

IUCN AND TRAFFIC

SUMMARY OF THE ANALYSES

of the proposals to amend the CITES Appendices at the
20TH MEETING OF THE CONFERENCE OF THE PARTIES

24 NOVEMBER - 05 DECEMBER 2025



TRAFFIC

IUCN/TRAFFIC analyses of the proposals to amend the CITES Appendices at the 20TH MEETING OF THE CONFERENCE OF THE PARTIES

Samarkand, Uzbekistan
24th November – 5th December 2025



Prepared by IUCN Biodiversity Assessment and Knowledge Team and Species Survival Commission and TRAFFIC

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The IUCN Species Survival Commission (SSC), the largest of IUCN's seven commissions, has over 10,000 volunteer experts recruited through its network of 186 groups (including Specialist Groups, Task Forces and groups focusing solely on Red List assessments). These experts contribute to the assessment of species, development of conservation strategies, and implementation of policies that aim to halt biodiversity loss. Biodiversity loss is one of the world's most pressing crises, with many species' populations declining to critical levels. SSC is dedicated to halting this decline in biodiversity and to provide an unmatched source of information and advice to influence conservation outcomes, as well as contribute to international conventions and agreements dealing with biodiversity conservation.

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CONTENTS

FOREWORD	iv
INTRODUCTION	v
ACKNOWLEDGEMENTS AND CREDITS	vi
METHODS	vii
CoP20 Prop. 1: Deletion of Bontebok <i>Damaliscus pygargus pygargus</i> from Appendix II	1
CoP20 Prop. 2: Inclusion of Dorcas Gazelle <i>Gazella dorcas</i> in Appendix II	2
CoP20 Prop. 3: Amendment of the existing annotation to the listing of Saiga Antelope <i>Saiga tatarica</i> in Appendix II	4
CoP20 Prop. 4: Deletion of Giraffe <i>Giraffa camelopardalis</i> populations of Angola, Botswana, Eswatini, Malawi, Mozambique, Namibia, South Africa and Zimbabwe from Appendix II	7
CoP20 Prop. 5: Inclusion of Okapi <i>Okapia johnstoni</i> in Appendix I	9
CoP20 Prop. 6: Inclusion of Striped Hyaena <i>Hyaena hyaena</i> in Appendix I	10
CoP20 Prop. 7: Transfer of Guadalupe Fur Seal <i>Arctocephalus townsendi</i> from Appendix I to Appendix II	11
CoP20 Prop. 8: Deletion of Caribbean Monk Seal <i>Monachus tropicalis</i> from Appendix I	12
CoP20 Prop. 9: Amendment of the Annotation of the Population of Southern White Rhinoceros <i>Ceratotherium simum simum</i> of Namibia Listed in Appendix II	13
CoP20 Prop. 10: Transfer of the population of South-Western Black Rhinoceros <i>Diceros bicornis bicornis</i> of Namibia from Appendix I to Appendix II with an annotation	16
CoP20 Prop. 11: Inclusion of Hoffman's Two-toed Sloth <i>Choloepus hoffmanni</i> and Linné's Two-toed Sloth <i>Choloepus didactylus</i> in Appendix II	18
CoP20 Prop. 12: Transfer of Golden-Bellied Mangabey <i>Cercocebus chrysogaster</i> from Appendix II to Appendix I	20
CoP20 Prop. 13: Allow Namibia to trade in registered government-owned stocks of raw ivory and achieve full Appendix-II status for its elephant population under specified conditions	21
CoP20 Prop. 14: Amend the existing annotation for the populations of African Elephant <i>Loxodonta africana</i> in Botswana, Namibia, South Africa, and Zimbabwe	23
CoP20 Prop. 15: Inclusion of hornbill genera <i>Ceratogymna</i> and <i>Bycanistes</i> in Appendix II	26
CoP20 Prop. 16: Transfer of White-Backed Vulture <i>Gyps africanus</i> and Ruppell's Vulture <i>Gyps rueppelli</i> from Appendix II to Appendix I	28
CoP20 Prop. 17: Transfer of Peregrine Falcon <i>Falco peregrinus</i> from Appendix I to Appendix II	29
CoP20 Prop. 18: Inclusion of Great-billed Seed-finch <i>Sporophila maximiliani</i> in Appendix I and <i>S. angolensis</i> , <i>S. atrirostris</i> , <i>S. crassirostris</i> , <i>S. funerea</i> and <i>S. nuttingi</i> in Appendix II	31
CoP20 Prop. 19: Inclusion of Giant Hispaniolan Galliwasp <i>Caribicus warreni</i> in Appendix I	33
CoP20 Prop. 20: Inclusion of Mount Elliot Leaf-tailed Gecko <i>Phyllurus amnicola</i> in Appendix II	34
CoP20 Prop. 21: Inclusion of the Ringed Thin-tail Gecko <i>Phyllurus caudiannulatus</i> in Appendix II	35
CoP20 Prop. 22: Transfer of the genus <i>Amblyrhynchus</i> spp. represented by the Galápagos Marine Iguana <i>Amblyrhynchus cristatus</i> from Appendix II to Appendix I	37
CoP20 Prop. 23: Transfer of Galápagos land iguanas <i>Conolophus</i> spp. from Appendix II to Appendix I	38

CoP20 Prop. 24: Inclusion of Bale Mountain Adder <i>Bitis harenni</i> and Ethiopian Mountains Adder <i>Bitis parviocula</i> in Appendix I	39
CoP20 Prop. 25: Inclusion of the Rock Rattlesnake <i>Crotalus lepidus</i> and Central Plateau Pygmy Rattlesnake <i>Crotalus ravus</i> in Appendix II and the genera <i>Crotalus</i> and <i>Sistrurus</i> in Appendix II as lookalikes	40
CoP20 Prop. 26: Transfer of Home's Hinge-back Tortoise <i>Kinixys homeana</i> from Appendix II to Appendix I	42
CoP20 Prop. 27: Inclusion of four species of water frogs in Appendix II: <i>Pelophylax epeiroticus</i> , <i>P. lessonae</i> , <i>P. ridibundus</i> and <i>P. shqipericus</i>	43
CoP20 Prop. 28: Transfer of Oceanic Whitetip Shark <i>Carcharhinus longimanus</i> from Appendix II to Appendix I	45
CoP20 Prop. 29: Inclusion of Tope (<i>Galeorhinus galeus</i>) and Smoothhounds (genus <i>Mustelus</i>) in Appendix II	47
CoP20 Prop. 30: Transfer of manta and devil rays Family Mobulidae (Mobulids) from Appendix II to Appendix I	49
CoP20 Prop. 31: Transfer of Whale Shark <i>Rhincodon typus</i> from Appendix II to Appendix I	51
CoP20 Prop. 32: Retain giant guitarfishes <i>Glaucostegus</i> spp. in Appendix II with a zero-export quota for wild specimens traded for commercial purposes	53
CoP20 Prop. 33: Retain wedgefishes Family Rhinidae in Appendix II with a zero-export quota for wild specimens traded for commercial purposes	55
CoP20 Prop. 34: Inclusion of Gulper Sharks of the Family Centrophoridae in Appendix II	57
CoP20 Prop. 35: Inclusion of eels <i>Anguilla</i> species in Appendix II	59
CoP20 Prop. 36: Inclusion of Sea Cucumbers <i>Actinopyga echinites</i> , <i>A. lecanora</i> , <i>A. mauritiana</i> , <i>A. miliaris</i> , <i>A. palauensis</i> and <i>A. varians</i> in Appendix II	61
CoP20 Prop. 37: Inclusion of Golden Sandfish <i>Holothuria lessona</i> in Appendix II	63
CoP20 Prop. 38: Inclusion of <i>Grammostola rosea</i> and the following fourteen tarantula species in Appendix II	65
CoP20 Prop. 39: Inclusion of South African Abalone <i>Haliotis midae</i> in Appendix II with an annotation "dried form only"	67
CoP20 Prop. 40: Amend annotation #3 to exempt finished products packaged and ready for retail trade of thin-sliced roots derived from artificially propagated plants of <i>Panax quinquefolius</i>	69
CoP20 Prop. 41: Inclusion of Chilean Palm <i>Jubaea chilensis</i> in Appendix I	71
CoP20 Prop. 42: Inclusion of species <i>Beaucarnea hookeri</i> and <i>Beaucarnea glassiana</i> in Appendix II, as part of the listing of the <i>Beaucarnea</i> spp.	73
CoP20 Prop. 43: Inclusion of <i>Commiphora wightii</i> in Appendix II	75
CoP20 Prop. 44: Transfer of Cycad Spurge <i>Euphorbia bupleurifolia</i> from Appendix II to Appendix I	77
CoP20 Prop. 45: Deletion from Appendix II of <i>Afzelia bipindensis</i> populations located in Central Africa: Cameroon, Central Africa Republic, Congo, Democratic Republic of the Congo, Equatorial Guinea and Gabon	79
CoP20 Prop. 46: Transfer of Brazilwood <i>Paubrasilia echinata</i> from Appendix II to Appendix I	81
CoP20 Prop. 47: Deletion from Appendix II of populations of <i>Pterocarpus soyauxii</i> located in Central Africa: Angola, Cameroon, the Central African Republic, Congo, the Democratic Republic of the Congo, Equatorial Guinea and Gabon	83

CoP20 Prop. 48: Inclusion of species <i>Aloe bergeriana</i> , <i>Aloe jeppeae</i> , <i>Aloe subspicata</i> , and <i>Aloe welwitschii</i> in Appendix II, as part of the listing of the <i>Aloe</i> spp.	85
CoP20 Prop. 49: Transfer of Parlature's Podocarp <i>Podocarpus parlaturei</i> from Appendix I to Appendix II	86
CoP20 Prop. 50: Transfer of <i>Avonia quinaria</i> from Appendix II to Appendix I	87
CoP20 Prop. 51: Amend annotation #4	89

FOREWORD

Unsustainable and illegal trade are driving declines in many species, and biological resource use overall is a threat to 45,840 species assessed as threatened on The IUCN Red List of Threatened Species. This said, the IPBES Assessment of Sustainable Use of Wild Species found that billions of people rely on over 50,000 wild species. Striking the balance between supporting sustainable use of wild species, on the one hand, while abating unsustainable use, on the other, is therefore crucial to achievement of global goals for nature like the Sustainable Development Goals and the Kunming-Montreal Global Biodiversity Framework.

CITES plays a vital role in balancing international trade and species conservation. It is a global agreement ensuring that trade in wild animals and plants does not threaten their survival. Originating from a 1963 IUCN resolution, it came into force on 1 July 1975. For CITES to be effective, decisions—especially regarding species listings in the Appendices, must be based on the best available scientific and technical evidence. This is particularly the case when deciding whether or not to include species in the CITES Appendices, transfer species between Appendix I and II, or remove them from the Appendices altogether. To assist Parties in ensuring that such decisions are evidence-based, IUCN and TRAFFIC undertake technical reviews of the proposals to amend the CITES Appendices for each of the Conference of the Parties (CoPs). It is with great pleasure that IUCN and TRAFFIC now produce the Analyses of the Proposals for CITES CoP20, which will take place in Samarkand, Uzbekistan, in 2025. We would like to thank the team in TRAFFIC and IUCN for producing such a helpful document, synthesising a great volume of complex underlying information, in a very short time.

Information on the extinction risk, threats to, and biology of species was collected from IUCN's Species Survival Commission Specialist Group network, TRAFFIC's network of information sources on trade, and the broader scientific community, and used to evaluate the proposals and the information provided by proponents, with respect to the CITES listing criteria. The resulting document therefore brings together data provided from across a broad range of expertise, which we are confident will be of great assistance to the Parties in their consideration of the proposals.

The Analyses for CoP20 will not only provide an assessment of whether or not each proposal meets the criteria specified by CITES, but also summarises any additional considerations that may be relevant to the decision on whether or not to adopt the proposal. These include, for example, any potential implementation challenges, benefits or risks that may be associated with the adoption of the proposal.

CITES has a key role to play in the next decade. Wise, evidence-based decisions that are true to the Convention's aim of ensuring that international trade is not a threat to wild species will be needed, in alignment with the CITES Strategic Vision 2021–2030, which aims to ensure that all international trade in wild fauna and flora is legal and sustainable by 2030, contributing to halting biodiversity loss and achieving the Global Biodiversity Framework and the Sustainable Development Goals.

Dr. Jon Paul Rodríguez
Chair, IUCN Species Survival
Commission

Dr. Thomas Brooks
Chief Scientist, IUCN

Richard Scobey
Executive Director, TRAFFIC

INTRODUCTION

CITES (the Convention on International Trade in Endangered Species of Wild Fauna and Flora) was opened for signature in Washington DC on 3rd March 1973, and to date has 185 Parties from across the world. If CITES is to remain a credible instrument for conserving species affected by trade, the decisions of the Parties must be based on the best available scientific and technical information. Recognizing this, IUCN and TRAFFIC have undertaken technical reviews of the proposals to amend the CITES Appendices submitted to the Twentieth Meeting of the Conference of the Parties to CITES (CoP20).

The Analyses - as these technical reviews are known - aim to provide as objective an assessment as possible of each amendment proposal against the requirements of the Convention, as agreed by Parties and laid out in the listing criteria elaborated in Resolution Conf. 9.24 (Rev. CoP17) and other relevant Resolutions and Decisions.

For each of The Analyses, a “Summary” section presents a synthesis of available information taken from each proposal’s Supporting Statement and other sources, and a separate “Analysis” paragraph provides an assessment of whether or not the proposal is considered to meet the pertinent criteria in Resolution Conf. 9.24 (Rev. CoP17) or other relevant CITES Resolutions and Decisions. In response to feedback from Parties, an additional paragraph is included for some proposals to summarise any “Additional considerations” that may be relevant to the decision on whether or not to adopt the proposal (for example, implementation challenges and potential risks or benefits for the conservation of the species concerned). Information used to compile these sections is provided in the “Summary of available information” section. Only information from sources other than the Supporting Statement is referenced in this section, and for brevity, these references are not repeated in the “Summary”, “Analysis” or “Additional considerations” sections. See the Methods section for more information.

Although draft versions of the “Summary”, “Analysis” and “Other considerations” sections were shared with relevant experts, this was to ensure the conclusions were drawn from the best available information, therefore, the conclusions drawn do not necessarily reflect the opinions of the reviewers.

The Analyses aim to highlight relevant information on which the Parties can base their decisions. They are produced with a limited budget under severe time constraints and are not exhaustive. Where proposals include many different taxa it is not possible to address them all in detail and there will invariably be omissions and differences of interpretation. We have nevertheless tried to ensure that the document is factual and objective, and consistent in how the criteria have been interpreted and applied across the proposals.

The Analyses were completed and made available online on 19th September 2025 to allow CITES Parties and other stakeholders sufficient time to consider the information in advance of the Conference of the Parties, which convenes for the twentieth time on 24 November 2025 in Uzbekistan. The “Summary”, “Analysis” and “Additional considerations” sections will be translated into French and Spanish and made available online. Printed versions of these sections will be made available to Parties at CoP20.

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We again acknowledge the generous support of all the project's donors.

Many individuals and institutions contributed to the compilation of the Analyses. Those to whom we would first like to extend our thanks are the reviewers (listed below), many of them members of the IUCN Species Survival Commission, TRAFFIC staff as well as the many other scientists and experts who have volunteered their time, data, contact list and expertise to this process. For this, we are immensely grateful.

The Analyses team was made up of: Paola Mosig Reidl, Tessa Cooper, Kathy Rock, James Stevens, Rachele Stoppoloni, and Amy Woolloff (TRAFFIC), Oliver Tallowin (IUCN), and several consultants including Thomasina Oldfield, Laura Cimo, Sara Oldfield, Steven Broad, and Martin Jenkins. Richard Scoby, Richard Jenkins, Melanie Heath and Sarah Baker Ferguson are thanked for their valuable input in reviewing The Analyses. Francesca Marcolini designed the cover. Ellie Smith and George Chilcott are thanked for their patience and administrative assistance. Craig Hilton-Taylor is thanked for his invaluable assistance with the IUCN Red List. Antony Bagott provided assistance with seizure and incident data, and Graham Laidler prepared trade record data ready for analysis. Oliver Tallowin led the fundraising for this project, without which it would not have been possible to undertake. All other colleagues within TRAFFIC and IUCN are thanked for their support and good humour, sugar, and caffeine. Paola Mosig Reidl and Oliver Tallowin were responsible for overseeing the project.

We are very grateful to the reviewers who contributed their valuable time to this project. Reviewers were not asked to comment on IUCN/TRAFFIC's conclusion of whether each proposal met the relevant criteria (in the "Analysis" paragraph), for which IUCN and TRAFFIC take sole responsibility.

The reviewers were:

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METHODS

Criteria

The taxa included in the proposals were assessed according to the criteria in Res. Conf. 9.24 (Rev. CoP17). All relevant criteria were addressed regardless of those explicitly cited in the proposal. Where multi-taxon proposals included many taxa with a large number of these proposed as lookalikes, we focused on assessing those identified as traded in significant volumes against all relevant criteria.

For proposals regarding commercially exploited aquatic species, the general guidelines listed in the footnote to Annex 5 of Res. Conf. 9.24 (Rev. CoP17) with respect to the application of the definition of “decline” were taken into account when species were assessed against criterion 2aA for inclusion of species in Appendix II (refer to doc. AC25 Inf.10 for a detailed explanation of TRAFFIC’s application of listing criteria to commercially exploited aquatic species).

Information sources

To evaluate the proposals against the CITES listing criteria, information on the status and biology of species has been collected from IUCN’s Species Survival Commission (SSC) Specialist Group network, peer reviewed and grey literature, news reports and experts in the broader scientific community. TRAFFIC has drawn on its own expert network and information sources to determine the nature and scale of any trade. Where possible, currencies were converted to USD with the average exchange rates of August 2025 sourced from xe.com unless otherwise specified.

Various databases were consulted to assess reported legal and illegal trade for all taxa proposed for listing. These include the CITES Trade Database, the EU-TWIX database, the TRAFFIC Wildlife Trade Information System (WiTIS), and the United States Fish and Wildlife Service’s (USFWS) Law Enforcement Management Information System (LEMIS).

CITES Trade Database

CITES trade data were downloaded on the 2nd of July 2025, covering at least the last decade of reported trade for the taxa of interest. The last most complete year for which data exist for the majority Parties is 2023, however, some Parties have reported trade for 2024 prior to the 31st of October 2025 deadline (Res. Conf. 11.17 [Rev. CoP18]). Data were downloaded in Comparative Tabulation format. In some cases, the terms “whole organism equivalents” and “parts and derivatives” are referred to in the Analyses. Whole organism equivalents are an aggregation of term codes that can be reasonably equated to a whole individual. These include the term codes for bodies, live, skeletons, skins, and skulls (codes BOD, LIV, SKE, SKI, and SKU) where they are reported by number (see CITES Notif. 2021-044-A1 for more information on term codes). Parts and derivatives are the remaining term codes reported by number as well as other units. Sources are sometimes combined for brevity as “wild sources” and “captive sources”. Wild sources include source codes for wild, ranched, and unknown or unreported (codes “W”, “R”, “U” and unreported), and captive sources include captive-born and captive-bred or artificially propagated (codes “C”, “F”, “A” and “D”). We reported only direct imports and exports when summarising total volumes of commodities in trade to avoid duplication of records, unless otherwise specified.

LEMIS Database

LEMIS data used in the Analyses included trade reports from 2008 to 2023, reported by the USA. Data are based on USFWS Form 3-177 (Rev. 10/2017) that all wildlife importers and exporters must declare with the US Fish and Wildlife Service; this includes information on trade in CITES and non-CITES listed species. These data include records for imports, exports, and transits, as well as information regarding the outcome of the reported trade. This can be cleared, i.e. permitted trade, or refused, i.e. not permitted for trade. Records referred to as “cleared” in the Analyses refer to records that have been cleared under the Action as well as the final Disposition. Some records that are refused may subsequently be seized, abandoned, re-exported, or cleared. The reason for refusal cannot be inferred from the data. Sources are sometimes combined for brevity as “wild sources” and “captive sources”. Wild sources include source codes for wild, ranched, and unknown or unreported (codes “W”, “R”, “U” and unreported), and captive sources include captive-born and captive-bred or artificially propagated (codes “C”, “F”, “A” and “D”).

LEMIS data was obtained through a previous Freedom of Information Act request to the US Government for data in the period 2008–2020, which included taxonomic data, description of the commodity, dates, action and disposition, purpose, source, quantity and unit, the type of trade (import/export/transit), country of origin, and the trading partner. A second Freedom of Information Act request resulted in data being provided for the period 2021-2023 but only in relation to Hunting Trophies and Personal.

EU-TWIX

EU-TWIX is the Europe Trade in Wildlife Information Exchange database, managed by TRAFFIC on behalf of the participating countries. The EU-TWIX system provides users with a mailing list which facilitates the rapid exchange of information, expertise, and experience on wildlife trade enforcement. EU-TWIX also includes access to a dedicated website containing useful resources to support enforcement efforts as well as a database of wildlife seizures. The EU-TWIX database contains centralised data on seizures and offences reported by all 27 EU Member States, Bosnia and Herzegovina, Iceland, Montenegro, North Macedonia, Switzerland, Ukraine, and the UK. Access to this database is restricted to wildlife law enforcement and management authorities in Europe. Data for use in the Analyses were downloaded with prior authorisation from the relevant countries on 26th February 2025, and included seizures made in the years 2014-2024.

TRAFFIC Databases

The Wildlife Trade Information System (WiTIS) is a database managed by TRAFFIC containing information on incidents involving wildlife seizures, poaching, and law enforcement actions, in addition to market monitoring and actionable information. This information is sourced predominantly from open-source media reports as well as some CITES Management Authorities, government agencies, customs organisations, social media platforms and NGOs. The whole database was consulted for the Analyses, and data have been inputted from 2010 onwards. Nonconfidential records held in this database are publicly available via the TRAFFIC Wildlife Trade Portal. Due to the nature of this database and illegal trade, it should not be inferred that there is a direct correlation between WiTIS incident data and the overall illegal wildlife trade, or that information across locations, species or time is consistent in the database.

The references for these data sources are as follows:

CITES (2025). CITES Trade Database, UNEP World Conservation Monitoring Centre, Cambridge, UK.

EU-TWIX (2025). Trade in Wildlife Information Exchange.

LEMIS (2025). United States Fish and Wildlife Service Law Enforcement Management Information System.

TRAFFIC (2025). Wildlife Trade Information System [database].

Deletion of Bontebok *Damaliscus pygargus pygargus* from Appendix II

Proponent: South Africa

Summary: The Bontebok *Damaliscus pygargus pygargus* is an antelope endemic to South Africa. A second subspecies, the Blesbok *Damaliscus pygargus phillipsi* is widespread and numerous in southern Africa, occurring in Eswatini, Namibia and South Africa. Hybridisation between the two is known to occur. *Damaliscus pygargus pygargus* was assessed as Vulnerable in 2015 on the IUCN Red List. Having been nearly extirpated in the 1930s through hunting, by 2021 the population had recovered from approximately 17 to over 10,000. Its natural habitat, renosterveld and grassy fynbos endemic to the Western Cape province of South Africa, is severely limited and fragmented, constraining population growth to fewer than 2,500 individuals within the natural range. Extensive management has resulted in more than 70% of the population now occurring outside this area in the Eastern Cape, Free State, Limpopo, North-West, and Northern Cape provinces of South Africa, predominantly on private land.

Reported legal trade occurs in the form of hunting trophies, as well as horns and skins traded as part of trophy hunts or as byproducts of legal offtake and culling. Nearly 80% of individuals involved in international trade come from wild sources, although there are also captive-bred and ranched specimens. Between 1975 and 2024, CITES exports averaged approximately 120 individuals per year, with no evidence of illegal trade. According to LEMIS, under 50 individuals per year were imported into the USA between 2008 and 2023. Less than 2% of trophies exported are from the native range in the Western Cape. The subspecies was considered for initial review under the Review of Significant Trade process but not selected for inclusion on the basis that adequate management controls were in place in South Africa.

Threats to *D. p. pygargus* include loss of natural habitat, low genetic diversity, and the risks of hybridisation with *D. pygargus phillipsi*. Intensive management and investment in the subspecies throughout the country, both by the government and private individuals, mitigate these risks through a national subspecies-specific biodiversity management plan, a management plan for Bontebok National Park, as well as a national genetic database and testing of translocated and hunted individuals to guard against hybridisation. A metapopulation management plan is still lacking.

Analysis: *Damaliscus pygargus pygargus* numbers in South Africa have increased from tens in the 1930s to possibly around 10,000 individuals in 2021. Its natural range would have limited the population to around 2,500 individuals but the taxon has been introduced into areas beyond its indigenous range in the country for the purposes of game ranching, tourist viewing, and trophy hunting. Significant national management efforts are in place, and international trade is limited.

Annex 4 of Res. Conf. 9.24 (Rev. CoP17) provides guidance on the removal of species from Appendix II: if *Damaliscus pygargus pygargus* were removed from Appendix II, **it seems unlikely that regulation of trade would be needed to avoid this taxon from becoming eligible for inclusion in Appendix I in the near future, nor 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 taxon has not been subject to recommendations under the Review of Significant Trade.

Blesbok *D. p. phillipsi*, the other subspecies, is not listed in the Appendices, therefore **deleting *D. p. pygargus* would remove any implementation issues that might arise due to one subspecies being listed in the Appendices and the other not.**

Inclusion of Dorcas Gazelle *Gazella dorcas* in Appendix II

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

Summary: The Dorcas Gazelle *Gazella dorcas* is a small antelope found throughout the Sahelo-Sahara region, where it is the most common antelope species, as well as in Israel and Jordan, and into the Horn of Africa. The species went extinct in Senegal, where it has since been reintroduced, and is possibly extinct in Nigeria and Burkina Faso. It occurs in a wide variety of arid and sub-arid habitats, with some local migration to exploit seasonal vegetation. The species has a variety of natural predators and is important in the ecosystem as a seed disperser.

In 2016, the species was assessed as Vulnerable on the IUCN Red List, based on evidence of a population decrease of over 30% over three generations (15 years), due to increasing hunting pressure and habitat degradation caused by livestock overgrazing and drought. Overall, while *G. dorcas* remains present across a broad geographic range (area of habitat ~10 million km²), its subpopulations are fragmented and declining in many areas. Its habitat is declining, particularly in West Africa. In extensive parts of its range including in the proponent countries, numbers are considered to be low or very low. It is much more numerous in Niger and especially Chad with one protected area in that country possibly holding as many as 50,000 animals.

G. dorcas is widely hunted, predominantly illegally, within its range for various purposes, including sport trophies, meat, and body parts used in decoration and traditional medicine. These items are commonly sold in local markets and herbalist shops.

The species was listed in Appendix III by Tunisia in 1976 and by Algeria in 2008. According to CITES trade data, over 4,000 whole organism equivalents of *G. dorcas* were directly exported for international trade between 2000 and 2022. Around half of the exports were live animals sourced from the wild with the remainder captive-bred; the majority were for commercial purposes. Nearly 80% of live exports were from Sudan and Niger for most of the remainder, with the UAE, Saudi Arabia, and Qatar as key importers.

While illegal trade may not significantly impact the global population, it poses a threat to smaller or isolated, national populations. Trade in horns, meat, skins, and live animals (mostly young) occurs mainly locally, but also to some extent internationally, with some seizures reported in the UAE. *G. dorcas* faces a range of pressures, with uncontrolled hunting being the most significant driver of population decline across its range. In addition to hunting, the species is affected by habitat loss and degradation due to expanding agriculture, drought, and overgrazing and by livestock and predation by domestic dogs. In some regions, killing of large numbers by militia groups and visiting hunting parties, has been reported.

Over 5,000 *G. dorcas* individuals are held *ex situ* across 21 institutions in 12 countries, including Israel, Qatar, Spain, and the USA. Reintroduction efforts have taken place in Morocco, and national restoration strategies exist in both Morocco and Tunisia. The species occurs in multiple protected areas across its range, including national parks and reserves in Algeria, Egypt, Tunisia, Mauritania, Chad, Niger, and Morocco.

Analysis: *Gazella dorcas* has a wide range across North Africa and parts of the Middle East, with a current global population estimate of more than 50,000 individuals. As such the wild population is not small, nor is it geographically restricted. While there have been local declines or in some cases extirpations, overall, the population was estimated to have reduced by 30% over three generations to 2016. The species is widely hunted for various purposes, with the resulting items commonly being sold in local markets nationally. International trade is occurring, with legal trade predominantly in live individuals, but its scale is not uniform across all range States, and recent information suggests it is not a major threat. The current level of trade does not appear to be negatively impacting the species

to the extent that it requires international regulation, so the species **does not meet the criteria for listing in Appendix II.**

Amendment of the existing annotation to the listing of Saiga Antelope *Saiga tatarica* in Appendix II

Proponent: Kazakhstan

Summary: *Saiga tatarica*, is one of two saiga species recognized under currently adopted CITES nomenclature. It is a nomadic herding antelope that inhabits open dry steppe grasslands and semi-arid deserts across Central Asia. There are four distinct populations, three largely in Kazakhstan, where over 98% of the global population resides, and one in the Russian Federation (in the Pre-Caspian region). Two of the populations largely found in Kazakhstan have transboundary elements, part of one population migrating seasonally into the trans-Volga region of the Russian Federation and a very small number of another population migrating into Uzbekistan. The second species, *Saiga borealis*, occurs only in Mongolia.

Saiga tatarica populations were reduced from millions to low thousands of individuals by excessive hunting for meat, hides and horn in the 19th and early 20th Centuries. The primary international market is for horns from male animals (only males are horned), long used in traditional Asian medicinal practices. Under protective measures, the species recovered with numbers reaching the hundreds of thousands by the 1950s, but these gains were partly reversed when Soviet regulatory systems and border restrictions collapsed in the early 1990s. Licensed exports of saiga horn to East and Southeast Asia were replaced by largely unregulated hunting and trade. Regulated hunting and trade were resumed alongside the listing of saiga in CITES Appendix II in 1995, but legal exports were stopped within the next decade. At CoP18 in 2019, instead of a proposed Appendix-I listing, a zero quota for wild specimens traded for commercial purposes of both saiga species, was adopted as an annotation (A2) to their listings in Appendix II. The proponent now seeks to amend the annotation for *Saiga tatarica* so that the zero quota does not apply to specimens from the population of Kazakhstan, which holds over 98% of the global population.

Although legal hunting and horn export of *Saiga tatarica* were halted at the end of the 1990s populations of the species continued to suffer large fluctuations, largely caused by disease outbreaks and poaching. Most notably, in 2015 a bacterial infection caused the mortality of over 200,000 individuals in Kazakhstan within a three-week period (at that time more than half of the global population). The species has also shown vulnerability to the effects of extreme climatic events and is constrained by loss or degradation of steppe habitats due to conversion for agriculture and overgrazing and disruption of seasonal migration by development of linear infrastructure (railways, roads, pipelines, and border fences). Nevertheless, due to high fecundity, populations can quickly rebound and the latest estimate was that the Kazakhstan population numbered over 2.8 million individuals in April 2024 and was still growing rapidly (at around 40% per year).

