were recorded being offered for sale: 218 *Grammostola rosea*, 169 *Avicularia avicularia*, 3 *Acanthoscurria musculosa*, 2 *Pamphobeteus antinous*, and 1 *Acanthoscurria chacoana*. Although these figures correspond to a geographically specific study, they illustrate the continued presence and demand for these species in the online trade.

The proponents state that while it is difficult to quantify the impact of trade, unregulated harvesting is a clear risk to these species. They use factors such as commercial demand (*G. rosea, A. avicularia, Acanthoscurria* spp.), endemism and restricted range (*H. albipes, C. perezmilesi*), a worrying conservation status (*Pamphobeteus antinous* – Vulnerable in Peru), and the widespread lack of population data on known threats to support this claim. They express the view that, applying the precautionary principle, listing in CITES Appendix II is a necessary measure to regulate trade and ensure that it does not threaten the survival of these species.

The proponents present information on some potential lookalike species, while noting that accurate identification of tarantula species, especially by non-experts and with juvenile specimens, represents a significant challenge for the effective implementation of CITES regulations. Furthermore, in online and hobbyist trade, dubious scientific names (*nomina dubia*) sometimes persist. Mislabelling and synonym usage may obscure trade origins, allowing potential laundering of wild specimens. The proponents express the view that listing would aid enforcement since distinguishing between closely related species is difficult without expert analysis, thus justifying inclusion of the other species under the look-alike criterion (Annex 2b).

In summary, there is no information on the population size, structure or trends for *G. rosea* and there are no formal population assessments or IUCN Red List assessments for any of the species proposed for listing. Indirect evidence is used to infer that the populations of *G. rosea* are likely to be declining. As referenced in the supporting statement, the proponents argue that factors such as endemism, the documented impact of trade, combined with widespread threats such as habitat loss, indicate a high likelihood of negative impacts. They suggest that the general lack of direct data on trends, in the face of known pressures and vulnerabilities for all species, strongly justifies the application of the precautionary approach. However, there is strong evidence from LEMIS data that the trade in *G. rosea* is significantly high, but the frequent use of synonyms (e.g. *G. spathulata* and *G. porteri* specifically mentioned in the proposal as synonyms of *G. rosea*) make it difficult to determine the true level of trade.

Should the meeting of the Conference of the Parties decide that *G. rosea* should be included in Appendix II under the criteria in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17), then in view of the reported difficulty of identifying parts and derivatives to individual species, the inclusion of *Acanthoscurria chacoana, Acanthoscurria insubtilis, Acanthoscurria musculosa, Acanthoscurria theraphosoides, Avicularia hirschii, Avicularia rufa, Avicularia avicularia, Catumiri argentinense, Cyriocosmus bertae, Cyriocosmus perezmilesi, Hapalotremus albipes, Holothele longipes, Pamphobeteus antinous* and *Umbyquyra acuminatum* in Appendix II may be warranted under criterion A of Annex 2b to Resolution Conf. 9.24 (Rev. CoP17).

Additional considerations

No nomenclature standard reference has been adopted by the CITES Parties for species in these genera, and no standard reference is recommended in the proposal for adoption. Each of the genera contains additional species beyond those proposed for inclusion in Appendix II. Consideration of a possible standard reference for the Theraphosid tarantulas appears to be a task for the Animals Committee following CoP20 if Proposal 38 is adopted.

No information is presented on consultations.

In the absence of any information on population status (size, structure or trends), any specific management plans, targeted studies or population monitoring programmes, as well as the frequent use of synonyms, it will be challenging for range States to make non-detriment findings for any of the species concerned.

Provisional conclusions

Based on the information available at the time of writing, it appears that *Grammostola rosea* may meet criterion B in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17) for its inclusion in Appendix II.

In addition, it appears that *Acanthoscurria chacoana, Acanthoscurria insubtilis, Acanthoscurria musculosa, Acanthoscurria theraphosoides, Avicularia hirschii, Avicularia rufa, Avicularia avicularia, Catumiri argentinense, Cyriocosmus bertae, Cyriocosmus perezmilesi, Hapalotremus albipes, Holothele longipes, Pamphobeteus antinous* and *Umbyquyra acuminatum* may meet criterion A of Annex 2b in Resolution Conf. 9.24 (Rev. CoP17).

Note to Parties and proponents

It would be useful if the proponents could provide any identification materials that could assist enforcement officers in recognizing the species concerned.

Proposal 39

Haliotis midae (South African abalone)

Proposal: Inclusion in Appendix II with an annotation “dried specimens only”.

Proponent: South Africa

Provisional assessment by the Secretariat

CITES background

This is the first time a proposal has been submitted to include *Haliotis midae* in Appendix II.

H. midae, was included in Appendix III between 2007 and 2011 at the request of South Africa.

Purpose and impact of the proposal

The proposal seeks to include *Haliotis midae* in Appendix II, in accordance with Article II, paragraph 2(a) of the Convention. If the proposal is adopted, international trade in specimens of this species will be regulated in accordance with the provisions of Article IV of the Convention.

Compliance with listing criteria

The supporting statement suggests that inclusion of *H. midae* in Appendix II satisfies criteria A and B in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17).

The proposal seeks to include the dried form of *H. midae*, in Appendix II of CITES because of rapid population declines due to a combination of overexploitation, illegal harvesting, and international trade, particularly to Hong Kong Special Administrative Region (SAR) of China, where it is considered a luxury seafood. Although aquaculture contributes to the supply, wild populations are critically affected by poaching, driven largely by organized criminal networks. Between 2,000 and 2,500 tonnes per year are harvested illegally, 50 times greater than the current Total Allowable Catch (TAC) (41.6 tonnes in 2024). An estimated 96 million animals of *H. midae* poached over ten years, undermined national management efforts for the species. The proposal argues that an Appendix II listing under CITES would enhance international cooperation, increase traceability, and regulate exports without banning legal trade, allowing sustainable aquaculture and certified trade to continue.

H. midae is a slow-growing, long-lived species of marine mollusc that can live over 30 years, reaching sexual maturity at ~60–64 mm shell breadth. It is a species endemic to South Africa, where it is found in shallow rocky reefs and kelp beds in the intertidal and subtidal zones (typically <10 meters deep) of coastal waters, especially the Western Cape and Eastern Cape provinces. The flat shell-shape reduces the powerful drag forces caused by waves and strong currents. Growth and reproductive success depend heavily on environmental conditions (temperature, food, habitat). It exhibits separate sexes, broadcast spawning, and a planktonic larval stage.

H. midae is subject to a correlation between population size or density and the mean individual fitness of a population or species, known as the “Allee effect”. As such, close proximity of sexes is necessary for success in broadcast spawning. Where individuals become too widely dispersed, as little as more than 2 m apart, recruitment failure may follow (Babcock and Keesing 1999)[31], leading to shrinking populations and eventual local extinction.

The geographic range of *H. midae* is naturally restricted and fragmented. Historically it was abundant along the southern and southwestern coasts of South Africa but is noted to have experienced severe population declines due to overharvesting (legal and illegal), poaching driven by international demand (especially from Hong Kong SAR of China) and habitat degradation. The supporting statement claims

[31] Babcock, R. and Keesing, J. 1999. Fertilization biology of the abalone *Haliotis laevigata*: laboratory and field studies. *Canadian Journal of Fisheries and Aquatic Sciences* 56: 1668-1678.

that recent estimates suggest population densities are far below historical levels in most regions with some areas reporting localized extirpation of populations.

The IUCN Red List assessment categorized *H. midae* as Endangered, with a decreasing population trend in 2020. Several examples of severely depleted populations of *Haliotis midae* are documented in the supporting statement, but many areas have not been surveyed. In the Red List report, it is noted that "Population surveys by the Department of Agriculture, Forestry and Fisheries (DAFF) indicate widespread recruitment failure throughout all west coast fishery zones resulting from over-fishing, principally poaching, with abalone densities falling below the level necessary for successful reproduction. Surveys of the Eastern Cape also show that this hitherto unexploited region has similarly fallen foul of intensive fishing, with stocks unable to recover as a direct result of enforcement failure by the authorities. Despite this, there has been some notable success in abalone ranching where young abalone are seeded into the wild. In the Eastern Cape, it has also been found that recruitment has endured in some areas despite high levels of poaching. Nevertheless, the picture overall is of a fishery in steep decline".

The supporting statement indicates that Illegal, Unreported and Unregulated (IUU) harvesting is the most significant threat to the species, with large-scale poaching of this species taking place since the early 1990s. A consequence has been a rapid decline in average size and densities of individuals throughout the species' range. Targeted by organized criminal syndicates, it is often smuggled out for trade in East Asian markets. Another identified threat is overfishing and quota mismanagement, with legal quotas often exceeded. In addition, quota allocations have sometimes been granted in ways that undermine conservation objectives. Habitat loss, climate change and oceanographic shifts, such as ocean warming and acidification may further reduce habitat suitability and reproductive success. The IUCN Red List assessment also mentions encroachment by west coast rock lobsters (*Jasus lalandii*) displacing sea urchins, which young abalone rely on for shelter.

South Africa is the sole legal source of *H. midae*. The species is traded in various forms including live, dried, canned and frozen. Trade includes both wild-harvested product (under quota allocations based on a Total Allowable Catch or TAC), and aquaculture production (which now exceeds legal wild harvest). International demand is extremely high, especially from China, Hong Kong SAR, and Vietnam. The supporting statement highlights that it is estimated that in excess of 90% of harvested abalone is illegally traded. It also notes that according to data in Okes *et al.* (2018) that between 2000 and 2016 only 57% of dried *H. midae* imports into Hong Kong SAR of China were exported by South Africa. The other 43% were exported by Mozambique (21%), Namibia (7%), Zimbabwe (7%) and Zambia (6%), with the remaining 2% coming from Angola, Eswatini, Congo and Kenya combined.

During the period 2007 to 2011, when *H. midae* was included in Appendix III, international trade data was collected in the CITES Trade Database. During this period, commercial trade was reported in bodies, carvings, meat, shells and live specimens. The main exporting Party was South Africa, but direct trade was also reported from Indonesia, Madagascar, New Zealand, Philippines, United States of America and Viet Nam. The main importers were China (including Hong Kong SAR of China and Taiwan, Province of China), Germany, Japan, Malaysia, Singapore and the United States of America. During this time, South Africa reported exporting around 4,583 tonnes of live specimens, of which 8.3 tonnes was from the wild.

Some Parties continued to report on trade in *H. midae* after it was removed from Appendix III in 2011. The following imports were reported since 2012: shells - with 14,830 indicated as Wild; 5,683 as Captive bred and 1,805 as Unknown; 636 Live species indicated as Unknown source.

Legal harvest is governed under the Marine Living Resources Act (MLRA) of 1998, which is administered by the Department of Forestry, Fisheries and the Environment (DFFE). The supporting statement outlines some management mitigation measures to conserve the species. Licences are required for both commercial and recreational harvesting, though few licences are currently issued. The minimum legal size for fishing is 114 mm shell length. Area-based restrictions and seasonal closures are implemented (usually during spawning periods), SCUBA or mechanical gear is banned and licensees are required to submit catch returns, but compliance is variable. The fishery has repeatedly been closed and reopened due to concerns over population collapse and illegal harvesting.

The proponent indicates that there is a national conservation and management plan in place for the species. Annual stock assessments are conducted by DFFE scientists, with dive surveys, catch per unit effort (CPUE) data, and poaching estimates used to assess abundance and establish the TAC on an annual basis. However, the supporting statement seems to imply that although monitoring is a requirement that no data have been collected since 2016. The proponent states that monitoring is heavily constrained by ongoing poaching, inaccessibility of illegal fishing locations and low compliance reporting from fishers. In many areas, there is no reliable data on actual population size, while a lack of genetic or tagging-based tracking impedes understanding of stock structure and recovery. The supporting statement indicates that since the 1980s, when the first stock assessment was made, there has been a steady decrease in the TAC of wild caught *H. midae.* In 1995/96, the TAC was 615 tonnes and in 2003 the recreational abalone fishery was closed. In 2007/08, the TAC was only 75 tonnes triggering the closure of commercial abalone fishing, with fishery scientists warning that continued high levels of illegal harvesting made the fishery unsustainable. The TAC in 2024 was 41.6 tonnes, subdivided between 302 commercial divers.

The proponent indicates that it has large commercial farming/ranching operations for abalone that are well-regulated and most of this abalone produced is exported in fresh, frozen or canned form. Since the 1990s, South Africa has become a major producer of *H. midae* from land-based farms and, to a lesser extent, from ranching. The supporting statement claims that illegal trade, at 2,000 to 3,000 tonnes/year, is over 50-60 times that of the TAC, with an estimated 96 million *H. midae* poached in ten years. In contrast, South Africa's 13 abalone farms have been very successful, producing 3,000 tonnes of *H. midae* per year, while five ranches produce a further 200 tonnes/year. The highest volumes of *H. midae* are exported by four large companies.

The proponent feels that it is unnecessary to regulate exports of fresh, frozen or canned forms of *H. midae* under CITES since the impact on the wild stock is negligible. It is claimed that regulating the exports of products produced by the commercial farming/ranching industry through CITES is also undesirable as the administrative burden would be significant as would be the socio-economic and livelihood impact. It is asserted that dried specimens of abalone are easily recognizable and can be easily distinguished from fresh, frozen and canned specimens. The proponents indicate that legally produced *H. midae*, mostly from abalone farms, are sold live, frozen, canned and dried. In contrast, most illegal trade is in dried abalone and to a lesser extent, frozen abalone. This indicates that trade in dried and frozen specimens can come from both legal and illegal sources. Therefore, should this proposal be adopted with the proposed annotation then aquaculture facilities exporting dried abalone would need an export permit.

The supporting statement indicates that several *Haliotis* species (e.g. *Haliotis rubra*, *Haliotis discus hannai*) are traded internationally, but none of these are listed in the CITES Appendices. While morphological differences exist, identification is extremely difficult for processed forms (dried, canned) and at present, no consistent system exists for differentiating *H. midae* from other abalone species once processed. Calls have been made for genetic traceability tools, though these are not yet widespread in enforcement.

In summary, *H. midae* is listed as Endangered on the IUCN Red List, and the national TAC has been reduced drastically due to declining stocks. However, the main reason for these declines is illegal harvesting. While there are population data available from areas along the coast of the Western Cape, the status of the population along the Eastern Cape is not known. In addition, the high level of poaching is making it difficult to accurately determine the status of the stock. There is insufficient evidence to determine if the species is likely to become eligible for inclusion in Appendix I in the near future. However, as illegal trade remains the main issue, the priority conservation need appears to be improved enforcement of the existing legislation in South Africa to reduce poaching levels and further incentivize legal and sustainable trade.

Additional considerations

To date, no nomenclature standard reference has been adopted by CITES that pertains to *Haliotis* spp.; if Proposal 39 is adopted, this would be a matter for the Animals Committee to consider.

The following CITES Parties were consulted: The European Union, Namibia, Singapore and China, but no responses are included in the supporting statement.

Since 1 April 2023, DFFE has started implementing an e-permitting system, and all CITES Appendix II applications are now submitted online, free of potential tampering and decreasing the administrative burden of issuing permits.

The proposal seeks to limit the application of the Appendix II listing to "dried specimens only", which is not the main specimen in trade, but rather the main specimen in illegal trade. In addition, dried specimens are not a term currently used in terms of reporting. Should this proposal be adopted with the proposed annotation, the Guidelines for the preparation and submission of CITES annual reports and the Guidelines for the preparation and submission of the CITES annual illegal trade report, would need to be amended to include this term.

The Secretariat notes that according to Article I, paragraph b) of the Convention, "specimen" means "(i) any animal or plant, whether alive or dead; (ii) in the case of an animal: for species included in Appendices I and II, any readily recognizable part or derivative thereof; and for species included in Appendix III, any readily recognizable part or derivative thereof specified in Appendix III in relation to the species".

The Secretariat understands that it follows from this definition that an annotation specifying the parts and derivatives to be covered by the inclusion of the animal species in the Appendices can only be associated with a species included in Appendix III. For animal species included in Appendix I or II, the whole animal (live or dead) as well as any readily recognizable part or derivative is covered by the inclusion of the species in Appendix I or II.

Further, the Secretariat notes that paragraph 7 of the Interpretation section of the Appendices reads: "*7. When a species is included in Appendix I, II or III, the whole, live or dead, animal or plant is* ***always*** *included. In addition, all parts and derivatives thereof are also included in the same Appendix unless, for animal species listed in Appendix III and plant species listed in Appendix II or III, the species is annotated with the symbol # followed by a number to indicate that only specific parts and derivatives are included."* (Emphasis added)

Along the same line, Resolution Conf. 11.21 (Rev. CoP19) on *Use of annotations in Appendices I and II*, recalls that "an annotated listing of an animal or plant species in any of the three Appendices always includes the whole live or dead animal or plant, as well as any specimen specified in the annotation".

Provisional conclusions

Based on the information available at the time of writing, there is insufficient evidence to conclude if *Haliotis midae* meets the criteria in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17) for its inclusion in Appendix II.

Concerning the proposed annotation to limit the listing to "dried specimens only" the Secretariat notes that this appears to be inconsistent with the text of the Convention, Article I b) i) according to which any species included in the Appendices always include any animal whether live or dead and ii) according to which annotations specifying which parts and derivatives are covered are only possible with regard to animal species included in Appendix III.