Past trade volumes appear to have significantly exceeded actual consumption levels and large stockpiles accumulated in some destination countries. A CITES review in 2006 estimated at least 130 tonnes of horn to be held outside the range States, with potential to meet demand for 10-15 years. Most legal trade movements over the past two decades have been between these non-range countries, mostly declared as pre-Convention, therefore by inference from stockpiles accumulated legally before 1995. Nevertheless, some illegal trade from Kazakhstan and, to a lesser extent, the Russian Federation continues, with seizures totalling 1-2 tonnes of horn each year recorded in these countries during the period 2022-2024. However, recent reports for both countries indicate that poaching remains at a stable level, not posing significant threat to the population size.

Kazakhstan has taken comprehensive conservation measures for the species and is actively engaged in related international initiatives, including those coordinated under the CMS Memorandum of Understanding concerning Conservation, Restoration and Sustainable Use of the Saiga Antelope (Saiga MoU), developed in collaboration with CITES. A hunting moratorium, in place since 1999, was temporarily relaxed during the autumn-winter period of 2023/24 when limited take was permitted on an experimental basis in light of increasing conflict with farming. Approximately 43,000 animals were removed, the horns from which were stored, and the meat and hides processed for domestic sale. Recent reports indicate that a further limited harvest of males was permitted in June 2025 and

that a more extensive harvest is planned for autumn 2025, possibly targeting females only, with the goal to reduce populations by up to 20% altogether during the year.

Kazakhstan indicates that its saiga management operations are state-controlled and that annual quotas for international trade will be established based on results of population monitoring employing a long-established and credible methodology. Control measures, including hunter registration, field marking and inventory systems, have been developed to reduce the potential for laundering of horn from poached animals into the stockpile derived from legal hunting and collection of horn from natural mortality. For trade control, a marking and chain of custody system is designed to ensure that exported horns have a legal origin and that illegally harvested horns cannot be used in legal trade. A stockpile of 42,161 horns from the experimental harvest in 2023/2024 (likely weighing 5-8 tonnes) has reportedly already been marked with barcode labels and is kept under government control. Future exports are to be managed through a single government-appointed organisation and it is planned that some horn stock will be retained prior to export for market stability to buffer any restrictions that might have to be introduced if population data indicate concern. If the current zero quota is lifted, Kazakhstan proposes that its horn marking and container tagging system be adopted by the CITES Parties as a common standard for international trade control.

In the main countries that imported saiga horn in the past, domestic trade and sale remains legal, though subject to stockpile declarations and regulation. CITES Decision 19.213 and the 2021-2025 work plan under the Saiga MoU called for involved countries to adopt internal market controls for saiga parts, including registration of stockpiles, labelling of parts and products, and registration of manufacturers and traders. Although most relevant governments have responded to related CITES Secretariat requests for information on stockpile controls, it appears that inventory control and monitoring is in most cases not comprehensive or regularly updated and there is a lack of transparency about actual volumes of horns now being held.

Analysis: Under the proposed amendment of the annotation for *Saiga tatarica*, all exports of specimens of this species from Kazakhstan would be subject to Appendix-II regulation. The zero quota for wild specimens traded for commercial purposes would continue to apply for specimens from *S. tatarica* populations in the Russian Federation and Uzbekistan, and to specimens of *S. borealis*, from Mongolia. There are no specific guidelines for assessing proposals to change annotations of this nature, but it seems appropriate to ensure that satisfactory precautionary measures, as detailed in Annex 4 of Res. Conf. 9.24 (Rev. CoP17), would be in place. Kazakhstan has not proposed an export quota or other special measure as an integrated part of its proposal, so the Parties have to consider whether they are satisfied that Kazakhstan will effectively implement the requirements of the Convention, particularly Article IV and enforcement controls.

Population data necessary to support Article IV implementation are already being collected on an annual basis and the planned centralized management system clearly has potential to ensure that harvest limits could be effectively managed and their impacts assessed in a timely manner. However, the proponents make no specific statement about how overall future harvest limits will be calculated, despite expert guidance on setting sustainable hunting quotas being referenced in the national saiga conservation and management strategy. Considering the on-going threat of disease outbreak and the findings of published population modelling, some experts have expressed concern that a 20% annual cull mooted in Kazakhstan's report to a meeting of Saiga MoU Parties in 2025 may be excessive.

The inventory control and marking systems in use have strong potential to mitigate risks that saiga horn illegally harvested from within Kazakhstan or from other countries, might be infiltrated into legal trade flows to end markets. There is some risk that a resumed supply of legal horn might increase the potential for legally held stockpiles in destination countries to provide cover for parallel illegal trade from range States. Overall, this appears to be a minimal risk and current evidence indicates that poaching and illegal trade levels are not a significant concern. Furthermore, almost all the global population of saiga would be subject to the management of a single country, Kazakhstan. Even greater security would be provided by stronger complementary control and monitoring of stockpiles in all involved countries, as already recommended by the Parties.

With some clarification of how existing guidance on setting precautionary harvest levels will be applied, and reassurance about trade control cooperation with market countries, the proposal to exclude this population from the current zero-quota annotation appears to be proportionate to the risks to the species in Kazakhstan.

Other considerations: In the SS, Kazakhstan notes it is considering an alternative approach to saiga horn trade management, with only finished processed products allowed for export. Considering the nature of end uses, with saiga horn used for direct dispensing by pharmacists and manufacture of patent medicines, the viability of such an approach is questionable.

Deletion of Giraffe *Giraffa camelopardalis* populations of Angola, Botswana, Eswatini, Malawi, Mozambique, Namibia, South Africa and Zimbabwe from Appendix II

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

Summary: The Giraffe *Giraffa camelopardalis* is the world's tallest land mammal. It remains widespread across Southern and Eastern Africa, with smaller, isolated populations in West and Central Africa. In 2016, based on evidence of 36-40% declines over three generations (30 years), the IUCN Red List classified the Giraffe as Vulnerable with the best available range-wide estimates indicating a total population in 1985 of around 152,000-163,000 individuals (106,000-114,000 mature), declining to around 100,000 in 2015 (68,000 mature). The main factors responsible for the observed declines were habitat loss, illegal hunting, civil unrest and ecological changes. The presence and severity of those threats, and the conservation strategies used to manage Giraffe populations showed large regional variations. More recently increases, with notable regional variations, have taken place across all parts of the range with the 2025 population estimated at 141,000.

The proponents refer to alternative taxonomies being proposed and supported by researchers within the scientific community, which 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*). However, they do not explicitly recommend the adoption of an updated nomenclature standard reference for giraffes and no updates to the taxonomy or nomenclature of the giraffe species have been recommended by the Animals Committee for consideration by the Parties at CoP20. This Proposal should therefore be understood to refer to the national populations of *Giraffa camelopardalis*, following current CITES standard nomenclature.

The species was included in Appendix II in 2019 after CoP18. At that time a number of countries (Botswana, the Democratic Republic of the Congo, Eswatini, Namibia, South Africa, United Republic of Tanzania, Zambia and Zimbabwe) took out reservations on the listing. The proponents now seek deletion of the populations of *G. camelopardalis* in Angola, Botswana, Eswatini, Malawi, Mozambique, Namibia, South Africa and Zimbabwe from Appendix II. The combined current (2025) population estimate for these eight range States is 68,000, or just under half of the global population. This represents a five-fold increase for southern African populations that were estimated to number under 15,000 in the 1970s.

Giraffes are traded both internationally and domestically. Reported trade in wild-sourced live Giraffes since the species was listed in Appendix II has been predominately from South Africa and Namibia, with 948 live specimens exported between 2019 and 2023. There is also a significant market for trophies from hunting, with a range of products being traded from hunted Giraffe exported from South Africa, Namibia and Zimbabwe. CITES reported trade from all other Giraffe range States since the 2019 listing has been negligible, comprising one trophy from Zambia (though three were reported by importers) and a small quantity of scientific specimens from Uganda and South Sudan (a non-Party). A record of 43 live individuals exported from Niger is likely a reporting error.

There are no indications of illegal killing of Giraffes for international trade; where poaching does take place this is reportedly for local use.

Analysis: The Giraffe populations referred to in this proposal do not appear to meet the criteria for inclusion in Appendix II. They do not have a restricted range nor a small population, are increasing and there is **no indication that regulation of international trade is required to prevent them becoming eligible for inclusion in Appendix I in the near future, nor is harvest for trade reducing them to a level at which their survival might be threatened.**

Adoption of this proposal would result in a split-listing of *Giraffa camelopardalis* by geographical population, with some remaining in the Appendices and others excluded. According to Annex 3 of Res. Conf. 9.24 (Rev. CoP17), "split-listings that place some populations of a species in the Appendices and the rest outside the Appendices should not normally be permitted" due to potential enforcement

challenges, although there are a few precedents for such split-listing in the Appendices. The only nearby Giraffe population – that in Zambia – is not part of the proposal and would remain in the Appendices if the proposal were accepted. However, reported Zambian exports are negligible and there are no indications of cross-border trade in Giraffes or Giraffe products between Zambia and the adjacent co-proponent Giraffe range States (Angola, Botswana, Namibia, Malawi, Mozambique and Zimbabwe). **It seems unlikely that such a split-listing would create significant enforcement problems.**

Inclusion of Okapi *Okapia johnstoni* in Appendix I

Proponent: Democratic Republic of the Congo

Summary: The Okapi *Okapia johnstoni* is a large, solitary member of the giraffe family that is now endemic to the Democratic Republic of the Congo but may have also occurred in Uganda in the past. The species prefers mixed primary and secondary forests where dense plant cover provides camouflage and a variety of plant species for consumption.

Estimates of population size are limited but in 2013, it was determined there could be 35,000-50,000 individuals. However, this estimate should be viewed with caution as it was calculated using patchily distributed dung-based surveys. In 2015, it was determined that the species had an area of occupancy of just over 14,000 km², although this is likely to be an underestimate. This species was assessed globally as Endangered in 2015 on the IUCN Red List. The justification was that the species had been decreasing since at least 1995 and was projected to continue decreasing. The rate of decline was estimated to have exceeded 50% over the past three generations (24 years). Dung surveys in 2018 in the Okapi Wildlife Reserve, the best protected area in its range, showed dung densities decreased by 60% since 1995.

The drivers of declines are illegal hunting, including by illegal armed groups in and around key protected areas and artisanal mining degrading the species' habitat. Armed groups have threatened conservation efforts including attacking the headquarters of the Okapi Wildlife Reserve, killing several people as well as 14 Okapis present at the centre, likely in retaliation for recent engagements by rangers that disrupted poaching and mining activities.

The species is totally protected in the Democratic Republic of the Congo, prohibiting the killing, capture, or commercial export. A small legal trade in captive-bred Okapi has been permitted that helps to fund conservation infrastructure. Illegal hunting for its meat, skin and oil is considered a threat to the species. Its oil is believed to have medicinal properties. There is some evidence that illegal trade occurs across the border into Uganda in Okapi products such as skins and oil, but the extent of this trade is unknown. Anecdotal reports suggest there is a trade to Southeast Asia and the Middle East, but no firm evidence is available. Likewise, an anecdotal report mentions a domestic market has opened up for the trade in Okapi oil in the Democratic Republic of the Congo, involving processing in South Africa, but this has not been corroborated.

Analysis: Information on the status of *Okapia johnstoni* is scarce. The species does not have a small population, nor a restricted area of distribution. However, acknowledging limited data sources, declines in population size have been inferred based on dung counts which would indicate that the species **has undergone a marked recent rate of decline** in its population size in the wild over the last three generations **meeting the biological criteria** in Res. Conf. 9.24 (Rev CoP17) Annex 1, paragraph C.

In the Democratic Republic of the Congo, the species cannot be exported for commercial purposes and therefore any international trade is illegal. Small numbers of animals bred in captivity have been exported legally from the Democratic Republic of the Congo to fund Okapi conservation efforts. Evidence of illegal trade is limited and, therefore **there is insufficient information to determine whether the species is affected by international trade, so it is not possible to assess whether the species overall qualifies for inclusion in Appendix I.**

Inclusion of Striped Hyena *Hyaena hyaena* in Appendix I

Proponents: Israel and Tajikistan

Summary: The Striped Hyena *Hyaena hyaena* is one of four extant species within the family Hyenidae. The species has an extensive, yet patchy distribution, extending from East and North Africa, through the Middle East and Arabian Peninsula, the Caucasus and Central Asia to the Indian subcontinent. It is found in 37 range countries, and potentially present in a further ten.

The species was globally assessed as Near Threatened in 2014 on the IUCN Red List. Estimates of the species' population size are limited. In 1998, the global population estimate was between 5,000 and 9,999 mature individuals with a decreasing population trend. A current preliminary estimate based on all available empirical data suggests that the global population is greater than 15,000 individuals. Population trend data across the species' range are also limited; however, observed declines reported in a few range States have been attributed to human-induced mortality, particularly through persecution such as poisoning, collisions with vehicles, reduced availability of natural and domestic carrion sources, and shifts in livestock management practices. The species has been extirpated from parts of its range, including in Bangladesh, and there are large areas of possibly extant or unknown range due to a paucity of data.

Although there appears to be limited legal trade in the species sourced from the wild (38 specimens mostly as hunting trophies, with a few skins and live animals reported over the past ten years whilst the species has been listed in Appendix III), there are also reports of illegal trade involving opportunistic transactions in parts and live animals. However, international trade does not currently appear to be a significant driver of the species' population decrease.

Analysis: *Hyaena hyaena* does not appear to have a small population, nor a restricted area of distribution. While the species' population may be decreasing, it is not possible to determine the extent of the reduction, and it is **unlikely that it would meet the biological criteria for an Appendix I** listing in accordance with Annex 1 paragraph C. Given limited evidence of significant international trade, **the species does not appear to meet the criteria for inclusion in Appendix I** in Res. Conf. 9.24 (Rev. CoP17).

Transfer of Guadalupe Fur Seal *Arctocephalus townsendi* from Appendix I to Appendix II

Proponents: Mexico and the United States of America

Summary: The Guadalupe Fur Seal *Arctocephalus townsendi* is a pinniped species native to the North Pacific. Historically found across the Channel Islands off the southwestern coast of the USA, and Guadalupe Island, the San Benito Archipelago, Cedros Island, and the Revillagigedo Archipelago off the western coast of Mexico. Once thought extinct due to intense hunting by the fur trade during the 18th and 19th centuries, the species was rediscovered on Guadalupe Island in 1954. Since then, strong conservation measures implemented by Mexico and the USA have enabled a notable population recovery.

From a remnant population of an estimated 200–500 individuals in the 1950s, *A. townsendi* has rebounded significantly. The population increased from 34,000–44,000 individuals in 2013, to around 74,000 individuals (~64,000 on Guadalupe Island and ~10,000 on San Benito Island) in 2022–2024, with continuing annual growth and a potential for recolonisation of historical sites. Nevertheless, the population remains below historical levels of up to 200,000 individuals.

The primary and only well-established breeding colony is located on Guadalupe Island, which hosts over 99% of all births. Recolonisation of former breeding sites remains slow and limited by ecological and demographic constraints. Reliance on a single breeding site increases the species' vulnerability to localised threats such as disease outbreaks, pollution, marine debris entanglement, invasive species, extreme weather events, and environmental variability (e.g. El Niño). Despite these vulnerabilities, the Guadalupe Fur Seal was globally assessed as Least Concern on the IUCN Red List in 2014. The species' distribution range is increasing, and sightings have been recorded as far north as Alaska in recent years, likely due to shifts in ocean temperatures.

Arctocephalus townsendi was included in CITES Appendix I due to its historic overexploitation and critical conservation status. International movement in this species has been extremely limited and primarily restricted to scientific specimens; only 40 transactions have been reported by direct exporters since 1975, with no recent evidence of commercial trade or any indications that trade currently poses a threat to the species, although this is unsurprising since the species is listed in Appendix I. Similarly, there is little evidence of illegal international trade. Although the USA suggests that some illegal trade may be occurring, there is no publicly available evidence to confirm this.

National legislation in the two range States provides strict protection. In Mexico, hunting and trade of *A. townsendi* have been banned since 1933, and the species is listed as a national conservation priority and a national Conservation Action Programme is in place. In the USA, the species is listed under the Endangered Species Act and the Marine Mammal Protection Act, and additional protection is granted by the Fur Seal Trade Act, which prohibits the capture, transport, importation, or possession of fur seals. These strong domestic frameworks are sufficient to ensure continued protection and monitoring. These measures would remain in place in the event of the transfer to Appendix II and therefore it is not anticipated that trade, legal or illegal would be stimulated by this.

Analysis: The population of *Arctocephalus townsendi* has recovered from a few hundred individuals in the 1950s to a population of approximately 74,000 in 2022–2024. It does not have a restricted area of distribution and its range may be expanding due to climatic changes, though it occurs at very few breeding locations. International trade has been negligible and limited primarily to scientific specimens, and the transfer of the species to Appendix II is not expected to increase demand nor create enforcement challenges, particularly as other species in the genus are listed in Appendix II. Robust national legislation is already in place that prohibits the harvest and trade of the species, ensuring that domestic controls are sufficient to enforce Appendix II provisions. The **species no longer meets the biological or trade criteria for inclusion in Appendix I and precautionary safeguards are in place**. This proposal was supported by the Animals Committee at its 33rd meeting.

Deletion of Caribbean Monk Seal *Monachus tropicalis* from Appendix I

Proponents: Mexico and the United States of America

Summary: The genus *Monachus*, at that time regarded as comprising three species (the Mediterranean Monk Seal *M. monachus*, the Hawaiian Monk Seal *M. schauinslandi* and the Caribbean Monk Seal *M. tropicalis*) was included in Appendix I in 1975.

The Caribbean Monk Seal, first described in 1492 during the voyages of Christopher Columbus to the Americas, was found in the Caribbean Sea and part of the Gulf of Mexico, from the south of Florida to Colombia and Venezuela. Demand, primarily for skins and oil from blubber resulted in overharvesting. The species was last reliably reported in 1952 and was classified as Extinct by IUCN in 1986.

The Caribbean Monk Seal was reviewed as part of the Periodic Review process, and the Animals Committee agreed with the recommendation to delete it as an extinct species from Appendix I. Were this proposal to be accepted, the Animals Committee and Nomenclature Specialist have recommended including a note in the Appendices that reads "*Monachus* spp. (except '*Monachus tropicalis*' which is extinct and was removed from the Appendices on [insert date])".

However, the Animals Committee, at its 33rd meeting, agreed to submit for adoption by CoP20 a proposed nomenclature update concerning Monk Seals (see document CoP20 Doc.110). If adopted this will split *Monachus* into two genera; *Neomonachus*, comprising the new combinations *N. schauinslandi* and *N. tropicalis*, and *Monachus*, retaining *M. monachus* unchanged. These references would come into effect 90 days after CoP20 at the same time as the amendments to the Appendices. Were both the listing proposal and the revised taxonomy to be adopted the amendment to the listing in the appendices could be one of the following options:

- *Monachus* spp. and *Neomonachus* spp. (except '*Neomonachus tropicalis*' which is extinct and was removed from the Appendices on [insert date]), or
- *Monachus monachus* and *Neomonachus* spp. (except '*Neomonachus tropicalis*' which is extinct and was removed from the Appendices on [insert date])

There has been very little trade in the other two extant species of *Monachus* almost all in scientific specimens of the extant species. The threats that affected the species (hunting for blubber and skins) no longer exist for most seal populations.

Analysis: The Caribbean Monk Seal was last seen before the species was included in the Appendices as part of a genus listing for Monk Seals. It was declared Extinct in 1986 on the IUCN Red List.

The Precautionary measures of Annex 4 in Res. Conf. 9.24 (Rev. CoP17) allows for the deletion of extinct species from Appendix I subject to the provisions of paragraph D, although this paragraph refers to species that are regarded as possibly extinct rather than extinct. Regardless, there is no reason to assume that the species would be affected by trade in the extremely unlikely event of its rediscovery. Even though the Caribbean Monk Seal may resemble the extant species of monk seal, amending the appendices to note that the extinct taxon is not in the Appendices, as is proposed, would ensure that there was no potential for one of the extant species to be exported as the Caribbean Monk Seal and therefore **deletion would not cause difficulties in implementing the Convention or complicate the Appendices.**

In the case that the new standard reference for this taxon is adopted, **amendment of the appendices could be one of the following options:**

- *Monachus* spp. and *Neomonachus* spp. (except '*Neomonachus tropicalis*' which is extinct and was removed from the Appendices on [insert date]), or
- *Monachus monachus* and *Neomonachus* spp. (except '*Neomonachus tropicalis*' which is extinct and was removed from the Appendices on [insert date])

Amendment of the Annotation of the Population of Southern White Rhinoceros *Ceratotherium simum simum* of Namibia Listed in Appendix II

Proponent: Namibia

Summary: The Southern White Rhinoceros *Ceratotherium simum simum* is one of two subspecies of White Rhinoceros (the other being the Northern White Rhinoceros *Ceratotherium simum cottoni*, likely to be extinct in the wild).

The Rhinocerotidae family was included in Appendix I in 1977. In 1995, the South African population of *Ceratotherium simum simum* was transferred to Appendix II. In 2005, the Eswatini (then Swaziland) population was also transferred to Appendix II, and in 2023, the Namibian population was transferred to Appendix II. The current listing states: *"Only the populations of Eswatini, Namibia and South Africa; all other populations are included in Appendix I. The populations of Eswatini and South Africa are included in Appendix II for the exclusive purpose of allowing international trade in live animals to appropriate and acceptable destinations and hunting trophies. The population of Namibia 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."*

The current proposal is to 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 seizure 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 domestic 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."

At the end of the 19th century the Southern White Rhinoceros was on the brink of extinction with one small population of 20-50 individuals remaining in South Africa. After years of protection and translocations, the subspecies had grown to an estimated 21,316 individuals by the end of 2012. However, following an increase in poaching, estimated numbers declined to 18,064 by the end of 2017 (a ~15% reduction). After further decreases, the population increased from 15,940 in 2021 to 16,799 in 2022, reaching 17,462 in 2023. By the end of 2024 there were estimated to be 15,750 individuals on the continent, the decrease being mostly because of an increase in poaching in South Africa.

In Namibia, from an initial reintroduction of 16 individuals in 1975, the White Rhino population grew by 6.7% annually to reach 1,500 by 2024. Currently, 1,161 (ca 80% of the total) are privately owned across roughly 74 populations, while 339 remain under state ownership in four protected areas.

Between 2022 and 2024 43 animals were legally hunted for trophies, equivalent to about 0.9% of the Namibian population. Between 2022 and 2024, 124 live individuals have been exported by Namibia. Domestic consumptive use of White Rhino and trade in its horn and other products is currently not

permitted in Namibia. Adult males are sometimes dehorned for safety or for management to deter poaching.

The greatest threat to the global population of White Rhino is poaching for the horn, with most losses occurring in South Africa. Since 2013 around 160 have been poached in Namibia; unrecovered horns are presumed to have entered illegal trade. In response to poaching risks, private landowners contend with high security costs to protect their rhino herds. The proponents note that despite current income generated from tourism, trophy hunting and live sales, the income often falls short to cover the costs, with owners reducing or disposing of their rhino herds, sometimes turning to other forms of land use and reducing the area of habitat available for conservation. The proponents also note that there are 12 million hectares of freehold land potentially suitable for White Rhino that remains largely unused as it is not financially viable for landowners to keep them. It is argued that the creation of financial incentives from rhino custodianship could encourage landowners to shift from other land uses to conservation, with a wide range of benefits.

It is not clear whether all privately held stockpiles are currently registered with the Government, nor how the stockpiles are currently secured. Approximately 70% of government-managed horns are genetically profiled and microchipped, with data integrated into a database (RhODIS). In the private sector, 80% of horns have been sampled, although only legally acquired historic horns are included under current permit frameworks. In addition to currently held stockpiles, horn from future dehorning would also be traded. The SS notes using an adaptive “pilot” framework for this but does not provide details.

The proponents set out in the annotation and in the supporting statement how management measures will be put in place to control supply, including permit control, marking of animals/products, customs and border control and how law enforcement is implemented. Information on how private landowners will engage in this process is lacking. There is also limited specific information on how the sale and exports of horn would be organised.

Namibia has also proposed the once-off export of its stockpile of rhino horn in Prop 10 relating to its population of Black Rhino. The supporting statement for Prop 10 includes a table detailing current rhinoceros horn stockpiles held by Namibia (currently almost 4.7 tonnes as of June 2025), but it does not state whether any of this is White Rhino horn.

Analysis: The Namibian population of the Southern White Rhino is already in Appendix II. There are no specific guidelines for assessing proposals to change annotations of this nature, but it seems appropriate to ensure that satisfactory precautionary measures, as detailed in Annex 4 of Res. Conf. 9.24 (Rev. CoP17), would be in place. Namibia has not proposed an export quota within the annotation, but has proposed several special measures to be approved by the Parties as an integrated part of its proposal through an annotation to the listing (Annex 4 A.2.a) iii)). The key question is to consider whether the safeguards provided by this annotation, together with management measures and enforcement controls described by Namibia might adequately mitigate risks for populations of *Ceratotherium simum simum* or other rhinoceros species.

The special measures detailed in the proposed annotation address the origin of horn to be exported (registered stockpiles of legally acquired and individually identifiable horn of known origin) and a mechanism for approving any future trading partners. However, it is not stated what stockpile of horn of *Ceratotherium simum simum* exist in Namibia already and what quantity might be expected to accumulate in the future including from dehorning. The supporting statement refers to an initial cap on exports of 200 kg of horn per year, with review of impacts and suspension or revision of quotas apparently being assumed as a matter of government prerogative. There is no indication of how long this phase is envisaged. As this is not an integral part of the proposal contained in the annotation, and as noted by the proponents, this quantity could change, and the trade would be subject only to implementation of Article IV of the Convention.

Despite Namibia's successful conservation efforts and detailed provision of information on enforcement controls and compliance, the Parties may seek more explicit reference to such management measures within an annotation.

The meaning and criteria for "sufficient national legislation and domestic trade controls" in prospective importing countries and the standards and process for verifying importing countries are not elaborated. Nor is there any indication in the proposed annotation or supporting statement of how future sales of rhino horn might be managed on supply or demand sides to minimize risks of perverse outcomes. This is particularly important, because currently there are no legal end markets for rhinoceros horn, yet illegal trade persists. **It is unclear how the sale of small quantities of horn from *Ceratotherium simum simum* could be expected to affect the wider rhinoceros horn market that currently involves illegal trade of several tonnes of horn each year.** Furthermore, while the CITES Secretariat is identified as playing a significant role in verifying the suitability of proposed trading partners, it is not clear how and with what resources it would undertake this work.

Regarding allowing the international trade in hunting trophies, the number of trophies exported is currently low, comprising a small proportion of the national population and the subspecies is well managed. Therefore, **satisfactory precautionary measures are likely to be met in relation to hunting trophies.**

Transfer of the population of South-Western Black Rhinoceros *Diceros bicornis bicornis* of Namibia from Appendix I to Appendix II with an annotation

Proponent: Namibia

Summary: The South-Western Black Rhinoceros *Diceros bicornis bicornis* is one of three extant subspecies of Black Rhinoceros (the others being the Eastern Black Rhino *Diceros bicornis michaeli* and the South-Eastern Black Rhino *Diceros bicornis minor*). The Black Rhinoceros has been included in Appendix I (under the family listing for Rhinocerotidae) since 1977.

The proposal is to 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:

- i) only registered Government-owned stock, originating in the State (excluding seized rhinoceros horn and rhinoceros horns of unknown origin);*
- 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 domestic trade controls;*
- iv) not before the Secretariat has verified prospective importing countries and the registered stocks; and*
- v) the proceeds of 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."

The Black Rhino was once relatively abundant in Namibia but was reduced to an estimated population of fewer than 100 by the 1960s. Numbers have recovered in recent years, increasing from around 1000 in 2004 to just over 2000 in 2024, with the country now home to over 80% of the global population. The increase is attributed to range expansion through the translocation of individuals to more secure areas, horn removal at times when poaching was a threat, close protection and monitoring of existing populations and the creation of new populations. In recent years numbers have stabilised, attributed to the impacts of drought. In Namibia, Black Rhinos are property of the State but occur in areas within different land tenure systems as part of a custodianship scheme.

Namibia has an annual hunting quota of five adult males, with the funds generated being used for conservation, although between 2009 and 2024 only 20 individuals were hunted for trophies. Between 2014 and 2024, no live individuals were exported. Domestic consumptive use of Black Rhino and trade in its horn and other products is currently not permitted in Namibia.

The proponents state that one of the most significant threats to wild rhino populations is the unsustainable cost of anti-poaching efforts. They propose that legal trade could replace illegal trade, benefiting the conservation of rhino populations, provided user demand can be met.

According to the supporting statement the proposed trade is a once-off sale of horn stockpiles although the quantity is not specified in the proposed annotation. The supporting statement includes a table detailing current rhinoceros horn stockpiles held by Namibia (almost 4.7 tonnes as of June 2025), but it does not include a breakdown by species. Namibia has also submitted a proposal to allow trade in White Rhino horn (Prop 9).

The proponents set out in the annotation and in the supporting statement what management measures will be put in place to control the supply of Black Rhino including permit control, marking of animals/products, customs and border control along with details of enforcement measures. Little specific information is presented on the measures that will be put in place to control the trade of horn

from the demand side, given that many potential destinations currently have domestic legislation that prohibits rhino horn trade.

Analysis: Namibia's population of Black Rhinoceros *Diceros bicornis bicornis* does not have a restricted range. Although its population is still small, it has increased steadily from historic lows and has now stabilized at around 2,100. The **subspecies does not appear to meet the biological criteria for Appendix I** in accordance with Annex 1 of Res. Conf. 9.24 (Rev. CoP17).

When considering the transfer of a taxon from Appendix I to Appendix II, the Resolution calls for the precautionary measures set out in its Annex 4 to be met, in this case, it appears, through an annotation forming an integrated part of the proposal. This addresses: the origin of horns to be exported (registered stockpiles of legally acquired and individually identifiable horns of known origin); a mechanism for approving any future trading partners; and the manner in which proceeds from trade will be used (for rhinoceros conservation and community development programmes within or adjacent to the rhinoceros range). The proponent has also described in the supporting statement a range of national management measures and enforcement controls aimed to mitigate risks for populations of other rhinoceros species.