The Secretariat would also like to note that this appears to be the first example where trade in the whole live animal is proposed to be entirely excluded from the control of the Convention (unlike for instance *Loxodonta africana* where certain specimens are included in Appendix II and all other specimens are covered by Appendix I).

Note to proponent

Information on the status and trends of the populations in the Eastern Cape would help to inform the final assessment.

It would also be useful if the proponent could provide additional details on the methodology used to determine the annual TAC, particularly in the apparent absence of population monitoring in the wild and the reported high levels of illegal trade.

Proposal 40

Panax quinquefolius (American ginseng)

Proposal: Amend annotation #3 to read as follows:

#3 Whole and sliced roots and parts of roots, excluding:

a) manufactured parts or derivatives such as powders, pills, extracts, tonics, teas and confectionery; and

b) finished products packaged and ready for retail trade of roots sliced 1-3 mm thick derived from artificially propagated plants of *Panax quinquefolius*.

Proponent: United States of America

Provisional assessment by the Secretariat

CITES background

Panax quinquefolius was included in Appendix II when the Convention came into effect in 1975, with an annotation indicating the listing was for roots only.

At the fifth meeting of the Conference of the Parties (CoP5; Buenos Aires, 1985), on the basis of a proposal by the United States (CoP5 Prop. 93), the annotation was amended to read "Designates roots and readily recognizable parts thereof" and the resulting annotation #2 entered into force on 1 August 1985. Following the seventh meeting of the Conference of the Parties (CoP7; Lausanne, 1989), the above-mentioned annotation was renumbered annotation #3.

At the 10th meeting of the Conference of the Parties (CoP10; Harare, 1997), on the basis of a Plants Committee proposal submitted by the Depositary Government (Switzerland) (CoP10 Prop. 13), the Conference of the Parties amended annotation #3 to read: "Designates whole and sliced roots and parts of roots, excluding manufactured parts or derivatives such as powders, pills, extracts, tonics, teas and confectionery".

At the 11th meeting of the Conference of the Parties (CoP11; Gigiri, 2000), the Russian Federation population of *Panax ginseng* was included in Appendix II with an annotation (#3) indicating "whole and sliced roots and parts of roots, excluding manufactured parts or derivatives such as powders, pills, extracts, tonics, teas and confectionery (CoP11 Prop. 54)". This annotation was also applied to *P. quinquefolius*.

At the 14th meeting of the Conference of the Parties (CoP14; The Hague, 2007), at the request of the Plants Committee, Switzerland as the Depositary Government submitted a proposal to amend the annotations for Appendix-II listed medicinal plant species including *Panax ginseng* and *Panax quinquefolius* (CoP14 Prop. 27). The amendment to annotation #3, as adopted, removed the exclusionary language "excluding manufactured parts or derivatives such as powders, pills, extracts, tonics, teas and confectionery" such that the annotation reads "whole and sliced roots and parts of roots."

At the 16th meeting of the Conference of the Parties (CoP16, Bangkok, 2013), the United States of America proposed to amend Annotation #3 by reinstating the underlined text: "Designates whole and sliced roots and parts of roots, excluding manufactured parts or derivatives such as powders, pills, extracts, tonics, teas and confectionery" (CoP16 Prop. 53), which had been deleted at CoP14. The proponents stated that this amendment was needed in order to clarify what specimens of *Panax ginseng* and *Panax quinquefolius* were regulated under CITES, and to avoid potential seizures of shipments of parts and derivatives not intended to be covered by the annotation.

Annotation #3 has remained unchanged since CoP16 and currently regulates live and dead plants, whole and sliced roots, and root parts (including fibers), while excluding seeds and manufactured derivatives such as powders, pills, extracts, tonics, teas and confectionery.

Purpose and impact of the proposal

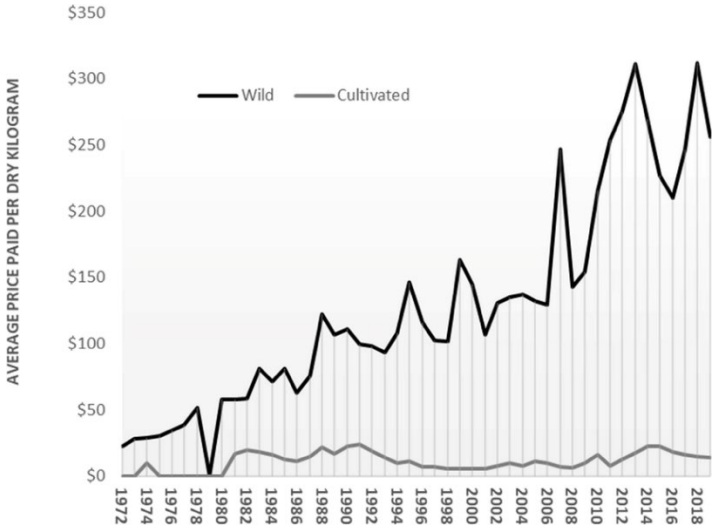
The proposal seeks to amend annotation #3 to exempt finished products packaged and ready for retail trade of thin-sliced roots (1–3 mm thick) derived from artificially propagated plants of *Panax quinquefolius.* Although #3 also applies to *Panax ginseng* (population of the Russian Federation), which is included in Appendix II, the proposed amendment concerns only the species of *Panax quinquefolius*. Therefore, the proposed exemption would not apply to the Russian Federation population of *Panax ginseng* which will remain subject to the current formulation of annotation #3.

P. quinquefolius is a long-lived, slow-growing perennial herb native to the deciduous forests of eastern North America (Canada and United States of America). The Secretariat notes that, according to Liu *et al.* (2021), ginseng is listed as "vulnerable" in the United States and out of 33 States where ginseng occurs as an indigenous forest species, seven consider the species to be "critically imperiled"; four "imperiled"; fourteen "vulnerable"; and eight apparently "secure". The species has been listed as "endangered" in Canada since 1999, with exports of wild ginseng prohibited altogether.

The supporting statement indicates that the United States is the only country exporting wild-harvested *P. quinquefolius* and wild harvest occurs under strict national and subnational regulations and CITES non-detriment findings (NDFs) set specific criteria regarding root age and harvest conditions.

The species is highly valued for its medicinal properties, especially in East Asian markets, and is in high demand internationally. It is traded in various forms, ranging from raw whole roots and sliced roots to processed products such as capsules and packaged teas. The proponent indicates that whole roots are commonly exported in bulk, often packed in 100-pound barrels, primarily for large-scale distribution to East Asian markets. The Secretariat conducted a brief online search of ginseng specimens and products for sale, which indicated that retailers do not generally mention the source (wild versus cultivated) or production method of the ginseng available.

The proponent asserts that markets for wild and artificially propagated *P. quinquefolius* roots are fundamentally distinct. Wild roots are prized for their age (usually over 10 years old), rarity, and unique morphological characteristics, including twisted shapes, pronounced growth rings, and darker, corkier skin. They are culturally and commercially important in East Asian traditional medicine markets. According to the references cited in the supporting statement, wild roots are typically sold whole and command premium prices ranging from USD 250 to USD 850 per dry pound, with exceptional specimens and higher demand fetching prices as high as USD 1,000 per pound. In contrast, artificially propagated roots are harvested much younger, generally after 3 to 4 years, resulting in smoother, more uniform roots. These are sold in higher volumes, either whole or sliced, at substantially lower prices—commonly between USD 10 and USD 25 per dry pound. In summary, the proponent contends that it would not be economically viable to slice wild roots as slicing wild roots removes key morphological features that buyers of whole wild roots value, as demonstrated by market values. This statement is supported by the graph below (reproduced from Liu *et al*., 2021), which shows a comparison of the average prices paid for wild *versus* cultivated American ginseng for the years 1972-2019.



Additional considerations

Concerning the differentiation between wild and artificially propagated specimens, the proponent states that "*sliced roots are typically derived from artificially propagated plants, often field-grown under shade in tilled soil*". The Secretariat notes that specific husbandry practices associated with farming or cultivation of ginseng form a husbandry continuum from management *in situ*, using enrichment plantings ("wild-simulated"), to intensive cultivation *in situ* using beds and/or tillage ("woods-cultivated"). Such *in situ* production systems may produce specimens that possess "wild" traits that are traditionally favoured by Asian consumers including taste, shape, colour and texture. The proponent does state that "Cultivation occurs under controlled and verifiable conditions, employing cultivated seed and established horticultural techniques. These practices enhance traceability and regulatory oversight. Roots produced through wild-simulated methods do not meet the CITES definition of artificial propagation and therefore remain subject to wild harvest regulations".

In its assessment, the Secretariat was mindful of paragraph 1 d) of Resolution Conf. 5.20 (Rev. CoP17) on *Guidelines for the Secretariat when making recommendations in accordance with Article XV,* which recommends that annotations should cover those specimens that first appear in international trade as exports from range State that dominate the trade and the demand for the wild resource. This principle is also contained in paragraph 6 b) i) to Resolution Conf. 11.21 (Rev. CoP19) on *Use of annotations in Appendices I and II*.

The proposed amendment to the annotation exempts only sliced roots (1–3 mm) from artificially propagated *P. quinquefolius* that are packaged and ready for retail trade. This targets a product that does not dominate the wild trade and is clearly distinct in form and purpose. The main demand for the wild specimens is in whole roots, which are not covered by the exemption.

Paragraph 6 a) iii) of Resolution Conf. 11.21 (Rev. CoP19) on *Use of annotations in Appendices I and II*, recommends that Parties submitting proposals that contain substantive annotations "consider the enforceability of the annotations." In addition, paragraph 1 d) of Resolution Conf. 5.20 (Rev. CoP17) on *Guidelines for the Secretariat when making recommendations in accordance with Article XV*, states that:

d) if the proposal includes an annotation, the recommendations should specifically cover:

i) the appropriateness of the proposed annotation with regard to those specimens that first appear in international trade as exports from range States and that dominate the trade and the demand for the wild resource;

ii) any potential problems in implementing the proposed annotation; and

iii) whether the proposed annotation is harmonized with existing annotations;

In this regard, the proponent acknowledges that enforcement concerns exist. The supporting statement indicates that clear, identifiable packaging, to facilitate inspection already exists, but that it is currently not mandatory for producers to use. The Secretariat questions how customs officers would be able to determine if specimens were within the size restriction indicated of 1 - 3 mm and from an artificially propagated plant. The Secretariat draws the attention to the Interpretation section of the Appendices, which contains the following definition of relevance for this proposal:

> "Finished products packaged and ready for retail trade
>
> *Products, shipped singly or in bulk, requiring no further processing, packaged, labelled for final use or the retail trade in a state fit for being sold to or used by the general public."*

The Secretariat is of the view that should the Parties agree to exempt the specimens as proposed, it would be critical that they comply with the above labelling requirements, in particular with respect to the origin of the specimens.

The change to the annotation would not apply to *Panax ginseng* and it is unclear if *P. quinquefolius* could be clearly identified and distinguished from *P. ginseng* by an enforcement officer, noting that a quick search online indicates that *P. ginseng* is often traded as sliced roots. When *P. ginseng* was listed at CoP11, proposal Prop. CoP11.54 stated that "*Panax quinquefolium* and *Panax ginseng* have the strongest resemblance as demonstrated by the morphology of the overground and underground organs, specifics of ontogenesis and life expectancy."

The Secretariat notes that the draft amendment to Annotation #3 introduces additional exclusionary language. As a matter of principle, the Secretariat believes that annotations should be 'positive' in nature and indicate what is covered by the Convention. Annotations with exclusionary language seem more complex and potentially challenging to interpret, apply and enforce. The Secretariat recognizes that annotation practice to-date reflects a mix of inclusionary and exclusionary annotations. The Secretariat is of the view that should the Parties agree to exempt the specimens as proposed, it would be critical that they comply with the labelling requirements, in particular with respect to the origin of the specimens.

It is not clear if the Russian Federation was consulted on this proposal and its potential impacts on *Panax ginseng*.

Canada, as a co-range State with a small endangered wild population of *P. quinquefolius*, has expressed concern over the exemption's potential impact on its wild populations, but no further detail is provided.

No standard nomenclature reference is suggested in the proposal. It might therefore be necessary to add the production of a standard nomenclature reference for the two CITES-listed *Panax* species to the nomenclature workplan of the Plants Committee for the next intersessional period.

Provisional conclusions

The listing history of annotation #3 reflects the difficulty faced by Parties in crafting an annotation for ginseng that clearly specifies the parts and derivatives covered by the Convention, in order for them to be easily followed by traders and identified by border officials, and for any permitting burden to be reduced or avoided, while ensuring that the potential risk to the wild populations is addressed.

The Secretariat considers that the distinction between *Panax quinquefolius* and *Panax ginseng* (population of the Russian Federation), could be made clearer or, alternatively, the revised annotation applicable to *Panax quinquefolius* should be separated from annotation #3 and re-numbered.

Note to Proponent

The proponent is invited to clarify the production systems it is including in the term "artificially propagated" and outline further what enforcement mechanisms and oversight would be put in place to

ensure that there is no risk to wild populations should the proposed amendment to annotation #3 be adopted.

Proposal 41

Jubaea chilensis (Chilean palm)

Proposal: Inclusion in Appendix I.

Proponent: Chile

Provisional assessment by the Secretariat

CITES background

This is the first time that *Jubaea chilensis* has been proposed for inclusion in the Appendices.

Purpose and impact of the proposal

The proposal seeks to include *Jubaea chilensis* in Appendix I, in accordance with Article I of the Convention. If the proposal is adopted, international trade in specimens of this species will be regulated in accordance with the provisions of Article III of the Convention.

If *Jubaea chilensis* is included in Appendix I, nurseries artificially propagating the species for commercial purposes would need to be registered with the Secretariat in accordance with Resolution Conf. 9.19 (Rev. CoP15) on *Registration of nurseries that artificially propagate specimens of Appendix-I plant species for export purposes.*

Compliance with listing criteria

The supporting statement suggests that inclusion of *Jubaea chilensis* in Appendix I satisfies criterion A in Annex 1 of Resolution Conf. 9.24 (Rev. CoP17).

The Chilean Palm, *Jubaea chilensis*, is an endemic species of Chile, whose distribution covers the regions of Coquimbo, Valparaíso, Metropolitana, O'Higgins and Maule corresponding to the central zone of Chile. It is a single-trunked, pinnate-leaved palm growing to 20-25 m tall. The trunk is the stoutest of any palm, commonly a metre diameter at the base, sometimes up to 1.3 m diameter, often widest in the upper part of the trunk, with smooth grey bark. Despite the length of the leaves (3 – 5 m long), they often look disproportionally small compared to the massive trunk, particularly on larger trees.

It is a slow-growing, long-lived species that can live for more than 400 years. Its fruit, known as “coquitos” are an ovoid drupe, about 4cm in diameter at maturity and are edible inside. It is the only species in its genus and is one of the largest palm species in the world. It is one of the slowest-growing palms, requiring many decades to mature, making it biologically vulnerable to exploitation and population disruption. Historically it was exploited for its sap and is currently valued for its ornamental appeal, with seeds and juvenile *Jubaea* plants increasingly available via nurseries and online platforms, including international markets.

The sap, which is obtained from incisions in the trunk or by cutting down the tree, is used for the production of honey or wine, which is why it is sometimes called “Chilean wine palm”. Its fruit is used in confectionery and pastry, and high quality oil is extracted from it for the manufacture of cosmetics and soaps. The leaves are used for making baskets and handicrafts. It also has a significant ornamental value.

Regarding its international trade, official records from the National Customs Service of Chile (CITES Enforcement Authority) have been provided in the supporting statement. The data indicates that international trade in specimens, parts and derivatives of the species has taken place (fruits, plants and seeds) as well as trade in live plants. The main exported product corresponds to the fruits or "coquitos de palma," which represent 88% of the total exported during the last six years (destinations Germany and Hong Kong). Live plants are also in international trade with information provided in the supporting statement showing a decline in exports to the Netherlands of more than 15,000 plants in 2018 to 139 in 2023. There also appears to be local illegal trade particularly in the “coquitos”, an activity that is punishable by imprisonment and heavy fines.

According to supporting statement, it is estimated that there are around 120,000 adult individuals in the entire country, concentrated mainly in the palm groves of Ocoa, Valparaíso region (La Campana National Park and Oasis de La Campana Ecological Reserve), and Cocalán, Libertador Bernardo O'Higgins region. The Ocoa palm grove, with 62,821 individuals, is the best preserved of all; it is located inside La Campana National Park, in the Valparaíso region, the only place with state protection through the National System of State-Protected Wild Areas according to the proponent. The supporting statement also refers to a more recent study done in PN La Campana by the National Forestry Corporation (CONAF) that has shown that there are 40,405 individuals of *Jubaea chilensis* in that subpopulation. It is unlikely that the population is greater than 120,000 individuals but this would not meet the criterion for a small population.

Currently, its populations are highly fragmented, preferring dry areas on the slopes of the Coastal Range, with some populations also found in the central valley. Fragmentation and population loss has occurred in the last 100 years, since the trees were cut to extract sap in the past, although this threat is now controlled. It is noteworthy that three of the most significant relicts of the species are located less than 150 km from the capital city of Santiago.

The proponents indicate that there are three known localities with the presence of the species where populations can reach more than 60,000 individuals. One of these is located in Cocalán, west of Rancagua (35,000 individuals). On the other hand, there are about 10 localities where the species populations contain fewer than 1,000 individuals. In these populations, densities vary between 8 and up to 60 individuals/ha according to the supporting statement, but these are some of the most important natural palm groves despite some of the areas having low density (e.g., 1.7 individuals/ha in Ocoa). The proponent reports density values for adult individuals that generally range between 26 and 35 individuals/ha, with some exceptions over 50 and 100 individuals/ha. Because the palm groves have some protection, natural regeneration fluctuates between 10 regeneration plants per hectare in arid sites, and up to 100 plants per hectare in more humid sites.

Of significance is that the supporting statement indicates that most populations are in an advanced state of decay, presenting an age structure with a large percentage of adult individuals and a low percentage of juvenile and infant individuals (González et al., 2009). It also refers to a recent study in the Ocoa palm grove where 113 sampling plots were monitored with the results indicating that there is very low regeneration and it is unlikely that seedlings can develop into a juvenile individual, which ultimately shows that the population is in an aging process. An examination of Bravo *et al*., (2019) indicates that the study found that from each adult individual currently, one seedling is generated; and only one out of every ten regenerated seedlings reaches the juvenile stage, which likely occurs in other palm groves in Chile with even more severity due to the lack of effective protection for the species. The proponent states that “all studied populations of *J. chilensis* have low genetic diversity, high inbreeding, and no evidence of isolation by distance”. Furthermore, “although existing populations are not at imminent risk of extinction due to the species longevity, the inbreeding rate could increase rapidly due to the effects of climate change and human impact.”

Jubaea chilensis has most recently been assessed for The IUCN Red List of Threatened Species in 2021 as Endangered with a decreasing population trend. According to the IUCN Red List assessment the present threats the species faces are more related to climate change, an increase of fire risk, urbanization, invasive alien species and the extraction of seeds for human consumption. The assessment also states that “it has a suspected past reduction of 50% of population size in the last 300 years (or three generations); past changes in land use and logging of individuals in combination with current substitution for cultivation, browsing on juveniles by rodents, livestock, wildfires, as well as intensive exploitation of its fruits has led to a decline of 50% of area of occupancy. Some authors suggest that the number of individuals has decreased by about 98%, in the last 500 years.”

The supporting statement identifies the main threats to wild populations of *J. chilensis* as loss of habitat mainly due to permanent damage by forest fires; the high harvest of fruits and seeds of its populations for commercial purposes, which have a high demand in the international market; herbivory and browsing; the extraction of water in its natural distribution areas, the drought phenomena of the last 14 years; the introduction of invasive alien species; land use change, urban expansion and deforestation.

In Chile, *J. chilensis* is under protection and regulation through various legal rules and is classified nationally as Endangered, due to habitat fragmentation, limited regeneration, and increasing threats

from land-use change, fire, and illegal collection. Given the endemism and ecological importance of the species, it is represented and protected in the National System of Protected Wild Areas of the State of Chile (SNASPE), specifically in the La Campana National Parks in the Valparaíso Region and Las Palmas de Cocalán in the O'Higgins Region. These populations are subject to Management Plans and fall under the administration of CONAF. Since 2005, CONAF has been implementing the National Conservation Plan for the Chilean Palm.

Data show documented international movement of seeds and live plants. Although currently low-volume, the trade has the potential to grow due to high ornamental value. Given the palm's commercial appeal, unregulated trade especially of seeds and fruits, poses future risks to wild populations, particularly in isolated stands. While trade volume is limited, a precautionary approach may be warranted given the species' life history, increasing demand, and poor regeneration capacity.

In summary, *J. chilensis* does not have a small population (with an estimate of 120,000 mature individuals), but this endemic species appears to have a highly fragmented range, with low rates of regeneration and few reproductive populations. It has also experienced a suspected 50% decrease in population size in the past three generations (300 years), due to a decrease in area of occupancy. The low reproductive rates are reasons for concern for the conservation of the species in the long term.

Additional considerations

The proponent submitted a document to the 27th meeting of the Plants Committee (PC27, Geneva, 2024) (PC27 Doc. 34), seeking feedback from the Committee on its intention to submit a proposal for the inclusion of *J. chilensis* in Appendix I (PC27 SR).

No standard nomenclature reference is suggested in the proposal. A time-stamped extract from Plants of the World Online (POWO) prepared by the nomenclature specialist of the Plants Committee is proposed for consideration by the Conference of the Parties:

> POWO. (2025). *Jubaea*. World Checklist of Vascular Plants. Facilitated by the Royal Botanic Gardens, Kew. Published on the Internet; https://powo.science.kew.org/ Retrieved 28 July 2025.

It is not clear if there are any nurseries or cultivation of *J. chilensis* in Chile or in non-range States.

The supporting statement suggests that there may be identification challenges with 3 species that are currently listed in the CITES Appendices

- *Dypsis decipiens*: commonly known as the Manambe palm, which is listed in CITES Appendix I and classified as Vulnerable by the IUCN Red List assessment.
- *Dypsis decaryi*: commonly known as the triangle palm, which is listed in CITES Appendix II and classified as Vulnerable by the IUCN Red List assessment.
- *Ravenea rivularis*: commonly known as the majestic palm, which is listed in CITES Appendix II and classified as Vulnerable by the IUCN Red List assessment.

Provisional conclusions

Based on the information available at the time of writing, it appears that *Jubaea chilensis* may meet criteria B and C of Annex 1 in Resolution Conf. 9.24 (Rev. CoP17) for its inclusion in Appendix I.

Proposal 42

Beaucarnea hookeri* and *Beaucarnea glassiana (pony-tailed palms)

Proposal: Inclusion in Appendix II

Proponents: Mexico and Switzerland (Depositary Government)

Provisional assessment by the Secretariat

CITES background

The genus *Beaucarnea* spp. was listed in Appendix II at the 17th meeting of the Conference of the Parties (CoP17; Johannesburg, 2016) (see CoP17 Prop. 50). At the time, the genus listing covered 11 species. Under Resolution Conf. 9.24 (Rev. CoP16), which was the relevant version of the Resolution at the time, the species *Beaucarnea recurvata* qualified for inclusion under Annex 2a, criterion B; while *Beaucarnea compacta, Beaucarnea goldmanii, Beaucarnea gracilis, Beaucarnea guatemalensis, Beaucarnea hiriartiae, Beaucarnea inermis, Beaucarnea pliabilis, Beaucarnea purpusii, Beaucarnea sanctomariana* and *Beaucarnea stricta* qualified under Annex 2b, criterion A.

The two species *Beaucarnea hookeri* and *Beaucarnea glassiana* were not included under the genus listing at CoP17 as they were not taxonomically recognized at that time.

Beaucarnea glassiana was originally named *Calibanus glassianus*, and along with *Beaucarnea hookeri* (previously *Calibanus hookeri*), these were the only two species that made up the genus *Calibanus*. Both species were moved to the genus *Beaucarnea* after molecular (phylogenetic) and morphological evidence demonstrated that both species have a very closely relationship to those contained in the genus *Beaucarnea*, leaving *Calibanus* as a now defunct genus.

As indicated in Summary Record (PC27 SR) of the 27th meeting of the Plants Committee (PC27; Geneva, 2024):

The Plants Committee

a) *agreed that the inclusion of* Beaucarnea hookeri *and* B. glassiana *in a standard nomenclature reference for the genus is a substantive amendment to the current higher taxon listing of the genus, and to invite the Depositary Government, in consultation with Mexico, to assess* Beaucarnea hookeri *and* B. glassiana *with regard to the listing criteria under Resolution Conf. 9.24, and to submit listing proposals to CoP20 for Appendix II in accordance with paragraph 2f) of Resolution 12.11 (Rev. CoP19), as appropriate.*

b) *agreed to recommend for consideration by the 20th meeting of the Conference of the Parties the adoption of Rojas-Pina et al. (2014) as a standard nomenclature reference for the genus* Beaucarnea *spp. in Resolution Conf. 12.11 (Rev. CoP19), and if appropriate, with a note to indicate the exclusion of* Beaucarnea hookeri *and* B. glassiana *from CITES regulations.*

[Rojas-Pina, V., Olsen, M.E., Alvaro-Cardenas, L.O. & Eguiarte, L.E. 2014. Molecular phylogenetics and morphology of Beaucarnea (Ruscaceae) as distinct from Nolina, and the submersion of Calibanus into Beaucarnea. Taxon 63(6): 1193–1211.]

Purpose and impact of the proposal

The proposal seeks to include *Beaucarnea hookeri* and *Beaucarnea glassiana* in Appendix II, in accordance with Article II, paragraph 2(b) of the Convention. If the proposal is adopted, international trade in specimens of these species will be regulated in accordance with the provisions of Article IV of the Convention.

Compliance with listing criteria

Beaucarnea hookeri and *B. glassiana* are two species of pony-tailed palms that are endemic to Mexico. Both species are rare, occur in restricted regions, and have very small populations. *B. hookeri* is distributed in the states of Guanajuato, Hidalgo, Querétaro, San Luis Potosí, and Tamaulipas; and *B. glassiana* in the state of Guanajuato. The supporting statement indicates that there are no population studies for either species but that "both have been reported in very localized locations and in populations with few individuals". Neither species has been assessed by IUCN, but the supporting statement indicates that *B. hookeri i*s officially listed as "Threatened" in Mexico, while *B. glassiana* has not been assessed nationally.

The most notable feature of *B. hookeri* is its caudex or swollen, bulbous base, which resembles an onion or a woody watermelon. This caudex serves as a water storage organ, allowing the plant to survive long periods of drought by storing moisture during the rainy season. The caudex can grow quite large and can be above or partially below ground, depending on the plant's age and growing conditions. In the wild, this plant can reach heights of up to 3 feet (1 meter), while the caudex can grow much larger. In spring or early summer, it produces small, inconspicuous flowers on tall stalks that emerge from the center of the rosette of leaves.

B. glassiana also forms a caudex geophyte that can grow to 60 centimetres or more in areas of tropical deciduous forest and submontane central Mexican matorral in the Sierra Madre Oriental, where it grows on well-drained soil.

This proposal seeks to include *B. hookeri* and *B. glassiana* in Appendix II of CITES, as part of the genus-wide listing of *Beaucarnea* spp. considering the morphological similarities of traded specimens of *Beaucarnea hookeri* and *B. glassiana* to *B. recurvata* and other species of the genus currently listed in Appendix II. The supporting statement states that *Beaucarnea hookeri* and *B. glassiana* display the typical morphological characteristics of the genus in their adult stage (a thick stem, broadened at the base that serves as water storage, as well as linear, elongated leaves), which allow them to be distinguished from *B. recurvata*. However, the seeds and seedlings are indistinguishable to non-specialists in species of this genus and they constitute the main specimens in international trade.

Considering the morphological similarities of traded specimens of *Beaucarnea hookeri* and *B. glassiana* to *B. recurvata* and other species of the genus currently listed in Appendix II, these two species may meet the look-alike criterion for inclusion in Appendix II (criterion A of Annex 2b of Resolution Conf. 9.24 (Rev. CoP17)).

According to the supporting statement, an examination of the CITES Trade Database for trade in specimens of the genus *Beaucarnea* spp. indicates that more than 25 million live specimens, 3,500,000 kilograms of seeds, and 1,387,000 seeds were exported between 2016 and 2025, mainly from artificial propagation for commercial purposes and from *B. recurvata*, *B. guatemalensis*, and *Beaucarnea* spp.

Additional considerations

B. recurvata has most recently been assessed for *The IUCN Red List of Threatened Species* in 2019 when it was categorized as Critically Endangered with a decreasing population trend.

At its 27th meeting (PC27; Geneva, 2024), the Plants Committee agreed to include the Mexican endemic species, *B. hookeri* and *B. glassiana,* in a standard nomenclature reference for the genus (Rojas-Piña et al., 2014). Because these species were not part of *Beaucarnea* at the time of their inclusion in Appendix II, and therefore their international trade is not regulated by CITES, the nomenclature change constitutes a substantive amendment to the current listing of the genus.

Inclusion of these species would not result in a change to the Appendices. If the proposal is not adopted, but Rojas-Pina et al. (2014) is adopted as a standard nomenclature reference for the genus *Beaucarnea* spp. in Resolution Conf. 12.11 (Rev. CoP19), an annotation may be required to indicate that *Beaucarnea hookeri* and *B. glassiana* are not subject to the provisions of the Convention.

There are no details of consultations provided as the two species concerned are Mexican endemics. However, there are *Beaucarnea* species that are found in Belize, El Salvador, Guatemala and Honduras.

Beaucarnea species are well established in cultivation and there is a large amount of trade in artificially propagated plants.

Provisional conclusions

Based on the information available at the time of writing, *Beaucarnea hookeri* and *Beaucarnea glassiana* appear to meet criterion A of Annex 2b) of Resolution Conf. 9.24 (Rev. CoP17) for inclusion in Appendix II.

Note to Parties and proponent

When *Beaucarnea* spp. was listed at CoP17, Mexico indicated that it was working on identification material. It would be useful if Mexico could provide such materials if it is available.

Proposal 43

Commiphora wightii (Guggul)

Proposal: Include in Appendix II.

Proponent: European Union

Provisional assessment by the Secretariat

CITES background

Commiphora wightii is currently not included in the CITES Appendices and this is the first time such a proposal has been submitted.

Purpose and impact of the proposal

The proposal seeks to include *Commiphora wightii* in Appendix II, in accordance with Article II, paragraph 2(a) of the Convention. If the proposal is adopted, international trade in specimens of this species will be regulated in accordance with the provisions of Article IV of the Convention.

Compliance with listing criteria

The inclusion of *Commiphora wightii* in Appendix II based on criteria A and B of Annex 2a of Resolution Conf. 9.24 (Rev. CoP17) is proposed based on an estimated global population decline of > 80% over the past three generations (84 years), due to unsustainable harvest for oleo-resin (a gum containing guggulsterones used in Ayurvedic, Unani and Siddha traditional systems of medicine as an antiseptic and to treat ailments such as arthritis, rheumatism, high cholesterol and diabetes) compounded by habitat loss and fragmentation due to among others agriculture expansion, infrastructure development, mining and urbanization.

According to the supporting statement the species is vulnerable to overexploitation due to its life history characteristics, including slow growth rate (reaches 3 – 3.5 m after 8 – 10 years), relatively low dispersal ability and poor germination rates (based on studies quoted in the supporting statement), as well as the destructive methods used to harvest its gum. These methods, which may ultimately result in plant death, include the application of gum suspensions containing pathogenic *Xanthomonas* bacteria to tapping cuts, the use of chemicals to increase gum yields such as ethephon and excessive tapping, chopping and lopping.

Commiphora wightii is a perennial shrub or small tree native to India, Pakistan and Oman. It is associated with semi-arid to arid open and hilly habitats and has an estimated extent of occurrence of 20,000-22,000 km^2 and an estimated area of occupancy of just 2000-2200 km^2 in India and Pakistan. According to the supporting statement no global population estimate is available for *C. wightii*, very little information is available relating to the population structure, and while limited population monitoring data were obtained for Rajasthan (India), no quantitative population trends for the species in Pakistan could be found and the CITES Management Authority of Oman informed the proponent that the *C. wightii* population in Oman was stable with no significant declines observed. The proponent also indicates that although no management plans could be located for *C. wightii*, initiatives and projects are underway to develop non-lethal resin extraction methods in India and to assess the distribution, population status and ecology of the species to inform recommendations to promote the long-term sustainability of harvest.

Smaller-scale studies of the species abundance and density conducted in India are referred to by the proponents. One study reports an estimated average population density for *C. wightii* of 21.9 plants/ha across Rajasthan based on 2,431 sampling plots measuring 0.09 ha (30m^2) across 141 forest blocks in Rajasthan (the year(s) of surveys was not specified). According to another study based on 52 sampling plots measuring 0.04 ha (400 m^2) each over 26 sites in Rajasthan, an estimated average density of 40 plants/ha were found in the mountainous zone and 25 plants/ha in the desert zone of Rajasthan. In the district of Kachchh in Gujarat, India, an average *C. wightii* density of approximately 49 plants/ha is

estimated based on 286 plots each measuring 0.1 ha (1000 m^2), with highest densities reported in undulating and hilly areas (127 plants/ha) and lowest densities (16.9 plants/ha) closer to the coast.

The species was assessed for the IUCN Red List as Critically Endangered in 2014 and needs updating. The Secretariat notes that the range description used in the IUCN Red List assessment does not include Oman: "The global distribution of *Commiphora wightii* is restricted to dry regions of western India and adjoining regions of Pakistan".

According to the supporting statement, surveys conducted in Rajasthan (India) indicated that the density of *C. wightii* across 12 locations (5 protected and 7 unprotected) in four districts declined from 1999 to 2013 and the species has disappeared from one site. Fourteen sub-populations of Rajasthan were considered to be declining due to unsustainable harvest of oleo-resin. The proponent states that large declines in production rates of *C. wightii* oleo-resin in India have also been suggested to be indicative of declines in the species' population based on several secondary sources of data, including "guggul' gum production data obtained from the Gujarat State Forest Development Corporation Limited that indicated a decline from 9.9 tons produced in 2008-2009 compared to 1.6 tons in 2012-2013. Historic figures provided by the proponent as reported by the Kachchh forestry department in Gujarat reported a decline in guggul gum collected from 30 tonnes in 1963 to 2.42 tonnes in 1998. According to Cunningham *et al*., 2018 large quantities of *C. wightii* oleo-resin (around 505 tons / year) are imported into India from Pakistan. An estimated 193 tons / year of crude gum equivalent is exported from India in the form of processed products.