With respect to the special measure annotation proposed, there is no reference made to the one-off nature of trade from registered stockpiles referred to in the supporting statement, nor the amount of horn proposed for export. In terms of future trade levels, as it stands the proposal amounts to unqualified implementation of Article IV of the Convention. **Despite Namibia's successful conservation efforts and detailed provision of information on enforcement controls and compliance, the Parties may seek more explicit reference in an annotation to the export limitation explained in the supporting statement.**

The meaning and criteria for "sufficient national legislation and domestic trade controls" in prospective importing countries and the standards and process for verifying importing countries are not elaborated. Nor is there any indication in the proposed annotation or supporting statement of how future sales of rhino horn might be managed on supply or demand sides to minimize risks of perverse outcomes. This is particularly important, because currently there are no legal end markets for rhinoceros horn, yet illegal trade persists. It is unclear how a one-off sale of Black Rhinoceros horn would affect demand in the future: opening a legal market may increase poaching pressure in other range States with fewer resources to address it. Furthermore, while the CITES Secretariat is identified as playing a significant role in verifying the suitability of proposed trading partners, it is not clear how and with what resources it would undertake this work. **Overall, insufficient precautionary measures have been detailed.**

Inclusion of Hoffman's Two-toed Sloth *Choloepus hoffmanni* and Linné's Two-toed Sloth *Choloepus didactylus* in Appendix II

Proponents: Brazil, Costa Rica, Panama

Summary: Hoffmann's Two-toed Sloth *Choloepus hoffmanni* and Linné's Two-toed Sloth *Choloepus didactylus* are arboreal mammals, widely distributed in Central and South America which together comprise the family Megalonychidae. There are four other sloth species, all in the family Bradypodidae. Two of these (*Bradypus pygmaeus* and *B. variegatus*) were included in Appendix II in 1983.

Choloepus hoffmanni is distributed from Honduras in Central America through northwestern South America to Bolivia and western Brazil, while *C. didactylus* occurs in the northern Amazon forest from Brazil to Ecuador. Both species are forest-dependent, nocturnal, and exhibit cryptic behaviour, making assessment of population status challenging. Both were globally assessed as Least Concern on the IUCN Red List in 2022. Some subpopulations have been assessed as threatened at the national level, as evidence suggests that local populations, particularly of *C. hoffmanni* in Colombia, Bolivia, and parts of Central America, are experiencing decreases mainly due to ongoing habitat loss and fragmentation caused by land use change and forest fires. *C. hoffmanni* is proposed for inclusion in Appendix II accordance with Article II, paragraph 2(a) of the Convention, and *C. didactylus* for 'lookalike' reasons in accordance with paragraph 2(b).

There are no global population size estimates for either species, but both are reported to be locally common. Population density estimates for *C. hoffmanni* range from 0.2 to 1.5 individuals per hectare in various habitats across Colombia and Panama. *C. didactylus* has been recorded at densities between 0.13 and 0.9 individuals per hectare in the Brazilian Amazon and French Guiana. Recent field observations in central-southern Amazonia indicate either a significant southward range expansion for *C. didactylus* or, more likely, that the species has long been present there but hitherto unrecorded. Both species are affected by habitat loss, deforestation for agriculture and cattle ranching, forest fires, logging, and urban expansion. Despite these pressures, they exhibit some adaptability to disturbed landscapes, with *C. hoffmanni* in particular occurring in modified habitats.

Given the extensive ranges of both species, which run to many tens of millions of hectares, if these species occur in even a fraction of this area at densities comparable to those observed in studies (0.13 to 1.5 per hectare), then the global populations of both could be very large.

Both species are subject to some domestic use, for food and as medicines, but there are no indications that this has a significant impact on wild populations. Sloths in international markets are almost exclusively traded as live animals for the exotic pet trade. *Choloepus hoffmanni* was included in Appendix III by Costa Rica from 1976 to 2019 during which time 39 live individuals were reported as exported or re-exported. During this period, importing countries reported the import of 80 individuals (almost all to the USA). Most traded individuals were recorded to be wild-sourced, with a small number in trade reported as captive-bred (from the USA). US LEMIS data report somewhat higher levels of imports of *C. didactylus* with some 1340 wild-sourced individuals reported between 2008 and 2020, virtually all of these from Guyana. Legal trade among other countries is poorly documented, and no comprehensive global trade data are available. There is no evidence of commercial-scale captive breeding for either species.

Some illegal trade has also been documented, although it appears largely domestic in nature with animals reportedly taken for sale as pets or for display to tourists. From 2015 to 2019, over 1,100 sloths were seized in Colombia, though species-level identification was generally absent (both *Choloepus* species and *Bradypus variegatus* occur there). There is some evidence of illegal export using fraudulent permits. Between 2021 and 2025, around 170 sloths were reported as illegally exported from Peru (where both *Choloepus* species and *Bradypus variegatus* also occur) to countries including the United Arab Emirates, Czechia and Malaysia. Animals can reach relatively high prices (several hundred USD) on international markets.

CITES-reported trade in the Appendix-II listed *Bradypus variegatus* has been at a very low level since the species was included in the Appendices in 1983, with only 15 live animals recorded in trade, all except two imported into the USA (the second listed species, *B. pygmaeus*, is an isolated island taxon from Panama split off from *B. variegatus* in 2001 and has not appeared in trade).

Historically, distinguishing between the two species has been difficult due to overlap in their external morphology. The most apparent external differences are in pelage colour (darker in *C. didactylus*), body size and skull morphology. However, these traits are most evident in adults and are therefore of limited use when young animals are in trade.

Analysis: Both species of *Choloepus* sloths have extensive ranges in the Americas, can adapt to modified habitats and occur at moderate densities in parts of their range (up to 1.5 individuals per ha in the case of *C. hoffmanni*). Both species are currently assessed as Least Concern on the IUCN Red List and likely have large or very large populations, which are however thought to be declining overall, principally owing to large-scale habitat conversion. Both are known to have been traded legally and illegally as live animals for the exotic pet trade, predominantly for domestic markets, but reported numbers involved are small and are unlikely to have significant impacts on the wild population.

Based on such relatively low international trade levels, there is no indication that regulation of trade is required to avoid these species becoming eligible for inclusion in Appendix I in the near future, nor to ensure that harvest is not reducing the wild population to a level at which the survival of either of them might be threatened by continued harvesting or other influences. On this basis **neither species meets the criteria for inclusion in Appendix II set out in Annex 2a or b** of Res. Conf. 9.24 (Rev. CoP17).

Transfer of Golden-Bellied Mangabey *Cercocebus chrysogaster* from Appendix II to Appendix I

Proponent: Democratic Republic of the Congo

Summary: The Golden-Bellied Mangabey *Cercocebus chrysogaster* is the largest of seven *Cercocebus* mangabey species, endemic to the Central Congo basin of the Democratic Republic of the Congo. Its total known range covers 80,000 km² split into two smaller subpopulations. The species, which was considered a subspecies of *Cercocebus agilis* until 2007, occurs in variety of forest habitats at an elevation of 300-500 m, and is largely terrestrial. Little is known of its social structure; fecundity is thought to be low, with one infant produced per year and sexual maturity reached at four to five.

C. chrysogaster was categorised as Endangered in the IUCN Red List in 2020, with a population estimated at 10,000-30,000, considered likely to have declined by 40% over two generations and projected to be decreasing at a rate of 50% over 30 years (three generations, 1999-2029). The species is primarily threatened by a combination of high hunting pressure for wild meat and habitat loss and degradation, with an estimated 30% loss of habitat over the last 20 years, owing to logging and land conversion. Wild meat trade is reported to be a major threat, with the species frequently recorded in market and roadside sales but decreasing availability reported in recent years.

The species was included in CITES Appendix II in 1977, along with the rest of the order Primates. Some legal trade has been reported over the past ten years, with 146 live individuals from wild sources exported from the Democratic Republic of the Congo to countries including Ghana, Thailand, and the United Arab Emirates. There are reports of ongoing illegal international trade in small numbers. No national management is in place, the species is not explicitly protected by national law, and very little population monitoring occurs. Minimal captive breeding occurs, with little success globally.

Analysis: According to the most recent assessments the Golden-bellied Mangabey does not have a small population, nor does it have a restricted range. It has been harvested extensively for the wild meat, for national consumption, with reports of reduced availability indicating a decreasing population, associated with overharvest and habitat loss. In the absence of greater local conservation action, this decrease is projected to reach levels that could be approaching the guideline level for a marked recent decline.

The species has been reported in international trade as live animals in small numbers (around 15 per year in the past ten years), but it seems highly unlikely that this has a significant impact on the wild population compared with harvest for local consumption and loss of suitable habitat. Overall, it therefore **seems unlikely that the species meets the criteria for inclusion in Appendix I** in Res. Conf. 9.24 (Rev. CoP17).

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

Summary: The African Elephant *Loxodonta africana* population of Namibia was transferred from Appendix I to Appendix II in 1997 at the same time as the population of Botswana and Zimbabwe, with South Africa's population similarly transferred in 2000. These transfers were subject to detailed conditions that were further modified during subsequent meetings of the Conference of the Parties and are at present expressed in Annotation A10. This annotation is the subject of another amendment proposal at CoP20 (Prop 14), for which Namibia is also a proponent.

Namibia's elephant population increased from 7,500 in 1995 to over 25,000 at the end of 2024, with its distribution expanding because of population growth and increasing habitat availability.

The proposal is *"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."*

It is not clear how Namibia anticipates this proposal being applied in the Appendices, if adopted. A "full Appendix II status" can be interpreted as removal of the annotation that currently applies to Namibia's population of elephants allowing the trade in any parts and derivatives in accordance with Article IV. Currently, under the listing of its population in Appendix II and under existing annotation A10, Namibia is permitted to export hunting trophies, live animals for *in-situ* conservation, hides, hair and leather goods and non-commercial ekipas. Namibia has also exported live animals to zoos under Appendix I (see Analysis for Prop 14 for discussion of live trade from Namibia).

The most significant impact of the proposal would be to allow trade in raw ivory. The Proponent states that it intends to trade in an existing stock of 46,268.30 kg of registered whole tusks and pieces of Namibian origin, owned by the Government of the Republic of Namibia, for commercial purposes. This ivory stock is stated to have been accumulated only from elephants that died of natural causes and through management practices, though a detailed breakdown in the supporting statement of stockpiles held in Namibia infers that this total includes some ivory of unknown origin for which no documentation is available. It is unclear from the supporting statement whether further trade in subsequently accumulated stocks is anticipated after current stocks have been exported.

All revenue generated from ivory sales would be paid into the Game Products Trust Fund and used exclusively for elephant conservation—including monitoring, research, law enforcement, and other management expenses—as well as for community conservation and development programmes.

The stated intention is to trade with partners that have been verified by the CITES Secretariat to have sufficient national legislation and domestic trade controls to ensure that ivory imported from Namibia will not be re-exported and will be managed according to all requirements of Res. Conf. 10.10 (Rev. CoP19) on *Trade in elephant specimens* concerning domestic manufacturing and trade. Few details

are provided as to how the proposed legal trade would take place. No potential trading partners are named and historically prominent markets either now have trade bans in force or very restrictive markets allowing only sale of ivory legally imported many years ago.

Namibia's management measures are described and there is a comprehensive conservation and management plan for elephants to 2031.

Analysis: Assuming the intention is to remove the current annotation of the listing of Namibia's African Elephant population in Appendix II, it would mean that all specimens of *Loxodonta africana* from Namibia would be subject to standard Appendix II regulation. Since the transfer of Namibia's population from Appendix I to II, trade has only been permitted under specific conditions, with raw ivory exports limited in terms of quantity and time. The greatest change of the removal of the annotation would be allowing commercial trade in ivory and ivory products under Appendix II conditions. Resolutions Conf. 10.10 (Rev. CoP19) on *Trade in elephants* and Conf. 11.20 (Rev. CoP18) on *Definition of the term 'appropriate and acceptable destinations'* would still guide any trade, the latter specifically applying to export of live elephants.

There are no specific guidelines for assessing proposals to change annotations of this nature, but it seems appropriate to ensure that satisfactory precautionary measures, as detailed in Annex 4 of Res. Conf. 9.24 (Rev. CoP17) are addressed. No such measures are integrated into the proposed amendment through an annotation (some are referred to in the supporting statement but these would not be binding) therefore Parties must be satisfied with: implementation by Namibia of the requirements of the Convention, in particular Article IV; and appropriate enforcement controls and compliance with the requirements of the Convention for both Namibia and any trading partners.

Namibia has provided details on precautions that it would implement for trade of legal (and unknown) ivory stockpiles and a comprehensive management plan to 2031 is in place. Namibia has demonstrated its ability to manage its elephant populations and stresses contribution that sale of ivory stocks could make to their conservation and associated community conservation and development programmes.

However, few details are provided as to how the proposed legal trade would be carried out and controlled; for example, it is not specified which countries might permit legal imports and on what terms they might open currently closed or highly regulated markets, how and by whom the proposed licensing of traders would be implemented, or how trade would be monitored (including in end-user markets) to avoid laundering. While the CITES Secretariat is identified as playing a significant role, it is not clear how and with what resources it would undertake this work.

With respect to the **proposed trade in ivory, there is significant uncertainty about potential impacts of the release of a legal supply on the continuing global illegal trade in ivory**. Considering the historical and ongoing impacts of trade on the conservation of elephant species and the risks associated with this proposal, it is **not possible to conclude that this proposal includes satisfactory Precautionary measures**, as detailed in Annex 4 of the Resolution.

Amend the existing annotation for the populations of African Elephant *Loxodonta africana* in Botswana, Namibia, South Africa, and Zimbabwe

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

Summary: The African Elephant *Loxodonta africana* populations of Botswana, Namibia, and Zimbabwe were transferred from Appendix I to Appendix II in 1997, as was the population of South Africa in 2000. These transfers were subject to detailed conditions that were further modified during subsequent meetings of the Conference of the Parties and are at present expressed in Annotation A10 (previously Annotation 2) to the CITES Appendices. Annotation A10 allows for trade in various non-ivory specimens and products of *L. africana* under a range of conditions, somewhat different for each of the four range States in question. Regarding trade in ivory, the annotation currently only allows for trade 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. However, the annotation also includes wording that provided for limited exports of stockpiled raw ivory in the past, under a series of conditions. One of these conditions, added to the annotation at CoP14 in 2007, was that no further proposals to allow trade in elephant ivory from populations already in Appendix II should be submitted until at least nine years after the date of the last permitted sale of ivory that occurred in 2008, during which time a decision-making mechanism for a process of trade in ivory would be developed. No agreed decision-making mechanism for allowing trade in ivory under the auspices of the Conference of the Parties has been adopted.

The proposal is to amend the existing annotation for the Appendix II populations of *Loxodonta africana* in Botswana, Namibia, South Africa, and Zimbabwe in order to remove redundant text and reference to Resolutions and Decisions, harmonize the trade conditions for the four range States and remove reference to trade in raw ivory. The amendments proposed are as follows (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.

The proposed amendments would;

- In paragraphs b), g) ii) and h) remove reference to CITES Resolution and Decisions.
- In paragraph b) remove text stipulating that trade in live animals from Namibia and South Africa is restricted to *in situ* conservation programmes, and harmonize the conditions with those for Botswana and Zimbabwe that live trade is to “appropriate and acceptable destinations”.
- In paragraph e) allow for commercial trade in leather goods from Zimbabwe (and thus all four range States), currently limited to non-commercial goods only.
- In paragraph f) streamline and simplify annotation wording with no substantive impact.
- In paragraph g) remove reference to trade in registered raw ivory from the Annotation and the conditions under which that was permitted.
- In paragraph h) remove reference to not submitting further proposals to allow trade in elephant ivory for nine years after the single sale of ivory that occurred in 2008 (a period that lapsed in 2017).
- In the penultimate paragraph to delete the role of the Secretariat in causing trade to cease.

The proponents argue that Resolutions and Decisions referred to in paragraphs b, g (ii) and h of the annotation are non-binding and regard reference to these in an annotation to a CITES listing as problematic because it implies that the relevant Resolution or Decision should be considered legally binding on the Parties as part of the Appendices to the Convention. Furthermore, Resolution Conf. 4.6 (Rev. CoP18) on *Submission of draft resolutions and other documents for meetings of the Conference of the Parties* directs that when a Resolution is revised, the Secretariat is required to update the references to that Resolution in other current Resolutions, and by extension any annotation in which they are referred to, despite this potentially amending the listing without an amendment proposal being considered by the Conference of the Parties.

Namibia, South Africa and Zimbabwe have all reported the export of small numbers of live elephants, with Namibia and Zimbabwe having reported some to *ex-situ* destinations. According to the current annotation to the Appendix-II listing, Namibia’s exports were restricted to *in-situ* destinations. However, their exports to *ex-situ* destinations were carried out under Appendix-I conditions.

Leather items have been reported as exports from all four Parties with populations in Appendix II, although only South Africa and Zimbabwe have exported commercial items. According to A10, Zimbabwe can only export non-commercial leather items. No concerns have been raised over the impact of this trade.

The proposed amendment to the annotation A10 is based on consensus reached at the CITES Dialogue Meeting for African elephant range States that took place from 23 to 26 September 2024 (see document CoP20 Doc. 76.6).

Analysis: The proposal would have two substantive impacts on trade in elephant products. The first being that the conditions for trade in live animals would be harmonised between the four proponents, Botswana, Namibia, South Africa and Zimbabwe, no longer stipulating that Namibia and South Africa may only export for *in-situ* conservation. Any such exports from all four range States would still be guided by the Resolution on *Trade in elephants* (Res. Conf. 10.10 (Rev. CoP19)*) and Res. Conf. 11.20 (Rev. CoP18), on *Definition of acceptable and appropriate destinations*. The amendment to the wording is unlikely to have significant impact on trade.

The second substantive impact would be that Zimbabwe would be able to trade in commercial leather products, which appears to already be taking place in small quantities with no apparent problems being noted.

Although the deletion of paragraph g) appears to be a significant amendment, no trade in raw ivory has been permitted since the conditional sales agreed at CoP12 and therefore the removal of this condition will have no impact on the current trade in elephants. Paragraph h has been redundant for many years and its removal will have no impact.

Overall, **the amendments are very unlikely to have any negative impact on the trade or conservation of African Elephants from these range States**. Any significant changes in trade (including possible issues in compliance arising from implementation of the existing Resolutions addressing trade in elephants), can be addressed by the Standing Committee through implementation of Res. Conf. 14.3 (Rev. CoP19) on *CITES compliance procedures* or through the Review of Significant Trade process. 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.

Inclusion of hornbill genera *Ceratogymna* and *Bycanistes* in Appendix II

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

Summary: The genera *Ceratogymna* (two species) and *Bycanistes* (seven species) comprise nine large-bodied arboreal hornbill species found within Africa (a total of four genera occur there). The hornbills (Bucerotidae) are a diverse lineage of birds with species extending across Africa and Asia. Their unique morphology includes a horn-like casque above the beak, typically more pronounced in males. Many of the Asian hornbill species have been exploited for their casques and skulls, with four species currently included in Appendix I and 20 in Appendix II. African hornbills are threatened across their ranges by habitat loss and degradation resulting from deforestation, climate change and conversion for agriculture. More recently, trade trends have prompted concern about increasing pressure from the regional and international curio and pet trade. No African hornbill species are currently included in the Appendices. There is limited national protection, management, and population monitoring.

All the African hornbill species within the *Bycanistes* and *Ceratogymna* genera have large ranges, but information on population sizes is sparse, with population estimates of more than 10,000 for *Ceratogymna atrata* and *Ceratogymna elata* and no information on the *Bycanistes* species. Two species within the genera, *Bycanistes cylindricus* and *C. elata*, are listed as Vulnerable on the IUCN Red List, while *C. atrata* has been assessed as Near Threatened in 2025. All other species are listed as Least Concern. There is evidence of population reductions in almost all species, except for *C. elata* with an unknown population trend, as well as evidence of local extirpations in some range States. Hornbills have a unique mating strategy, are long-lived and have a low reproductive output, making them particularly vulnerable to exploitation. They are monogamous with females sealing themselves inside natural tree cavities while incubating eggs until the chicks have hatched; they receive all their food from the male through a small slit in the cavity opening and are entirely dependent on him at this time, making both females and chicks vulnerable to the poaching of males.

In addition to threats from hunting and deforestation, there are some indications that African hornbills are being traded internationally to supply the demand for hornbill products in Asia. This trend has been attributed to the lower levels of trade regulation currently in place for African hornbill species. Trade monitoring and control is complicated by the similarities between species in their traded parts and derivative forms, both within the African species and between the African and Asian species, including skulls, feathers, casques, skeletons, and skins. These parts and derivatives are difficult to identify to the species level, as are whole or live females and juveniles. Male skulls/casques are generally distinguishable at species level but identifying those of females and immatures may be challenging. International trade has been recorded in the USA and Asia, with regional trade within Africa. Online surveys have noted more than 500 individual posts containing offers for sale of *Bycanistes* and *Ceratogymna* species between 2010 and 2024, with sellers from Cameroon, Canada, Europe, and the USA. Target countries for the adverts include various Asian countries and the USA; however, the source of the individuals in the posts is unclear and hard to verify. Regional trade is also known to occur in Benin, Nigeria, South Africa, and Togo, with estimated numbers of more than 450 annually between Cameroon and Nigeria alone. Without clear population estimates it is difficult to directly assess the impacts of trade on these species in the wild.

Across Africa, national protection for *Bycanistes* and *Ceratogymna* hornbill species is highly variable. Many countries offer no formal protection, some countries provide conditional or species-specific safeguards, and a few countries enforce stronger protections through permit systems or outright bans on hunting and trade. No commercial captive-breeding facilities are known to exist, and breeding in captivity is known to be challenging. However, these species are recorded in low numbers in zoos and other holding institutions across various countries.

Analysis: The two African hornbill genera *Bycanistes* and *Ceratogymna* comprise nine species, including six assessed as Least Concern, one Near Threatened and two Vulnerable on the IUCN Red List. Population estimates are unknown for most species, with numbers believed to be around or

exceeding 10,000 for both *C. atrata* and *C. elata*; populations are reported to be decreasing for most species. The species generally have large geographic ranges and are predominantly threatened by decreasing extent and quality of habitat caused by deforestation and logging. While national and low levels of international trade in some species are reported along with a few seizures, the impact of this trade on wild populations is unclear. Overall, there is **insufficient information on the status and trends of wild populations, and on the impacts of collection for trade for any species of either genus to determine whether they meet the criteria for inclusion in Appendix II** in Res. Conf. 9.24 (Rev CoP17).

Although there are similarities in the traded forms of Asian CITES-listed hornbill species and *Bycanistes* and *Ceratogymna* species, further evidence would be necessary to determine whether the species enter Asian markets and create enforcement problems for control in the listed species. Therefore, at present it is **unclear whether these species meet criterion A in Annex 2b** of Res. Conf. 9.24 (Rev. CoP17).

Transfer of White-Backed Vulture *Gyps africanus* and Ruppell's Vulture *Gyps rueppelli* from Appendix II to Appendix I

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

Summary: White-Backed Vulture *Gyps africanus* and Ruppell's Vulture *Gyps rueppelli* are both large, old-world vultures with expansive ranges across sub-Saharan Africa, with *G. rueppelli* also occurring in southwestern Europe and the Middle East. Historically reported to be "common", both species have experienced significant declines across their ranges in recent years. The global population of *G. africanus* was inferred to be around 27,000 individuals in the mid-2010s, estimated to have declined by 80% (range: 63-89%) over three generations (40 years). In 2021, the population of *G. rueppelli* was inferred to be fewer than 30,000 individuals with an estimated decline of over 90% (range: 88-98%) over three generations (also ~40 years). Declines of *G. africanus* in Burkina Faso and Mali have been rapid and local extirpations are evident in parts of Ghana, Niger, and Nigeria. Likewise, *G. rueppelli* has experienced 93-99% declines in Burkina Faso, Mali, and Niger, with severe population declines and local extirpations elsewhere in West Africa. Both were globally assessed as Critically Endangered on the IUCN Red List in 2021.

Vultures are scavengers, forming an important part of the ecosystem by breaking down carcasses. They are primarily threatened by reduced food abundance, contamination of their food source, habitat loss, accidental and deliberate poisoning, and hunting for trade. Additional pressures include human disturbance of nesting sites, collision with wind turbines and electrocution from power cables.

Gyps rueppelli and *G. africanus* were included in Appendix II of CITES in 1979 as part of the listing of the Order Falconiformes. Vulture parts are traded nationally and internationally for belief-based use or as wild meat, with body parts commonly used in traditional practices to treat physical and mental ailments and to bring good luck when gambling or competing. The growing profitability of regional belief-based trade is reportedly driving increased exploitation and there are estimates of several thousand individuals traded annually across West and Central Africa, mainly for belief-based use.

Reported international trade in vultures has primarily involved live individuals imported by European countries. Overall figures are low: between 1979 and 2023, around 900 *G. africanus* and just under 700 *G. rueppelli*, were reported in trade, mostly as live, wild-sourced specimens, with the majority originating in Guinea, United Republic of Tanzania and Cameroon and destined for countries in Europe. Some illegal trade has been reported, including seizures of over 883 individuals between 2012 and 2025.

Analysis: Neither *Gyps africanus* nor *G. rueppelli* has a restricted area of distribution. Up-to-date population information is lacking, although according to the most recent estimates, neither species has a small population. However, both are recorded as having undergone steep population declines and local extirpations in recent years, ascribed to a range of factors, including habitat loss, decreasing food availability and deliberate and inadvertent poisoning. As a result, both have been assessed as Critically Endangered on the IUCN Red List both in 2021 with **marked historic declines and meet criterion C** in Annex 1 of Res. Conf. 9.24 (Rev. CoP17).

Reported legal commercial international trade in wild-sourced individuals of both species has been very limited and would be unlikely to have had an adverse impact on wild populations. However, there are reports of illegal cross-border trade, particularly in West and Central Africa, of vulture parts and derivatives used for a variety of belief-based purposes. Levels of such trade are unknown but may be affecting the species in combination with other threats. Considering the Critically Endangered status of both species, **Appendix-I listing seems proportionate**, however, with most of the trade across porous country borders, the benefits of the listing will require significant enforcement efforts.

Transfer of Peregrine Falcon *Falco peregrinus* from Appendix I to Appendix II

Proponents: Canada and the United States of America

Summary: The Peregrine Falcon *Falco peregrinus* is a falcon in the order Falconiformes with a global distribution encompassing over 200 range States across the Americas, Africa, Asia, Australasia and Europe. It was included in Appendix I in 1977. Currently most Falconiformes are listed in Appendix II, though some are listed in Appendix I and III, and four species are not included in the Appendices.

The global population size of *F. peregrinus* is estimated to be 248,000 to 478,000 mature individuals and increasing, having recovered from severe population declines in the mid-20th century due to the widespread use of pesticides containing DDT, which reduced many bird species' reproductive success. Successful captive breeding and re-introduction programs and regulations on pesticide use have allowed significant species recovery. The extent of occurrence is now estimated to be over 40 million km². Evidence of higher fecundity and juvenile survival rates in highly modified human environments showcase high species adaptivity. Despite decreases reported in parts of North Africa and Ukraine, *Falco peregrinus* was assessed as Least Concern on the global IUCN Red List in 2021 and on the European regional IUCN Red List assessment in 2020. Factors currently impacting *F. peregrinus* populations likely include environmental toxins, habitat loss and modification, illegal killing, and removal from the wild.

Falco peregrinus is currently traded internationally for falconry in Middle Eastern countries. According to the CITES Trade Database almost 13,500 live individuals were reported as exported during the period 2014-2023, the majority (98%) from captive-born sources (C, D and F). A small number of wild specimens (248) were exported during the same period, mainly for re-introduction (80%) and a small number for personal use (12.5%). Trade in captive-produced specimens increased significantly from the previous ten-year period and exports of wild-sourced specimens were less than half the number exported between 2004-2013. Currently the global commercial demand for *F. peregrinus* is largely met by captive-bred birds. Much of the trade is supplied by producers in the UK, Spain and Germany, all of which have CITES-registered captive breeding facilities. There are reports of illegal trade, but it is likely not significant in relation to the increasing wild population.

Parties consulted about their legislative instruments and other tools (including the key trading countries), through a Notification to the Parties in 2024, indicated that they have protection measures in place, deemed effective by the CITES Secretariat. Protection ranges from total prohibition of the capture, killing, owning, transporting, possession and trade of wild specimens and the practice of falconry to countries where falconry is allowed and *F. peregrinus* can be harvested from the wild for national use with certain controls. Most Parties indicated that they would not have concerns with the effectiveness of national/international legislation for ensuring conservation of *F. peregrinus* with an Appendix-II listing. International and regional instruments (particularly in Europe covering the top three exporters) support regional and global efforts aimed at the conservation and sustainable management of *F. peregrinus* and its habitat, and the global population of *F. peregrinus* continues to grow and increase.

A small number of Parties have expressed concern that an Appendix-II listing could increase demand for wild individuals and/or increase illegal trade, which could impact the global population and/or smaller subpopulations. The extensive captive breeding industry and preference for captive-bred individuals for the falconry trade mitigate the risks of increased demand for wild *F. peregrinus*, with offtake for new bloodlines and specific varieties being the main risk. However, falconers often cross falcon species and hybrids to produce offspring that expresses characteristics desired for falconry, wild-sourced individuals in trade are currently minimal, and several breeding operations have confirmed sufficient genetic diversity in captive stock. Avian flu, while impacting some populations, is not considered a serious threat to global populations.

Analysis: *F. peregrinus* has an extremely wide distribution and a large and increasing population in the wild. Populations have recovered since the mid-20th century. The species **does not meet the**

biological criteria for listing in Appendix I.

The trade in live birds for falconry has been increasing although this is mostly supplied by captive-bred birds from countries with registered breeding facilities. Relatively small numbers of wild birds are exported for reintroduction purposes. Illegal trade is limited to low numbers and certain populations, including Pakistan, Iran, the Netherlands, the Russian Federation, and South America, with demand coming primarily from the Middle East.

It is possible that a transfer to Appendix II will stimulate applications for trade in wild individuals, the potential for negative impact on the wild population is likely to be minimal due to the success of the captive breeding industry and the preference within the falconry industry for captive-born individuals, along with evidence of stable and increasing populations of the species.

Given the species is present in over 200 countries, it is difficult to determine whether management and appropriate enforcement and compliance controls in each are such that Parties can be satisfied with implementation by all range States of Article IV. However, the majority of current key trading countries have indicated that national-level controls would not change as a result of a transfer of *F. peregrinus* to Appendix II. The species is unlikely to enter commercial trade from the great majority of range States. It seems likely, therefore, that **precautionary requirements of Annex 4 are satisfied in the greater part of the range and would be proportionate to the anticipated risks to the species.**

There are provisions to monitor trade in wild-caught birds through the *Review of Significant Trade* (Res. Conf. 12.8 (Rev. CoP18)) and captive breeding through the *Review of trade in animal specimens reported as produced in captivity* (Res. Conf. 17.7 (Rev CoP19)), which would allow Parties to address any future concerns.