The proponent states that according to the National Medicinal Plants Board of India, the estimated annual trade in *C. wightii* oleo-resin, stems and roots is 1000-2000 metric tonnes, but the proponent notes several uncertainties associated with this figure. Based on export data from Zauba Technologies & Data Services Pvt Ltd provided in the supporting statement, India's export of *C. wightii* oleo-resin extract was estimated at 27.5 tonnes in 2014 (it is possible a proportion of this trade represents re-exports). Using a conversion factor of 7:1 (w/w[32]) based on an average of reported drug-to-extract ratios in the wider literature, this was suggested to represent approximately 192.5 tonnes raw oleo-resin.

With regard to legal instruments, *C. wightii* is not included in India's Wildlife Protection Act (1972) as a protected species, but the Rajasthan State Biodiversity Board included *C. wightii* both in the state's list of rare, threatened and endangered plant species and in the list of 'critically endangered plant species of economic value'. The CITES Management Authority (CITES MA) of India informed the proponent that harvest of *C. wightii* was possible with permission from the Rajasthan Forest Department and destructive resin tapping was strictly prohibited, but that "in practice, harvesting from wild populations is highly restricted or prohibited". A Public Notice published in 1994 prohibited the export of *C. wightii* obtained from the wild (including its derivatives and extracts) (Public Notice No. 47 (PN)/92-97). However, the CITES MA of India informed the proponent that while the export of raw *C. wightii* resin was prohibited, export of processed products was permitted and "encouraged", creating some uncertainty whether the prohibition on derivatives and extracts established by Public Notice No. 47 (PN)/92-97 remains in effect.

In Pakistan *C. wightii* does not appear to have specific legal protection from harvest or trade. The protection of wildlife in Pakistan is mainly administered at the provincial level. In Sindh Province, *C. wightii* was declared a protected species in March 2024, in accordance with the Sindh Wildlife Protection, Preservation, Conservation and Management Act of 2020. The Secretariat reached out to the CITES MA of Pakistan to request clarification whether the measure prohibits or regulates the harvest of *C. wightii* gum through permitting or licensing provisions. The CITES MA of Pakistan confirmed that the measure prohibits the harvest, extraction and trade in *C. wightii* in any form in the province. No information on national legislation for *C. wightii* could be located for Oman.

The supporting statement notes a lack of available data to quantify illegal trade in *C. wightii but* suggests possible ongoing illegal export and clandestine tapping in protected forests in India. It also reports two large seizures of gum in Pakistan in 2024 following the designation of *C. wightii* as a protected species in Sindh Province. The seizures included 18 tonnes intended for export to the United Arab Emirates and 500 kg destined for Sri Lanka.

[32] 'weight in weight'; the concentration of a substance in a mixture, expressed as a ratio of the weight of the substance to the weight of the mixture.

Information relating to the cultivation of *C. wightii* as well as challenges associated with cultivation is included in the supporting statement. Cultivation has been recognized as essential for the conservation of the species and several cultivation projects have been initiated in India, including *C. wightii* saplings planted by the Medicinal Plants Board in Kachchh, Gujarat across 250 hectares in 2018-2019; 1,000 hectares in 2019-2020, 300 in 2022-2023; and 300 hectares planned for 2023-2024. A total of 70 000 saplings have been planted by the Gujarat Institute of Desert Ecology (GUIDE) in the State Medicinal Board Garden in Kachchh since 2015. The Indian government provides subsidies to promote the cultivation of traditionally important medicinal plants and *C. wightii* is included in the list of plants eligible for the highest available subsidy of 75%. While the CITES MA of India confirmed to the proponent that research was being conducted to promote large-scale cultivation and several state-level initiatives have been developed to reduce reliance on wild populations, the success of these initiatives remains unclear.

The Secretariat notes that according to Cunningham *et al*., 2018[33], some cultivation initiatives in India date back over 40 years and the Rajasthan government started a project that aims to have 1,700 ha of *C. wightii* under cultivation, aiming to raise about 500,000 *C. wightii* saplings for distribution to nurseries in 32 districts in Rajasthan. In the Kachchh area of Gujarat, the Indian National Medicinal Plants Board (New Delhi) initiated a *C. wightii* cultivation project in a 500 to 800 ha area (Kulhari *et al*., 2014[34]).

According to the supporting statement *C. wightii* gum was reported to be difficult to distinguish morphologically from oleo-resins of other species, both within and outside the genus. Natural oleo-resins of other species that are commonly in international trade include myrrh (*Commiphora* spp.) and frankincense (*Boswellia* spp.); neither of these genera are currently listed in the CITES Appendices. Identification of oleo-resins generally requires the use of chromatography, e.g. high-performance liquid chromatography (HPLC) and thin-layer chromatography (TLC). The presence of guggulsterones (a plant steroid) in *C. wightii* distinguishes the gum of this species from others in the genus.

The proponents indicate that resins of *Boswellia* spp. were reported to be commonly mixed with other *Commiphora* species (PC25 Doc. 25), and in response to Notification 2020/010 and its Annex on *Questionnaire on Boswellia trees* (*Boswellia* spp.), India indicated that *B. ovalifoliolata* was used as a substitute for gum extracted from *C. wightii* (PC25 Inf. 7). Other known adulterants of *C. wightii* include *B. serrata* gum ("salai guggul gum"), *Hymenodictyon excelsum* and *C. myrrh.*

The gum of *C. roxburghii* was reportedly also sold under the "guggul" trade name according to the proponent. The aroma of the gum of *C. wightii* and *B. serrata* is reportedly similar, and the adulterated gum of these species is considered difficult to detect based on morphology alone. However, as described above, the gum of these species can be distinguished using HPLC and TLC methods.

It seems enforcement officials may experience some difficulties identifying the species based on the specimens in trade and the proponent states that it is unclear whether identification is feasible for non-experts or trained customs officers.

In assessing the species against criteria A and B of Annex 2a of Resolution Conf. 9.24 (Rev. CoP17), the information contained in the supporting statement indicate that the wild population of *C. wightii* experienced an estimated global population decline of > 80% over the past three generations (84 years) (a marked decline based on the guidance in Annex 5 to the Resolution), due to unsustainable harvest for oleo-resin compounded by habitat loss and fragmentation due to among others agriculture expansion, infrastructure development, mining and urbanization. The species is also vulnerability to extrinsic factors (including methods of gum harvesting). The harvest of the oleo-resin for the international trade impact the species and regulation of this activity and international trade in specimens of the species may be warranted to ensure the harvest does not threaten the survival of the species in the wild.

[33] Cunningham, A.B., Brinckmann, J.A., Kulloli, R.N. and Schippmann, U., 2018. Rising trade, declining stocks: The global gugul (Commiphora wightii) trade. *Journal of ethnopharmacology*, *223*, pp.22-32.
[34] Kulhari, A.L.P.A.N.A., Sheorayan, A.R.U.N., Singh, R.O.H.T.A.S., Dhawan, A.K. and Kalia, R.K., 2014. Survey, collection and conservation of Commiphora wightii (Arn.) Bhandari-an important medicinal plant heading towards extinction. *Indian Forester*, *140*(12), pp.1171-1183.

Additional considerations

At its 20th meeting (CoP20, Samarkand, 2025) the Conference of the Parties will consider document CoP20 Doc. 94 on *Boswellia trees (*Boswellia *spp*.) submitted by the Plants Committee. Reports considered by the Plants Committee in the implementation of Decisions 19.241 and 19. 242 on *Boswellia trees* (Boswellia spp.) includes reference to *Commiphora* species (PC25 Doc. 25; CoP19 Inf. 10 (Rev.1); PC26 Doc. 28.1 and 28.2).

The proponent consulted range States affected by the proposal and the responses are included in Annex 1 to the supporting statement. Although the proponent reached out to Bangladesh and Nepal, no responses were received and these countries are not confirmed as range States for the species.

The Secretariat requested the nomenclature specialist of the Plants Committee for advice relating to the distribution of the species and it seems the distribution of the species is uncertain. According to the nomenclature specialist *C. wightii* has been shown to occur in India, Pakistan and Oman, but there are unsubstantiated reports of its presence in Bangladesh and Nepal in the literature with no concrete proof (e.g., no herbarium records) and the possible occurrence of the species in these countries need to be further investigated. The nomenclature specialist advised that until evidence is found to extend the distribution range of *C. wightii*, it should be regarded as occurring in India, Pakistan and Oman.

The proponent indicates that Kew's Plants of the World Online (POWO) is followed in the proposal and supporting statement and the nomenclature specialist of the Plants Committee informed the Secretariat that the following time-stamped extract from POWO will be proposed by the nomenclature specialist for adoption as a standard nomenclature reference:

> POWO. (2025). *Commiphora wightii*. World Checklist of Vascular Plants. Facilitated by the Royal Botanic Gardens, Kew. Published on the Internet; https://powo.science.kew.org/ Retrieved 29 July 2025.

Provisional conclusions

Based on the information available at the time of writing, it appears that *Commiphora wightii* meets criteria A and B in Annex 2a to Resolution Conf. 9.24 (Rev. CoP17) for its inclusion in Appendix II.

Notes to the Parties

Information from range States relating to current legislative provisions, the status of cultivation initiatives and the source of the specimens in trade could be helpful to inform the final assessment.

Proposal 44

Euphorbia bupleurifolia (Bupleurifolia spurge)

Proposal: Transfer from Appendix II to Appendix I.

Proponent: South Africa

Provisional assessment by the Secretariat

CITES background

Euphorbia bupleurifolia was included in CITES Appendix II in 1975 under the genus listing *Euphorbia* spp.

The genus listing has been the subject of several proposals to include and amend an annotation applicable to *Euphorbia* species, which was initially annotation #1 but was amended to annotation #4 at the 15th meeting of the Conference of the Parties (CoP15; Doha, 2010) (see CoP9 Prop. 76 and Prop. 77, CoP10 Prop. 68, CoP13 Prop. 38 (Rev. 1) and CoP13 Prop. 39 (Rev. 1), CoP14 Prop. 29, CoP15 Prop. 25). Proposals to amend annotation #4 were adopted at the 17th meeting of the Conference of the Parties (CoP17; Johannesburg, 2016)(CoP17 Prop. 53) and the 19th meeting of the Conference of the Parties (CoP19; Panama City, 2022) (CoP19 Prop. 43).

The current Appendix II listing for *Euphorbia* spp. covers "Succulent species only except *Euphorbia misera* and the species included in Appendix I" and is subject to annotations P2 and #4.

Purpose and impact of the proposal

The proposal seeks to transfer *Euphorbia bupleurifolia* from Appendix II to Appendix I. If the proposal is adopted, international trade in specimens of this species will be regulated in accordance with the provisions of Article III of the Convention.

If *E. bupleurifolia* is included in Appendix I, nurseries artificially propagating the species for commercial purposes would need to be registered with the Secretariat in accordance with Resolution Conf. 9.19 (Rev. CoP15) on *Registration of nurseries that artificially propagate specimens of Appendix-I plant species for export purposes.*

Compliance with listing criteria

The supporting statement suggests that inclusion of *E. bupleurifolia* in Appendix I satisfies criterion A (i) and (ii), criterion B (iv), and criterion C (i) and (ii) in Annex 1 of Resolution Conf. 9.24 (Rev. CoP17)

E. bupleurifolia is long-lived, attractive and extremely slow growing dwarf succulent plant that is endemic to South Africa. The species does not occur continuously across the landscape and is instead confined to pockets of microhabitats with high bare ground cover and lower levels of vegetation biomass where there is very little shade. Seedling growth is rapid during the initial years of development and slows down significantly as the plant ages. The species regenerates from seed produced by reproductive individuals between winter and early summer. Plants produce up to three seeds per fruit capsule and the ballistic mode of dispersal is generally limited to short distances. Recruitment is episodic, and no succulent *Euphorbia* species are known to maintain persistent seed banks.

Based on Mhlongo and Pfab (2022), the national conservation status of *E. bupleurifolia* was upgraded from Least Concern to Critically Endangered, with a decreasing population trend, under South Africa's Threatened or Protected Species (TOPS) regulations. This assessment was owing to a notable population size reduction brought on by ongoing high levels of exploitation as well as a decline in the species area of occupancy, extent of occurrence and habitat quality over the years. The extent of occurrence (EOO) was estimated to be around 64,496 km^2, while the area of occupancy (AOO) is estimated to be only 132 km^2 spread across fragmented subpopulations in KwaZulu-Natal and the Eastern Cape provinces in South Africa. Mhlongo and Pfab (2022) determined that the species "has experienced a reduction of at least 97% since 1975 due to illegal collecting for the specialist succulent

trade and the traditional medicine trade. This decline level is estimated based on the reported number of plants exported for the horticultural trade and on those suspected to have been harvested for trade in muthi markets relative to the number of plants remaining in the wild as determined by extensive surveys across this species' distribution in 2018. About 40% of suitable habitat has been lost (calculated using Geographic Information System (GIS)), mostly due to infrastructure developments, mining, and agriculture. Ongoing loss of individuals due to trade and habitat loss is likely to cause at least a further 10% decline in the population by 2035."

Concerning criterion A, the supporting statement indicates that the population of *E. bupleurifolia* is very small, with an estimate of less than 2,500 mature individuals, based on the best available information. A total of just 1,724 plants were counted during systematic field surveys in 2018 in 31 known historical localities across the species' distribution. Plants were only found in nine of the 31 known localities surveyed, representing less than 30% of the historical localities recorded for *E. bupleurifolia*, with subpopulations varying in size from one plant to 675 individuals; six of the subpopulations comprised less than 100 plants each; two of the surveyed subpopulations comprised more than 500 plants each. There is anecdotal information to suggest that the plants are more common than ascertained during these surveys, with several additional subpopulation localities recently identified and at least one extant subpopulation not yet surveyed.

The information presented in the supporting statement differs slightly from that presented in Mhlongo and Pfab (2022), which states that "Between 10 and 36 subpopulations are likely to be extant based on extensive surveys undertaken across this species range in 2018. Of the 39 historic records, 17 could not be relocated, which indicates that at least 43% of historically recorded subpopulations have been lost. Field surveys in 2018 indicate that between 2,460 and 2,658 mature individuals are likely extant." Nevertheless, it is clear that the targeted field surveys conducted in 2018 support the determination that the population is small.

Concerning criterion B, distances between the nearest neighbouring populations are 8 km, thus the distribution is considered to be highly fragmented, particularly in light of the method of seed dispersal being limited to short distances. There is also a recorded decrease in the number of subpopulations and the number of individuals as evidenced by the fieldwork carried out in 2018.

Concerning criterion C, the proponent states that the population is inferred to have experienced a decline of 97% since 1975, which is within a three-generation time period for this species (generation length 20 years). This was based on the determination that over 70,000 plants have been exported from South Africa since 1975, nursery audits indicating that 98% of these have evidence of being of wild origin, and a further 5 to 10 thousand individuals are suspected to have been harvested for local medicinal use. In addition, based on Mhlongo and Pfab (2022), about 40% of suitable habitat has been irreversibly lost (calculated using GIS), mostly due to infrastructure developments, mining, and agriculture and ongoing loss of individuals due to trade and habitat loss is likely to cause at least a further 10% decline in the population by 2035. The proponent states that "less than 5% of the remaining subpopulations occur within some type of protected area", however, Mhlongo and Pfab (2022) indicate that the species is conserved in three nature reserves, while one subpopulation occurs on a timber plantation.

Collection for international and local horticultural markets, as well as the local traditional medicine markets, are identified as significant threats to the conservation of the species in the wild. It is suspected that large scale laundering of wild specimens is occurring into the legal trade to supplement shortfalls in supply, especially to meet the demand for large specimens. Mhlongo and Pfab (2022) reported that nursery audits conducted in 2018 found over 8,600 plants in cultivation, with approximately 98% of them having distinctively wild characteristics, suggesting a wild collection of plants. The proposal reports that over 3,500 illegal specimens were seized from one nursery alone. None of the nurseries were able to produce clearly marked, legally acquired parental stock. Whilst three nurseries had only juvenile plants on site, *E. bupleurifolia* plants at two of the nurseries (which had most of the plants) were mostly large with distinctive wild features including high degrees of variation in sizes, irregular shaped stems and growth forms, evident animal damage as well as lichen growth along the stems. Legislative protection for the species is weak and habitat conservation poor, while there is no management or monitoring of the wild population. The proponents express the view that "increased regulation through an Appendix I listing would assist by ensuring trade is limited to bona fide artificially propagated plants." Listing in Appendix I would prohibit all commercial trade in wild-sourced specimens internationally, allow only

trade in certified, artificially propagated plants, creating a stricter verification process, reduce laundering risks via improved scrutiny under stricter permitting.