Inclusion of Great-billed Seed-finch *Sporophila maximiliani* in Appendix I and *S. angolensis*, *S. atrirostris*, *S. crassirostris*, *S. funerea* and *S. nuttingi* in Appendix II

Proponent: Brazil

Summary: The genus *Sporophila* includes a total of 41 species of small-sized songbirds found in the Neotropics of which six are proposed for inclusion in the Appendices: the Great-billed Seed-finch *Sporophila maximiliani* in Appendix I, owing to concern about over-collection for trade, and the Chestnut-bellied Seed-finch *S. angolensis*, Black-billed Seed-finch *S. atrirostris*, Large-billed Seed-finch *S. crassirostris*, Thick-billed Seed-finch *S. funerea* and Nicaraguan Seed-finch *S. nuttingi* in Appendix II due to their resemblance to *S. maximiliani*. The Great-billed Seed-finch has historically inhabited the Plurinational State of Bolivia (referred to as “Bolivia” hereafter), Brazil, French Guiana, Guyana, Suriname and the Bolivarian Republic of Venezuela (referred to as “Venezuela” hereafter), although its presence throughout this range is no longer certain.

Sporophila species are primarily sought after for their singing capabilities and are entered into singing competitions, which are popular in Brazil, Colombia, Guyana and Suriname.

Capture of wild specimens of Great-billed Seed-finch, habitat loss and degradation have caused rapid population decreases across this species’ range, particularly in Brazil, leading to it being classified as Endangered on the IUCN Red List in 2017. Once widespread, this species is now scarce in the wild with a 2017 global population estimate of below 2500; more recent surveys and information suggest that there may be fewer than 1,000 mature individuals. In Brazil, subpopulations are generally of fewer than 50 mature individuals, possibly occurring in only two areas, and the species is considered by some to be close to extinction in the country. Little information is available on occurrence in other range States. Brazil’s captive population is likely to number over 200,000.

Among the species proposed for inclusion in Appendix II, decreasing population trends for subpopulations of *S. angolensis*, *S. crassirostris*, *S. funerea* and *S. nuttingi* have been reported across their ranges, with the former two having reportedly become extinct in some parts of Brazil (*S. angolensis*), and in Suriname (*S. crassirostris*). Global populations of both *S. angolensis* and *S. crassirostris* were nonetheless reported to be increasing according to their IUCN Red List assessments published in 2018 and 2021 respectively. According to the Red List assessment, *S. atrirostris* was believed to have a stable global population with no evidence of any declines or substantial threats, although BirdLife International believes that this assessment may require review.

Trade is predominantly domestic although there has been export to the USA, Canada and the Netherlands, where Surinamese citizens have established bird singing clubs and tournaments. Online trade of *S. maximiliani* reveals prices in the USA of up to USD800 for females and USD1,000 for males. Most birds in trade appear to be captive-bred; Brazil has a registration system in place for both amateur and commercial breeders of *S. maximiliani*. There are records of wild-sourced specimens of *S. maximiliani*, *S. angolensis* and *S. crassirostris* being exported. Small numbers of wild specimens of *S. maximiliani* have been observed in trade and it is believed that some wild exports are declared as captive-bred. Seizures have been reported mainly within Brazil. The scale of any cross-border trade within the range of *S. maximiliani* remains unknown.

In Brazil, *S. maximiliani* is classified as critically endangered and protected under national legislation, meaning that the capture, transport, storage, custody, handling, processing, and commercialisation of wild individuals are banned. However, the export of captive-bred individuals from registered enterprises is permitted. Legislation is in place in other range States, with a varying degree of protection for wild species.

Males of the six *Sporophila* spp. proposed for inclusion present morphological differences that allow for species-level identification, except for *S. maximiliani* and *S. crassirostris*. However, trade also involves females and juveniles, which are morphologically similar and not easily distinguishable.

Analysis: *Sporophila maximiliani* has a small wild population, possibly of fewer than 1,000 specimens with likely very small subpopulations. Illegal capture of wild specimens has led to the extirpation of subpopulations across the range. The captive population in Brazil held by registered breeders is estimated at over 200,000. Despite recent records mostly involving trade in captive-bred specimens, there is evidence of ongoing wild capture and trade. The species therefore **meets both the biological and trade criteria for inclusion in Appendix I**. Trade in captive-bred specimens could continue from commercial operations breeding the species, which would need to be registered with the CITES Secretariat in accordance with Res. Conf. 12.10 (Rev. CoP15) on *Registration of operations that breed Appendix-I animal species in captivity for commercial purposes*.

Regarding the other five *Sporophila* species proposed as lookalikes, given the resemblance of the females and juveniles of all these species and the evidence that they are found in trade, **if *S. maximiliani* were to be included in Appendix I, the other species would appear to meet the criteria in Annex 2b** of Res. Conf. 9.24 (Rev. CoP17) for inclusion in Appendix II.

Other Considerations: If these species are included in the Appendices, there are other species within the *Sporophila* genus that may merit consideration for inclusion in Appendix II under Annex 2b of Res. Conf. 9.24 (Rev. CoP17).

Inclusion of Giant Hispaniolan Galliwasp *Caribicus warreni* in Appendix I

Proponent: Dominican Republic

Summary: The Giant Hispaniolan Galliwasp *Caribicus warreni* is a large-sized galliwasp lizard native to the Island of Hispaniola and reported to inhabit the north of the Dominican Republic as well as the northern part of Haiti, including Tortuga Island. The species was globally classified as Vulnerable by IUCN in 2015 primarily due to its restricted and fragmented distribution.

Despite extensive search efforts across the years, there are no global population estimates of *C. warreni*, and the only recorded subpopulation in the Dominican Republic was last recorded in 2021 in the natural monument Loma Isabel de Torres, where it is currently being monitored. The IUCN Red List assessment from 2015 reported that the species had a decreasing population. The extent of occurrence (estimated at 100 km²), area of occupancy (smaller than 10 km²), habitat quality and number of locations are reported to be experiencing a continued decline, primarily due to expanding agricultural and livestock farming activities. Other threats include predation by invasive species, occasional killings by local people and the illegal pet trade.

The Giant Hispaniolan Galliwasp is very rarely utilised nationally, and only traded by reptile enthusiasts who keep them as pets. Dominican authorities have never issued any export permits for *C. warreni*. A moderate level of international trade has been detected in Canada, Czechia, Germany and the USA, as recently as early 2025. Haiti is believed to be the source of most traded specimens, although it is unclear whether specimens in trade continue to be wild-sourced or from captive sources. Giant galliwasp are relatively long-lived (up to 40 years in captivity) and have been bred successfully in captivity producing large litters (up to 34 specimens).

Captive-breeding programmes for the species exist in North America and Europe, with the largest residing at Nashville Zoo in the USA. According to ZIMS, there are currently 264 specimens in 23 different holding institutions across eight countries and territories.

The species is currently listed in the national Red List of Threatened Species of the Dominican Republic as critically endangered, which restricts its use to scientific purposes, research and priority breeding for conservation of the species.

Analysis: Little is known about the population of *Caribicus warreni*, but it is likely small or very small and was last reported as decreasing in a 2015 IUCN Red List global assessment. The species' range is restricted and fragmented, and the extent of occurrence, area of occupancy, habitat quality and number of locations are declining. Together these factors suggest that the species **meets the biological criteria A and B of Annex 1** of Res. Conf 9.24 (Rev. CoP17). Habitat loss and fragmentation are the primary threats to the species. International trade levels are unknown, but specimens have been observed for sale in North American and European pet markets. It is believed that these originated in Haiti, although it is unclear whether there is ongoing export of wild-specimens or such specimens are now originating from captive sources. Despite limited data, due to the likely small and severely fragmented population and its restricted range, as well as the presence of ongoing international trade, the **species appears to meet criteria for inclusion in Appendix I**.

Inclusion of Mount Elliot Leaf-tailed Gecko *Phyllurus amnicola* in Appendix II

Proponent: Australia

Summary: The Mount Elliot Leaf-tailed Gecko *Phyllurus amnicola* is a moderately sized gecko, one of 11 species in the genus *Phyllurus*, described in 2000 endemic to Queensland, Australia, where it is known from three subpopulations in the Mount Eliot region of Bowling Green Bay National Park in rocky rainforest habitats between 400 and 1000 m above sea level with a fourth subpopulation from nearby Saddle Mountain. Extent of occurrence has been estimated at around 200 km². There are no population estimates but the species is presumed to exist at high densities in areas of suitable habitat, which is extensive within its range.

Leaf-tailed geckos *Phyllurus* species such as *P. amnicola* are relatively slow-growing compared to other gecko species and usually reach reproductive size at 2-3 years of age. They are reported to be in demand in the international pet trade. The commercial export of live, native reptiles from Australia has been prohibited since 1982. Despite this, *P. amnicola* has been identified in international trade, indicating historic or ongoing illegal export. Field studies in 2013 identified a substantial reduction in population density for one of the four subpopulations, believed to be due to a single poaching event.

Phyllurus amnicola was assessed as Near Threatened on the IUCN Red List in 2017 due to an absence of other threats beyond its restricted distribution and an ongoing threat of collection for trade, with three of the four known subpopulations reported to be less accessible to collectors and hence less likely to be impacted by this threat. It is listed as vulnerable under Queensland state legislation. Aside from illegal collection, other potential threats include increasing frequency and intensity of periodic fires impacting habitats and habitat connectivity.

Around 80 live individuals were reported to be in trade based on US trade data between 2012 and 2021. There were also estimates of around 935 individuals offered for sale in over 355 online advertisements between 2014 and 2023, with most of these reported to be offering adult individuals. Twenty individuals directly imported into the USA from Germany and the Netherlands between 2015 and 2018 were reported to be wild-sourced, although this may have been a reporting error. The sources of specimens found for sale online were generally not reported, but where they were, sellers often claimed they were captive-bred. A survey of online platforms in Europe in 2017-2018 indicated that prices sought for specimens of this species varied from USD1470-2385. More recently, two advertisements in 2025 offered individuals for sale for USD220, and USD450, each.

The species was listed in CITES Appendix III in 2022, and since then, 24 specimens have been reported in direct exports for commercial purposes from European countries to Japan. Three of these (exported by Germany in 2022) were reported to be from captive-born sources. Little further information is available on the extent of captive breeding.

Analysis: *Phyllurus amnicola* is characterised by a restricted area of distribution occurring in just four known subpopulations (three on Mount Elliot, and one on Saddle Mountain) in the state of Queensland, Australia, and therefore may already meet the biological criteria B in Annex 1 of Res. Conf. 9.24 (Rev. CoP17). Although no legal commercial export of the species has been permitted from Australia, the species has been identified in international trade in recent years with high prices per individual. Although there is no clear evidence of the impact of trade across all subpopulations, there is evidence that illegal collection has previously led to notable declines in one of the four subpopulations. Although, the reported trade has been relatively low, given the apparent vulnerability of populations of this species to wild harvest, **it may meet the criteria for inclusion in Appendix II.**

All commercial export of wild specimens from Australia is illegal. If the species were to be included in Appendix II, **Australia could also submit a zero quota for wild-sourced commercial exports** to be posted on the CITES website to indicate that trade in wild harvested specimens of the species from Australia is not permitted.

Inclusion of the Ringed Thin-tail Gecko *Phyllurus caudiannulatus* in Appendix II

Proponent: Australia

Summary: The Ringed Thin-tail Gecko *Phyllurus caudiannulatus* is a moderately sized gecko, one of 11 species in the genus *Phyllurus* endemic to Queensland, Australia where it inhabits subtropical vine forest and adjacent wet sclerophyll forests as well as Hoop Pine *Araucaria cunninghamii* plantations 180-600 m above sea level. It is currently known to occur in just three isolated subpopulations within 15 km of each other, the largest in Bulburin National Park (NP). Overall extent of occurrence has been estimated at just under 350 km², with a possible area of Occupancy (AOO) of 20 km².

There are no population estimates, but the species may occur at high densities, at least in Bulburin NP. The two subpopulations located outside Bulburin NP were only discovered in the last ten years, and there may be other as yet undiscovered subpopulations. A quarter of the modelled potential habitat for the largest subpopulation in Bulburin NP was burnt during bushfires in 2019 and 2020; information on the impact on the species from this is lacking. *Phyllurus caudiannulatus* was assessed as Near Threatened on the IUCN Red List in 2017. It is listed as endangered at both the national and state levels in Australia. It was included in Appendix III (by Australia) in 2022.

Leaf-tailed geckos *Phyllurus* species are said to be in demand in the international pet trade amongst specialist collectors, with the distinctive markings of this species reportedly making it particularly desirable.

Commercial export of live native reptiles is illegal in Australia but the species has appeared in international trade. US LEMIS trade data report 32 live individuals in trade between 2010 and 2018, and there are estimates of around 190 individuals offered for sale in around 80 online advertisements between 2009 and 2022, with most reported as adult individuals. Six individuals in direct exports from the USA in 2017 were reported to be wild-sourced, although these may have been a reporting error; individuals have been offered for sale as captive-bred. Two live captive-bred specimens have been reported in CITES trade data (from Czechia to Japan for commercial purposes).

Sources differ on the likely impact of poaching for the international pet trade on populations of *P. caudiannulatus*, with the proposal stating that although poaching intensity is relatively low, it is likely that demand for the species is increasing, with the species reported to occur in accessible areas making it vulnerable to poaching. Information from the US does not demonstrate a clear trend for increased trade over time, with most offers for sale in 2017 and fairly consistent quantities in other years between 2010 and 2018, averaging two individuals per year. Supplementary data files from a study of online trade show around half of the 76 advertisements were posted in recent years (between 2019 and 2022), but as older advertisements are often deleted once individuals are sold, it is difficult to infer trends based on online trade.

There are no captive breeding populations for the species in Australia and captive breeding potential is likely to be low.

Analysis: *Phyllurus caudiannulatus* is a localised species that occurs in three known subpopulations in the state of Queensland, Australia. Its habitat has been impacted by recent wildfires.

Although no legal commercial export of the species has been permitted from Australia, the species has been identified in international trade in recent years in very small numbers. There is however no evidence of the impact of trade on wild populations, which can be at least locally abundant. Given the small quantities of individuals reported in trade, and a lack of clear evidence that a significant proportion of this trade is from wild-sourced individuals and that this collection is ongoing, **it is unclear that the species meets the criteria in 2a of Res. Conf. 9.24 (Rev. CoP17).**

As all commercial export of wild specimens from Australia is illegal. If the species were to be included in Appendix II, **Australia could also submit a zero quota for wild-sourced commercial exports** to be

posted on the CITES website to indicate that trade in wild harvested specimens of the species from Australia is not permitted.

Transfer of the genus *Amblyrhynchus* spp. represented by the Galápagos Marine Iguana *Amblyrhynchus cristatus* from Appendix II to Appendix I

Proponent: Ecuador

Summary: The Marine Iguana *Amblyrhynchus cristatus*, the sole species in the genus *Amblyrhynchus*, is endemic to the Galápagos Islands, Ecuador. It is known to occur throughout the archipelago inhabiting a range of large to satellite islands. Its area of occupancy has been estimated at 4,368 km² with area of habitat of around 3,250 km².

The Marine Iguana was assessed on the IUCN Red List in 2019 as Vulnerable on the basis that its population had decreased by at least 30% over the last three generations (18-24 years). The species' global population was estimated to be between 19,800-210,000 mature individuals in 2019. Its population undergoes significant fluctuations, with mortality rates ranging from 10% to 90% during El Niño climate events. While climate events are the primary threat to the species, it is also impacted by alien invasive species (e.g., cats, rats, dogs) affecting around 30% of the total population, as well as anthropogenic disturbance, pollution, habitat degradation and disease.

The species *Amblyrhynchus cristatus* has been listed in CITES Appendix II since 1975; Ecuador became a Party to the Convention in the same year. No live wild-collected individuals of the species have been reported as legally exported from Ecuador since the listing, and the export of this species from Ecuador has been prohibited since 1998. Very small quantities of live *A. cristatus* are recorded in the CITES Trade Database, all captive-bred. Between 2012 and 2019, exporters reported eight individuals: four from Uganda to Japan (for captive breeding), two from Switzerland to Uganda (commercial), and two from Austria to Japan (commercial; origin Spain). In contrast, importers reported 11 captive-bred individuals over the same period.

As no legal exports of this species have been authorised by Ecuador, it is questionable whether the "captive-bred" individuals in trade were legally acquired and that trade in *ex situ* captive-bred individuals was carried out in compliance with CITES provisions. There is some evidence of illegal trade in juveniles being smuggled off the islands by sea, with seizures of live individuals of this species being made in 2010, 2014 and 2015, indicating some level of demand, likely from specialist breeders and collectors. However, the impact of this trade on the wild populations of these species is unknown.

Analysis: The Marine Iguana *Amblyrhynchus cristatus* is endemic to the Galápagos Islands, Ecuador. The species is classified as Vulnerable on the IUCN Red List with an estimated population reduction of at least 30% over the past three generations. The species has a somewhat restricted range with an area of habitat around 3,250 km² and is subject to extreme population fluctuations due to climatic events. These fluctuations, combined with ongoing threats from invasive species, habitat degradation, pollution, and disease make the population intrinsically vulnerable. There is some evidence of illegal international trade, likely in wild-caught individuals, although the quantities appear to be limited and impact on the wild population is unlikely to be detrimental. The species therefore **does not appear to meet the criteria for inclusion in Appendix I**. If the Parties decide against the listing, Ecuador could submit a zero quota for wild-sourced commercial exports of the Marine Iguana to be posted on the CITES website to indicate that trade in wild harvested specimens is not permitted.

Other considerations: The proposal is to transfer the genus *Amblyrhynchus* spp., represented by the Galápagos marine iguana, *Amblyrhynchus cristatus*, from Appendix II to Appendix I. The current listing is at the species level. Were this proposal to be accepted the effect of transferring the species or the genus would be the same.

Transfer of Galápagos land iguanas *Conolophus* spp. from Appendix II to Appendix I

Proponent: Ecuador

Summary: The Galápagos land iguanas *Conolophus* spp. endemic to the Galápagos Islands, Ecuador, comprise three species: *Conolophus marthae*, *C. pallidus*, and *C. subcristatus*. The Galápagos Pink Land Iguana *C. marthae* is endemic to Isabela Island, Barrington Land Iguana *C. pallidus* endemic to Santa Fe (Barrington) Island, and the Galápagos Land Iguana *C. subcristatus* occurs on several islands. All are currently included in Appendix II and all three are proposed for transfer to Appendix I.

- *Conolophus marthae* was assessed as Critically Endangered in 2012, based on a very small population estimate of 192 mature individuals confined to a single subpopulation occupying an area of 25 km². The population trend was unknown but subsequently reported to be stable.
- *Conolophus pallidus* was assessed as Vulnerable in 2019, with 3,500–4,000 mature individuals in a single subpopulation and an area of occupancy of 40 km². Its population trend was unknown.
- *Conolophus subcristatus* was assessed as Vulnerable in 2020 based on a best estimate of 10,216 mature individuals in 13 subpopulations and an area of occupancy of 540 km².

Galápagos land iguanas face an array of threats that vary in intensity across the archipelago. One of the most significant natural threats is the El Niño climate phenomenon, which can lead to prolonged droughts and severe food shortages, resulting in high mortality rates. In addition, the species are highly vulnerable to invasive alien species, including feral cats, dogs, pigs, goats, and rats, which impact iguana populations through predation of eggs, juveniles, and adults, and indirectly through habitat degradation. The iguanas' intrinsic biological traits, such as slow reproductive rates, long generation length, and small, isolated populations, further exacerbate their vulnerability. Low genetic diversity and stochastic events such as volcanic eruptions also threaten these species.

Limited trade has been reported in recent years mostly declared as captive-bred, however the legitimacy of this has been questioned as since the species was listed in Appendix II in 1975, no legal exports of live specimens have reportedly been authorized by Ecuador. Some seizures of live individuals demonstrate there is international demand for these species. However, the impact of this trade on the wild populations of these species is unknown.

Analysis: The **Galápagos Pink Land Iguana (*C. marthae*)** has a very small population and the population of **Barrington Land Iguana (*C. pallidus*)** is small. Both of these species have restricted areas of distribution, occur in one location and have a high vulnerability to ongoing extrinsic factors such as climate events resulting in large fluctuations in the number of individuals and quality of habitat. As such, **both appear to meet the biological criteria for inclusion in Appendix I.**

The **Galápagos Land Iguana (*C. subcristatus*)** has a larger population, although estimates vary considerably. It has a somewhat restricted range and is projected to incur ongoing subpopulation decreases due to extrinsic factors including alien invasive species and climate events causing large subpopulation and habitat quality fluctuations. As such, this species **may meet the biological criteria in Annex 1** of Res. Conf. 9.24 (Rev. CoP17).

No legal exports have been permitted by Ecuador; trade in live specimens of uncertain origin has been recorded and there is some evidence of illegal harvesting. It is difficult to ascertain the impact that collection of these species for trade has on their wild populations, though it would likely be more detrimental to *C. marthae* and *C. pallidus* than *C. subcristatus*. Given the uncertainties about trade impact and high level of conservation risk, Appendix I-listing could be justifiable for all three species. If the Parties consider that certain species meet the criteria for inclusion in Appendix I while others do not, Ecuador could submit a zero-export quota for wild-sourced commercial exports of those species to be posted on the CITES website to indicate that trade in wild harvested specimens is not permitted.

Inclusion of Bale Mountain Adder *Bitis harenni* and Ethiopian Mountains Adder *Bitis parviocula* in Appendix I

Proponent: Ethiopia

Summary: The Bale Mountain Adder *Bitis harenni* and Ethiopian Mountains Adder *Bitis parviocula* are large, morphologically similar viper species endemic to Ethiopia, where they occur in montane forests and grassland. *Bitis parviocula* was assessed in 2014 on the IUCN Red List as Endangered due to its limited range and ongoing decrease in extent and quality of habitat. At that time *Bitis harenni* was considered a subpopulation of *B. parviocula*. It was elevated to species level in 2016 and has not yet been assessed on the IUCN Red List.

Both species occur on either side of the Ethiopian Rift Valley, *B. harenni* having a restricted range and known from two localities, with *B. parviocula* having an estimated area of habitat of over 20,000 km². The current known ranges of both species likely represent an underestimate of their occurrence. There is no detailed population information for either species, both of which are rarely encountered due to their cryptic habits. Their natural habitats are reported to be decreasing in extent and quality due to pressures from deforestation, agricultural expansion including coffee cultivation, and human encroachment.

The only recent trade data available for these species are from the USA; between 2008 and 2020, 141 live captive-bred and wild-sourced *B. parviocula* were recorded as imported. The trade in wild-sourced individuals comprised 31 individuals exported directly from Ethiopia, and 14 originating in Ethiopia and re-exported by Switzerland, both in 2009. Captive-bred individuals were exported from the USA to Germany, the Netherlands, Slovenia, and Ecuador. Individuals appear to fetch a high price based on market observations in the USA and Europe. While the legitimacy of the captive-breeding *B. parviocula* stocks observed in USA and European markets is unclear, experts report that *B. parviocula* has been bred successfully on multiple occasions by both private and public institutions and individuals. No verified records of *B. harenni* in trade exist, and experts found no evidence of illegal trade involving this species. Although *B. parviocula* continues to appear sporadically in trade, including online platforms, the volume appears limited, and evidence of illegal trade is unclear.

The species are protected under national legislation with the collection or export of endemic animals including *B. parviocula* and *B. harenni*, prohibited since 2004, and prohibited without a permit since 1957. As such, the legitimacy of the wild-sourced *B. parviocula* individuals reported as exported from Ethiopia is unclear.

Analysis: *Bitis harenni* and *B. parviocula* are rarely encountered species, with *B. harenni* occupying a restricted range. Current population estimates and trends are unknown for either species. Despite protection under Ethiopian law since 2004 prohibiting trade in both species, *B. parviocula* from Ethiopia in wild-sourced individuals were last recorded in trade in 2009. *Bitis parviocula* has been observed in pet trade markets in Europe and the USA, although infrequently and only in low numbers, and experts report it has been successfully bred in captivity on multiple occasions. There is no evidence that *B. harenni* is affected by trade and it is unclear if the wild population of *B. parviocula* is affected by ongoing harvest and trade, or whether captive breeding is now meeting demand.

While *B. harenni* appears to meet the biological criteria for inclusion in Appendix I based on Criterion B in Annex 1 of Res. Conf. 9.24 (Rev CoP17), the species is not affected by trade and therefore **does not meet the trade criterion**.

As *B. parviocula* does not have a restricted range and only low levels of international trade in predominantly captive-bred individuals have been reported recently, it also **is unlikely to meet either criterion for inclusion in Appendix I**.

Inclusion of the Rock Rattlesnake *Crotalus lepidus* and Central Plateau Pygmy Rattlesnake *Crotalus ravus* in Appendix II and the genera *Crotalus* and *Sistrurus* in Appendix II as lookalikes

Proponents: Mexico and Plurinational State of Bolivia

Summary: The Rock Rattlesnake *Crotalus lepidus* and the Central Plateau Pygmy Rattlesnake *Crotalus ravus* and other species belonging to the genera *Crotalus* and *Sistrurus*, are terrestrial, ectothermic reptiles that occupy a range of habitats including arid rocky slopes, montane forests, and scrublands throughout North, Central and South America. *Crotalus ravus* is endemic to the central highlands of Mexico and *Crotalus lepidus* occurs only in the southwestern United States of America and Mexico. *Crotalus durissus unicolor*, included in Appendix III by Honduras in 1987, is the only taxon within the two genera currently included in the Appendices.

The proponents seek to include the genera *Crotalus* and *Sistrurus* in CITES Appendix II in accordance with Res. Conf. 9.24 (Rev. CoP17), with *C. lepidus* and *C. ravus* under Criterion A of Annex 2a and the remainder of the genera under Criterion A of Annex 2b, stating that trade is mostly in parts and derivatives not identifiable to the species level.

Of the 54 recognised *Crotalus* and three *Sistrurus* species, 36 have been assessed on the IUCN Red List, all but three of these completed in 2007 and considered in need of updating. *Crotalus lepidus* and *C. ravus* were both assessed in 2007 as Least Concern with stable populations. In 2006 the US population of *C. lepidus* was assessed as substantial (between 10,000 and one million individuals), with a range of between 200,000 and 2.5 million km². There are no more recent population data for either species. Three other species among those proposed for listing were considered globally threatened, with *Crotalus catalinensis* assessed as Critically Endangered due to over-collection for the exotic pet trade in 2007. A further two species have been assessed as nationally threatened in countries to which they are endemic with one, *Crotalus adamanteus*, assessed as vulnerable in the USA in 2020, partly due to harvesting for the skin trade.

Crotalus and *Sistrurus* species, including *C. lepidus* and *C. ravus*, are primarily affected by habitat loss, climate change, human persecution, road mortality, and illegal collection, with range-restricted species or those with specialised habitats being especially vulnerable. Of the 47 *Crotalus* and *Sistrurus* species that occur in Mexico, 13, including *C. lepidus*, are listed nationally under special protection (which includes species that are not considered threatened), eight (including *C. ravus*) are listed as threatened, and one (*C. transversus*) is listed as endangered. In the USA, 11 species are listed nationally as secure (including *C. lepidus*), two species are listed as apparently secure, and two as vulnerable.

Between 2008 and 2020, there were very few reports of international trade in *C. lepidus* and *C. ravus* in available trade data, with most reported to be from captive-bred individuals. Between 2022 and 2024 there were exports of wild-sourced medical specimens (e.g. capsules containing dried meat) of *C. lepidus* by both the USA and Mexico, equated to an estimated 740 live individuals a year. There is evidence of illegal trade in *Crotalus* and *Sistrurus* species but in low quantities and considered unlikely to be at levels impacting wild populations. The only species currently classified as globally threatened (*C. catalinensis*, *C. pusillus* and *C. stejnegeri*) were subject to very low levels of wild-sourced export for scientific purposes. There was some notable trade in *Crotalus adamanteus*, assessed as vulnerable within the USA, with direct commercial exports of ~60,000 skin pieces from wild sources in 2018 reported in LEMIS. Between 2019 and the first quarter of 2021, however, very little international trade in this species has been reported in US trade data. This species is distributed across seven states in the USA with an extensive range (200,000-2.5 million km²) and large estimated population size (100,000 to 1 million).

Conservation and management of *Crotalus* and *Sistrurus* species are guided by a mix of national and international legislation, including habitat protection laws, wildlife trade regulations, and species-specific assessments. Two taxa are protected under the US Endangered Species Act (ESA), *Crotalus*

willardi obscurus and *Sistrurus catenatus*, and 22 species afforded legal protection under Mexico's environmental regulation (NOM-059-SEMARNAT). However, other species lack protection, or in the case of the USA likely have protection that varies between states.

Mexico allows export of wild specimens of species including *Crotalus* and *Sistrurus* species under certain conditions and has also authorised export permits for *Crotalus* species from captive-bred sources since 2022; in the USA regulations for harvest and export of species (other than those protected under the ESA) is likely to vary by state. Exports of captive-bred individuals reported in US trade data indicate that commercial captive breeding of *C. lepidus* and *C. ravus* is successfully underway, including in non-range State countries. *Crotalus* species are relatively commonly kept and bred in captivity by keepers of exotic pets, with captive-bred individuals of *C. lepidus* selling for USD150-300; there appears to be little motivation to catch this or other species in the wild for export.

Only *Crotalus durissus* is listed in CITES Appendix III (since 1987), and very little trade has been reported in recent years, with none of this wild-sourced. Identification of *Crotalus* and *Sistrurus* species in international trade when traded as parts and derivatives, such as skins and skin pieces, makes species identification difficult given that a complete specimen is generally required to correctly identify specimens at the species level.

Analysis: Of the lead species proposed for inclusion in Appendix II, *Crotalus lepidus* and *Crotalus ravus* were both assessed as Least Concern on the IUCN Red List in 2007, with stable population trends and no major threats identified. Reported international trade in these species is minimal, with most reported to be in captive-bred specimens and negligible illegal trade. Although recent population information is lacking there are no indications of collection for export having impact on wild populations, and it seems **very unlikely that either *C. lepidus* or *C. ravus* meet the criteria for inclusion in Appendix II under Annex 2aB** of Res. Conf. 9.24 (Rev CoP17). Based on levels of international trade and threat from trade for other species in both genera it is unlikely that any of these meet the criteria for inclusion in Appendix II under Annex 2a of the Resolution. Even though the limited trade in wild-sourced *Crotalus* and *Sistrurus* species is largely in parts and derivatives, which are difficult to assign to species without complete specimens, given that no species in either genus appears to meet the criteria set out in Annex 2a, **neither genus merits listing for 'lookalike' reasons under criteria in Annex 2b.**

Transfer of Home's Hinge-back Tortoise *Kinixys homeana* from Appendix II to Appendix I

Proponents: Cameroon, Guinea, Nigeria, Togo

Summary: *Kinixys homeana*, commonly known as Home's Hinge-back Tortoise, is a medium-sized terrestrial tortoise native to the humid tropical forests of West and Central Africa. Its indigenous range includes Liberia, Côte d'Ivoire, Ghana, Togo, Benin, Nigeria and Cameroon, with unconfirmed reports from Central African Republic and the Democratic Republic of the Congo likely reflecting misidentifications or traded specimens. The species occurs in lowland evergreen and semi-deciduous forests, often in association with swampy habitats, streams and mangroves. It is a habitat specialist that prefers closed-canopy forests providing cool, moist, and shaded microhabitats, though in regions such as the Niger Delta in Nigeria, it now persists primarily in mature secondary forests, as primary forest has been lost. The species has a low reproductive rate (clutches of 2-4 eggs once or twice a year), is long-lived (~60 years) and relatively slow to mature (estimated at ~10 years), with an estimated generation time of 15 years. It has been included in Appendix II since 1975 when the whole genus *Kinixys* was listed.