An examination of the CITES Trade Database by the Secretariat for the period 2000 to 2023 for direct exports from South Africa (data extracted on 26 July 2025) indicates that trade is reported under several specimen types including live, seeds, stems and dried plants; but is almost exclusively reported as artificially propagated specimens. The total number of live plants traded during this time was 58,833 plants as reported by exporter and 50,022 plants as reported by importer. South Africa also reported the export of 410 artificially propagated seeds. The main importers include Belgium, Germany, Spain, Japan, Thailand and the United States of America.

In conclusion, *E. bupleurifolia* has a small wild population that has undergone an observed marked decline in both the number of individuals and area of distribution owing to unsustainable levels or patterns of exploitation for the international horticultural trade.

Additional considerations

The supporting statement indicates that there are at least five nurseries in South Africa known to be involved in the cultivation and trade of *E. bupleurifolia*.

An analysis of the CITES trade database indicates that the species is widely cultivated with artificially propagated specimens being traded from several non-range States.

Provisional conclusions

Based on the information available at the time of writing, *Euphorbia bupleurifolia* appears to meet criterion A i) in Annex 1 to Resolution Conf. 9.24 (Rev. CoP17) for its inclusion in Appendix I.

Proposal 45

Afzelia bipindensis (Red doussie)

Proposal: Delete the populations of Cameroon, the Central African Republic, Congo, the Democratic Republic of the Congo, Equatorial Guinea and Gabon from Appendix II.

Proponent(s): Burundi, Cameroon, Central African Republic, Congo, Democratic Republic of the Congo, Equatorial Guinea, Gabon

Provisional assessment by the Secretariat

CITES background

At the 19th meeting of the Conference of the Parties (CoP19; Panama City, 2022) proposal CoP19 Prop. 46 to include African populations of Afzelia spp. in Appendix II with annotation #17 (Logs, sawn wood, veneer sheets, plywood and transformed wood) was adopted. Proposal CoP19 Prop. 46 indicated that *Afzelia africana, A. bipindensis, A. pachyloba* and *A. quanzensis* satisfied criterion B of Annex 2a of Resolution Conf. 9.24 (Rev. CoP17) and all other African populations of the genus *Afzelia* satisfied criterion A of Annex 2b of Resolution Conf. 9.24 (Rev. CoP17).

Purpose and impact of the proposal

The proposal seeks to delete the populations of *A. bipindensis of* Cameroon, the Central African Republic, Congo, the Democratic Republic of the Congo, Equatorial Guinea and Gabon from Appendix II.

If the proposal is adopted, international trade in logs, sawn wood, veneer sheets, plywood and transformed wood of this species originating from Cameroon, the Central African Republic, Congo, the Democratic Republic of the Congo, Equatorial Guinea and Gabon will not be regulated in accordance with the provisions of the Convention. The species will be retained in Appendix II with annotation #17 for all other African populations and continue to be regulated in accordance with Article IV of the Convention.

Compliance with listing criteria

The supporting statement suggests the deletion of the populations of Cameroon, the Central African Republic, Congo, the Democratic Republic of the Congo, Equatorial Guinea and Gabon from CITES Appendix II as they do not meet criterion B of Annex 2a or criterion A of Annex 2b of Resolution Conf. 9.24 (Rev. CoP17). The proponents do not refer to the precautionary measures in Annex 4 of the same Resolution that state in paragraph 4 that “No species should be deleted from Appendix II if such deletion would be likely to result in it qualifying for inclusion in the Appendices in the near future”.

According to the supporting statement, updated information on *Afzelia bipindensis* shows that the species is subject to strict management in Central Africa, harvesting remains below the volumes authorized by management plans, minimum exploitable diameters are systematically greater than the fruiting diameter of the species, natural regeneration is satisfactory, and robust traceability systems are in place.

With regards to the potential confusion between species of the genus *Afzelia*, the proponents indicate that manufactured products (logs, sawn wood, veneer sheets, plywood and transformed wood) of *A. bipindensis* can be distinguished from those of other species based on anatomical and technological characteristics and with the help of available identification tools. According to the proponents, clear commercial classification in the timber industry that distinguishes between *A. bipindensis* (“doussié”), *A. pachyloba* (“pachyloba”) and *A. africana* (“lingué”) is in place and recognized by operators to avoid confusion in the market. Furthermore, the traceability systems used in Central African countries ensure a strict monitoring of the forest products exported.

Afzelia bipindensis, a species sought after for its aesthetic and mechanical qualities, is harvested in the Congo Basin, mainly for export, particularly to European markets. It is a non-pioneer species that can

reach a height 40 m with a diameter of 1.5 m. As a leguminous plant, it enriches the soil in nitrogen through symbiosis with nitrogen-fixing bacteria contained in root nodules, thus promoting regeneration of other woody species. The IUCN Red List Assessment categorized *A. bipindensis* as Vulnerable in 1998 but needs updating. The Secretariat notes that the assessment was based on an African Regional Workshop that took place in 1996 and the details relating to the justification for the assessment is not available on the IUCN Red List website.

The proponents state that the implementation of management plans in forest concessions and regional initiatives such as the DYNAFAC[35] collective (that includes devices established in the region for research purposes over 40 years ago) has enabled the accumulation of data in a robust database on the distribution of commercial species, including *A. bipindensis*, contributing to a better understanding of its population dynamics. The first data syntheses revealed a population structure with the shape of an exponentially decreasing curve, typical of a good regeneration potential, with a considerable representation of small diameter classes. According to the supporting statement this structure is observed in managed forest concessions where species are regularly inventoried.

Although it is difficult to accurately estimate the population size of *A. bipindensis* due to its large geographic distribution (area of occupancy (AOO) estimated at 560 km², and area of distribution (EOO) at over 5,730,000 km²) inventories made in 76 forest management units (FMUs) covering a total area of 17.2 million hectares in five Central African countries - Cameroon (21), Central African Republic (4), Democratic Republic of Congo (13), Gabon (31) and Republic of Congo (7) provide reliable estimates according to the proponents. In sustainably managed concessions, the mean stem density of *A. bipindensis* with a diameter at breast height (DBH) ≥ 20 cm is 0.13 stems/ha, indicating a moderate abundance among commercially exploited timber species. Extrapolating the density of 0.13 stems/ha to all the region's production forests, the total population of mature individuals is estimated by the proponents at over 2,262,000. Simulations projected over a 100-year period, incorporating the species' ecological and silvicultural parameters, estimate a population decrease of just 2.4%, well below the 30% threshold defined by the IUCN to categorize a species as Vulnerable.

The proponents assert that these results confirm the current low level of threat to *A. bipindensis* in the wild, while highlighting the importance of maintaining rigorous sustainable management practices. They indicate that *A. bipindensis* is not harvested in protected areas, which cover a significant proportion of the permanent forest estate[36]. According to the proponents, the progressive implementation of management plans, underpinned by monitoring, make it possible to reconcile exploitation and conservation.

According to the supporting statement, the forest concessions in Central Africa have been managing *A. bipindensis* on the basis of robust principles: prior floristic inventories, long rotations of 25 to 30 years, compliance with a minimum logging diameter (often ≥ 70 cm) greater than the regular fruiting diameter (~50 cm), conservation of seed trees and stand monitoring. In this context, only 1 to 2 individuals per hectare (all species combined) are generally removed, thus preserving the species' natural regeneration capacity.

The supporting statement indicates that *A. bipindensis* is "mainly threatened by illegal exploitation of its timber, appreciated for its durability, its natural resistance to xylophagous insects and its dimensional stability". According to a regional study conducted by the African Development Bank, referred to by the proponents, “40-50% of the timber harvested in the region still escapes formal channels, fueling a significant informal economy”. These volumes are mainly destined for the local market, which has little interest in *A. bipindensis,* according to the proponent. The Secretariat did not find any records of seizures in the CITES Illegal Trade Database (accessed on 3 July 2025). Information relating to measures implemented to address illegal trade will be helpful to inform the final assessment.

Other threats to the species include deforestation associated with slash-and-burn agriculture, urbanization and mining, which lead to degradation or progressive loss of forest habitat. These dynamics are particularly concerning in areas outside forest concessions or protected areas. The proponents state that the observed habitat losses (the total area of evergreen and semi-deciduous forests in Central Africa was estimated at around 200 million hectares, of which more than 184 million

[35] https://www.dynafac.org/fr/p/130/installation-de-dispositifs-de-suivi-de-la-dynamique-forestiere

[36] The permanent forest estate includes protected areas and forest concession areas according to the supporting statement.

were still relatively intact) have a relatively limited impact on *A. bipindensis* populations in the wild in Central Africa, due to the relative stability of forests, the presence of the species in protected areas and the legal framework for its exploitation in production forests.

Information relating to the legal trade in *A. bipindensis* is provided in the supporting statement. The proponents state that since its inclusion in Appendix II, the export of *A. bipindensis* has been subject to a strict regulatory framework governing its international trade, including non-detriment findings to be obtained from the respective Scientific Authorities and the issuance of export permits. It is not clear whether all range States affected by the proposal have prepared non-detriment findings, and the Secretariat notes that national quotas have been established by some of the proponents for 2023 (Cameroon: 21,468.81 m^3; Equatorial Guinea: 4,000 m^3), 2024 (Cameroon: 22,872.75 m^3; Congo: 113,731 m^3; DRC: 25,000 kg) and 2025 (Congo: 27,357.738 m^3; DRC: 5,848 m^3; Equatorial Guinea: 3,000 m^3).

In 2023, legal exports declared in Central Africa amounted to around 6,330 m^3, mainly sawn timber and, to a lesser extent, logs. The main exporters were Cameroon, the Republic of Congo and the Democratic Republic of Congo.

The supporting statement includes details relating to the legal instruments used by the proponents to regulate the sustainable management of forest resources and the protection of biodiversity. According to the proponents the legislation provides forestry and environmental framework laws, supplemented by decrees, orders and technical standards governing logging methods, management plans and harvesting quotas. Several countries in the sub-region have implemented traceability and legality verification tools (e.g. GIS systems, barcodes, electronic registers, etc.) enabling rigorous control of timber flows, from felling to export. The proponents contends that these systems make a significant contribution to limiting the risks of illegal or unsustainable trade, but it is not clear whether these tools were adopted by all the proponents and detailed information relating to the systems are not provided.

The proponents indicated that although there is no specific monitoring program dedicated exclusively to *A. bipindensis*, the monitoring of natural populations is an integral part of the sustainable management obligations of forest concessions. Management plans provide for the periodic updating of silvicultural data, in particular through inventories of annual felling plots. In addition, permanent monitoring plots have been set up in several concessions, making it possible to document growth, mortality and regeneration dynamics.

Unlike other species of the same genus that are in great demand in other parts of Africa, such as *Afzelia africana* or *Afzelia quanzensis*, international trade in *A. bipindensis* in Central Africa has remained moderate and relatively stable in recent years according to the proponents. This is due to the fact that the majority of harvesting takes place within the framework of managed forest concessions, where exploitation is strictly regulated by approved management plans.

The proponents state that other than the CITES provisions there is currently no additional specific measures to regulate the cross-border movement of *A. bipindensis*, but they are of the view that the existing systems underpinned by robust regulatory frameworks and management systems provide adequate control in terms of legality and traceability and compliance of exports. Additional information relating to the traceability systems and confirmation that all the range States are effectively implementing these would be helpful to inform the final assessment of the proposal.

Taxonomic and commercial similarity between *A. bipindensis* and the following species in the same genus: *A. africana, A. bella* and *A. pachyloba* has led to confusion during forest inventories, particularly in the field, but according to the supporting statement several studies have shown that *A. bipindensis* can be clearly differentiated, both by specific morphological characters (e.g., its medium-sized, opposite leaflets, compressed seeds with a red bilobed aril and granular bark with a strong odour) and by distinct chemical signatures detected via mass spectrometry. It is not clear whether the uncertainties relating to identification have been resolved in terms of carrying out inventories and monitoring. No identification materials are provided and further information relating to whether enforcement authorities who encounter specimens of CITES-listed species are likely to be able to distinguish between the species is not include in the supporting statement.

The proponents also indicate that a recent study has clarified the commercial classification of *A. bipindensis* to reflect the technological differences observed between the wood of these species and to improve traceability and sustainable management of the species.

In terms of paragraph A 4 of Annex 4 of Resolution Conf. 9.24 (Rev. CoP17) "No species should be deleted from Appendix II if such deletion would be likely to result in it qualifying for inclusion in the Appendices in the near future". The Secretariat notes that the proponents implement control measures as part of the forest management plans and that forests in the sub-region are managed based on fundamental principles that align with the principles in Resolution Conf. 16.7 (Rev. CoP17) on *Non-detriment findings.* It is clear that significant steps have been taken by the proponents to ensure sustainable forest management and sustainable harvest and trade with traceability and monitoring systems in place. Further information on the traceability systems and measures implemented by the Parties proposing the deletion of their populations of *A. bipindensis* to address illegal harvest and illegal trade would be helpful to inform the final assessment.

Based on information provided in the supporting statement, concerns relating to the similarity between *A. bipindensis* and *A. africana, A. bella* and *A. pachyloba* have been resolved but additional information is needed to determine whether criterion A in Annex 2b of Resolution Conf. 9.24 (Rev. CoP17) is still met. Information relating to the access of enforcement authorities to the tools to be used for identification and the provision of further details relating to the means to distinguish between the species will be helpful. The proponents should indicate if identification materials are available to be shared.

Additional considerations

The proponents indicated that as soon as all the African populations of *Afzelia bipindensis* were listed in CITES Appendix II at CoP19, the range States of the Central African populations of the species initiated the process to prepare the proposal with the aim of removing their *Afzelia bipindensis* populations from Appendix II. The other Central African countries (Burundi, Rwanda, Sao Tome and Principe and Chad) were consulted, but the details relating to their responses are not provided.

The Secretariat notes that the proposal does not include the populations of Angola, Côte d'Ivoire, Nigeria and Uganda, resulting in a split-listing of the species. Based on the guidance in Annex 3 to Resolution Conf. 9.24 (Rev. CoP17), when split-listing does occur, this should generally be on the basis of national or regional populations and split-listings that place some populations of a species in the Appendices and the rest outside the Appendices should normally not be permitted. It also seems the proponents only consulted range States in Central Africa and not the range States in West and Eastern Africa.

Document CoP20 Doc. 110 on *Standard nomenclature* indicates that *Afzelia* spp. is amongst the group of taxa indicated as priorities for production of standard nomenclature references. The nomenclature specialist of the Plants Committee proposed the following time-stamped extract from Kew's Plants of the World Online (POWO) for adoption as a standard nomenclature reference while the Plants Committee undertake further work on this matter during the next intersessional period:

> POWO. (2025). African populations of *Afzelia* spp. World Checklist of Vascular Plants. Facilitated by the Royal Botanic Gardens, Kew. Published on the Internet; https://powo.science.kew.org/ Retrieved DATE 2025.

The Secretariat consulted the nomenclature specialist of the Plants Committee on the distribution of *A. bipindensis* especially with reference to Equatorial Guinea who was not listed as a range State in the CoP19 proposal (CoP19 Prop. 46). The nomenclature specialist indicated that the *Flora de Guinea Ecuatorial*, Volume 5, confirms that this species (as well as *A. africana*, *A. bella*, *A. pachyloba*) is present in Equatorial Guinea. The nomenclature specialist liaised with the POWO editors to amend the distribution of these species accordingly to ensure that the proposed standard nomenclature reference is accurate.

Provisional conclusions

Based on the information available at the time of writing, it appears that the populations of *Afzelia bipindensis* of Cameroon, the Central African Republic, Congo, the Democratic Republic of the Congo,

Equatorial Guinea and Gabon do not meet criteria A or B of Annex 2a of Resolution Conf. 9.24 (Rev. CoP17), but more information is needed to inform the assessment relating to criterion A in Annex 2b of the same Resolution.

Notes to proponents

Further information relating to the following matters raised in the provisional assessment could inform the final assessment:

- traceability systems used by the proponents;
- alternative mechanisms to control the cross-border movement of *Afzelia bipindensis* specimens, detect illegally sourced specimens and to address illegal harvest and trade;
- identification challenges identified in the supporting statement – information on how these have been accounted for in inventories and monitoring systems; and
- information on access by enforcement authorities to the species identification tools to be used to distinguish between *Afzelia bipindensis* and other species in the same genus.

Proposal 46

Paubrasilia echinata (Brazilwood)

Proposal: Transfer from Appendix II to Appendix I.

Proponent: Brazil

Provisional assessment by the Secretariat

CITES background

The species was originally listed as *Caesalpinia echinata* based on a proposal submitted by Brazil for consideration at the 14th meeting of the Conference of the Parties (CoP14; The Hague, 2007) (CoP14 Prop. 30) and amended to include an annotation (CoP14 Com. I Rep. 6 (Rev. 1): Annotation #10 – Logs, sawn wood, veneer sheets, including unfinished wood articles used for the fabrication of bows for stringed musical instruments [CoP14 Com. I Rep. 10 (Rev. 1)].

Caesalpinia echinata, became a synonym of *Paubrasilia echinata* in 2019, following taxonomic changes adopted at the 18th meeting of the Conference of the Parties (CoP18; Geneva, 2019).

At its 19th meeting (CoP19; Panama City, 2022), the Conference of the Parties considered a proposal to transfer *Paubrasilia echinata* from Appendix II to Appendix I submitted by Brazil (CoP19 Prop. 49). *Paubrasilia echinata* was maintained in Appendix II with the following annotation which replaced Annotation #10 agreed at CoP14: *All parts, derivatives and finished products, except re-export of finished musical instruments, finished musical instrument accessories and finished musical instrument parts*. A number of decisions were also adopted CoP19 Com. I. Rec. 16 (Rev. 1).

Purpose and impact of the proposal

The proposal seeks to transfer *Paubrasilia echinata* from Appendix II to Appendix I in accordance with Article I of the Convention. If the proposal is adopted, international trade in specimens of this species will be regulated in accordance with the provisions of Article III of the Convention.

If *Paubrasilia echinata* is included in Appendix I, nurseries artificially propagating specimens of the species for export purposes would need to be registered with the Secretariat in accordance with Resolution Conf. 9.19 (Rev. CoP15) on *Registration of nurseries that artificially propagate specimens of Appendix I plant species for export purposes*.

Compliance with listing criteria

The supporting statement suggests that inclusion of *Paubrasilia echinata* in Appendix I satisfies criterion A i) and v) and criterion B iii) and iv) in Annex 1 of Resolution Conf. 9.24 (Rev. CoP17).

Paubrasilia echinata, the national tree of Brazil, is a slow-growing, long-lived species endemic to the Atlantic Forest biome of Brazil. It is highly valued for its dense, durable, and aesthetically striking heartwood, which is uniquely suited for high-quality string instrument bows. Although there is no consensus regarding the ideal age for harvesting planted Brazilwood trees, the species exhibits slow and irregular growth, often requiring several decades to reach the optimal stage for bow making according to the supporting statement. Rolim and Piotto (2018) concluded that *Paubrasilia echinata* requires approximately 40 to 50 years to reach a diameter at breast height (DBH) of at least 30 cm, indicating a long growth cycle for the species.

The species is restricted to coastal areas between Rio de Janeiro and Rio Grande do Norte, a region that has experienced severe habitat loss, with only 12.4% of the original Atlantic Forest remaining. Recent deforestation in the biome remains high, with over 14,000 hectares lost annually in the past three years. Native populations of *P. echinata* have been severely reduced by centuries of logging for dye and timber, agricultural expansion, and urban development. Remaining populations are now largely confined to protected areas and cocoa-cabruca agroforestry systems, which are themselves under

pressure from conversion to pasture. The species has been eliminated from parts of its former range due to overexploitation and habitat fragmentation. Natural populations are now absent from Sergipe, and only a few remain in Espírito Santo and Rio de Janeiro, with urbanization and the decline of cocoa agroforestry systems further threatening habitat.

P. echinata (at the time *Caesalpinia echinata*) was categorized in the IUCN Red List as Endangered in 1998 and a review done in 2024 by the National Center for Flora Conservation (CNCFlora)[37], linked to the Rio de Janeiro Botanical Garden (JBRJ), concluded that the species is Critically Endangered. Although reliable data on the size of natural populations in the remaining fragments of the species is lacking, the proponent states that estimates suggest there are around 10,000 mature individuals and that the species' populations have declined by 84% over the past three generations. The area of occupancy (AOO) for *P. echinata* is 692 km² based on the review done by CNCFlora. Based on an analyses of land use overlap from 1985 to 2020 it was estimated that more than 22% of the species AOO was converted to pasture areas, 18.76% was occupied by mosaic areas of land use, and 3.02% was converted to temporary cropland.

Although *Paubrasilia echinata* is recognized as a single species, it exhibits morphological and genetic variation across its range. Three main morphological variants are distinguished by leaflet shape and size: a widely distributed small-leaf type (Arruda), a medium-leaf type (coffee-leaf) and a rare large-leaf type (orange-leaf) restricted to the Rio Pardo Valley in Bahia. Genetic studies have identified at least five geographically structured lineages within the fragmented Atlantic Forest.

Although recent decades have seen increased research and conservation attention, no formal studies have assessed population trends, and pressures on remaining populations are intensifying. Two rare lineages—the coffee-leaf and orange-leaf types—are of particular conservation concern due to their distinct genetic identity and specialized habitats.

The legislation concerning the conservation of *Paubrasilia echinata* consists of a series of specific legal instruments and more generalized measures that govern the exploitation and transport of native Brazilian plants. Brazil is currently the only country requiring CITES permits for the international trade of finished musical instruments made with *Paubrasilia echinata* based on annotation #10. This situation does little to curb illegal logging or the laundering of wood in other countries where stakeholders remain active in the trade of this species.

The national legislation, Federal Law No. 11,428 of 2006 and Federal Decree No. 6,660 of 2008, prohibits the exploitation of native species included in the Official List of Threatened Species of Brazilian Flora in the Atlantic Forest. The proponent states that despite this prohibition illegal logging of mature trees were recorded in various areas in the range. The Brazilian Institute for the Environment and Renewable Natural Resources (IBAMA) confiscated 102 *P. echinata* logs in 2019 and in 2022 it confiscated 175 illegal sourced logs. Based on investigations conducted it appears that the logs were being sold to bow makers, transformed into bows and traded internationally, covering this wood under documents obtained from environmental agencies. Selective logging of centuries-old trees also took place inside Paubrasil National Park in 2021. According to the supporting statement in all cases recently detected, the destination of the wood is the bow-making industry for musical instruments.

In 2018, Brazil launched Operation Dó-Ré-Mi to combat illegal trade in CITES-listed timber, especially *Paubrasilia echinata*. The operation uncovered widespread environmental violations, particularly in Espírito Santo, involving approximately 45 bow makers and companies engaged in illegal possession, transport, and sale of Brazilwood products. Over 292,000 illegal bows and blanks were seized. Investigations revealed systematic laundering of illegally sourced wood, often from protected areas in southern Bahia, using pre-Convention documents and fraudulent permits. The Brazilian Federal Police estimated over USD 46 million in illicit profits, with illegal material disguised using the Document of Forest Origin (DOF) traceability system and plantation-grown tree permits. Most Brazilwood bows sold in the last 25 years likely originated from illegal sources.

[37] CNCFlora. (2024). Painel de dados do Centro Nacional de Conservação da Flora. Available at: https://cncflora.jbrj.gov.br/ficha/602728. Accessed on 30 July 2025.

There are no large-scale commercial plantations of this species. Only small-scale plantations and conservation efforts exist, such as those led by the International Pernambuco Conservation Initiative (IPCI). Wood from these plantations is not yet being commercially traded. According to the proponent most of the plantations that exist do not meet the registration requirements by the environmental legislation and are not listed in IBAMA's National System of the Control of Origin of Forest Products (SINAFLOR). According to the proponent there are also no reports of commercial plantations that have been properly managed and developed with the aim of future harvesting to produce raw material with the specific qualities required for bow making. According to Brazilian legislation, existing plantations must be duly registered with the relevant environmental authorities and supported by technical management plans prepared by legally certified professionals.

The proponent states that the inclusion of Brazilwood in Appendix I will lead to additional administrative procedures for companies that commercialize the species products and by-products outside Brazil, especially in transactions involving finished musical instruments, finished musical instrument accessories and finished musical instrument parts, which are currently not subject to CITES provisions in terms of annotation #10. The transfer of the species to Appendix I will affect musicians and orchestras. The proponent indicates that provisions in Resolution Conf. 16.8 (Rev. CoP17) on *Frequent cross-border non-commercial movements of musical instruments* could possibly assist in this regard.

Brazilwood wood can be easily identified by its orange/reddish coloration, storied rays on the tangential face, and the presence of brazilein, which appears as a reddish dye when in contact with a basic solution.

In summary, the wild population is not small based on the estimate that suggest there is approximately 10,000 mature individuals. The wild population of this endemic species seems to have a restricted area of distribution with an area of occupancy of 692 km² and is characterized by a high vulnerability to extrinsic factors such as selective logging; an observed decrease in the area and quality of the habitat (AOO converted to pasture areas and occupied by mosaic areas of land use); and local extinctions that has fragmented *P. echinata*'s distribution, reducing genetic variability and limiting gene flow between remaining subpopulations. Based on the information in the supporting statement it appears the population of the species has declined by 84% over the past three generations with the potential for the decline to resume in the absence of management plans and due to its high vulnerability to extrinsic factors.

Additional considerations

At its 20th meeting (CoP20, Samarkand, 2025) the Conference of the Parties will consider document CoP20 Doc. 97 on *Paubrasilia echinata* that includes information relating to the implementation of Decisions 19.249 to 19.253 on *Brazilwood (Paubrasilia echinata)*, including a report on "*Paubrasilia echinata* bows: Fine tuning traceability solutions".

The Parties will also consider document CoP20 Doc. 61 on *Rapid movemement of wildlife diagnostic samples and musical instruments* that could be relevant considering the potential impact the transfer of *P. echinata* could have for the musical instrument industry.

Provisional conclusions

Based on the information available at the time of writing, *Paubrasilia echinata* appears to meet criteria B iii) and iv) and C i) in Annex 1 to Resolution Conf. 9.24 (Rev. CoP17) for its inclusion in Appendix I.

Proposal 47

Pterocarpus soyauxii (Padouk)

Proposal: Delete the populations of *Pterocarpus soyauxii* of Angola, Cameroon, the Central African Republic, Congo, the Democratic Republic of Congo, Equatorial Guinea and Gabon from Appendix II.

Proponents: Burundi, Cameroon, Central African Republic, Congo, Democratic Republic of the Congo, Equatorial Guinea, Gabon

Provisional assessment by the Secretariat

CITES background

At its 19th meeting (CoP19; Panama City, 2022) the Conference of the Parties adopted proposal CoP19 Prop. 50 to include African populations of *Pterocarpus* spp. in Appendix II with annotation #17. Proposal CoP19 Prop. 50 proposed the inclusion of all African populations of *Pterocarpus* species in Appendix II in accordance with Article II, paragraph 2(a) of the Convention and based on criterion B of Annex 2a and criterion A of Annex 2b of Resolution Conf. 9.24 (Rev. CoP17).

Purpose and impact of the proposal

The proposal seeks to delete the populations of *Pterocarpus soyauxii* of Angola, Cameroon, the Central African Republic, Congo, the Democratic Republic of Congo, Equatorial Guinea and Gabon from Appendix II.

If the proposal is adopted, international trade in logs, sawn wood, veneer sheets, plywood and transformed wood of this species originating from Angola, Cameroon, the Central African Republic, Congo, the Democratic Republic of Congo, Equatorial Guinea and Gabon will not be regulated in accordance with the provisions of Article IV of the Convention. The species will be retained in Appendix II for all other African populations and continue to be regulated in accordance with Article IV of the Convention.

Compliance with listing criteria

The supporting statement claims that the populations of *Pterocarpus soyauxii* of Angola, Cameroon, the Central African Republic, Congo, the Democratic Republic of Congo, Equatorial Guinea and Gabon do not satisfy criterion A in **Annex 2b of Resolution Conf. 9.24 (Rev. CoP17)**.

The proponents state that *Pterocarpus soyauxii* was included in CITES Appendix II in accordance with Resolution Conf. 9.24 (Rev. CoP17), **Annex 2b, criterion A,** due to its **similarity to other listed African species of the same genus**, and the presumed difficulty for enforcement authorities to distinguish commercial products of these different species. The Secretariat notes that in the supporting statement of proposal CoP19 Prop. 50 it was stated that all African species of the genus *Pterocarpus* meet the criteria for listing in Appendix II in compliance with Annex 2a, criteria A and B, and Annex 2b, criterion A.

The proponents provide five main elements supporting the finding by the proponents that these populations do not meet the listing criteria. This includes reliable identification of products derived from *P. soyauxii* (including sawn wood, parquet, deck boards) based on new scientific techniques (anatomical, chemical and genetic analysis); the distinct range and trade flows of the species involved; the implementation of sustainable forest management practices by the respective proponents; the abundance of *P. soyauxii* and the effective control of the trade including the use of traceability systems by the respective proponents.

According to the proponents, *Pterocarpus soyauxii* is not classified as threatened in the IUCN Red List. The Secretariat's understanding is that the species has not been assessed by the IUCN.

The species is widely represented in protected areas as well as in managed production forests. It is generally difficult to accurately estimate the population size of widely distributed species such as

Pterocarpus soyauxii. However, data from inventories carried out as part of forest management plans provide robust estimates within sustainably managed forest concessions. According to the supporting statement a recent study that covered 98 forest management units (FMUs) and a total area of 22 million hectares in five Central African countries: Cameroon (22), Central African Republic (7), Democratic Republic of Congo (15), Gabon (46) and Republic of Congo (8), representing around 38% of the total area allocated to forest production in the sub-region, show an average density of 0.88 stems/ha for individuals with a diameter at breast height (DBH) ≥ 20 cm, making *P. soyauxii* one of the most abundant commercial species in Central Africa. This density can be even higher in secondary forests, where the species' natural regeneration is often significant. Taking into account the average density of mature stems and the total area of production forests in Central Africa, the total population of mature individuals of *Pterocarpus soyauxii* is estimated at over 18,883,000 individuals in its regional range.

According to the proponents the implementation of forest management plans has provided robust data on the spatial distribution of commercial tree species, including *P. soyauxii*, contributing to a better understanding of the structure and dynamics of logged stands. Furthermore, the species' area of occupancy (AOO) is estimated at 1,768 km², and its extent of occurrence (EOO) extends to 1,922,341 km², these values are above the critical thresholds defined by the IUCN for Red List categories, according to the proponent. Gene flow studies carried out on several commercial species with similar biology and ecology to *Pterocarpus soyauxii* reveal long-distance dispersal capabilities, ensuring connectivity between stands.

Recent studies referred to by the proponents indicate that in 88% of *P. soyauxii* populations assessed, the demographic structure is considered “very satisfactory”, with no reports of major regeneration problems throughout the species' natural range. Population structure analyses highlight a decreasing exponential curve distribution, characteristic of good regeneration potential, with a balanced representation of diameter classes, including a significant proportion of young individuals. This conclusion made by the proponents is based in part on the data from management inventories carried out in production forests managed by forestry companies.

Although a reduction in the size of *Pterocarpus soyauxii* populations can be observed on a national scale in some Central African countries, the proponents indicated that this decline mainly concerns areas within the non-permanent forest estate. The proponents highlighted that within the permanent forest estate, which includes both protected areas and production forests, increasing efforts are being made to strengthen conservation and ensure sustainable resource management. In production forests, the gradual implementation of ever-improving forest management standards is helping to maintain a balance between economic exploitation and preservation of the ecological functions of ecosystems.

For *P. soyauxii*, the minimum exploitable diameter (MED) varies from country to country in the region: 60 cm in Cameroon, Central African Republic and the Democratic Republic of Congo; and 80 cm in Gabon and the Republic of Congo. This MED is higher than the regular fruiting diameter (RFD) observed in the region (around 35 cm in Cameroon and Gabon), thus guaranteeing a complete reproductive cycle before harvesting according to the proponents. In some forest concessions active planting initiatives of *P. soyauxii* have been implemented, reinforcing the species' assisted regeneration potential.

The proponents participate in regional scientific networks such as P3FAC [38] and DYNAFAC [39]. DYNAFAC is a collective that brings together research institutions and forestry administrations to promote the development of technical and scientific skills and aim to monitor forest dynamics based on a network of sites. The proponents assert that the link between these networks and data from monitoring plots installed in concessions helps to consolidate the scientific basis needed to assess the sustainability of harvesting and the rational management of forest resources in the sub-region. The DYNAFAC collective for example recommended a harmonized Minimum Felling Diameter (MFD) of 60 cm for Central Africa for *P. soyauxii*.

Pterocarpus soyauxii is mainly threatened by illegal logging of its wood, which is highly prized for its technological and aesthetic qualities. In Central Africa, almost 46% of total log production comes from illegal logging, particularly in non-permanent forest zones.

[38] P3FAC: Public-Private Partnership for the sustainable management of Central African forests.
[39] https://www.dynafac.org/fr/p/130/installation-de-dispositifs-de-suivi-de-la-dynamique-forestiere

According to the supporting statement the risks of over-exploitation are largely under control in forest concession areas, due to the implementation of forest management plans over the last three decades, including management measures applicable to *P. soyauxii*. These are based on fundamental principles such as forest inventories, the planning of cuttings according to long rotations (often 25 to 30 years), the respect of a minimum cutting diameter greater than the fruiting diameter, the conservation of seed trees and the monitoring of stand dynamics. Within this framework, only 1 to 2 stems per hectare (all species combined) are generally harvested in areas subject to logging, which greatly limits the impact on natural regeneration.

International trade in *P. soyauxii* has remained stable in recent years according to the proponent. Information relating to international trade contained in the supporting statement indicate that the 2023 export volume of 146,336 m^3 was divided between Gabon, the Congo, Cameroon and the Democratic Republic of Congo with a significant drop in exports in 2024. Exports mainly involved sawn timber and, to a lesser extent, logs, mainly destined for Asian and European markets. The Secretariat notes that trade data available in the CITES Trade Database are limited since the species was included in the Appendices based on the proposal adopted at CoP19 in 2022 and the deadline for the submission of annual reports for 2024 is only 31 October 2025.

Central African countries have put in place a range of national legal instruments to regulate the sustainable management of forest resources and the protection of biodiversity. In Central Africa, most of the countries hosting *Pterocarpus soyauxii* populations have a regulatory framework, based on current forestry laws, designed to guarantee sustainable forest management, as well as the responsible harvesting and trade of forest resources, including *P. soyauxii*.