Kinixys homeana was assessed on the IUCN Red List as Critically Endangered in 2019 based on inferred and projected population declines of more than 80% over three generations (~45 years). Populations of *K. homeana* are increasingly fragmented and isolated within forest patches, with evidence of significant population declines in parts of its range. In Nigeria alone, populations of the species are estimated to have dropped by approximately 90% over the past three decades. This decline is attributed to widespread deforestation, agricultural encroachment, infrastructure development, and intensive harvesting for local consumption (for food, traditional medicine and belief-based purposes), as well as for international trade, particularly for the exotic pet market. The IUCN Red List assessment concluded that the surviving population was likely to be large, possibly very large, though with a sharply declining trend.

International trade volumes have been relatively limited in recent years, likely linked to the inclusion of the species in the Review of Significant Trade process. This has resulted in several range States establishing zero export quotas, in some cases to avoid formal trade suspensions being advised under CITES. Benin is currently subject to a CITES recommendation to suspend trade in *K. homeana*. In the recent past, specimens exported from range States were often declared as ranches with a small proportion declared as captive-bred. All are presumed to have originated from the wild, as no facilities have successfully reproduced the species in captivity in significant numbers.

Analysis: *Kinixys homeana* does not have a restricted range nor, based on currently available information, does it have a small population. However, its distribution is fragmented and its population is believed to have undergone a marked recent decline (over 80%) over the past three generations (45 years), which is projected to continue. This decline is attributed to high levels of habitat loss and overexploitation for both domestic use across its range, and to a lesser extent international trade (including regional). However, it does appear to adapt to secondary or modified habitats. The species has a low reproductive rate. Combined with delayed maturity this limits its capacity to withstand overharvesting and, while not large in volume, the extent and impact of international trade, consisting mainly or entirely of wild-sourced specimens has contributed to pressure on already vulnerable populations. Recent reductions in reported trade reflect export restrictions resulting from the Review of Significant Trade process, but there is potential for trade to resume and there may also be unreported regional trade. On this basis, *Kinixys homeana* **may meet both the biological and trade criteria for inclusion in Appendix I** of Res. Conf. 9.24 (Rev. CoP17).

Inclusion of four species of water frogs in Appendix II: *Pelophylax epeiroticus*, *P. lessonae*, *P. ridibundus* and *P. shqipericus*

Proponents: European Union, Israel, North Macedonia

Summary: *Pelophylax epeiroticus*, *P. lessonae*, *P. ridibundus* and *P. shqipericus* belong to the taxonomically complex water frog genus *Pelophylax*, which currently contains 14 recognized species, with numerous clades awaiting taxonomic resolution. The four species are medium-sized Western Palearctic water frogs distributed across Europe, western Asia and northern Africa extensively harvested and traded for food, chiefly as frogs' legs for the EU market. Three of the species (*P. epeiroticus*, *P. ridibundus* and *P. shqipericus*) are proposed for inclusion in Appendix II under Criterion B in Annex 2a of Res. Conf. 9.24 (Rev. CoP17), with *P. lessonae* proposed as a 'lookalike' species under Criterion A in Annex 2b. No *Pelophylax* species are currently included in the Appendices. It is proposed that entry into force of the listing would be delayed by 18 months, i.e. until 5 June 2027.

The total EU imports of frogs' legs was estimated at 40,700 tonnes between 2010 and 2019, purported to equate to between 800 million and 2 billion frogs. The largest importers, accounting for the vast majority of demand, are Belgium, France, and the Netherlands, with most frogs believed to be sourced from wild populations in Indonesia, Viet Nam, Türkiye, and Albania. International trade involves a large number of species, including other *Pelophylax* species and frogs of other genera, and many frog species are also eaten locally in parts of their native range. A lack of species-specific data prevents accurate assessment of the impact of trade on the four focal species.

Pelophylax epeiroticus is restricted to wetland habitats along the Ionian coast from western Greece to southwestern Albania. The species was globally classified as Near Threatened on the IUCN Red List in 2023 due to a suspected population decline linked to habitat degradation. No population estimates are available, but it has been described as "quite abundant" and "common" across much of its range, with some subpopulations reported to be decreasing, particularly in Greece. The species is legally protected in Albania but is known to be harvested in both countries in its range. International trade in *P. epeiroticus* is poorly documented due to a lack of species-specific trade codes. Commercial trade in *P. epeiroticus* is presumed to be wild-sourced and primarily for human consumption.

Pelophylax ridibundus is widely distributed across Europe and parts of western Asia and was globally classified as Least Concern on the IUCN Red List in 2021 with a stable global population trend. It is reportedly the most commonly harvested *Pelophylax* species for international trade, particularly for frogs' legs. The trade in *P. ridibundus* is again poorly documented but has been reported from Türkiye, Bosnia and Herzegovina, Croatia, Montenegro, North Macedonia, Serbia, Slovenia, and likely Romania. Trade volumes in Türkiye, where the species is reportedly collected almost exclusively from the wild, suggest substantial extraction pressure. Mislabelling in trade has been reported at the species and genus level, but no seizures are recorded in EU-TWIX or WiTIS databases. Between 2015 and 2024, EU imports of frogs' legs from Türkiye, likely primarily *P. ridibundus*, totalled 1,221 tonnes, equivalent to an estimated 24–61 million individuals. Trade declined by 31% over the period, though it is unclear whether this reflected reduced demand, reporting inconsistencies, or population declines.

P. ridibundus is listed in Annex V of the EU Habitats Directive, allowing regulated use with monitoring. In Türkiye, the species is subject to national harvest regulations, whereby wild harvest is permitted but this is reportedly poorly monitored. Illegal harvest in this species has been reported in Montenegro.

Pelophylax shqipericus is endemic to the western Balkans, with a range limited to Albania and Montenegro. There are introduced populations in Italy and possibly Croatia. No population size or trend estimates are available. In 2023 it was globally classified as Vulnerable in the IUCN Red List because of its restricted distribution and ongoing threats from habitat loss and pollution. It was also reported to be threatened by over-collection in northern parts of its range, specifically at the transboundary Lake Skadar. Trade data specific to this species is lacking. Commercial trade in *P. shqipericus* for human consumption is presumed to be in wild-sourced individuals. In Montenegro, sourcing for export of frogs, including this species, during the 20th century are reported to have shifted toward illegal harvesting, although the extent of this illicit trade remains uncertain. No

seizures were recorded in EU-TWIX or WiTIS databases. Although included in Annex D of the EU Wildlife Trade Regulations, no EU trade has been recorded.

Pelophylax lessonae has a very wide range spanning much of Europe, from France in the west, east to the Russian Federation, and Scandinavia in the north, south to Bulgaria. It is currently globally assessed as Least Concern on the IUCN Red List (2022), although regional declines have been documented, particularly in mixed populations where hybridisation with *P. ridibundus* and the hybrid *P. kl. esculentus* has led to reduced frequency of *P. lessonae*. International trade is expected to be negligible, with no significant commercial trade reported although identification without molecular tools is unreliable.

The four *Pelophylax* species are morphologically similar, but live individuals can be generally differentiated based on a combination of morphological and morphometric traits.

Pelophylax shqipericus and *P. epeiroticus* show only slight morphological differences, despite clear genetic and bioacoustic distinctions. *P. ridibundus* tends to be larger and exhibits more pronounced sexual dimorphism, while *P. lessonae* is generally smaller with distinctive dorsal striping and males displaying white vocal sacs during the breeding season. However, most trade in *Pelophylax* species for human consumption is of skinned and processed legs, either fresh, chilled or frozen, or as live individuals intended for consumption as frogs' legs. Trade in legs would be difficult to differentiate by species.

Analysis: Of the four *Pelophylax* species considered, *P. epeiroticus* and *P. shqipericus* have relatively restricted distributions and are classified as Near Threatened and Vulnerable on the IUCN Red List, respectively. Their conservation status reflects concerns about collection pressure for international trade. *P. ridibundus* has a much wider distribution and is listed as Least Concern, although some populations are reported to be under significant harvest pressure. *P. lessonae* is also listed as Least Concern, but concerns have been raised primarily in relation to trade in hybrids involving this species and *P. ridibundus*, which can also hybridise with *P. epeiroticus* and *P. shqipericus*.

All four species are believed to contribute to the high-volume frogs' legs trade, particularly for EU markets, with exports from range States such as Albania (where all of the proposed species except *P. lessonae* are native) and Türkiye (where of the four proposed species only *P. ridibundus* occurs) being especially notable. However, available trade data do not distinguish volumes at the species level, further obscured by misidentification in national reporting. While *P. ridibundus* is thought to be the most heavily traded species, this cannot be confirmed due to the lack of species-specific data. Other species, including other *Pelophylax* species also occurring in the main exporting countries also contribute to the frogs' legs trade. Overall, **the uncertainty surrounding species-specific trade volumes and their impact on individual species, particularly for *P. lessonae*, hampers assessment of whether any of them meet the criteria for inclusion in Appendix II** under Res. Conf. 9.24 (Rev. CoP17).

In the case of *P. lessonae* the main concern appears to be trade in hybrids with *P. ridibundus*. Should *P. ridibundus* be listed, trade in hybrids occurring across Eastern Europe would be subject to the same controls, in line with guidance under Res. Conf. 10.17 (Rev. CoP14) on *Animal Hybrids*.

Transfer of Oceanic Whitetip Shark *Carcharhinus longimanus* from Appendix II to Appendix I

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

Summary: The Oceanic Whitetip Shark *Carcharhinus longimanus* is a globally distributed, large (3 m), pelagic shark species that is highly migratory, has low-moderate productivity, and relatively low reproductive rates. It can be found in epipelagic tropical and subtropical waters between 30° North latitude and 35° South latitude.

The main threat to *Carcharhinus longimanus* is overexploitation, primarily as a result of incidental secondary catch in commercial fisheries. Although it is not typically targeted, its habit of staying near the surface in tropical waters—where fishing activity is intense—makes it especially vulnerable. Most of the catch is taken as secondary catch of commercial pelagic fleets in offshore and high-seas waters but it is also captured in coastal longlines, gillnets, trammel nets and sometimes trawls. Its fins are large and of high value within the trade.

In 2013, *Carcharhinus longimanus* was included in CITES Appendix II under the family listing for Carcharhinidae. Since 2014, 45,109 kg of fins have been reported as exported for commercial purposes from India, Kenya, Oman, Papua New Guinea, Senegal, Seychelles, Sri Lanka and Yemen, along with 509 individual fins.

Having once been one of the most abundant pelagic shark species in tropical seas worldwide, *Carcharhinus longimanus* was globally assessed in 2018 as Critically Endangered on the IUCN Red List, with populations severely reduced in all oceans. Based on modelling of Catch Per Unit Effort (CPUE) and stock assessment data, the global population was estimated as to have undergone a reduction possibly more than 98%, with the highest probability of more than an 80% reduction over three generation lengths (61.2 years). The South Atlantic, which comprises a small proportion of the range, was the only region where the species was assessed as Least Concern, based in part on conflicting CPUE data. *Carcharhinus longimanus* has been the subject of the CITES Review of Significant Trade process in 2023. The process resulted in Senegal establishing zero export quotas in 2024 for wild-sourced trade and for all specimens taken in “the marine environment not under the jurisdiction of any State”; the same quotas were established by Kenya and Yemen in 2025. Oman also established a zero-export quota for commercial trade in 2024.

All tuna Regional Fisheries Management Organizations (tRFMOs) established retention bans between 2010 and 2013, and over 31 countries have fully protected the species. *Carcharhinus longimanus* appears to have relatively high at-vessel survivorship compared to other sharks, suggesting individuals caught and released alive may be able to survive. However, there is currently insufficient evidence to determine the impact of these retention bans and more recent zero-export quotas and whether global population abundance continues to decline, has reached a plateau, or is showing signs of increase.

Analysis: *Carcharhinus longimanus* does not have a restricted area of distribution and it is unlikely to have a small population. An assessment in 2018 found that the global population was estimated to have undergone a reduction potentially over 98%, with the highest probability of more than an 80% reduction over three generations. This meets the criteria for inclusion in Appendix I for a historical extent of decline for a commercially exploited aquatic marine species with low-moderate productivity as set out in the footnote to Annex 5 of Res. Conf. 9.24 (Rev. CoP17). Despite retention bans, there is evidence that incidentally caught *Carcharhinus longimanus* are still retained for sale. Substantial trade levels have been reported by CITES Parties within the past five years and there is direct and indirect

evidence of ongoing and illegal trade in fins, likely placing pressure on any recovery of the species. The species therefore **appears to meet the criteria for inclusion in Appendix I**.

Inclusion of Tope (*Galeorhinus galeus*) and Smoothhounds (genus *Mustelus*) in Appendix II

Proponents: Brazil, Ecuador, European Union, Panama, Senegal

Summary: Tope (also known as School Shark, Soupfin Shark, and Oil Shark) *Galeorhinus galeus*, and smoothhounds (*Mustelus* spp.) are members of the family Triakidae, small to medium-sized sharks generally found on continental shelves in warm and temperate waters worldwide comprising around 40 species in nine genera. Three species (Tope, Nownose Smoothhound *Mustelus schmitti*, and Common Smoothhound *M. mustelus* – referred to here as the lead species) are proposed for inclusion in Appendix II in accordance with Article II paragraph 2(a) of the Convention. All other smoothhound species in the genus *Mustelus* (28 species total) are proposed for inclusion as 'lookalike' species under Article II paragraph 2(b). According to the proponents, other genera in this family are not being considered in the proposal as other species are not traded in significant volumes and do not present 'lookalike' implementation challenges.

Tope are found most frequently at depths of 0 to 200 m. Nownose Smoothhound and Common Smoothhound live and feed near the bottom in sandy, muddy, and rocky habitats; Nownose Smoothhound are generally found in waters from 2 to 195 m and Common Smoothhound usually occur in waters less than 50 m deep. Tope and smoothhounds are known, or inferred, to have low productivity based on estimates of natural mortality (less than 0.2) or generation length (greater than five years). Frequency of reproduction ranges from annual (Nownose Smoothhound) to triennial (Tope), with an average litter size ranging from 4 to 5 pups for Nownose Smoothhound, 1 to 25 pups (with an average of 11) for Common Smoothhound, and 20 to 35 pups for Tope. The three-generation period (which can be used to determine the recent rate of decline) is estimated to be 79 years for Tope, 28 years for Nownose Smoothhound, and 53 years for Common Smoothhound.

Tope and all smoothhound species are subject to targeted or incidental catch by commercial fisheries, and some are caught by artisanal or recreational fisheries. Many smoothhound species are captured in trawl, gillnet or longline fisheries; a few are primarily taken by demersal trawl fisheries or may be caught with other gear types, including line, seine, set net, or trammel gear fisheries. Although Tope was historically targeted for its liver oil, this species and smoothhounds are now primarily traded internationally for their meat. A study estimating unreported shark landings from 2012 to 2019 found that Tope and Common Smoothhound were among the top ten species in the global shark meat trade, and Nownose Smoothhound was among the top 20 species. Fins of these species are traded internationally in various forms (typically dried or frozen) and fins of multiple species are typically combined within similar size and grade categories. An analysis of the trade in small shark fins through Hong Kong SAR of China found that one-third of species present in samples collected between 2014 and 2021 were members of the family Triakidae, with Tope the 14th most highly traded species in the fin trade; over 20% were species of Smoothhound sharks.

Among the lead species, *Galeorhinus galeus* is the most widespread, with populations occurring in all major oceans and the Mediterranean. It was globally assessed in 2020 as Critically Endangered on the IUCN Red List (with estimated population reductions greater than 80% over the past three generations) due to levels of exploitation. Reductions in Tope populations were estimated based on fishery independent surveys, stock assessments, and catch per unit effort (CPUE) data from demersal trawl, longline, and gillnet fisheries. In some regions, notably the north-east Pacific and the Celtic Sea ecoregion in the north-east Atlantic, regulatory measures and a decline in commercial landings has led to some stock recovery, but elsewhere stocks that have been assessed remain highly depleted or continue to decline. *Mustelus schmitti* has a much more restricted distribution than Tope, being confined to waters of the south-east Atlantic off Brazil, Uruguay and Argentina. It was also globally assessed by IUCN as Critically Endangered in 2019, due to fishing pressure, lack of refuge at depth, and documented decreases in both research trawl surveys and fishery landings data. Catches in Uruguay and Argentina have stabilised since 2017 at around 3000 mt per year. *Mustelus mustelus* occurs in the Mediterranean and along the west coast of Africa. It was globally assessed by IUCN as Endangered (with suspected population reductions of 50-79% over the past three generations) based on decreasing trends in catch, fishing intensity, absence of management, limited areas of refuge at

depth, and declines in other shark species in 2020.

Of the remaining *Mustelus* species proposed for listing under Article II 2(b), three have been globally assessed on the IUCN Red List as Critically Endangered (*Mustelus fasciatus*, *M. mento*, and *M. whitneyi*), five as Endangered (*M. griseus*, *M. higmani*, *M. manazo*, *M. minicanis*, and *M. mosis*), four as Near Threatened (*M. asterias*, *M. canis*, *M. lunulatus*, *M. norrisi*), and four as Vulnerable (*M. andamanensis*, *M. dorsalis*, *M. punctulatus*, and *M. widodoi*). Nine were Least Concern (*M. albiginnis*, *M. antarcticus*, *M. californicus*, *M. henlei*, *M. lenticulatus*, *M. palumbes*, *M. ravidus*, *M. sinusmexicanus* and *M. stevensi*), and one was Data Deficient (*M. walkerii*).

Legislation and regulations are in place in some countries for Tope. The species is included in Appendix II of the Convention on Migratory Species (CMS), Annex I of the CMS Memorandum of Understanding on the Conservation of Migratory Sharks (Shark MOU), and Annex II of the Protocol concerning Specially Protected Areas and Biological Diversity in the Mediterranean (SPA/BD Protocol) under the Convention for the Protection of the Marine Environment and Coastal Region of the Mediterranean (Barcelona Convention). Limited national measures are in place for Nownose Smoothhound and Common Smoothhound.

There is currently no method to visually distinguish meat, the primary product in trade, of Tope and smoothhound species. The remaining smoothhounds are also proposed for inclusion based on the similarity in appearance of products in trade and overlapping habitat with Tope, Nownose Smoothhound, and Common Smoothhound. Since multiple species are often caught in the same fisheries and it is challenging to distinguish between them and their products, data on catch, landings, and trade are often aggregated. Apart from two species (*M. californicus* and *M. stevensi*, which are not currently known to be exploited), their meat is generally consumed domestically, although the meat of *M. lenticulatus* may be traded internationally and the fins of some smoothhound species are in international trade.

Analysis: Where regulations impacting the fishing pressure on Tope and Nownose Smoothhound have been enacted and effectively implemented, they appear to have resulted in some levels of population recovery. However, based on population reductions in other regions, **Tope *Galeorhinus galeus* appears to meet the criteria for inclusion in Appendix II** in Annex 2aA of Res. Conf. 9.24 (Rev. CoP17) as declines appear consistent with the indicative guidelines for inclusion in Appendix II of commercially exploited low-productivity aquatic species suggested in the footnote to Annex 5 of the Resolution. Despite indications of stabilising catches in Argentina and Uruguay, **historic declines in Nownose Smoothhound *M. schmitti* are also consistent with the guidelines for an Appendix-II listing.**

Common Smoothhound populations have also reduced, but there is insufficient information on historic population levels to determine if these are in line with those suggested in the footnote to Annex 5 to constitute a marked decline. In a large part of its range (coastal Africa), fishing pressure is generally increasing, and many countries have not implemented effective management regulations. Evidence of ongoing decreases in some regions, contraction of the range in one region, and demand for the species in international trade, imply that regulation is needed to ensure that the harvest is not reducing the wild populations to a level at which their survival may be threatened by continued harvesting or other influences, indicating that ***M. mustelus* meets the criteria for inclusion in Appendix II in Annex 2aB** of the Resolution.

The remaining *Mustelus* species are primarily killed for their meat, which is largely consumed domestically. The fins of some of these species enter international trade. Based on the difficulty distinguishing between the meat and fins of different smoothhound species, if Tope, Nownose Smoothhound or Common Smoothhound were to be included in Appendix II, products of other Smoothhound species that enter international trade would resemble specimens of species included in Appendix II; enforcement officers who encounter these products would be unlikely to be able to distinguish them. Therefore, these species **appear to qualify for inclusion in Appendix II in accordance with the criteria in Annex 2bA.**

Transfer of manta and devil rays Family Mobulidae (Mobulids) from Appendix II to Appendix I

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

Summary: Nine species of manta and devil rays, in the genus *Mobula* (family Mobulidae) are proposed for transfer from Appendix II to Appendix I in accordance with Article II, paragraph 1 of the Convention and under Criterion C (i & ii) in Annex 1 of Res. Conf. 9.24 (Rev. CoP17).

Mobula species are highly migratory cartilaginous fish found in a diversity of marine habitats in tropical and subtropical waters worldwide. Bentfin Devil Ray (*M. thurstoni*), Oceanic Manta Ray (*M. birostris*), Sicklefins Devil Ray (*M. tarapacana*) and Spinetail Devil Ray (*M. mobular*) are generally found in oceanic habitats along coastlines at oceanic islands, offshore pinnacles, and seamounts, but seasonally can be found along productive coastlines with regular upwelling. The Reef Manta Ray (*M. alfredi*) is generally found in shallow, productive coral reef habitats of island groups, atoll archipelagos, and continental coastlines. Longhorned Pygmy Devil Ray (*M. eregoodoo*) and Shorthorned Pygmy Devil Ray (*M. kuhlii*) occur in coastal and continental shelf waters in the Indian Ocean and western Pacific Ocean, while Atlantic Pygmy Devil Ray (*M. hypostoma*) is found in similar habitats within the Atlantic Ocean. Munk's Pygmy Devil Ray (*M. munkiana*) is found in warm, shallow waters along the coast, often in bays, estuaries, and along continental shelves in the Eastern Pacific Ocean.

Manta rays (*Mobula alfredi* and *M. birostris*) were included as "*Manta alfredi*" and "*Manta birostris*" in Appendix II at CoP16 (entering into effect in September 2014), but taxonomic changes adopted at CoP19 have subsumed *Manta* into *Mobula*. Remaining members of the genus were included in Appendix II in 2017 following CoP17.

All *Mobula* species are characterized by low productivity due to their slow growth, low fecundity, and long generation times. Most are relatively large with a wingspan – referred to as disc width – of one to five metres. Manta rays are typically larger than devil rays, and the Oceanic Manta Ray can reach up to seven metres disc width. Age at maturity varies with species but is generally 5-10 years. *Mobula* spp. reproduce by aplacental viviparity, and are thought to produce one pup per pregnancy, generally every one to three years. The lifespan is estimated at 15 to 20 years for devil rays, and around 40 years in manta rays.

Mobula species are impacted by overfishing, the gill plate trade (legal and illegal), degradation of coastal and coral reef habitats, boat strikes, increases in surface temperature associated with climate change, and disturbances from unregulated tourism activities. Their aggregating behaviour may increase access to food, courtship and mating, and avoidance of predators, but may also facilitate increased exploitation.

There are no historical baseline population data and global population numbers are unknown for all species, but population trends have been estimated based on available information from monitored populations, catch and landings data (including landings by vessel), and evidence of depletion. All *Mobula* spp. were assessed for the IUCN Red List between 2018 and 2020. Two species (Munk's Pygmy Devil Ray and Reef Manta Ray) were classified as Vulnerable, the remaining seven as Endangered because of estimated population reductions of 50-79% over the past three generations based on several factors, including levels of exploitation and slow life histories. More recently, Bentfin Devil Ray, Sicklefins Devil Ray, and Spinetail Devil Ray have been assessed as Critically Endangered on the IUCN Red List 2025-2 update, due to suspected global population reductions of greater than 80% over the past three generations.

All Mobulids are expected to face further population reduction in the future due to the demand for their high-value gill plates in international trade, which are prized for use in traditional medicine in Asia. There is also commercial trade in fins, skins, and live animals. *Mobula* spp. were included in the

CITES Review of Significant Trade process, in combination with Sri Lanka, at the 32nd meeting of the CITES Animals Committee (AC32) in 2023, resulting in Sri Lanka establishing a zero-export quota for all species. Current levels of international trade in gill plates may exceed those prior to their inclusion in Appendix II, although records of international trade have improved since the listing.

Mobula species are protected under several international instruments. Measures prohibiting the retention, transshipment, and landing of Mobulids have been adopted by four tuna Regional Fishery Management Organizations (tRFMOs). At least 44 countries have developed policies or legislation providing full or partial protection for these species.

Analysis: Mobulids are characterized by very low productivity and low fecundity and are vulnerable to overexploitation due to their interactions with a range of fisheries and the high value of their gill plates in international trade. Global population sizes of all *Mobula* species are unknown, but population estimates for the manta rays suggest that their populations are not small. They do not have a restricted distribution.

Overall, the available data for **Bentfin Devil Ray *M. thurstoni*, Oceanic Manta Ray *M. birostris*, Sicklefins Devil Ray *M. tarapacana*, and Spinetail Devil Ray *M. mobular*** indicate declines consistent with the indicative guidelines for inclusion in Appendix I of commercially exploited low-productivity aquatic species suggested in the footnote to Annex 5 of Res. Conf. 9.24 (Rev. CoP17). **These species are affected by trade and meet the biological and trade criteria for inclusion in Appendix I.**

Decreases of **Atlantic Pygmy Devil Ray *M. hypostoma*, Longhorned Pygmy Devil Ray *M. eregoodoo*, and Shorthorned Pygmy Devil Ray *M. kuhlii*** may demonstrate declines consistent with the guidelines for inclusion in Appendix I if genus-level data for *Mobula* species are considered in assessing population trends. All of these species do appear to be affected by trade.

Based on the available data, **Munk's Pygmy Devil Ray *M. munkiana* and Reef Manta Ray *M. alfredi***, similarly affected by trade, **do not appear to meet the decline guidelines** for inclusion in Appendix I.

A split-listing for the family Mobulidae, with some species listed in Appendix I and some in Appendix II, could lead to regulatory challenges as products in trade would be hard to distinguish. Article II of the treaty does not provide for listing 'lookalike' species in Appendix I, so if this challenge arises, the **Parties could consider annotating the listing of species remaining in Appendix II with a zero quota for commercial trade in wild-caught specimens.**

Transfer of Whale Shark *Rhincodon typus* from Appendix II to Appendix I

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

Summary: The Whale Shark *Rhincodon typus* is the largest living fish, found in all tropical and warm-temperate waters of the Atlantic, Pacific, and Indian Oceans, generally between 30 degrees North and 35 degrees South of the Equator. It is pelagic and highly migratory. The species was included in Appendix II in 2003 following CoP12 and is proposed for transfer to Appendix I in accordance with Criterion C (i & ii) in Annex 1 of Res. Conf. 9.24 (Rev. CoP17).

The Whale Shark is characterized by very low productivity due to its slow growth, late maturity (~25 years in males, probably longer in females), and long generation time. It is believed to have high fecundity, with a single female able to produce up to 300 embryos on a biennial or longer basis. Whale Shark pups are approximately between 50 and 60 cm in length at birth. Based on its size and birth in open ocean environments, the Whale Shark is expected to have high early mortality, although it can live more than 50 years.

The Whale Shark is threatened by a range of factors including overfishing, illegal trade, vessel strikes, pollution, and habitat loss due to climate change. There are no stock assessments for Whale Shark, but population size and trends can be estimated based on genetic studies and data from standardized surveys, aerial surveys, observations, logbooks, and landings. Population estimates have ranged from ~100,000 adults (estimated in 2009) to 120,000-240,000 females (estimated in 2007). Population decreases equal to or greater than 50% have been inferred based on count data, modelled population estimates and habitat availability. The species was assessed by IUCN as Endangered in 2016 and was recently reassessed as Endangered for the forthcoming 2025 IUCN Red List (generation length having been reevaluated since the 2016 IUCN Red List assessment). This is based on an inferred population reduction of more than 30% over the last three generations (120 years) for the Atlantic where around 25% of the population is inferred to occur. In the Indo-Pacific, where the remainder of the population occurs, a reduction of more than 65% is inferred over the last three generations. Combining data from these regions a global population reduction of 50–79% over the last three generations was inferred, but the basis for the higher end of this estimate is unclear.

The species was listed in Appendix II at CoP12, effective from 2003, based on concerns over international trade, particularly in fins and meat. Since the listing, reported trade to CITES has been minimal. Fins were found in market surveys after their inclusion in Appendix II of CITES, but legal trade does not appear to be impacting the species, likely due to the numerous protections that have been put in place over the last 20 years. Illegal trade is reported in meat, fins, and gill plates, and there are records of eight seizures involving live Whale Sharks or fins between 2014 and 2023.

Protective measures have been put into place for Whale Shark at the national, regional, and international level, including under several tuna Regional Fishery Management Organizations (RFMOs). The Convention on Migratory Species of Wild Animals (CMS) prohibits take of the species by those nations that are Parties to CMS and the Whale Shark is also included in Annex I of the CMS Memorandum of Understanding on the Conservation of Migratory Sharks (Shark MOU).

Analysis: Whale Shark populations are not small, nor do they have a restricted area of distribution at present. Available data show that the population size of Whale Sharks has decreased significantly in some locations and is projected to continue to decrease, due to fishing, ship strikes and climate change. According to the footnote in Annex 5 of Res. Conf. 9.24 (Rev CoP17) on commercially exploited aquatic species, the likely decrease of 50%, perhaps somewhat higher, over 120 years for a low productivity species would not be considered a marked historic decline consistent with the indicative guidelines for inclusion in Appendix I (which suggests a reduction to 15-20% of historic

baseline). Levels of reported legal trade are minimal, likely due to national and international protection measures. Available evidence of illegal trade levels suggests they are unlikely to be affecting the population overall.

On this basis and taking into account the wide range of conservation measures adopted in recent years, **this species does not appear to meet the biological or trade criteria** for inclusion in Appendix I.