Since the inclusion of *P. soyauxii* in Appendix II in 2023, the scientific authorities of the countries in the species' range have been required to develop non-detriment findings (NDFs). Cameroon's NDF for *P. soyauxii* established a national cutting quota of 31,906.77 m^3, representing 29.22% of the exploitable standing volume and 40% of the harvesting potential. For the year 2024, Gabon has validated an NDF with national quotas for 2024 distributed as follows: 345,027.601 m^3 as harvest quota and 158,712.696 m^3 for processed products. The Democratic Republic of Congo has set the national export quota for *P. soyauxii* at 48,934 m^3 for 2025 according to the supporting statement. It is not clear from the reporting statement whether all range States prepared quotas based on NDFs. The Secretariat notes that some proponents established national export quotas for 2023, 2024 and 2025 (2023: Cameroon and Equatorial Guinea - 75,610.29 m^3 and 12,500 m^3 respectively; 2024: Cameroon – 91,713.49 m^3; Congo – 244,282.41 m^3; DRC – 40,000 m^3 and Gabon – 158,712.70 m^3); 2025: Congo – 200,414.663 m^3; DRC – 81,711 m^3 and Equatorial Guinea – 15,000 m^3).

The proponents indicated that there is no specific monitoring program dedicated exclusively to *P. soyauxii.* However, the monitoring of natural populations is an integral part of the sustainable management obligations of forest concessions. In addition, permanent monitoring plots have been set up in several concessions, enabling growth, mortality and regeneration dynamics to be documented. According to the proponents the average rate of deforestation between 1990 and 2023 remained relatively low in Central Africa (9.5%), compared with much higher levels in West Africa (32.5%) and East Africa (45%). In the view of the proponents, forest zoning policies and sustainable management practices implemented by several countries in the sub-region has resulted in habitat loss having a limited impact on wild populations of *P. soyauxii* in the Central African region. The proponents do reflect on illegal trade and it is noted that around **40% to 50% of timber harvested in Central Africa** enters the informal economy. Formal exploitation of *P. soyauxii* remains moderate, with harvested volumes well below the maximum possibilities set out in management plans according to the information provided by the proponents.

Other than the mechanisms provided for by CITES, notably the designation of competent national authorities, the issuance of non-detriment findings, certificates of origin, legal acquisition findings and CITES export permits, the countries of the Central African range do not currently have any additional specific measures to control the cross-border movement of *Pterocarpus soyauxii* specimens.

Several countries in the Communauté Economique et Monétaire de l'Afrique Centrale zone (CEMAC zone) have introduced log export restrictions. Gabon has banned this practice since 2010, in order to promote national industrial development. Cameroon and the Republic of Congo have undertaken similar processes, with progressive bans implemented from 2018 and 2023 respectively.

The proponents state that several scientific techniques make it possible to reliably identify woods of the *Pterocarpus* genus, in particular *P. soyauxii*, thereby helping to combat fraud and strengthen the traceability of forest products. Genetic approaches, based on the use of molecular markers (microsatellites, SNPs), have proved effective in differentiating closely related species and tracing the geographical origin of wood. These methods can be complemented by analytical techniques such as near-infrared spectroscopy (NIRS) or mass spectrometry (GC-MS, DART-TOFMS), which enable the detection of specific chemical signatures, linked to the composition of secondary metabolites. In addition, anatomical analysis of wood, using optical microscopy or tomography, is a valuable complementary tool. The Secretariat notes that enforcement officers who encounter species of CITES listed species may not have these tools readily available to assist with identification of the specimens in trade and more information relating to the accessibility of these tools or user-friendly low-technology alternatives may assist in informing the final assessment by the Secretariat.

Species differentiation is also based on their disjointed ranges. *P. soyauxii* is confined to the dense rainforests of Central Africa (southern Cameroon, Gabon, Congo, northern DRC, Equatorial Guinea, Angola). *P. erinaceus* is found in West Africa, as well as in dry areas of northern Cameroon and northern Central African Republic, with no overlap with the industrial exploitation areas of *P. soyauxii*. *P. tinctorius* is found in southeastern DRC (Katanga), Angola and Zambia.

The trade flows of these species are geographically quite distinct according to the proponents: *P. soyauxii* transits through Atlantic ports (Libreville, Pointe-Noire, Douala, Kribi, Bata, Matadi), while *P. tinctorius* is generally exported via Zambia, the port of Dar es Salaam (Tanzania), or even Durban (South Africa). According to the proponents this clear separation of exploitation zones and logistical routes considerably reduces the risk of substitution or confusion at export, all the more so when national traceability systems are effectively applied.

The Secretariat notes that it seems differentiation is feasible for the legally harvested specimens but it is not clear whether the proponents considered the illegal trade and the need for enforcement authorities to be able to distinguish the species if illegal trade is detected.

With regards to artificial propagation, the proponents note that it is not applicable for the species but provided information relating to germination and growth of *P. soyauxii* in plantations. Over a 15-year period, the average annual increase in volume has been estimated at between 20 and 30 m³/ha. At the age of 17, the 150 largest trees per hectare showed an average annual growth in diameter of 2.5 cm.

The proponents express the view that the criteria in Annex 2b of Resolution Conf. 9.24 (Rev. CoP17) are not met. In terms of paragraph A 4 of Annex 4 of Resolution Conf. 9.24 (Rev. CoP17) “No species should be deleted from Appendix II if such deletion would be likely to result in it qualifying for inclusion in the Appendices in the near future”. The Secretariat notes that the proponents implement control measures as part of their forest management plans and that forests in the sub-region are managed based on fundamental principles that align with the principles in Resolution Conf. 16.7 (Rev. CoP17) on *Non-detriment findings.* It is clear that significant steps have been taken by the proponents to ensure that sustainable forest management and sustainable harvest and trade with traceability and monitoring systems are in place. Further information relating to the traceability systems implemented by the Parties proposing the deletion of their populations of *P. soyauxii* from Appendix II will be helpful to inform the final assessment.

The proponents indicate that the Central African range States do not currently have any specific measures other than CITES to control the cross-border movement of *Pterocarpus soyauxii* specimens. Further information relating to the measures implemented by the proponents to address illegal harvest and trade will be useful in informing the assessment. Additional information relating to the access of enforcement authorities to the tools to be used for identification and the provision of further details relating to the means to distinguish between the species will also be helpful. The proponents should indicate if identification materials are available to be shared.

Additional considerations

The proponents indicated that as soon as all the African populations of *Pterocarpus soyauxii* were listed in CITES Appendix II at CoP19, the range States of the Central African populations of the species initiated the process to prepare the proposal with the aim of removing their *P. soyauxii* populations from

Appendix II. The other Central African countries (Burundi, Rwanda, Sao Tome and Principe and Chad) were consulted, but the details relating to their responses are not provided.

The Secretariat notes that the proposal does not include the population of Nigeria. The Secretariat consulted the nomenclature specialist of the Plants Committee relating to the standard reference and distribution range of the species. The original listing proposal (CoP19 Prop. 50) did indicate Nigeria as a range state for *P. soyauxii*. The distribution as reflected in CoP19 Prop. 50 is also contained in the standard nomenclature reference in Resolution 12.11 (Rev. CoP19) on *Standard Nomenclature* for *Pterocarpus* spp., on POWO, the African Plants Database, the Legume Data Portal, and GBIF. The species therefore definitely also occurs in Nigeria based on available records.

The proposal will therefore result in a split-listing of the species. Based on the guidance in Annex 3 to Resolution Conf. 9.24 (Rev. CoP17), when split-listing does occur, this should generally be on the basis of national or regional populations and split-listings that place some populations of a species in the Appendices and the rest outside the Appendices should normally not be permitted.

Provisional conclusions

Based on the information available at the time of writing, it appears that the populations of *Pterocarpus soyauxii* of Angola, Cameroon, the Central African Republic, Congo, the Democratic Republic of Congo, Equatorial Guinea and Gabon do not meet criterion A or criterion B of Annex 2a of Resolution Conf. 9.24 (Rev. CoP17), but more information is needed to inform the assessment relating to criterion A in Annex 2b of the same Resolution.

Notes to proponents

Further information relating to the following matters raised in the provisional assessment could inform the final assessment:

- traceability systems used by the proponents;
- alternative mechanisms to control the cross-border movement of *Pterocarpus soyauxii* specimens, detect illegally sourced specimens and to address illegal harvest and trade; and
- information on the access by enforcement authorities to the species identification tools to be used to distinguish between this species and other species in the same genus.

Proposal 48

Aloe bergeriana, Aloe jeppeae, Aloe subspicata,* and *Aloe welwitschia (Aloes)

Proposal: Amend the listing of *Aloe* spp. in Appendix II to also include the four species previously treated in the non-listed genus *Chortolirion*, but now included in Aloe section *Chortolirion*, namely *Aloe bergeriana, Aloe jeppeae, Aloe subspicata,* and *Aloe welwitschia*

Proponents: Depository Government (Switzerland), South Africa and Zimbabwe

Provisional assessment by the Secretariat

CITES background

The genus *Aloe* spp. has been included in Appendix II since 1975.

At the same time, four southern African aloes were included in Appendix I, namely *Aloe albida, A. pillansii, A. polyphylla,*and *A. vossii*. In February 1995, a further 17 Malagasy aloe species were uplisted to Appendix I and *Aloe vera* was removed from the CITES Appendices. An annotation was first added to the aloe listing in Appendix II in August 1985 to exempt seed, pollen, tissue cultures, flasked seedling cultures of aloes, and separate leaves and parts, and derivatives thereof of naturalized or artificially propagated *A. vera*. This annotation was amended over the years; to also exclude cut flowers and artificially propagated plants. Several further amendments and refinements have taken place since 2005, including the addition of finished products of *Aloe ferox* to the exception in 2019, to form what is today annotation #4.

Currently, *Aloe* spp. is a split-listing, with 21 species listed in Appendix I and the remainder in Appendix II, except *Aloe vera*, also referenced as *Aloe barbadensis*, which is not included in the Appendices.

Purpose and impact of the proposal

The proposal seeks to include *Aloe bergeriana, Aloe jeppeae, Aloe subspicata,* and *Aloe welwitschia* in Appendix II, in accordance with Article II, paragraph 2(b) of the Convention. If the proposal is adopted, international trade in specimens of these species will be regulated in accordance with the provisions of Article IV of the Convention.

Compliance with listing criteria

The supporting statement suggests that inclusion of *Aloe bergeriana, Aloe jeppeae, Aloe subspicata,* and *Aloe welwitschia* in Appendix II satisfies **criterion A in Annex 2b** of Resolution Conf. 9.24 (Rev. CoP17).

At the 27th meeting of the Plants Committee (PC27; Geneva, 2024) the Secretariat introduced document PC27 Doc. 41.2 that proposed an updated nomenclature reference for aloes in Annexes 1 and 2 in compliance with Decisions 19.279 and 19.280 on *Nomenclature for Aloes (*Aloe *spp.)*. The Secretariat pointed out in paragraph 8 of the document that recent taxonomic publications proposed the inclusion of four additional species (*Aloe welwitschia, Aloe bergeriana, Aloe jeppeae* and *Aloe subspicata*) into the genus *Aloe* spp., which were previously considered as not listed in the Appendices as they pertained to the non-CITES listed genus *Chortolirion* spp.

The supporting statement explains that all aloes were traditionally included in a broadly circumscribed single genus, *Aloe*. Based on evidence from molecular and phylogenetic studies on aloes and their relatives, the genus *Aloe* (in the broad sense) has been divided into segregate genera, namely the true aloes in the genus *Aloe*, as well as *Aloestrela* (ancient aloe), *Aloiampelos* (rambling aloes), *Aloidendron* (tree aloes), *Aristaloe* (awn-leaf aloe), *Gonialoe* (kanniedood aloes), and *Kumara* (fan aloes). Results from this research also confirmed that the genus *Chortolirion*, comprising four species, is embedded within *Aloe* in the phylogeny for this group of plants. Therefore, the genus *Chortolirion* was transferred to the genus *Aloe*, as *Aloe* section *Chortolirion.*

Unlike *Aloe*, the genus *Chortolirion* is not included in the Appendices to CITES. Including these four (now *Aloe*) species in the genus-level listing in Appendix II would thus constitute a substantive change as it alters the scope of protection under the Convention in accordance with paragraph 2 f) of Resolution Conf. 12.11 (Rev. CoP19) on *Standard nomenclature*.

This matter was discussed by the Nomenclature Working Group at the 27th meeting of the CITES Plants Committee (PC27, Geneva, 2024). Regarding aloes, as indicated in the summary record PC27 SR:

The Plants Committee:

a) agreed to use the genus classification as outlined in paragraph 7 of document PC27 Doc. 41.2.

b) invited the Depositary Government to work with South Africa to submit a listing proposal for the four Aloe species previously treated in the genus Chortolirion for Appendix II to CoP20, in accordance with paragraph 2f) of Resolution 12.11 (Rev. CoP19).

c) contingent on the adoption of the listing proposal to be submitted by the Depositary Government, and any resulting amendments required for the four species previously treated in Chortolirion, agreed to propose the Aloe Checklist, as contained in the Annexes to document PC27 Doc. 41.7, for inclusion as standard nomenclature reference in Resolution 12.11 (Rev. Cop19)

Aloes are traded commercially or informally as living plants used in horticulture for gardening, landscaping or succulent collecting. They are used in food, cosmetics and various supermarket commodities; for these purposes, they are wild-crafted (harvested from managed natural populations) or farmed on a large scale in plantations. Two raw ingredients are extracted from the leaves: the watery succulent tissue, and a bitter exudate (sap). No information is provided on whether the four species that are the subject of this proposal are in trade or not.

Individual, non-flowering bulbs of members of *Aloe* section *Chortolirion*, as they would appear in trade, would be difficult to separate with certainty and ease from those of other small bulbous grass-aloes. Therefore, the look-alike criterion (paragraph A of Annex 2b to Resolution Conf. 9.24 (Rev. CoP17)) appears to apply.

Additional considerations

The proposal indicates that all range States (Angola, Botswana, Eswatini, Lesotho, Namibia, South Africa and Zimbabwe) were consulted but no responses have been included in the supporting statement.

Provisional conclusions

Based on the information available at the time of writing, it appears that *Aloe bergeriana, Aloe jeppeae, Aloe subspicata* and *Aloe welwitschia* meet criterion A in Annex 2b of Resolution Conf. 9.24 (Rev. CoP17) for their inclusion in Appendix II.

Proposal 49

Podocarpus parlatorei (Parlatore's Podocarp)

Proposal: Transfer from Appendix I to Appendix II

Proponent: Argentina

Provisional assessment by the Secretariat

CITES background

The species was included in Appendix I in 1975 and selected for periodic review at the 15th meeting of the Plants Committee (PC15; Geneva, 2005) (PC15 SR). A review was completed and submitted for consideration by the 17th meeting of the Plants Committee (PC17; Geneva, 2008) in document PC17 Doc. 11 (Annex 3 and 4). Based on the review, Argentina considered submitting a proposal to the 15th meeting of the Conference of the Parties to CITES (CoP15; Doha, 2010) to downlist *Podocarpus parlatorei* from Appendix I to Appendix II with an appropriate annotation for parts and derivatives (PC17 SR).

At the 18th meeting of the Plants Committee (PC18; Buenos Aires, 2009), Argentina as a range State proposed that *P. parlatorei* be retained in Appendix I (PC18 Doc. 16.1.1 – Annex 4) as a precautionary approach.

The species was again selected for periodic review at the 27th meeting of the Plants Committee (PC27; Geneva, 2024) (PC27 SR) in accordance with Resolution Conf. 14.8 (Rev. CoP19) on *Periodic Review of species included in Appendices I and II* to be reviewed during the intersessional period before CoP21 (2028). In response to Notification to the Parties No. 2024/084, Argentina indicated its interest in undertaking the review.

Purpose and impact of the proposal

This proposal seeks to transfer *P. parlatorei* from Appendix I to II. If the proposal is adopted, international trade in specimens of *P. parlatorei* will be regulated in accordance with the provisions of Article IV of the Convention.

Compliance with listing criteria

This proposal seeks to transfer *P. parlatorei* from Appendix I to II as it no longer meets the biological criteria in Annex 1 of Resolution Conf. 9.24 (Rev. CoP17) for inclusion in Appendix I. The proponent states that the transfer is also proposed in terms of A1 of Annex 4 to Resolution Conf. 9.24 (Rev. CoP17). The Secretariat notes that based on the information contained in the supporting statement precautionary measures A 2 a) i) and ii) in Annex 4 of Resolution Conf. 9.24 (Rev. CoP17) could also be relevant. The proponent states that there has been no international trade in the species since 1975; that the demand for timber products has been covered by products from commercial plantations of exotic species of the genera *Pinus* and *Eucalyptus*; that conservation schemes and legislative frameworks are in place; and the proponent is able to manage the species in accordance with Article IV of the Convention.