Retain giant guitarfishes *Glaucostegus* spp. in Appendix II with a zero-export quota for wild specimens traded for commercial purposes

Proponents: 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, Togo

Summary: Giant guitarfish species in the genus *Glaucostegus*, the only genus in the family Glaucostegidae, are shark-like batoid species occurring in the coastal waters of the Mediterranean and Black Sea, Atlantic, Pacific, and Indian Oceans. The genus *Glaucostegus* was included in Appendix II of CITES at CoP18 in 2019 due to concerns that the international trade in their fins could be causing significant population declines. The intention of the listing was to cover all species within the genus. While currently adopted CITES nomenclature recognises nine species within the genus, the proposal and this analysis consider seven species within the genus in line with recent taxonomic revisions and recommendations that will be considered by CoP20 (in CoP20 Doc 110). This does not change the scope of the listing, which is to regulate trade in all *Glaucostegus* species. The current proposal seeks to add an annotation to this listing specifying: “a zero annual export quota for wild-taken specimens traded for commercial purposes”. According to the supporting statement, this quota is proposed to ensure international trade is paused until population levels are able to support sustainable trade levels, prevent an Appendix-I listing in the future, and prevent the extinction of Glaucostegidae.

Giant guitarfish can reach more than 2 m in total length. Species in the family Glaucostegidae grow slowly, mature late, have a generation length between 10 and 15 years, and exhibit low productivity.

Similar to wedgefish, Rhinidae (the subject of proposal CoP20 Prop. 33), and sawfishes (Family Pristidae, also listed in Appendix I), giant guitarfish are generally found in shallow coastal and continental shelf waters up to depths of 120 m. Most species are strongly associated with soft-bottom habitats in shallow warm-temperate to tropical coastal waters less than 50 m deep.

Giant Guitarfish are subject to intense fishing pressure, and they are primarily impacted by unregulated fisheries. The fins of *Glaucostegus* species are highly valued on the international market, so they are targeted and commonly retained as bycatch in coastal fisheries. Given their dependence on shallow coastal environments, other factors affecting these species are habitat degradation, coastal development, and pollution.

Despite the extent of their capture in fisheries, there are no stock assessments for these data-limited species, and catches of giant guitarfish have historically only been reported at the genus or family level. Members of the Glaucostegidae family are similar in appearance and can be difficult to distinguish from each other, consequently, there are limited species-specific data, making it difficult to determine decreases in population for individual *Glaucostegus* species.

Due to the lack of species-specific data, population trends for *Glaucostegus* species are estimated or inferred using catch, landings, effort, and size data that often include data reported at the family-level, as well as information on potential extinctions of local populations. Decreases in other batoid species with similar life history characteristics and habitats - such as wedgefishes or sawfishes - are also used to infer population reductions in Giant Guitarfish species. All seven *Glaucostegus* species are globally assessed as Critically Endangered on the IUCN Red List between 2018 and 2022, due to severe population decreases. Based on an analysis of variable data sets over a timeframe from 1948 until 2015, population decreases of greater than 80% are inferred based on trends in landings and modelled population estimates.

Analysis of the fin market in Hong Kong SAR of China from 2014 to 2021 indicated continued international trade in their fins. Between 2021 and 2023, the CITES Trade Database recorded commercial exports of about 150,000 kg of fins, 60,000 kg of skins, and over 3,000 kg of meat from Giant Guitarfishes in international trade, mostly from Indonesia to Hong Kong SAR of China. Around

50% of the reported trade volume is related to *G. typus*, 20% to *G. cemiculus*, and the remainder was reported at a genus level, with limited records for other species. Evidence suggests there is illegal trade in the fins of Glaucostegidae based on discrepancies in trade data and recent seizures between 2019 and 2024.

There are few conservation measures in place for giant guitarfishes. They are not protected under any other international Convention. At the regional level, Blackchin Guitarfish (*G. cemiculus*) is listed in Annex II of the Protocol concerning Specially Protected Areas and Biological Diversity in the Mediterranean (SPA/BD Protocol) under the Convention for the Protection of the Marine Environment and Coastal Region of the Mediterranean (Barcelona Convention). However, these species are not directly managed by Regional Fishery Management Organizations (RFMOs), and few national management and conservation measures are in place for them.

Analysis: There is currently no guidance on how to assess a proposal to add an annotation to the listing of a species already in Appendix II. This is equivalent to the inclusion of an export quota or other special measure for a species being transferred from Appendix I to II, as provided for as precautionary measures under Annex 4, paragraph A.2.a) iii).

Giant Guitarfishes are characterized by slow growth, late maturity, and low productivity. Their reliance on shallow, coastal water habitats where fisheries occur combined with the high value and demand for their fins in international trade, make them highly vulnerable to overexploitation.

In the absence of species-specific data for *Glaucostegus* species, information on related species (Rhinobatidae (guitarfishes), unspecified Glaucostegidae (giant guitarfishes), or Rhinidae (Wedgefishes)) have been used to help infer population trends. Given the fishing pressure on these coastal, low productivity species and on-going exploitation pressure, it is likely that population declines, estimated at over 80% in the respective IUCN Red List assessments, have continued and would already meet the criteria in Annex 1 paragraph C of Res. Conf 9.24 (Rev CoP17).

In this light, the **proposed annotation of a zero-quota for wild specimens traded for commercial purposes, does appear to be an appropriate precautionary measure** pending improved circumstances.

Retain wedgefishes Family Rhinidae in Appendix II with a zero-export quota for wild specimens traded for commercial purposes

Proponents: Bangladesh, Benin, Brazil, Burkina Faso, Burundi, Central African Republic, Comoros, Congo, Gabon, Gambia, Guinea, Guinea-Bissau, Maldives, Mali, Niger, Nigeria, Senegal, Sierra Leone, Sudan, Togo

Summary: Wedgefishes in the family Rhinidae comprise 10 or 11 recognised species of medium to large rays that generally inhabit warm temperate to tropical inshore waters on the continental shelf ranging from the Eastern Atlantic, across the Western and Eastern Indian Ocean and extending far into the Pacific. The family Rhinidae was included in Appendix II at CoP18 in 2019 due to concerns that the high value of their fins in international markets was driving declines. The proposal is to retain the family in Appendix II with the following annotation: “a zero annual export quota for wild-taken specimens traded for commercial purposes.” According to the supporting statement, this quota is proposed to provide Wedgefishes an opportunity to recover to a point where trade will not threaten them with extinction.

Although there is limited information on their life history characteristics and general biology, wedgefishes appear to be characterized by low productivity due to their relatively low fecundity (2-19 pups), slow growth rates, and estimated late age at maturity (10-15 years).

Like giant guitarfishes *Glaucostegus* spp. (the subject of proposal CoP20 Prop. 32) and sawfishes (Family Pristidae, also listed in Appendix I), wedgefishes are bottom dwelling fish that are often found in shallow coastal waters and are rarely found at depths below 400 m. They inhabit enclosed bays and estuaries and are found on coral reefs. Based on their size and use of coastal habitat, wedgefishes are susceptible to exploitation by demersal trawl, net, and line fisheries as either target or incidental catch. Meat of these species is usually consumed locally, but wedgefish fins are known as being some of the most valuable fins traded internationally. Snouts, skin, and other products are also traded.

As some species in this family are morphologically similar, share common names, and have overlapping ranges, there has been confusion and possible misidentification in reporting and catch data. Information is not available to determine the precise population size of any species in the family and there is a lack of species-specific data to calculate population trends.

All members of the Rhinidae were globally assessed as Critically Endangered on the IUCN Red List between 2018 and 2023 except for the Eyebrow Wedgefish (*Rhynchobatus palpebratus*), which was assessed as Near Threatened in 2018. Some species appear to have restricted areas of distribution and are still being heavily exploited in coastal fisheries. Because of the paucity of species-specific status information, population decreases have been inferred from fisheries data. Declines over three generations have been estimated at greater than or equal to 80% for the Critically Endangered species and 20-30% for *Rhynchobatus palpebratus*. Observations of reductions of over 90% have been observed in some fishing areas, and one species, *R. cooki*, has only had one confirmed record in the last 23 years. The distributions of species such as the False Shark Ray (*Rhynchorhina mauritaniensis*), Japanese Wedgefish (*Rhynchobatus mononoke*), and Taiwanese Wedgefish (*Rhynchobatus immaculatus*) are notably limited.

Analysis of the fin market in Hong Kong SAR of China between 2015-2017 and 2020-2021 revealed that wedgefish fins continued to be traded internationally. According to the CITES Trade Database, approximately 127,000 kg of dried fins, 136,000 kg of fins, 35,000 kg of skins, and 4,600 kg of meat from wild-sourced Rhinidae species were commercially exported between 2021 and 2023. Across different products exported for commercial purposes, Bottlenose Wedgefish (*Rhynchobatus australiae*) comprised about 40% of the reported trade volume during this period.

There is little management of wedgefishes across their range, but some countries have enacted legislation or regulations for these species. Bottlenose Wedgefish (*Rhynchobatus australiae*) is listed

in Appendix II of the Convention on the Conservation of Migratory Species of Wild Animals (CMS), and three species are listed in Annex 1 the CMS Memorandum of Understanding on the Conservation of Migratory Sharks (Shark MOU).

Analysis: There is currently no guidance on how to assess a proposal to add an annotation to the listing of a species already in Appendix II. This is equivalent to the inclusion of an export quota or other special measure for a species being transferred from Appendix I to II, as provided for as precautionary measures under Annex 4, paragraph A.2.a) iii).

Rhinidae species are mostly found in inshore continental areas, and their areas of habitat overlap with areas with high levels of fishing pressure. There is international demand for their fins, which are extremely valuable, as well as local use for meat, both of which provide an incentive to retain catch even when incidental.

There are no estimates of the global populations of wedgefishes, but data that are available on catch and landings suggest that the populations of most species are not small, possibly with the exception of *R. cooki* which has only been recorded once in the past two decades. In the absence of species-specific data for Rhinidae species, fisheries information for related species (Rhinobatidae (guitarfishes), Glaucostegidae (Giant Guitarfishes), or unspecified Rhinidae (Wedgefishes)) have been used to help infer population trends of over 80% declines for all species except *Rhynchobatus palpebratus*. Given the continued fishing pressure on these low productivity species, it is likely that the population declines identified in the respective IUCN Red List assessments have continued, meaning that all species except the Eyebrow Wedgefish (*Rhynchobatus palpebratus*), may already meet the criteria in Annex 1 of Res. Conf. 9.24 (Rev. CoP17).

In this light, the proposed **annotation of a zero-quota for wild specimens traded for commercial purposes, does appear to be an appropriate precautionary measure for all species of the family** pending improved circumstances.

Inclusion of Gulper Sharks of the Family Centrophoridae in Appendix II

Proponents: Brazil, Comoros, Dominican Republic, Ecuador, European Union, Lebanon, Nigeria, Panama, Senegal, Syrian Arab Republic, United Kingdom of Great Britain and Northern Ireland

Summary: The Dwarf Gulper Shark *Centrophorus atromarginatus* and the Gulper Shark *Centrophorus granulosus* (lead species) are proposed to be included in Appendix II in accordance with Article II paragraph 2(a) of the Convention and satisfying Criterion A and B in Annex 2a of Res. Conf. 9.24 (Rev. CoP17). All 14 other gulper shark species in the Family Centrophoridae¹ are proposed for inclusion in Appendix II in accordance with Article II paragraph 2(b) of the Convention and satisfying Criterion A in Annex 2b (lookalike species) of the Resolution.

The Centrophoridae comprises two genera (*Centrophorus* and *Deania*) of deepwater sharks, typically found at depths between 200 and 1,500 m, occurring in cold-temperate to tropical waters. They are recorded throughout the world with few exceptions (Northeast Pacific and at high latitudes). The *Centrophorus atromarginatus* occurs in association with the seafloor on the upper continental slope at depths between 100 and 540 m, and *C. granulosus* is found on or near continental and insular shelves and slopes below 50 m, but primarily at depths between 300 and 1,100 m.

Gulper sharks are characterized by low productivity, with slow growth rates, long gestation periods, low fecundity, and late maturity. Their maximum size depends on the species, reaching up to 176 cm in *C. granulosus*. Breeding is generally every two years with small litter sizes: 1-2 in *C. atromarginatus* and 4-11 (usually 4-6) in *C. granulosus*. Age parameters for *C. atromarginatus* are unknown, but are inferred to be similar to *C. granulosus* with a generation length between 27 and 28 years.

All gulper shark species have IUCN Red List global assessments with *C. atromarginatus* classified as Critically Endangered and *C. granulosus* as Endangered. Among the other species, seven are assessed as Endangered (*C. harrissoni*, *C. isodon*, *C. lesliei*, *C. longipinnis*, *C. squamosus*, *C. tessellatus*, and *C. uyato*), and three as Vulnerable (*C. lusitanicus*¹, *C. moluccensis*, and *Deania quadrispinosa*) due to levels of exploitation. Of the remaining species, two are classified as Near Threatened (*D. calceus* and *D. profundorum*) and one (*C. seychellorum*) as Least Concern, with one (*C. westraliensis*) listed as Data Deficient.

The main threats to sharks in the Centrophoridae are commercial and artisanal fisheries. They are targeted and retained when caught as bycatch because they have some of the highest value shark liver oil on the international market. Unlike coastal sharks, deepwater sharks have very large livers that can account for up to 30% of their body weight. They are also used for meat, fins, and possibly fish meal. The Dwarf Gulper Shark and Gulper Shark (*C. granulosus*) have a squalene content above 70%, squalene being the traded product extracted from shark liver oil, used in cosmetics, pharmaceuticals, food and dietary supplements. In addition to fishing, gulper sharks also face threats from deep-sea mining, marine pollution, and climate change.

Although there is a lack of species-specific data for gulper sharks, decreases in population have been estimated from catch per unit effort (CPUE) data, catch and landings data, fishing effort, and reported exports of shark liver oil for deepwater sharks. *C. atromarginatus* was assessed globally as Critically Endangered due to an over 80% reduction over the past three generations, caused by limited biological productivity and high levels of exploitation across most of its range. The Gulper Shark (*C. granulosus*) was assessed globally as Endangered due to a 50-79% population reduction over the past three generations, based on abundance data and levels of exploitation. These estimates were derived based on analysis of limited available data sets collected between 1975 and 2022.

Gulper shark fisheries are mostly unregulated, except for in parts of the Northeast Atlantic and

¹ A recent taxonomic revision reduced the number of species within the genus *Centrophorus*. Evidence suggests that *Centrophorus lusitanicus* refers to the true *C. granulosus* from off Portugal and must be considered a junior synonym of the latter species (Fishbase 2025).

Southwest Pacific where concerns about their status have led to some fisheries management measures. Where management is lacking, these deepwater fisheries can be considered boom-and-bust fisheries.

All species of gulper sharks, except one, Seychelles Gulper Shark (*C. seychellorum*), have been identified in the shark liver oil trade or inferred to be traded based on their range and interactions with fisheries that have reported trade of *Centrophorus* species. Taxonomy of the Centrophoridae family is complex, and while it is possible to distinguish Gulper sharks of the genus *Deania* from those in the genus *Centrophorus*, it is difficult to visually distinguish between species within the genus *Centrophorus* as morphological changes between a juvenile and adult may be greater than the differences between species. Consequently, species-specific identification is challenging, and gulper shark catches and landings are often nationally reported under a generic category, such as by genus. The main commodity in trade is the highly valued liver oil, which cannot be differentiated by species visually or easily with other techniques.

Analysis: Species in the family Centrophoridae are among the most valuable shark species in international trade due to the use of liver oil in cosmetics, pharmaceuticals, food and dietary supplements. However, information on their conservation status – particularly species-specific information – is patchy in geographic coverage and timeframes.

Limited fishing and trade data sets for deepwater shark species are used as a basis for estimation of population trends of **Dwarf Gulper Shark *C. atromarginatus* and Gulper Shark *C. granulosus*, declines for both species would appear consistent with the indicative guidelines for inclusion in Appendix II** of commercially exploited low-productivity aquatic species suggested in the footnote to Annex 5 of Res. Conf. 9.24 (Rev. CoP17) (**thereby meeting Criterion 2aA of the Resolution**). Fishing for trade in liver oil does appear to be a significant factor affecting these species.

The taxonomic uncertainty and difficulty in identifying gulper sharks have caused some confusion with respect to the distribution of the various species. Different species are often reported under a general category, and some studies only refer to the genus *Centrophorus*. It is likely that most gulper sharks are retained when caught as bycatch due to the high value of shark liver oil on the international market. Only one species has not been identified in trade (*C. seychellorum*). It is not possible to differentiate liver oil by species visually or easily with other techniques. Therefore, the **regulation of all species in the family Centrophoridae may be necessary to ensure that international trade in *C. atromarginatus* and *C. granulosus* is effectively controlled consistent with criterion 2bA.**

Inclusion of eels *Anguilla* species in Appendix II

Proponents: European Union, Honduras

Summary: Eels, *Anguilla* spp., are a very distinctive group of elongated fish distributed throughout temperate and tropical waters across the Atlantic, Indian, and Pacific Oceans. They migrate from freshwater or estuarine habitats to marine spawning grounds, completing a complex life cycle across oceanic and continental ranges. They pass through various life stages (marine leptocephali, glass eels, elvers, yellow eels and 'silver' eels) and breed only once (i.e. are semelparous), with each female potentially producing millions of eggs. The European Eel *Anguilla anguilla*, was included in Appendix II at CoP14 in 2007. The Japanese Eel *Anguilla japonica* and American Eel *A. rostrata* are now proposed for inclusion in Appendix II in accordance with Article II, paragraph 2(a) of the Convention and Annex 2a Criterion B of Res. Conf. 9.24 (Rev. CoP17); the remaining 14 non-listed *Anguilla* species are proposed for inclusion as lookalike species in accordance with Annex 2b.

Eels are highly sought after as food species, particularly in East Asia, notably China and Japan. Nearly 90% of global eel production for human consumption relies on input of live wild-caught glass eels, elvers or yellow eels (seedstock) that are raised in aquaculture systems, because commercial-scale captive breeding remains unfeasible for all species. The vast majority of eel aquaculture production is in East Asia. With increasing difficulty in obtaining adequate seedstock of *A. japonica* there has been growing reliance on international trade of other species to meet demand.

The life history of eels makes stock assessment extremely difficult and no global population sizes are known. However sometimes drastically decreasing harvests, both of seedstock for aquaculture and of larger (mainly 'silver') eels for consumption are persuasive indicators of decreasing populations. *Anguilla japonica* and *A. rostrata* were categorised as Endangered in 2018 and 2020 on the IUCN Red List respectively, based on an approximate 50% decrease in abundance over three generations across their respective ranges. The main identified threats include overfishing, habitat degradation, pollution, migration barriers such as hydroelectric dams and climate change impacts. The significance of any one threat or the synergy it may have with other threats is still poorly understood. Notably it is difficult to assess the effects of harvest on stock levels and recruitment rates.

The trade includes seedstock destined for aquaculture as well as yellow and silver eels for direct human consumption (in both cases, mostly *A. japonica*, *A. rostrata*, and *A. anguilla*, to a lesser extent *A. bicolor*, but also some exports of farmed *A. marmorata*, *A. australis*, and *A. dieffenbachii*). According to the UN Comtrade database, global exports of anguillid products between 2014 and 2023 amounted to 920,000 tonnes, or ~80,000 to ~110,000 tonnes annually, just under half comprising processed or preserved eels and one third live eels, with the remainder largely frozen. However, the global Harmonised System (HS) codes used that relate to *Anguilla* spp. do not distinguish between species or life stages. Trade in *Anguilla* species is dynamic and constantly evolving, with historic intensive harvesting of glass eels for aquaculture initially concentrated on *A. japonica* for East Asian farms.

During the 1980s and 1990s European glass eel demand surged for aquaculture and consumption in East Asia, largely due to shortages of *A. japonica*. Following a decline of over 90% in *A. anguilla* recruitment and increased regulatory controls for the species (including its inclusion in Appendix II in 2007), commercial demand shifted toward other species, notably *A. rostrata* and, to a lesser extent, tropical eels such as Shortfin Eel *A. bicolor*. Since 2014, reported glass eel inputs into aquaculture ponds in China show that inputs of *A. rostrata* have equalled or surpassed *A. japonica* in volume, highlighting a significant shift in sourcing for eel farming operations. Additionally, East Asian imports of *A. rostrata* in 2022 were more than five times the annual average recorded between 2004 and 2021. This corresponded with sharp price increase for *A. rostrata* seedstock landed in Canada, from USD314/kg in 2009 to USD3,492/kg in 2023. A study investigating the species composition of eel products in Japan found that approximately 60% of imported eel products were *A. rostrata*.

Enforcement is complicated by the absence of species-specific HS codes and the fact that processed products are visually indistinguishable between species. DNA-based market studies have revealed frequent mislabelling, with substitution of species detected in products sold on domestic markets

within producing countries and in products exported to international markets. Such identification challenges hinder monitoring of trade volumes by species, complicate the detection of illegal trade, and reduce the effectiveness of management measures. However, large variations in market price, for example between *A. japonica* and *A. marmorata*, may serve as incentives for traders to separate the two in some cases.

Several national and subnational measures regulate eel harvest and trade across range States. For *A. japonica*, management is subject to an informal agreement among China, Japan, the Republic of Korea, and Taiwan Province of China, which includes (voluntary) limits on seed (glass eel) input to aquaculture. The reported quantity of eel seed input into aquaculture ponds was expected to approach 125 tonnes for the 2024-2025 fishing season, substantially exceeding the agreed threshold (78.8 tonnes), which has not been modified since the agreement was established in 2014. Other species are managed nationally through seasonal restrictions, minimum size limits, gear limitations, and licensing systems; however, implementation and enforcement vary widely. The USA has implemented domestic restrictions for *A. rostrata*. Canada also recently developed new legislation for harvest of *A. rostrata*.

Analysis: Eels *Anguilla* spp. are a highly valuable fisheries resource that in the case of temperate species, notably the CITES-listed *A. anguilla*, and the non-listed *A. japonica* and *A. rostrata*, has been harvested in large quantities, particularly as seedstock for aquaculture, mainly in China and Japan. Resulting eel products are largely consumed nationally but are also re-exported to a range of other markets, including south-east Asia, Europe and the USA.

Eel stocks of some species, have decreased in several range States, including Japan, European countries, Canada and the USA. Eels are affected by a wide range of factors including habitat loss and fragmentation, pollution, and barriers to migration (notably dams and weirs) as well as harvest and it is difficult to separate the effects of these when assessing changes to populations. *A. anguilla* recruitment levels have largely stabilised, albeit at very low levels compared with historic baselines.

In some jurisdictions, notably Canada and the USA for *A. rostrata* and China, Japan and Republic of Korea for *A. japonica*, harvest is regulated through a variety of mechanisms, including quotas, closed seasons, licenses and Total Allowable Catches (TACs). Stocks have decreased or appear to have decreased in some or possibly all of these range States. However, the distinctive nature of eel biology makes it difficult to ascribe a single cause to such decreases. As such, **it is not possible to say with certainty whether either *A. rostrata* or *A. japonica* meets the criteria for inclusion in Appendix II set out in Annex 2a** of Res. Conf. 9.24 (Rev CoP17). The complexity of eel fisheries and management, whereby wild seedstock is harvested to replenish reduced stocks, compounds this difficulty.

The most heavily traded species of Anguillid are *A. japonica* and *A. rostrata* and the already Appendix-II listed *A. anguilla* and products of other eel species are also known to enter trade. Processed eel products and glass eels or elvers, some of the main products in trade, may closely resemble each other. These would be difficult for non-specialists to distinguish by species, particularly in consignments of mixed species and almost impossible without expensive and impractical genetic testing in products destined for the retail market. Therefore, **all currently unlisted *Anguilla* species meet criteria for inclusion in Appendix II in Annex 2b** of Res. Conf. 9.24 (Rev. CoP17) as lookalikes of *A. anguilla*.

Inclusion of Sea Cucumbers *Actinopyga echinites*, *A. lecanora*, *A. mauritiana*, *A. miliaris*, *A. palauensis* and *A. varians* in Appendix II

Proponent: European Union

Summary: Sea cucumbers (class Holothuroidea) are marine echinoderms with a worldwide distribution, comprising around 1,800 species. In dried form, known as trepang or bêche-de-mer, sea cucumbers are traded for food and use in traditional medicine, particularly in Asia. The genus *Actinopyga* contains 18 species, including several commercially exploited species of medium value.

Actinopyga echinites (Deep-water Redfish), *A. mauritiana* (Surf Brownfish), *A. miliaris* (Blackfish) and *A. varians* (Surf Redfish, previously considered part of *A. mauritiana*) are proposed for inclusion in Appendix II in accordance with Article II, Paragraph 2a of the Convention, and *A. lecanora* and *A. palauensis* in accordance with Paragraph 2b due to their similarity in appearance.

The six *Actinopyga* species are found across the Indo-Pacific region, with some range overlap and typically inhabit coral reefs, lagoons, and seagrass beds at depths of less than 30 m. Their sedentary nature, accessibility in shallow waters, assumed longevity (12 years or more), slow recovery rates, and density-dependent reproduction make them vulnerable to overexploitation.

No global population estimates exist, but localised declines have been widely documented. Examples include commercial extinction of *A. echinites* and *A. miliaris* in parts of Fiji; limited recovery of *Actinopyga* populations was noted in the Egyptian Red Sea despite fishery closures. Three of the lead species (*A. echinites*, *A. mauritiana* and *A. miliaris*) were assessed as Vulnerable on the IUCN Red List in 2010 (now in need of updating), with decreasing population trends, and estimated 30-40% global decreases over three generations based on estimates of depletion and over-exploitation across their ranges. *Actinopyga varians* was assessed as Data Deficient in 2012 after its recognition as a valid species separate from *A. mauritiana*.

Sea cucumber fisheries have developed globally, and many species have been subject to overfishing. Although aquaculture of sea cucumbers has expanded in some countries (e.g., China), for *Actinopyga* spp., captive breeding remains largely undeveloped. Current and future trade in *Actinopyga* is expected to continue relying on harvest from wild populations.

The majority of sea cucumber harvest is intended for export: a 2013 review found that out of 77 fisheries in major sea cucumber fishing regions, only four (in the Cook Islands, Samoa, Guam and Nauru) were solely for subsistence use. In Papua New Guinea, *A. mauritiana*, *A. miliaris* and *A. echinites* are among the top-targeted species in the bêche-de-mer fishery, and prices for dried *Actinopyga* species are among the highest paid to local fishers. In the Solomon Islands, *A. miliaris* and *A. echinites* are also key harvested species of economic importance, often as secondary targets after higher-value taxa.

Assessing trade volumes by individual species is challenging due to sea cucumbers often being traded without specific taxonomic identification and there are no reliable estimates of the volume of *Actinopyga* species in international trade. However, several sources indicate that *A. echinites*, *A. mauritiana*, and *A. miliaris* represent a notable proportion of global holothurian exports. According to LEMIS, between 2009 and 2024, the USA imported notable volumes of *A. echinites* (4,597 kg), *A. miliaris* (2,946 kg) and *A. mauritiana* (648 kg), mostly from Fiji, Taiwan Province of China and Indonesia. *A. varians* was not reported in LEMIS. From 2009 to 2020, the USA also imported 180 kg of *A. spinea* and 687 kg of unspecified *Actinopyga* spp. along with other species from the genus not found in the same area (i.e. *A. agassizii*). *Actinopyga spinea* occurs in the Western Central Pacific, overlapping with the ranges of some of the species proposed for inclusion in the Appendices. Identification guides note that *A. spinea* is frequently grouped with *A. miliaris* by fishers and processors and is probably misidentified as that species. Regarding *A. lecanora* and *A. palauensis*, a study of 38 retail shops in Hong Kong SAR of China in 2022 found that they were not present despite previous records, possibly reflecting reduced availability or mislabelling.

While illegal trade in sea cucumbers is recognised, there is little direct evidence specific to *Actinopyga*. There is a range of domestic management measures including moratoria, area closures, licensing, size limits, export restrictions and quotas, but enforcement remains inconsistent and large areas are not effectively regulated. Species-level identification in trade remains a major challenge, as morphological features overlap considerably, especially in processed forms, resulting in frequent mislabelling and mixed consignments.

Analysis: The six species of *Actinopyga* sea cucumber proposed for inclusion in Appendix II are shallow-water Indo-Pacific species that are widely harvested for international trade where they are known as trepang or bêche-de-mer. Their life-histories make them intrinsically vulnerable to overharvest and there is evidence of significant depletion of some of the species, including *A. echinites* and *A. miliaris*, in at least some parts of their range. While species-level trade volumes remain unquantified, shipment records indicate that *Actinopyga* species make a significant contribution to the overall bêche-de-mer trade. Distinguishing species in processed form is complicated by the fact they are often traded in mixed consignments. However, there is a lack of recent information on the global status of and trends in populations of the species proposed and little is known about the current overall impact of wild harvest on any of them. Where information is available, it generally indicates population decreases. Overall, there is **insufficient information at present to determine whether any of the species proposed meets the criteria in Annex 2a** of Res. Conf. 9.24 (Rev. CoP17). Therefore, it is also **unclear whether regulation of trade in *A. lecanora* or *A. palauensis* is required to effectively control the trade in other *Actinopyga* species and should be included in Appendix II** as lookalikes under the criteria in Annex 2b.

Inclusion of Golden Sandfish *Holothuria lessoni* in Appendix II

Proponent: European Union

Summary: Sea cucumbers (Holothuroidea) are marine echinoderms comprising approximately 1,800 species worldwide. The Golden Sandfish *Holothuria lessoni* is a large tropical species typically reaching lengths of 25-35 cm, with some individuals growing up to 46 cm. The species inhabits shallow waters (up to 30 metres), with its range extending from Africa and the Indian Ocean to Asia and the Western Central Pacific.

The species is in demand for luxury food and traditional medicine, particularly in many Asian countries where consumption of *bêche-de-mer*, dried and cooked sea cucumbers, is popular. It is reported as the highest-priced tropical sea cucumber in market surveys in 2022 in Hong Kong SAR of China but was scarce in those markets.

Golden Sandfish is harvested throughout its range. Once common in parts of its range, exploitation has led to observed density reductions and in some places, local extirpations (e.g. Australia, specifically Ashmore Reef, the north and east of Fiji, and Vanuatu, Efate). No global population estimates are available for *H. lessoni*, but it was listed as Endangered on the IUCN Red List in 2010, an assessment now noted to need updating. This assessment estimated the species' global population had decreased by at least 50% over the previous 30 - 50 years, primarily due to overfishing and loss of mature individuals. These estimates were inferred in part based on comparison with another species, *H. scabra*, with which it is commonly traded, taking into account exploitation levels and biological vulnerability, as well as, observed population decreases across much of its range.

H. lessoni is considered intrinsically vulnerable to overharvesting, due to its sedentary behaviour, late maturity (2-5 years), density-dependent reproduction, low recruitment rates, as well as accessibility to harvest. Its generation length is thought to span several decades, and despite probable medium productivity, it is known to recover slowly after depletion, especially when population densities are too low for successful spawning, since reproduction relies on external fertilisation and close proximity of individuals. Although females produce several million eggs, survival rates are low due to the vulnerability of eggs and larvae to predation and environmental conditions.

Sea cucumber fisheries have developed in many parts of the world and have followed boom-and-bust patterns and most have declined as a result of overfishing. Whilst aquaculture development has focused mainly on *H. scabra*, *H. lessoni* has been explored for cultivation due to its high market value. though current production remains small in scale, and any benefits to wild populations are likely limited to local contexts.

Trade in *H. lessoni* is widespread but poorly tracked, as species-specific reporting is generally lacking. *H. lessoni* was exported from Indonesia in significant volumes from 2017–2020 (totalling 93,050 kg). In the Solomon Islands, the Ministry of Fisheries and Marine Resources (MFMR) reported export volumes of 925 kg in 2021 and 2,095 kg in 2022. According to the UN Comtrade database, between 2015 and 2024, Indonesia, Malaysia, and mainland China were among the leading exporters of sea cucumbers under general sea cucumber HS codes (exports from *H. lessoni* range States). Saudi Arabia, Hong Kong SAR of China, and mainland China were the top importers. Market prices for *H. lessoni* in Hong Kong SAR of China reached USD849/kg in 2016, and USD635/kg in 2022. Local prices also reflect high value in several locations. Illegal trade involving this species has been reported in several countries.

Identification challenges arise as *H. lessoni* is often sold together with *H. scabra* under the local name “putian,” for example in the Philippines. Morphological variation within the species in colour and body shape also contributes to misidentification risks. Enforcement challenges include misreporting, fraud, and difficulty in species-level identification, especially in dried or processed forms.

Few regulatory instruments are specific to *H. lessoni*, although it is managed under general sea cucumber frameworks in several range States. In Australia, the species is commercially harvested in

regulated fisheries, with seasonal closures, limited entry, licensing, and Total Allowable Catch (TAC) in place. Papua New Guinea also includes the species in its national sea cucumber management plan, which prohibits SCUBA use, requires licensing, and sets TACs. Fiji, Vanuatu, and Kiribati have similar national plans or general restrictions that apply to *H. lessoni*. Tonga, after a long moratorium, excluded the species from catch quota allocations when the fishery reopened in 2021. In the Seychelles, *H. lessoni* was authorised for exploitation under a TAC of 100,000 individuals in 2022-2023, but just under 9,000 were caught.

Holothuria lessoni is proposed for listing in CITES Appendix II, in accordance with Article II, Paragraph 2 (a) of the Convention and satisfying Criterion B of Annex 2a of Resolution Conf. 9.24 (Rev. CoP17). Three other species in the genus are already listed in Appendix II (*Holothuria fuscogilva*, *H. nobilis* and *H. whitmaei*) as well as the genus *Thelenota*.

Analysis: *Holothuria lessoni* is widely reported as over-exploited throughout much of its range, driven primarily by international trade for bêche-de-mer. Anecdotal and recorded evidence suggests that this species commands high market prices, driving targeted exploitation even in remote areas. The species was classified as Endangered in 2010, having undergone an estimated decrease of over 50% globally over the previous 30 – 50 years, with a then decreasing population trend. It is likely that fishing pressure has increased since then and population decreases may have accelerated, with more recent evidence of localised extirpation or severe depletion in specific locations. Considering the species' biological vulnerabilities that hinder population recovery, it is likely that trade regulation is required to ensure that harvesting does not reduce wild populations to a level that threatens their survival. Therefore, the species **meets the criteria in Annex 2aB** of Res. Conf 9.24 (Rev CoP17).

Inclusion of the following fifteen tarantula species in Appendix II: *Grammostola rosea*, *Acanthoscurria chacoana*, *Acanthoscurria insubtilis*, *Acanthoscurria musculosa*, *Acanthoscurria theraphosoides*, *Avicularia hirschii*, *Avicularia rufa*, *Avicularia avicularia*, *Catumiri argentinense*, *Cyriocosmus berate*, *Cyriocosmus perezmilei*, *Haplotremus albipes*, *Holothele longipes*, *Pamphobeteus antinous*, and *Umbyquyra acuminatum*

Proponents: Argentina, Plurinational State of Bolivia, Panama

Summary: Fifteen recognised species of tarantulas, from nine genera, are proposed for inclusion in Appendix II. *Grammostola rosea* is proposed for inclusion under Article II, paragraph 2(a) (lead species), while the 14 other species from the genera *Acanthoscurria*, *Avicularia*, *Catumiri*, *Cyriocosmus*, *Haplotremus*, *Holothele*, *Pamphobeteus*, and *Umbyquyra* are proposed as 'lookalikes'. These species are distributed across a range of South and Central American countries, with Bolivia (Plurinational State of, hereafter referred to as Bolivia) representing a common range State for all fifteen, including two endemics (*Cyriocosmus perezmilei* and *Haplotremus albipes*). None of the species has been assessed for the IUCN Red List, although *Grammostola rosea* and *Pamphobeteus antinous* are listed as vulnerable in national assessments in Chile and Peru, respectively. Currently 37 tarantula species are listed in CITES, with 36 listed in Appendix II and the Antilles pinktoe tarantula *Caribena versicolor* listed in Appendix III.

Current and historical population estimates for all the proposed species are lacking, and population trends unknown. These tarantulas inhabit a variety of ecosystems including deserts, scrublands, deciduous forests, and grasslands. They are typically found in burrows or natural cavities and are sensitive to habitat disturbance. The primary threat to these species appears to be habitat loss and fragmentation, driven by agricultural expansion, urban development, fire, and logging. Collection for the international pet trade is also reported as a secondary threat affecting all fifteen species.

Many of these species, particularly *Grammostola rosea*, are reported in the pet trade, with the USA and Europe being the main destinations. Between 2012 and 2021, over 74,000 live *Grammostola rosea* individuals were imported into the USA, 80% of which were wild-sourced, predominantly from Chile; this trade virtually ceased in 2015 when wild harvest of all tarantulas for commercial export was prohibited in Chile. In 2020, Bolivia prohibited the export of all wildlife for the pet trade. Trade in other species has also been reported in lower numbers, including wild-sourced individuals of *Pamphobeteus antinous*, *Cyriocosmus bertae*, *Catumiri argentinense*, and *Avicularia avicularia*. In other range States, regulations vary, and captive breeding is limited or absent.

Illegal trade, species misidentification and misreporting are ongoing concerns. Seizure records confirm the presence of low numbers of these species in unregulated and illegal trade, including incidents in Brazil, Colombia, the Philippines, China, and Europe. Experts report that juveniles and hatchlings are particularly difficult to identify to species level, potentially posing challenges for enforcement. However most juvenile spiders in trade are already legally captive-sourced. In contrast, adult specimens from captive sources are not commonly found in the legal trade, as long maturation times and limited profitability make large-scale raising of mature individuals for sale impractical.

Analysis: Comprehensive data on the historical and current wild population sizes of the fifteen tarantula species proposed for inclusion in Appendix II are lacking, and population trends remain unknown. Several of the proposed species appear in international trade, with *Grammostola rosea* reportedly among the most commonly traded tarantulas globally, the majority reported from Chile, which banned the export of all tarantula species in 2015. Reported trade in other species is low and largely reported as captive-bred. Misidentification and misreporting of trade appear to be common issues, with species often reported under synonyms or traded from non-range States, complicating regulation.

The impact of trade on wild populations remains unclear for *Grammostola rosea* or any of the other fourteen species, with little population information available. Given recent regulations in Chile, and the

absence of significant trade from 2017 onwards, there is no evidence to indicate that regulation of trade in any of these fifteen species is required to ensure that the harvest of specimens from the wild is not reducing the wild populations to a level at which their survival might be threatened; **none appears to meet the criteria for inclusion in Appendix II in Annex 2a or 2b** of Res. Conf. 9.24 (Rev CoP17).

If the Parties did consider that any species met the criteria in Annex 2a, it is not clear that other species would meet the criteria in Annex 2bA. Adult specimens of the species under consideration are reportedly distinguishable. Juveniles and hatchlings are difficult to differentiate and could present identification challenges for enforcement authorities; although tarantulas are frequently traded as juveniles and hatchlings, these life stages are predominantly sourced from captive breeding operations. No implementation challenges in currently listed species have been raised.

Inclusion of South African Abalone *Haliotis midae* in Appendix II with an annotation “dried form only”

Proponent: South Africa

Summary: South African Abalone *Haliotis midae*, locally known as “perlemoen”, is a large marine snail that is a highly sought after seafood delicacy. The species is endemic to South Africa where it is found in kelp forests along rocky coasts. The proposal is for inclusion in Appendix II with an annotation limiting application of CITES to specimens traded in the “dried form only”. The proponent explains that this is the predominant form that illegally taken wild abalone is traded, in contrast to legal exports that mostly derive from a large, regulated commercial abalone farming/ranching model, the products of which are exported in fresh, frozen, dried or canned form. The proponent believes that it is unnecessary to regulate exports of fresh, frozen or canned form under CITES since the impact on the wild stock is negligible and the administrative burden on South Africa would be significant as would be the socio-economic and livelihood impact.

The species is slow growing, has a late maturity and can live for over 30 years. It was globally assessed as Endangered on the IUCN Red List in 2020 with a continuing population reduction and local extirpations noted due to overexploitation for trade. There are no estimates of its population size. In one of its main conservation areas in the Western Cape, Betty’s Bay Marine Protected Area, by 2012, densities of adult members of the species had declined to 1% of the level recorded in the 1990s. Over a similar period, Dyer Island, another conservation area in the Western Cape, reported high densities in 1990, with 40% of individuals being above legal size (4.5 inches or 11.4 cm) between 0-5 m depth; by 2013, only 4% of the population was above legal size. Catch Per Unit Effort (CPUE), where it has been recorded, has significantly declined since first recorded in 1983. In some fishing zones, the spawning biomass is estimated to have dropped below 20% of its estimated pre-fished biomass. The latest status review of marine fishery resources in South Africa concluded that the *Haliotis midae* remains in a depleted state, with the collective fishing pressure from both the legal commercial fishery and illegal harvesting being higher than is sustainable, and likely to worsen in the future.

The Eastern Cape, although not historically part of the commercial fishery, has become a major source for the illegal *H. midae* trade since substantial stocks were found in 1997, with observed declines at Cape Recife and Bird Island. The elevated level of illegal fishing effort was determined to have had a negative effect on stocks with symptoms of decline and local collapse. More recent research suggests that wild spawner biomass may have persisted despite heavy poaching.

Haliotis midae is primarily traded legally from farms (3000 tonnes/year) and ranches (200 tonnes/year), sold in live, frozen, canned and dried forms. There is also a small commercial wild fishery with a Total Allowable Catch (TAC) of 41.6 tonnes in 2024. Commercial divers are allocated an annual quota in fishing zones, the catch from which they often sell on to the companies running the farms who will export the product. To export the species the exporter needs to be able to demonstrate its origin and the holder of the quota. The species is also traded illegally from wild harvest at an estimated 2000-2500 tonnes/year predominantly in dried form, with a small quantity traded as frozen. Data show that nearly 60% of dried imports into Hong Kong SAR of China were exported by South Africa, with the remainder reported as exports from non-range States suggesting illegal harvest is being moved across borders for export. Overall, the greatest threat to the species is the illegal harvest of wild populations. There is however an economically important legal fishery.

Analysis: South African Abalone *Haliotis midae* is traded both legally and illegally. Live, frozen, canned and dried forms are traded legally internationally, mostly from regulated farming and ranching operations with relatively small wild TAC; dried forms are also traded illegally from wild harvested stock, with a small quantity traded in frozen form. Harvest for illegal trade is having a major impact on wild populations. Where data are available, reductions in densities are significant and historical data indicate reductions in CPUE. In some key conservation areas, the species has undergone a marked historical decline to an extent where it may already meet the biological criteria for inclusion in

Appendix I in Res. Conf. 9.24 (Rev. CoP17) as some populations have seen spawning biomass drop below 20% of its estimated pre-fished biomass. Considering the species' biological vulnerability, clearly trade regulation is needed to ensure that harvesting does not reduce wild populations to a level that threatens their survival and therefore **the species meets the criteria for inclusion in Appendix II** set out in Annex 2a of the Resolution.

However, **it is not clear that the Parties could adopt this proposal as currently presented, since the proposed annotation appears to be inconsistent with the text of the Convention.** Definitions set out in Article I of the Convention text do not provide for specification of which parts and derivatives of an animal species listed in Appendix I or II will be subject to CITES trade controls. Article I(b)(2) specifies that "in the case of an animal: for species included in Appendices I and II", specimen "means any animal, whether alive or dead, and any readily recognizable part or derivative thereof". This is further emphasised in Res. Conf. 11.21 (Rev.CoP19) which states that "RECALLING 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".

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*

Proponent: United States of America

Summary: This proposal concerns the exemption of finished products packaged and ready for retail trade of roots sliced 1-3 mm thick derived from artificially propagated plants of American Ginseng *Panax quinquefolius*. This amendment would add to the current exemption, under annotation #3, of manufactured parts or derivatives of powders, pills, extracts, tonics, teas and confectionery that apply to whole and sliced roots and parts of roots, and would apply exclusively to *P. quinquefolius*.

American Ginseng is native to the USA and Canada, with less than 1% of the global population occurring in Canada. It is listed as endangered nationally within Canada and vulnerable in the USA but has no global IUCN Red List Assessment. American Ginseng is in demand in international trade for use in herbal supplements, traditional medicine, and wellness products, particularly in Asian countries. Cultivated (e.g. artificially propagated) American Ginseng has become an increasingly significant portion of legal trade and, between 2014 and 2023, accounted for more than 99% of all CITES global exports. The USA was the only direct commercial exporter of wild-sourced roots since 2014, which totalled approximately 135,000 kg. Wild harvest and sale (even domestically) of American Ginseng is not permitted in Canada but between 2014 and 2023, Canada was the main global exporter of *Panax quinquefolius* roots from artificial propagation, with 98% of all exports totalling around 30 million kg. The USA reported exports of ~1.5 million kg of artificially propagated roots in the same period.

The proponent states that the intention of proposed amendment is to reduce the administrative burden associated with trade in artificially propagated roots. Currently, individuals purchasing legally cultivated packaged and sliced American Ginseng, often bought in small amounts by tourists, require CITES Appendix II export documents. They often also need to obtain import permits from countries implementing stricter domestic measures (including China, the main importing country for this product between 2020 and 2023). The USA reports that the process of obtaining such documentation can be costly and burdensome, with the potential to discourage lawful trade. It is argued that the exemption would streamline legal trade and reduce permitting requirements for this low-risk product, allowing enforcement agencies to focus instead on those products with a higher conservation risk.

The USA states that to meet the requirements for the proposed exemption, producers would have to package sliced, artificially propagated roots with clear visual identification, such as transparent windows or clear panels. Such packaging is already available in the USA. If the proposal were accepted its use would become mandatory to support effective enforcement. The proposal does not state the extent to which packaged sliced roots make up a significant proportion of artificially propagated American Ginseng exported from Canada, or whether Canada has the capacity to produce similar packaging. A targeted search for sliced American Ginseng for sale in Canada identified five online platforms based in Canada offering sliced roots of American Ginseng (with prices and ages indicating these were artificially propagated roots), with international shipping available.

Canada, which holds a very small proportion of the wild population of *P. quinquefolius*, has noted the potential for wild roots - particularly of lower grades - to be laundered as sliced roots, with some instances of illegal wild harvest having occurred in Canada within the last ten years. Information provided in the proposal, and corroborated by industry and plant trade experts, indicates that this is however unlikely. The market for wild and cultivated roots of American Ginseng differs markedly, with the value of wild roots associated with their age, size, shape, and surface texture (e.g., such as having twisted shapes), which are all features which slicing roots can remove. Wild roots are therefore typically sold whole, and reportedly rarely sliced before export. There is no clear economic incentive for slicing wild sourced American Ginseng and hence a low risk of wild harvested roots being laundered in this form. Artificially propagated roots are typically smoother and more uniform in appearance, harvested at a younger age (e.g., at three to four years compared to over ten years for wild roots), and sold in higher volumes, or sliced. Wild roots typically sell for USD250-850 a pound but can sometimes be worth up to USD1000, whilst artificially propagated roots typically sell for USD10-

25 a pound.

A rapid online survey conducted for this analysis in 2025 did identify sliced American Ginseng labelled as wild for sale on five online platforms, with prices ranging from USD16 to USD560 for less than a pound. One online platform offering sliced ginseng labelled as wild for USD560 was the only platform with a company seemingly based in the USA. One other additional online platform based in the USA and shipping internationally offered a custom slicing service for wild roots prior to export. The sliced roots offered for sale in each instance were all clearly labelled as wild-sourced, and the probability of laundering wild roots into finished products advertised as artificially propagated still appears to be unlikely.

Analysis: There are clearly differentiated markets for wild sourced and cultivated American Ginseng. Given the lack of economic incentives to slice wild roots, which are valued internationally for their shape, size, and other morphological features, there appears to be a low risk of wild roots being sliced and laundered as finished products derived from artificially propagated plants. The **amendment to annotation #3 would therefore appear not to pose a threat** to the conservation of wild populations of this species. This amendment is **in line with Res. Conf. 11.21 (Rev. CoP18)** on the *Use of annotations in Appendices I and II* and Res. Conf. 9.24 (Rev. CoP17), which recommend Parties ensure that annotations to listings in the Appendices include those specimens that first appear in international trade as exports from range States and that dominate the trade and the demand from the wild. A possible enhancement of the annotation could be to include the requirement that the packaging used facilitates clear visual identification.

Inclusion of Chilean Palm *Jubaea chilensis* in Appendix I

Proponent: Chile

Summary: The Chilean Palm *Jubaea chilensis* is a large, slow growing palm endemic to the mediterranean region of Chile. It is a very long-lived species that matures at 75-150 years and can live to over 700 years. It is the only native palm in mainland Chile and has a restricted and highly fragmented distribution. Its extent of occurrence is estimated at ~24,000 km² with an area of occupancy of 1,600 km². The population has been estimated at ~120,000 mature individuals, having decreased by more than 50% over the last 300 years (three generations), and possibly by 98% in the last 500 years. Population declines have been driven by habitat loss from land-use changes and fire damage, felling of palms, the harvesting of its fruits and seeds and their predation, particularly by introduced rabbits and livestock. The population is largely composed of older individuals, with limited recruitment of younger plants. Due to this demographic imbalance and multiple threats to its habitat, *Jubaea chilensis* was globally assessed as Endangered on the IUCN Red List in 2021, as well as being nationally assessed as endangered in Chile in 2020.

In the past, young stems were eaten as hearts of palm. Trees were cut to extract sap used to make palm syrup “miel de palma”, which was also fermented to make palm wine. Felling in Chile has been restricted by law since 1941. The fruits of *Jubaea chilensis* have been harvested for centuries; the nuts are edible once the hard shells are removed and are known in South America as “coco chileno” or “coquito”. Collection of seed for domestic use and export is believed likely to have a significant impact on recruitment of wild plants. Nuts or coquitos, are offered for sale in specialized shops in Europe and on the internet. The high price that the Chilean Palm seed has reached in the international market, mainly Asian, has generated an unusual rise in the collection of seeds/nuts, leading to this practice being suspended in areas where collection by local communities has traditionally been allowed. Information provided by Chilean Customs show exports primarily of the seeds/nuts as well as plants to Europe, Hong Kong SAR of China and Singapore.

Currently around 90% of trees are found in three areas (Ocoa, Cocolán and Las Siete Hermanas), all protected, although illicit seed collection is believed to take place in some of these. The species has been widely propagated and planted as an ornamental in Chile, often outside its indigenous range, and in other countries, including the USA and Europe. One foundation in Chile, set up in 1997 specifically to address conservation of the Chilean Palm, has raised over two million plants since its establishment, many planted elsewhere in Chile.

Various conservation measures are in place for *Jubaea chilensis* including through legislation, *in-situ* protection and implementation of a National Conservation Plan since 2005. The general objective of the Plan is to develop conservation actions for the species by reestablishing sustainable natural populations and promoting cultivation of the species in areas of its natural distribution, within a framework of environmentally sustainable social and economic development.

Analysis: *Jubaea chilensis* is a late-maturing long-lived palm with a relatively restricted range in central Chile, whose seeds and sap have been widely exploited for food. Its habitat has been affected by land-use change, deforestation and fire and it is believed to have undergone significant historic population declines. With over 100,000 individuals (mostly mature) estimated in the wild, most in protected areas, it does not currently have a small population. At present the population appears stable, although recruitment is low and fire in particular remains an ongoing threat. Seeds have traditionally been collected by local communities (sometimes illegally) with an unknown proportion of these being exported. Economic benefits derived from this export are unclear, although prices of seeds in overseas markets have increased markedly in recent years. The species is widely grown as an ornamental within Chile and elsewhere. Although historical declines are believed to have occurred, current protection (both through the majority of its wild population now occurring in protected areas and by regulation of harvest) appear to have stabilised the wild population. It is therefore **unclear whether *Jubaea chilensis* meets the criteria for inclusion in Appendix I** set out in Annex 1 of Res. Conf. 9.24 (Rev. CoP17) or requires regulation in Appendix I.

Inclusion in Appendix II would ensure that any trade was regulated and non-detrimental, with an option to establish a zero quota for wild-sourced seeds. Furthermore, nurseries intending to export plants would not require registration in accordance with Res. Conf. 9.19 (Rev. CoP15) *Registration of nurseries that artificially propagate specimens of Appendix-I plant species for export purposes.*

Inclusion of species *Beaucarnea hookeri* and *Beaucarnea glassiana* in Appendix II, as part of the listing of the *Beaucarnea* spp.

Proponents: Depositary Government (Switzerland) and Mexico

Summary: The genus *Beaucarnea*, known as Ponytail Palms, consists of plants native to countries in Central America (Belize, El Salvador, Guatemala, Honduras) and Mexico, traded primarily for use as ornamentals. The genus was included in Appendix II in 2017 after Mexico submitted a proposal to list one species (*B. recurvata*) based on criterion B of Annex 2a of Res. Conf. 9.24 (Rev. CoP16) and the other 10 species then recognised in the genus as lookalikes, given their similarity in seedlings and seeds (reportedly the main specimens entering international trade). At that time Mexico considered illegal harvesting of wild plants for ornamental purposes to be one of the main threats to *B. recurvata*.

At the time of the genus listing, no standard reference for the genus was adopted. However, two species formerly included in *Calibanus* have since been transferred into the genus *Beaucarnea*, (now *Beaucarnea hookeri* and *Beaucarnea glassiana*), and are recognised in the proposed standard reference (Rojas-Piña *et al.*, 2014) to be considered for adoption at CoP20 under Nomenclature matters (see CoP20 Doc. 110). As *B. hookeri* and *B. glassiana* were not considered part of *Beaucarnea* by the proponent at the time of the original listing in 2017, the Plants Committee agreed that their inclusion would constitute a substantive amendment to the current listing. At its 27th meeting (PC27) the Plants Committee invited the Depositary Government, in consultation with Mexico, to assess both species against the listing criteria in accordance with Res. Conf. 9.24 (Rev. CoP17) and to submit proposals for inclusion in Appendix II to CoP20 in accordance with paragraph 2f) of Res. Conf. 12.11 (Rev. CoP19) on *Standard nomenclature*.

According to the proposal, adult forms of *Beaucarnea* species (including *B. hookeri* and *B. glassiana*) display characteristics that can differentiate them from each other. However, the seeds and seedlings are reported to be indistinguishable to non-specialists and constitute the main specimens of *Beaucarnea* entering international trade. This proposal is therefore to include *B. hookeri* and *B. glassiana* in Appendix II under the look-alike criterion for inclusion in Appendix II based on criterion A of Annex 2b in Res. Conf. 9.24 (Rev. CoP17).

Beaucarnea hookeri and *Beaucarnea glassiana* are both endemic to Mexico and reportedly found in relatively few locations. *B. hookeri* was reported to be locally relatively common in the late 1960s. Information on its current status, and of *B. glassiana*, is lacking. There is some evidence of trade in seedlings and seeds of *B. hookeri* on online platforms in countries outside Mexico although according to one source all plants in trade derive from collections made in 1968. Of the nine online platforms found to be offering *B. hookeri* specimens for sale, all but two offered international shipping from countries including China, Czechia, Germany, Italy, the Netherlands and South Africa.

According to the CITES Trade Database, from 2017 to 2023, exporters have reported trade in *Beaucarnea* spp. to be mostly in artificially propagated live specimens and seeds, with most of these coming from the species *B. guatemalensis* and smaller quantities from *B. recurvata*. Most exports of seeds are reported to be from the USA, and most live specimens from China, Guatemala and Thailand. Mexico has reported very few exports of specimens from *Beaucarnea* species since the listing in 2017 (around 200 specimens and 1,150 kg of seeds), and all specimens are reported to be from artificial propagation.

In Mexico, harvest of terrestrial and native wildlife species is permitted under certain circumstances: it must be proven that harvest rates are lower than the natural renewal of the populations subject to use and that harvest will not have a detrimental effect on populations. Based on reports of seizures in EU-TWIX between 2017 and 2023 there are some indications of illegal trade in *B. recurvata* but none of these have reported Mexico as a country of origin, with most originating from the Netherlands. A high proportion of these seizures was reported as in artificially propagated plants with none reported to be of wild origin; it is probable that the remaining seizures were also of artificially propagated plants that lacked appropriate CITES certificates.

The genus listing proposal submitted at CoP17 in 2016 for *Beaucarnea* species stated artificial propagation of *Beaucarnea recurvata* did occur in nurseries in Mexico but that this did not satisfy the demand of the ornamental plant market at the national and international levels.

Analysis: There is evidence of some international trade in *Beaucarnea hookeri* seeds and seedlings (e.g. in the form that is reported to be difficult to distinguish for *Beaucarnea* species), but there is no evidence that *B. glassiana* is in international trade. It is likely that all *B. hookeri* specimens in trade originate in plants long-established in cultivation. Small quantities of species in the genus *Beaucarnea* being exported from Mexico in recent years (all reportedly being from artificial propagation) with no indication that illegal trade is still a threat to the wild species. Given that almost all global trade since the listing in 2017 has also been reported to be in artificially propagated specimens, regulation of trade in these two endemic species is unlikely to be necessary to bring trade under effective control for any of the *Beaucarnea* species currently in Appendix II. The **species do not therefore appear to meet the criteria in 2bA**. Nevertheless, this proposal has been submitted after consideration by the Plants Committee **following the guidance of Res. Conf. 12.11** (Rev. CoP19) on *Standard nomenclature* and **adding these species under the genus listing of *Beaucarnea* may be a more pragmatic solution than adding an annotation to clarify that they are excluded from the Appendices.**

Inclusion of *Commiphora wightii* in Appendix II

Proponent: European Union

Summary: *Commiphora wightii* is a slow-growing shrub or small tree that occurs in arid areas of India, Pakistan and Oman. The stems and branches produce an oleoresin or gum, known commonly as guggul or Indian bdellium, which has been harvested from the wild for medicinal use for centuries. The yields obtained by traditional tapping methods are in the order of 250-500 g of dry guggul per tree each season. Over time the tapping methods used generally lead to the death of individual trees.

Commiphora wightii faces numerous threats, the most serious of which are unsustainable harvesting practices, habitat degradation, overgrazing, and limited natural regeneration. The species was assessed as Critically Endangered on the IUCN Red List in 2014 due to an estimated global population decline of >80% over the three generations; this assessment needs updating. There is little more recent population information available; one recent study in Pakistan found that the average height of shrubs had noticeably reduced as mature plants are tapped for the resin; the populations in Oman are reported to be stable and in India local studies indicate that healthy populations of the species exist in some areas so that decline is not consistent throughout the range.

The export of wild-harvested guggul resin from India has been banned for over 30 years. The Indian state of Gujarat was historically the key producer and exporter. However, decreasing wild populations in India and increased state level regulation of wild-harvested gum have increasingly shifted sourcing of wild-harvested resin to Pakistan. In the early 2000s, an estimated quantity of 450 tonnes of *C. wightii* gum was exported from Pakistan to India each year for the industrial pharmaceutical industry. Finished products are processed in and exported from India, apparently now mainly produced from imports of resin from Pakistan. However, wild-harvested resin from India can also be processed for export. The wide availability of *C. wightii* products for sale on online marketplaces demonstrates ongoing worldwide commercial demand. Exported material can be in the form of bulk extract, or as powders, capsules and tinctures.

Techniques to cultivate the species and improve tapping methods are being developed in India but remain small-scale and insufficient to meet commercial demand. The success of cultivation efforts will not be known for years to come.

Extract (resin), powders and finished products all appear to be products first seen in trade. It may be necessary to ensure that these are specified as included as part of the listing through the inclusion of an annotation. According to the definition of "Extract" in Interpretation section of the Appendices this would cover "Any substance obtained directly from plant material by physical or chemical means regardless of the manufacturing process. An extract may be solid (e.g. crystals, resin, fine or coarse particles), semi-solid (e.g. gums, waxes) or liquid (e.g. solutions, tinctures, oil and essential oils)."

Analysis: *Commiphora wightii* is a relatively widespread shrub which occurs at moderate density in arid regions of western India, Pakistan and Oman. It has been extensively harvested for its gum and there has reportedly been a marked decline in the wild population size, expected to continue with a decrease in area and quality of habitat, and significant levels of exploitation and an inherent biological vulnerability. High levels of wild harvesting of *C. wightii* gum for international trade, with very limited, if any, cultivated alternatives, contributed to the species being assessed as Critically Endangered on the IUCN Red List assessment in 2014 based on population declines. Recent information on the population size at a global level is scarce although the species is reported to be locally abundant with healthy populations in parts of India (e.g. the Kachchh region of Gujarat) and in Oman. With depletion of accessible resources in India, most resin processed in India is imported from Pakistan, with some wild harvested resin also contributing to the exports of processed products from India. *Commiphora wightii* may meet criterion 2aB for inclusion in Appendix II Res. Conf. 9.24 (Rev. CoP17).

No annotation was proposed specifying parts and derivatives to be covered by the Appendix-II listing. Extract (resin), powders and finished products all appear to be products first seen in trade. Therefore,

if the Parties considered an annotation was necessary #1 would cover the most relevant products in trade.

Transfer of Cycad Spurge *Euphorbia bupleurifolia* from Appendix II to Appendix I

Proponent: South Africa

Summary: The Cycad Spurge *Euphorbia bupleurifolia* is a very slow-growing succulent species endemic to South Africa. *Euphorbia bupleurifolia* has not been assessed by IUCN but was assessed as critically endangered in a national red list assessment in 2022. It is popular in international trade as an ornamental plant and has been included in Appendix II since 1975 under the listing of the genus *Euphorbia* (currently with annotation #4).