The Secretariat notes that the information contained in the supporting statement mainly focus on the population of *P. parlatorei in Argentina and although the Secretariat consulted some additional sources, information relating to the status of the species in the Plurinational State of Bolivia would assist in informing the assessment of the proposal.*

P. parlatorei, a species of temperate Gondwanan origin, is currently restricted to montane forests along the Andes in northwestern Argentina and southern Bolivia. The latitudinal distribution of *P. parlatorei* is extensive, but it occupies a narrow band that rarely exceeds 20 km in width in the montane cloud forest. Throughout its distribution it grows in a wide altitudinal range of about 2,000 m (from 1,000 m elevation in Catamarca and Tucumán to more than 3,000 m in central Bolivia).

In Argentina, the distribution of *P. parlatorei* covers an area of approximately 1,912,000 hectares and detailed information is provided in the supporting statement including a distribution map. According to Thomas (2023)[40] *P. parlatorei* has a naturally fragmented distribution of approximately 1,000 x 100 km along the Andes of northwestern Argentina and Bolivia and large parts of the population are located within protected areas of Argentina and Bolivia. According to the supporting statement approximately 28% of the area of distribution of *P. parlatorei* in Argentina is covered by national, provincial or internationally recognized protected areas. Quiroga and Premoli, 2007 quoted in Thomas (2023) indicate that the most genetically variable subpopulations in the southern sector of the species distribution fall outside protected areas.

The proponents use two data sources, the Subtropical Network of permanent plots and the 2nd National Inventory of Native Forests (INBN2), to analyze the abundance of *P. parlatorei*. Both sources indicate high *Podocarpus* abundance, close to 300 individuals per hectare, particularly above 1,800 meters where the species forms dense patches. The long-term plot data show that abundance values have remained stable over the past 30 years.

The species was categorized as Near Threatened in the IUCN Red List in 2012, but the assessment needs updating. According to Thomas (2023) although its extent of occurrence does not meet the thresholds for a threatened category, it is reasonable to suspect that there has been a past population decline approaching 30%, primarily due to historic logging, though precise figures are lacking. Present-day loss is minimal, as logging is mostly for local use and many populations occur in remote, steep areas with challenging conditions for commercial forestry. The species regenerates well following large-scale disturbances and is currently considered more or less stable.

Two threats to the species are discussed in the proposal, risk of deforestation and presence of disturbance (fires). According to the supporting statement, forest types where *P. parlatorei* is found in Argentina have experienced relatively low levels of forest loss and an analysis of the fires that occurred between 2018 and 2023 shows that *P. parlatorei* forests were not greatly affected.

The supporting statement includes information relating to the use of the species at a national level. Although it is used in carpentry and papermaking, the use is limited because the areas where it occurs are generally difficult to access, which restricts its availability and exploitation. In Argentina a harvest of 3,965 tons was authorized between 1994 and 2022, 95% of which is made up of logs for the local industry, but currently there is no wild collection. The proponent points out that the demand for similar characteristics has been covered by products (timber) from commercial plantations of exotic species of the genera *Pinus* and *Eucalyptus*.

According to the supporting statement, there are only three records in the CITES Trade Database of trade in specimens of wild origin (source code W), traded for scientific purposes, and one record relating to confiscated specimens. The proponent indicates that there are no records of illegal trade. The Secretariat accessed the CITES Illegal Trade Database on 12 July 2025 and note that one seizure record was reported by the United States of America in 2020, involving 8 specimens (carvings).

The proponent provides detailed information relating to the national and provincial regulations used by Argentina to classify and categorize forests with different options relating to the use based on national planning processes. *P. parlatorei* inhabits mountainous areas protected under these regulations and any activity in these areas must be governed by a plan. Information on legislative measures in place in Bolivia to regulate the sustainable use and harvesting of forest resources is provided in the supporting statement. The proponent states that although there is no specific law for *P. parlatorei*, its conservation is within the framework of general protection of high mountain forests.

Artificial propagation of *P. parlatorei* has been the subject of study in Argentina due to its ecological value and propagation trials have been developed. Experimental forest nurseries have been established in areas of the Yungas to produce seedlings for reforestation and conservation, but no commercial plantations of the species exist.

[40] Thomas, P. (2023) *Podocarpus parlatorei*. Threatened Conifers of the World. Available at: https://threatenedconifers.rbge.org.uk/conifers/podocarpus-parlatorei (Accessed: 25 July 2025).

The available evidence suggests that the population of the species is not small, it does not have a restricted range, and it does not show a marked decline. There does not appear to be demand for the species for international trade and the range States seems to have measures in place to implement the requirements of the Convention, in particular those of Article IV.

Additional considerations

The proponent provides information that is largely focused on Argentina. Information on the species and its management in the *Plurinational State of Bolivia, the other range State of P. parlatorei,* would assist in the assessment of the proposal.

The Secretariat notes that Peru indicated that it is not a range State for the species. Peru is included as a range State in the CITES Checklist*, but based on the information provided by Peru and after consultation with the nomenclature specialist of the Plants Committee and based on Farjon and Filler (2013)*[41] *it was confirmed that the records reporting the species in Peru were found to be inaccurate* and the Checklist will be corrected.

The nomenclature specialist of the Plants Committee indicated that she would liaise with editors of Kew's Plants of the World Online (POWO) to make the required correction. The following time-stamped extract from POWO was proposed by the nomenclature specialist of the Plants Committee for adoption as a standard nomenclature reference by the 20th meeting of the Conference of the Parties (CoP20; Samarkand, 2025):

> POWO. (2025). *Podocarpus parlatorei*. World Checklist of Vascular Plants. Facilitated by the Royal Botanic Gardens, Kew. Published on the Internet; https://powo.science.kew.org/ Retrieved 30 July 2025.

Provisional conclusions

Based on the information available at the time of writing, *Podocarpus parlatorei* does not appear to meet the biological criteria in Resolution Conf. 9.24 (Rev. CoP17) Annex 1 for the retention of the species in Appendix I. The precautionary measures, contained in Annex 4 to the same Resolution, for the transfer of a species from Appendix I to Appendix II, also seem to be met, in particular criteria A 1, A 2 a) ii) A and A 2 a) ii) B.

Note to proponent

It would be useful if information could be provided by the Plurinational State of Bolivia on the status and management of the species there, to inform consideration of the proposal by Parties and the Secretariat.

The proponent could furthermore clarify whether the intention is to propose the species for deletion after the two CoP cycles are over based on precautionary measure A 1 in Annex 4 to Resolution Conf. 9.24 (Rev. CoP17).

[41] Farjon, A. and Filer, D., 2013. *An atlas of the world's conifers: an analysis of their distribution, biogeography, diversity and conservation status*. Brill.

Proposal 50

Avonia quinaria

Proposal: Transfer from Appendix II to I

Proponent: South Africa

Provisional assessment by the Secretariat

CITES background

The species *Avonia quinaria* was included in CITES Appendix II in 1975 under the genus listing *Anacampseros* spp. and with annotation #4.

There are around 14 species in this genus, all of which are listed in CITES Appendix II, distributed throughout South Africa, Botswana and Namibia.

Purpose and impact of the proposal

The proposal seeks to transfer *Avonia quinaria* from Appendix II to Appendix I. If the proposal is adopted, international trade in specimens of this species will be regulated in accordance with the provisions of Article III of the Convention.

If *Avonia quinaria* is included in Appendix I, nurseries artificially propagating the species for commercial purposes would need to be registered with the Secretariat in accordance with Resolution Conf. 9.19 (Rev. CoP15) on *Registration of nurseries that artificially propagate specimens of Appendix-I plant species for export purposes.*

Compliance with listing criteria

The supporting statement suggests that inclusion of *Avonia quinaria* in Appendix I satisfies Criterion C i) and ii) in Annex 1 of Resolution Conf. 9.24 (Rev. CoP17).

According to the supporting statement, *A. quinaria* is subject to a marked decline in the wild population size which is observed as both ongoing and projected due to unsustainable levels or patterns of exploitation for the international horticultural trade.

Avonia quinaria, (also known as *Anacampseros quinaria*), is a dwarf many-branched succulent with a flat-topped underground caudex and a crown of short slender branches with tiny leaves hidden by triangular to broadly ovate scales darkening towards the tip. It grows up to 1.2 inches (3 cm) tall. The caudex is fleshy to somewhat woody and up to 2 inches (5 cm) in diameter. The solitary flowers are pink, up to 0.6 inches (1.5 cm) across, and appear at the tips of the branches in summer.

The supporting statement indicates that *A. quinaria* is endemic to South Africa and Namibia, though only marginally occurring in southern Namibia. It only occurs in select areas of the Namaqualand Hardeveld and Richtersveld Bioregions, mostly on quartz gravel plains and some mountain-top plateaus. Within South Africa, the species has a restricted and fragmented distribution occurring across an estimated 17, 206 km^2 within the arid north-western regions of the Succulent Karoo Biome, while one population was recently found on the border with the Western Cape province. Although the distribution range is relatively large, the area of occupancy (AOO) is quite small (estimated at 120 km^2 nationally, though this is likely to be an overestimate of the actual area occupied by the species in South Africa). Populations tend to be confined to small areas of between 0.002 km^2 and 0.507 km^2 and are patchily distributed. *A. quinaria* comprises of two geographically distinct subspecies: *A. quinaria* subsp. *quinaria* which is restricted to the southern portion of the distribution range and *A. quinaria* subsp*. alstonii* which occurs exclusively in the northern section.

The proponent states that the population size is unlikely to exceed 500 000 individuals in total. This estimation is based on population surveys carried out in 2019, 2022 and 2023 during the reproductive period of the species (between October and December). A total of 22 populations were surveyed, which

is estimated to represent around 85% of the national population. Population size estimates are exceedingly difficult to establish given the cryptic nature of the plants and as such, density has been used as a proxy for abundance. Plant density in most of the populations was found to be extremely low, with 86% of the surveyed populations having a density of less than 1 plant/m^2 (varying between 0.01 – 0.89 plants/m^2). The highest plant density recorded in the field between 2022 and 2023 was 2.68 plants/m^2. Although formerly abundant in suitable habitat, most populations have been significantly reduced by illegal harvest over an extended period and this threat is ongoing.

As indicated in the supporting statement, the species is currently assessed as Endangered in the Red List of South African Plants (Mhlongo *et al*. 2022), which determined that "the population will experience a decline of at least 50% over a three generation period including two generations in the past (60 years) and one generation into the future (30 years)". This population decline is forecast due to illegal collection of mature individuals to supply the specialist ornamental horticultural trade. Mhlongo et al. (2022) determined that "based on the high numbers of plants in confiscations, it is suspected that at least 30% of the South African population of this species has been lost due to poaching since 1960 (two generations). The species remains highly desirable in the ornamental horticultural trade with an increase in confiscations reported since 2019, indicating that a further 30% loss over the next 30 years (one generation) is likely."

The major threat to *A. quinaria* identified in the supporting statement is the illegal harvest of wild plants for the horticultural/ornamental plant trade. Other threats include habitat destruction from mining, overgrazing, and droughts; degradation of specialized quartz field ecosystems; and population fragmentation and poor recruitment due to climatic and anthropogenic stress. Large adult plants have historically been targeted by harvesters, which is extremely detrimental to such long-lived, slow-growing taxa as populations are reliant on adult persistence for survival.

Concerning international trade levels, the CITES Trade Database shows that over 38,000 live plants have been exported from South Africa between 1996 and 2021, the vast majority (97%) between 2011 and 2021. Germany is the primary importer (>50%), followed by Hong Kong Special Administrative Region of China, the Republic of Korea, and Belgium.

Although all exports of *A. quinaria* from South Africa have been declared as artificially propagated, the proponent explains that many wild plants are thought to have left the country through misdeclaration. For example, the supporting statement highlights that more than 80% of *A. quinaria* plants exported during the 2011-2021 period were exported from a single nursery, which was recently prosecuted for the trade in illegally harvested wild plants misdeclared as artificially propagated. During an enforcement operation in 2019, 3,326 *A. quinaria* plants displaying wild characteristics including distinctly oblong shapes and blackening of the stems due to exposure to harsh sunlight were seized. A further 21,240 wild *A. quinaria* were seized by law enforcement over the period January 2019 to May 2024, and many more plants than this have likely left the country illegally. The proponent highlights that "several parts and derivatives of the species, including seeds, are currently exempt from regulation under CITES as per annotation #4, and seeds of the species are widely traded and readily available online. Under an Appendix I listing, parts and derivatives, including seeds, would no longer be exempt from regulation under CITES." An Appendix I listing would assist by ensuring trade is limited to *bona fide* artificially propagated plants.

The supporting statement indicates that *A. quinaria* is legally protected under the Northern Cape Nature Conservation Act No. 9 of 2009, such that no person may pick, import, export, transport, cultivate or trade in a specimen of a protected plant without a permit. The species remains poorly protected, however, with just one population known to occur in a formally protected area. There is no formal management or harvest strategy or the species and access to most populations remains unrestricted. Of 22 recently surveyed populations, nine occurred on communal land, eight on property belonging to private landowners, and the remaining five on state-owned land including just two (small) *A. quinaria* populations (<1% of the national population) that occur within a Provincial Nature Reserve.

In summary, the population is not small, but it has a restricted range and patchy distribution. This endemic is assessed as Endangered in the Red List of South African Plants, where it has been determined that "the population will experience a decline of at least 50% over a three generation period including two generations in the past (60 years) and one generation into the future (30 years)." Illegal harvest of wild plants for the horticultural/ornamental plant trade is the main threat.

Additional considerations

The 20th meeting of the Conference of the Parties (CoP20, Samarkand, 2025) will consider a time-stamped extract for the genus *Anacampseros* (including *Avonia* spp.) in Annex 2 to document CoP20 Doc. 110 on *Standard nomenclature* (also included in Notification No. 2025/069) as an interim standard nomenclature reference. Therefore, should this standard reference be adopted, the species would be listed in the Appendices as *Anacampseros quinaria* E.Mey. ex Fenzl. The adoption of draft decisions on a Checklist for *Anacampseros* spp. contained in Annex 1 of document CoP20 Doc. 110 is also proposed; and it is recommended to move the listing for *Anacampseros* spp. (including *Avonia* spp.) in Appendix II from the Portulacaceae to a new family, namely Anacampserotaceae.

Namibia was consulted but the supporting statement does not indicate if a response was received.

The proponent notes that although there are a handful of South African nurseries (<5) who may offer limited quantities of artificially propagated plants for sale to the South African public, there is no evidence that any of the nurseries have the capacity to produce the large quantities of plants that have been exported from the country over the years. There are currently only two nurseries licensed to trade in *A. quinaria* internationally. The species is reportedly relatively easy to propagate from seed, but plants grow very slowly, and the caudex will take many years to enlarge (between 8-12 years or more under ideal conditions). It is therefore not common to see artificially propagated large plants in cultivation.

There also appear to be nurseries in Europe (Czechia, the Netherlands) selling small numbers of plants of this genus.

Provisional conclusions

Based on the information available at the time of writing, *Avonia quinaria* appears to meet criterion C i) and ii) in Annex 1 to Resolution Conf. 9.24 (Rev. CoP17) for its inclusion in Appendix I.

Proposal 51

Aloe ferox (Cape aloe) **and *Euphorbia antisyphilitica*** (Candelilla)

Proposal: Amend annotation #4 as follows:

f) finished products packaged and ready for retail trade of *Aloe ferox* and *Euphorbia antisyphilitica* ~~packaged and ready for retail trade~~;

Proponent: United Kingdom of Great Britain and Northern Ireland (as Chair of the SC working group on annotations)

Provisional assessment by the Secretariat

CITES background

At its 78th meeting (SC78; Geneva, 2025), the Standing Committee considered the report of the Working Group on Annotations in document SC78 Doc. 76. Paragraphs 13 to 16 of SC78 Doc. 76 outlined the considerations by the working group of annotation #4, with members agreeing that this is a complex and challenging annotation to implement. Discussions focused on the need to simplify and align wording in the annotation. Members discussed the challenges of implementing this annotation due to the length of paragraphs, and the feasibility of enforcement officers or importers on determining whether products are derived from 'artificial propagation' or 'naturalized or artificially propagated' sources.

A minor amendment to Annotation #4 paragraph f), proposed by the Working Group was endorsed by the Standing Committee, as indicated in the SC78 Summary Record.

Purpose and impact of the proposal

This proposal aims to simplify and align wording in Annotation #4 for readability purposes and to harmonize both occurrences of the phrase "packaged and ready for retail trade" within Annotation #4. A minor amendment to Annotation #4 to align the text in paragraph f) with paragraph g) is therefore proposed.

Additional considerations

In line with Resolution Conf. 11.21 (Rev. CoP19) on *Use of annotations in Appendices I and II*, annotations to species listed in the Appendices are considered substantive annotations that are integral parts of species listings, they may be adopted, deleted or amended only by the Conference of the Parties, in accordance with the provisions of Article XV of the Convention.

The Conference of the Parties agreed in paragraph 1 d) of Resolution Conf. 11.21 (Rev. CoP19) on *Use of annotations in Appendices I and II* that "substantive annotations relating to species in Appendix I or II may be introduced, amended or deleted only by the Conference of the Parties in accordance with Article XV of the Convention". The proposed amendment to Annotation #4 endorsed by the Standing Committee at SC78 was therefore prepared in line with Rule 24 of the Rules of Procedure of the Conference of the Parties.

Parties should note that document CoP20 Doc. 96 on *Products containing specimens of Appendix-II listed orchids (Orchidaceae spp.),* also refers to annotation #4.

Provisional conclusions

The Secretariat supports the proposed amendment to annotation #4.