Historically the species was found from inland areas around Pietermaritzburg in the province of KwaZulu-Natal, down along the coast, and then further west throughout the eastern region of the Eastern Cape up to Makhanda but most of the remaining populations are now restricted to the Eastern Cape province with a restricted area of distribution with an estimated area of occupancy of around 130 km², and an extent of occurrence of around 65,000 km². Subpopulations are small or very small and fragmented, varying in size from one to 675 individuals and with distances between the nearest neighbouring populations often around 8 km. Around 40% of suitable habitat is estimated to have been lost due to infrastructure development, mining and agriculture. Field surveys of *Euphorbia bupleurifolia* in 2018 across most historic localities identified just over 1,700 individual plants with a total population size estimated at around 2,500 individuals. Plants were only present in nine of the 31 historic subpopulations surveyed. The national red list assessment inferred a marked decline of 97% since 1975 based on estimates of the quantities of plants with a suspected wild origin in trade relative to the number of plants remaining in the wild from the 2018 field surveys.

Euphorbia bupleurifolia is a protected indigenous plant in South Africa; collection within state and private nature reserves requires a permit from the relevant conservation authority, whilst landowner permission is required to gather plants on privately owned land.

Historically there have been large quantities of *Euphorbia bupleurifolia* directly exported by South Africa, with over 63,000 plants reported since 1980. Between 2014 and 2018, South Africa exported just under 4000 plants per year; the only recorded exports since then are of 200 in 2021. Almost all exports have been declared as artificially propagated, but it is suspected that a large proportion were wild-collected, with many specimens observed in nurseries showing characteristics of wild-collected plants and two nurseries admitting to having sourced large plants from the wild without the permits required. One of the nurseries that had been the source of over 94% of ~ 30,000 *E. bupleurifolia* plants exported from South Africa between 2010 and 2018, has since been implicated in laundering of wild plants and has been closed, which is likely the main reason for a decline in reported *E. bupleurifolia* exports since 2019.

Although the species occurs in accessible areas and is legally protected where it grows, current enforcement is believed to be insufficient to prevent illegal harvesting. The species is reportedly moderately difficult to grow when propagated from seed, which would appear to make it challenging to produce large quantities in cultivation.

Additional pressures on the species include wild harvesting for local use as well as ongoing habitat loss and degradation.

Analysis: The overall wild population of *Euphorbia bupleurifolia* is small with some very small subpopulations. It has a restricted area of occupancy within a wider extent of occurrence and occurs at very few locations, with evidence of a decrease of 70% in the number of known subpopulations.

There is evidence that export in wild specimens falsely declared as artificially propagated has previously impacted populations of the species and may have been the main cause of marked recent population declines. Recent enforcement efforts appear to have stopped, or at least reduced, the illegal wild harvest and trade but there is evidence of some continued demand for the species, including exports of live plants from South Africa in small numbers in the last five years. The species

therefore **appears to meet the biological and trade criteria for inclusion in Appendix I** in Res. Conf. 9.24 (Rev. CoP17).

Deletion from Appendix II of *Afzelia bipindensis* populations located in Central Africa: Cameroon, Central Africa Republic, Congo, Democratic Republic of the Congo, Equatorial Guinea and Gabon

Proponents: Burundi, Cameroon, Central African Republic, Congo, Democratic Republic of Congo, Equatorial Guinea, Gabon

Summary: *Afzelia bipindensis* is an African tree species that provides commercially important timber known generally as Afzelia, pod mahogany, African Mahogany or Doussie. It has been one of the most traded African *Afzelia* species and has a widespread distribution occurring at generally low density in evergreen and semi-deciduous rainforest in Angola, Cameroon, Central African Republic, Congo, Côte d'Ivoire, Democratic Republic of the Congo (DRC), Equatorial Guinea, Gabon, Nigeria, Uganda and Zambia. Commercial harvesting for timber mainly takes place in Central Africa. Three other species of *Afzelia* also occur in the same region: *A. africana*, *A. bella*, and *A. pachyloba*. *Afzelia* timber has a wide range of uses for decorative veneer, flooring, door frames, staircases, docks, boatbuilding, exterior millwork and construction, furniture, musical instruments, turned objects, inlays, and other small speciality wood items.

Afzelia bipindensis and the other African species in the same genus were included in Appendix II in 2023 after CoP19 with annotation #17, which includes logs, sawn wood, veneer sheets, plywood, and transformed wood.

Since listing Cameroon, Congo, DRC and Equatorial Guinea have reported exports to European and Asian countries and imports to Belgium are reported from Gabon. Implementation of the Appendix-II listing has included the development and publication of Non-Detriment Findings (NDFs) and declaration of associated export quotas for *A. bipindensis* by Cameroon and DRC. Export quotas for 2025 have also been set by Congo and Equatorial Guinea although the non-detriment basis for these quotas is not known. The development of NDFs for *Afzelia* spp. was recommended as a priority by the 26th Meeting of the Plants Committee in 2023.

Illegal logging is reported to be the main threat to the species alongside other threats such as deforestation resulting from agriculture, urbanisation and mining. The extent to which illegal logging of *A. bipindensis* occurs is unknown but, in the Central African region, a large proportion of total log production is believed to be of illegal origin.

The proposal is to delete the populations of *Afzelia bipindensis* that occur in six central African countries (Cameroon, Central African Republic, Congo, DRC, Equatorial Guinea and Gabon) from Appendix II. The proponents indicate that with strict management measures and robust traceability systems for the species in place within these countries, and with satisfactory levels of regeneration, international trade regulation is not necessary for the species in this part of its range. Populations of *A. bipindensis* in Angola, Côte d'Ivoire, Nigeria, Uganda and Zambia would remain in the Appendices. No exports nor imports of *Afzelia* species have been reported from Angola, Côte d'Ivoire, Nigeria and Zambia since the CITES listing. Uganda has re-exported significant quantities of *Afzelia* reported as *A. africana* and originating in South Sudan.

Available information, based largely on forest inventories in forest management units (FMUs) in Central Africa, indicates moderate abundance of *A. bipindensis* among commercially exploited timber species, with potentially a large population of mature trees showing generally good regeneration.

Five *Afzelia* species are currently identified as of major commercial importance: *Afzelia africana*, *A. bella*, *A. bipindensis*, *A. pachyloba* and *A. quanzensis*. The timber of different species of *Afzelia* has been difficult to distinguish and is commonly marketed under the same commercial names. The proponents note that there has now been a clarification of preferred names for different species by the timber industry. Furthermore, they note that the processed products from *A. bipindensis* can be differentiated from those of other species, notably by anatomical and technological characteristics

and with the help of identification tools. They consider that Appendix-II listing for the species for lookalike reasons is not required.

Analysis: Available information, based largely on forest inventory in central African FMUs indicates that *Afzelia bipindensis* remains a widespread species occurring at moderate density with a large population of mature trees. Measures are reportedly in place to ensure the sustainable and legal harvesting and trade of timber of the species in Cameroon, Congo, DRC, Central African Republic, Equatorial Guinea and Gabon, and regeneration appears to be good within managed concessions. Non-detriment Findings (NDFs) have been published for Cameroon and DRC and export quotas published for Congo and Equatorial Guinea although it is not known if these are based on NDFs. Based on this information the species in these range States **may not meet the criteria for inclusion in Appendix II** in Annex 2a of Res. Conf. 9.24 (Rev. CoP17).

However, it appears that **the species still meets the lookalike criteria for inclusion in Appendix II** (Criterion A of Annex 2b of Res. Conf. 9.24 (Rev. CoP17)). Action has been taken to clarify and standardise trade names for timber of different species of African *Afzelia*, and techniques are available to differentiate the wood. Nevertheless, standardised names may not be universally applied and enforcement officers without access to appropriate identification techniques or tools would generally be unlikely to be able to distinguish specimens of *A. bipindensis* in the form in which they are traded from those of other species in the genus listed in Appendix II. This applies to the species, *A. africana*, *A. bella*, and *A. pachyloba* which also occur within Central African countries and are in international trade, as well as to other species in the genus. Furthermore, timber products from the populations of *A. bipindensis* would only be differentiated from those of populations of the same species in other countries covered by the Appendix-II listing by their stated origin. This may lead to laundering given that timber consignments of species for export from Central African countries are known to include timber consolidated from different countries and may include a substantial proportion of illegally harvested timber.

If adopted this proposal would result in a split-listing of *Afzelia bipindensis* by geographical populations. Some populations of the species would remain in the Appendices, and the populations covered by the proposal would not. Annex 3 of Res Conf 9.24 (Rev. CoP17) notes that “*split-listings that place some populations of a species in the Appendices, and the rest outside the Appendices, should normally not be permitted*” in view of enforcement problems it might create, although there are a few precedents for such split-listing in the Appendices.

Transfer of Brazilwood *Paubrasilia echinata* from Appendix II to Appendix I

Proponent: Brazil

Summary: *Paubrasilia echinata*, commonly known as Brazilwood, Pernambuco or Pau-brasil, is a slow-growing leguminous tree, reaching around 15 m in height with a maximum trunk diameter of around 70 cm. It is endemic to the Mata Atlântica (Atlantic Coastal Forest) biodiversity hotspot in Brazil. Many aspects of the biology of Brazilwood and the composition and structure of the plant communities in which it occurs are poorly known. The wood is currently used worldwide for the manufacture of high-quality bows for musical instruments, for which the species has been exploited for over 200 years. *Paubrasilia echinata* was globally assessed as Endangered on the IUCN Red List in 1998 and was assessed in 2024 as critically endangered by Brazil's National Centre for Flora Conservation.

Originally included in Appendix II with Annotation #10 at CoP14 (2007) as *Caesalpinia echinata*, that name becoming a synonym of *Paubrasilia echinata* in 2019, following taxonomic changes adopted at CoP18. Annotation #10 initially included logs, sawn wood, veneer sheets and unfinished wood articles used for the fabrication of bows for stringed musical instruments. The annotation exempted finished bows until February 2023 when an amendment to the Annotation adopted at CoP19 came into force including "all parts, derivatives and finished products, except re-export of finished musical instruments, finished musical instrument accessories and finished musical instrument parts". This is the only species subject to this annotation. In response to ongoing trade pressure on wild populations of the species, Brazil now proposes to transfer it to Appendix I, a listing that would apply to all parts and derivatives (in accord with Article 1b(iii) of the Convention).

No empirical estimates of the natural populations of *P. echinata* across the Atlantic Forest are currently available. The species is fragmented between forest remnants and localised extinctions of subpopulations have been observed. The deforestation of the Mata Atlântica has been intensifying in recent years with almost 50,000 ha lost to deforestation between 2021 and 2024. Although reliable data on the size of natural populations of the species in the remaining forest fragments is lacking, estimates by CNCFlora in 2024 suggest there are around 10,000 mature trees. It is also estimated that the population of this species has declined by more than 80% over the past three generations. The species is widely cultivated as an ornamental and has been extensively planted in Brazil and elsewhere. Small-scale plantations have been established but none is known to produce export-grade wood.

The species has been heavily traded for over 500 years, initially as a source of red dye (brazilein) and more recently as timber. Since the early 1800s, the species' wood, which is highly valued for its combination of durability, flexibility and resonance, has been used to produce bows for musical instruments such as violins, violas, cellos, and double basses. It has been estimated that over half a million mature trees were removed over the last five centuries. Trade in finished bows is predominantly international. Based on available invoices from the past 25 years, Brazilian companies, where the vast majority of bows are manufactured, sold about 8,000 finished bows in the domestic market (6%) and more than 130,000 abroad (94%). In contrast, bow blanks are mainly traded at the national level, with around 460,000 units sold within Brazil (91%) and only around 40,000 exported (9%). More than half of the finished bow exports are destined for the USA, with the remainder going primarily to Europe and smaller volumes to Asia. In contrast, over half of the bow blank exports are to Japan, followed by the USA, and to a lesser extent, Europe.

Domestic trade in *P. echinata* wood between companies and bow makers within Brazil has been regulated and controlled under the Document of Forest Origin (DOF) system since 2006, but there appears to be some uncertainty about the accuracy of records of existing stocks registered in Brazil at the time the Appendix-II listing came into force. The DOF system did not regulate domestic or international trade in bows as finished products until June 2022, when a domestic permit requirement for the export of finished bows became effective. Since then, and the amendment to Annotation #10, no CITES Permits have been issued by Brazil for international bow trade.

According to an international survey of bow makers conducted in July 2022, the average annual global production of bows made from *P. echinata* is approximately 25,000. A conservative estimate suggests that 144 trees are required each year to produce 700 high-quality violin bows, based on an average wood yield of one cubic metre per tree, implying that around 5,000 trees would need to be used annually to sustain a production of 25,000 high-quality bows, excluding existing stockpiles. However, other estimates differ, with one stating that a single mature tree could produce up to 500 bows with 25-50 of high-quality.

Harvesting of *P. echinata* in its natural habitat and export is prohibited under Brazilian law, and only wood from planted trees that are registered with the environmental agency (none of which are currently registered according to the Brazilian Management Authority), or pre-Convention specimens can be traded. Its inclusion on the official list of Brazilian flora threatened with extinction, means collection, harvesting, transportation, storage, handling, processing, and commercialisation of wild-sourced specimens is prohibited. However, recent investigations in Brazil have shown that illegal trade in *Paubrasilia echinata* timber for bow-making has been, and remains, significant.

The proponent seeks listing of the species in Appendix I, which would result in additional administrative procedures for companies trading products derived from the species outside Brazil; particularly in transactions involving finished musical instruments, their accessories, and parts, which are currently exempt from CITES permit requirements under Annotation #10.

The proponent suggests that, according to Res. Conf. 16.8 (Rev. CoP17), frequent cross-border, non-commercial movements of musical instruments may be facilitated by Musical Instrument Certificates (MICs). These certificates would enable musicians and orchestras to transport Brazilwood instruments across borders. However, according to this Resolution as it currently stands, MICs only apply to specimens listed in Appendix I acquired before the species was included in the Appendices, as well as to species listed in Appendices II and III. In the case of *Paubrasilia echinata*, if it were to be listed in Appendix I, MICs could only apply to instruments acquired before 2007 (when the species was listed after CoP14). Any cross-border movement of musical instruments and their accessories and parts acquired after 2007 would need to be permitted on a case-by-case basis in compliance with Articles III and VII of the Convention. Such authorisation would be limited to personal and household instruments, pre-Convention instruments, and instruments, their accessories and parts recognised as derived from artificially propagated trees grown in CITES-registered nurseries.

Analysis: *Paubrasilia echinata* has been subject to extensive historical exploitation for international trade. Its natural population is small and fragmented, with records of extirpation of some subpopulations. Based on rates of deforestation within its natural range (Atlantic Coastal Forest) the wild population is likely to have declined by more than 80% over the last three generations. There is evidence of ongoing international demand in the USA, Europe, and Asia, with instances of significant illegal trade reported and it is likely that illicit felling to produce timber for export is continuing to have an impact on the wild population. *P. echinata* therefore **appears to meet the biological and trade criteria for inclusion in Appendix I** under Criterion C of Annex 1 of Res. Conf. 9.24 (Rev. CoP17).

The proposed transfer of this species from Appendix II to Appendix I would effectively ban all commercial trade in wild-sourced Brazilwood specimens. Although the proponent has expressed the expectation that the use of Musical Instrument Certificates could facilitate the cross-border movement of musical instruments and their parts by musicians and orchestras, this would not be universally applicable as such documents cannot be issued for Appendix-I species acquired after their inclusion in the Appendices, in this case 2007.

If there are concerns about practical application of an Appendix-I listing, **Brazil could alternatively propose retaining the species in Appendix II with an amended Annotation #10 to cover “all parts, derivatives and finished products” (removing the current exemptions for re-export of finished musical instruments, their accessories and parts), combined with a zero-export quota for wild specimens of *P. echinata* traded for commercial purposes.** This option would strengthen controls on international trade while still allowing the use of MICs for non-commercial cross-border movements.

Deletion from Appendix II of populations of *Pterocarpus soyauxii* located in Central Africa: Angola, Cameroon, the Central African Republic, Congo, the Democratic Republic of the Congo, Equatorial Guinea and Gabon

Proponents: Burundi, Cameroon, Central African Republic, Congo, Democratic Republic of the Congo, Equatorial Guinea, Gabon

Summary: *Pterocarpus soyauxii* is an African tree species that provides commercially important timber known generally as mukula, rosewood, African Padauk or African Padouk. It is one of the most exploited timber species in tropical Africa with a wide distribution in lowland forests of Angola, Cameroon, Central African Republic, Congo, Democratic Republic of the Congo (DRC), Equatorial Guinea, Gabon and Nigeria. Eleven other species of *Pterocarpus* occur in Africa, with distributions at country-level overlapping. The species was included in Appendix II in 2023 along with other unlisted African *Pterocarpus* populations following CoP19. Deletion from the Appendices of the regional populations from seven central African countries, that is all range States except Nigeria, is now proposed.

Globally there are around 40 species of *Pterocarpus* native to tropical and subtropical regions, many of which produce valuable hardwoods. China has been a major importer of *Pterocarpus* timber for use in traditional Hongmu and other rosewood furniture. Significant growth in the consumption of Hongmu and other “rosewoods” from 2010 led to dramatically increased levels of exploitation of *Pterocarpus* along with *Dalbergia* spp. and other genera producing timber with similar properties. The increase in trade in the African species *P. erinaceus* was of particular concern leading to its inclusion in Appendix II in 2017 following CoP17. A second species, *P. tinctorius* was included in Appendix II in 2019 following CoP18. Subsequently there were reports of increased pressure on other non-CITES African *Pterocarpus* species. Trade has generally shifted between African *Pterocarpus* spp. depending on availability with multiple species traded under the same names. *P. soyauxii* has been one of the main African species of *Pterocarpus* recorded in trade within China in recent years. It also comprised around 80% of recorded African rosewood imports to Viet Nam during 2018-2022.

Concern about the level of exploitation and trade in timber of *Pterocarpus* species in Africa, including in *P. soyauxii*, led to the inclusion of all African populations of *Pterocarpus* species in Appendix II in 2023 after CoP19 with annotation #17, which includes logs, sawn wood, veneer sheets, plywood and transformed wood. This species has not been globally assessed on the IUCN Red List and no overall population estimates are available although at least one recent assessment has concluded the species is not currently of conservation concern. It is widely distributed in suitable habitat, occurring as individual trees or small groups in forested areas. Forest inventories indicate that the population may be very large – comprising millions of mature trees – and is likely to be able to sustain current harvest levels.

The proposal seeks to delete *Pterocarpus soyauxii* populations from all range States except Nigeria on the basis that they do not meet the “lookalike” criteria for inclusion in Appendix II, specifically criterion A of Annex 2b of Res. Conf. 9.24 (Rev. CoP17). The proponents consider that transformed products of *P. soyauxii* (e.g., sawn wood, parquet, deck boards) can now be reliably distinguished from those of the other species of the genus with available scientific techniques. Timber of *P. soyauxii* may be difficult to distinguish from that of the other CITES Appendix-II listed rosewoods, *Dalbergia* (genus listing at CoP18) and *Guibourtia* (three African species listed at CoP18). According to the supporting statement Central African countries are implementing sustainable forest management and rigorous traceability mechanisms that make it possible to guarantee the origin and identity of the species in trade.

CITES trade data show ~69,500 m³ of logs, sawn wood and timber of *P. soyauxii* reported in direct commercial exports by the seven Central African countries in 2023 and 2024, most (70%) reported either as wild-sourced or of remaining pre-Convention stock. Angola, Cameroon, Congo, DRC, and Equatorial Guinea have all reported some quantities of logs, sawn wood and timber from *P. soyauxii* in direct commercial exports, and although Central African Republic and Gabon have not yet submitted

CITES trade data for 2023-2024, importers have reported imports of *P. soyauxii* in those years. For three of these countries (Angola, Cameroon and DRC) CITES trade data show direct commercial exports of logs and sawn wood in other *Pterocarpus* species also took place between 2020 and 2023. Despite considerable efforts to improve the enforcement of forestry laws, governance, and trade in the Congo Basin countries, large quantities of timber in general are believed to be illegally sourced.

Implementation of CITES for *P. soyauxii* has included development of Non-Detriment Findings (NDFs) and annual quotas for the species by Cameroon, DRC and Gabon. Annual quotas have also been developed by Congo and Equatorial Guinea.

The supporting statement recommends the establishment of a monitoring mechanism if the populations are removed from the Appendices to prevent any drift towards future over-exploitation, although presumably this would no longer be under the auspices of CITES.

Analysis: Available information indicates that the populations of *P. soyauxii* located in Angola, Cameroon, Congo, DRC, Central African Republic, Equatorial Guinea and Gabon **may not meet Criterion B of Annex 2a** of Res. Conf. 9.24 (Rev. CoP17). Measures are reportedly in place to ensure the sustainable and legal harvesting and trade of timber of the species in the countries for which the delisting is proposed, and regeneration appears to be good within managed concessions. The extent and impact of illegal logging are currently difficult to quantify, but illegal logging is believed to be the main ongoing threat. Uncertainties remain regarding the sustainability of harvesting and trade in *P. soyauxii* and the development of NDFs for the species in some exporting range States.

Although available scientific techniques may exist to distinguish *P. soyauxii* from those of other species in the genus, enforcement officers may not have access to these. Of particular concern may be distinguishing specimens of *P. soyauxii* from those of the Endangered *P. erinaceus*, which is currently subject to a range of CITES trade suspensions. Furthermore, timber products from the populations of *P. soyauxii* proposed for delisting would only be differentiated from products from populations covered by Appendix II by their stated origin. Evidence indicates that timber consignments exported from Central Africa are frequently consolidated, often in Cameroon, from multiple countries such as Central African Republic, Congo and Cameroon itself. Due to weak enforcement and porosity in supply chains, these consignments incorporate timber of uncertain or illegal origin. **These populations of *P. soyauxii* thus appear to continue to meet the 'lookalike' criteria in Annex 2b** of Res. Conf. 9.24 (Rev. CoP17).

If adopted this proposal would result in a split-listing of *P. soyauxii* by geographical populations, with the population of the species in Nigeria remaining in the Appendices, and the populations in countries covered by the proposal outside the Appendices. Annex 3 of Res Conf 9.24 (Rev. CoP17) notes that "*split-listings that place some populations of a species in the Appendices, and the rest outside the Appendices, should normally not be permitted*" in view of enforcement problems it might create, although there are a few precedents for such split-listing in the Appendices.

Inclusion of species *Aloe bergeriana*, *Aloe jeppeae*, *Aloe subspicata*, and *Aloe welwitschii* in Appendix II, as part of the listing of the *Aloe* spp.

Proponents: Depositary Government (Switzerland), South Africa and Zimbabwe

Summary: The genus *Aloe* consists of over 600 species, most native to Africa. Aloe species have a variety of uses and are mostly traded as live specimens, stems, extracts, flowers, dried plants, and leaves and have a variety of uses. The genus *Aloe* has been included in CITES Appendix II since 1975, with 21 of these species now included in Appendix I.

Four additional species *Aloe bergeriana*, *Aloe jeppeae*, *Aloe subspicata*, and *Aloe welwitschia*, previously comprising the genus *Chortolirion* and now included within *Aloe*, are proposed for inclusion in the genus listing for *Aloe*. This classification is also followed in the updated CITES Checklist for *Aloe* species, which is proposed for adoption and inclusion as standard nomenclature reference at CoP20 (see document CoP20 Doc.110). The change in taxonomy was previously discussed by the Nomenclature Working Group at the 27th meeting of the CITES Plants Committee in 2024. It was concluded that any change to the appendices would be substantive and that the best course of action would be to invite the Depositary Government to work with South Africa on the present proposal to include the four *Aloe* species previously treated as *Chortolirion* in Appendix II in accordance with paragraph 2f) of Res. Conf. 12.11 (Rev. CoP19) on *Standard nomenclature*.

Inclusion of these species in Appendix II is claimed to be justified under criterion A of Annex 2b in Res. Conf. 9.24 (Rev. CoP17). The proposal states that although their flowers distinguish these four species from other aloes, the bulbous base of the four species and thin grass-like leaves are very similar to other small bulbous grass aloe species, with the bulblike stem bases being the form in which they - and the currently listed aloes - appear in trade. It would therefore be difficult to separate the four species proposed for inclusion with certainty and ease from those of other small bulbous grass-aloes already listed in the genus.

Aloe bergeriana is native to Namibia, South Africa, and Zimbabwe, *A. subspicata* to Botswana, Eswatini, Lesotho, Namibia, and South Africa, *A. jeppeae* is endemic to South Africa, and *A. welwitschii* endemic to Angola. Three of the four species (excepting *A. welwitschii*) have been assessed within South Africa as not of conservation concern. There is no evidence of international trade in any of the species. According to CITES trade data (2019-2023), out of the seven countries in which these four species are native, exports of wild sourced specimens of any *Aloe* species were only reported from South Africa (mostly extracts, derivatives and powder of *Aloe ferox* and *Aloe arborescens*) and Zimbabwe (mostly stems of *Aloe arborescens*) for commercial purposes.

Analysis: Of the four *Aloe* species included in the proposal, three have been assessed as not threatened (the fourth is unassessed) and none is known to be in international trade, nor is there likely to be demand for wild-collected specimens of any of them. Therefore, these **species do not meet the criteria for inclusion in Appendix II in Annex 2a** of Res. Conf. 9.24 (Rev. CoP17). Their similarity to other small, bulbous grass aloe species means there is **some possibility of their meeting the criteria under Annex 2b** of the Resolution, but none of these other bulbous grass aloe species are known currently to be in trade as wild-collected plants. Nevertheless, this proposal has been submitted after consideration by the Plants Committee **following the guidance of Res. Conf. 12.11** (Rev. CoP19) on *Standard nomenclature* and **adding these species under the genus listing of *Aloe* may be a more pragmatic solution than adding an annotation to clarify that they are excluded from the Appendices.**

Transfer of Parlatore's Podocarp *Podocarpus parlatorei* from Appendix I to Appendix II

Proponent: Argentina

Summary: *Podocarpus parlatorei* is a conifer endemic to the montane Yungas forests of Argentina and Plurinational State of Bolivia (Bolivia). Heavily exploited between the 1950s and mid-1970s, it was included in Appendix I when the Convention came into force in 1975. The species has recently been globally assessed as Vulnerable on the IUCN Red List, 2025 in press, due to its restricted and fragmented distribution, ongoing habitat decline from climate change and selective logging, and a small area of occupancy.

Podocarpus parlatorei is relatively abundant in certain high-elevation forest patches (above 1,800 m), with densities of up to 300 individuals per hectare reported in both long-term monitoring plots and national forest inventories in Argentina; and even higher densities up to 1,700 regenerating individuals per hectare in Bolivia. However, these values reflect local abundance within a naturally fragmented range restricted to mountain slopes in the eastern Andes, with an extent of occurrence limited by elevation and climate tolerance and area of occupancy limited to ~280 km². *P. parlatorei* depends on a relatively narrow range of warm-season temperatures and precipitation levels, making it particularly sensitive to climatic changes. Modelling predicts substantial loss of suitable habitat within its range by 2050 due to climate change.

Historically, *P. parlatorei* was intensively logged for its lightweight, workable wood, highly prized in fine carpentry and furniture making. Since 1975, however, there have been only three legal international transactions reported to CITES, involving timber pieces and leaves for scientific purposes. Nevertheless, there appears to be some potential interest in the species as an ornamental tree in international horticulture, as it has been observed in public gardens in Europe and is available commercially in countries such as New Zealand. Ornamental plants in cultivation are considered to derive from cultivated stock, rather than from recent wild collection.

Conservation and management measures are well established in Argentina and Bolivia through national forestry legislation and land-use planning frameworks. Argentina also employs remote sensing and traceability systems for native forest species, although *P. parlatorei* is not currently harvested from the wild. Artificial propagation of *P. parlatorei* has been trialled in Argentina mainly for restoration and conservation purposes, but not on a commercial scale. Experimental nurseries have been established in the Yungas, but no commercial plantations are known to exist, and any potential trade in timber would therefore be of wild origin. While the species is present in some protected areas in Argentina and Bolivia, studies indicate that population structure and regeneration in Bolivia do not reflect a healthy conservation status. In addition to traditional pressures such as agricultural deforestation, expanding real estate development on mountain slopes—particularly around Salta, Argentina—is having a growing impact on the species. Moreover, the most genetically diverse subpopulations in the southern range lie outside protected zones.

Analysis: Information available for *Podocarpus parlatorei* does not indicate a small wild population and it can be locally abundant. It has a restricted area of occupancy, which is impacted by development, but the forests in which it occurs have suffered little deforestation. While the species is subject to climate-related risks, projected population decreases would not appear to justify its retention in Appendix I. Therefore, ***P. parlatorei* does not appear to meet the biological criteria** outlined in Res. Conf. 9.24 (Rev. CoP17) for inclusion in Appendix I.

No significant international trade has occurred for nearly 50 years, and there is no indication that future demand would threaten its survival in the wild. There is some potential interest in *P. parlatorei* as an ornamental tree in temperate horticulture, which would remain regulated and subject to Non-detriment Findings. Therefore, **a transfer to Appendix II, would be consistent with the precautionary measures set out in Annex 4, section A.2 of that Resolution.**

Transfer of *Avonia quinaria* from Appendix II to Appendix I

Proponent: South Africa

Summary: *Avonia quinaria* is a slow-growing succulent plant with attractive flowers native to South Africa and Namibia. The species occurs in specific habitats within select areas of the Namaqualand Hardeveld and Richtersveld Bioregions, mostly on quartz gravel plains and some mountain-top plateaus. *Avonia quinaria* has not been assessed globally by IUCN, but was assessed as endangered in South Africa's National Red List in 2022 and has not yet been assessed nationally in Namibia.

In South Africa, the species has a restricted and fragmented distribution occurring across an estimated 17,200 km² with an estimated area of occurrence of between 84 and 120 km². Population surveys in South Africa between 2019 and 2023 found that 86% of surveyed populations had densities of less than 1 plant/m², with estimates based on this that fewer than 500,000 plants exist in the wild. There are no available data for the area or extent of occurrence of *Avonia quinaria* in Namibia, but it is reported to occur only marginally in the far southeast of the country. All populations of the species are reported to be patchily distributed. Anecdotal information indicates that the species is extremely long-lived, with large individuals possibly exceeding 100 years, and that growth is exceptionally slow, with plants requiring decades to attain even minimal size. Regeneration is infrequent and often dependent on rare recruitment events linked to sustained high rainfall.

Avonia quinaria is popular in international trade as an ornamental plant and has been included in Appendix II since 1975 under a genus listing of *Avonia* species (with annotation #4).

Large quantities of live *A. quinaria* plants have been reported in direct exports from South Africa in recent years (~43,000 between 2014 and 2019, with the highest quantities in 2015 and 2017). All direct exports by both South Africa and other countries have been reported as artificially propagated, but there are clear indications of wild collected plants entering trade. Observations during a law enforcement operation at one nursery (now closed) known to have been granted CITES export permits for over 33,000 live plants between 2010 and 2018 resulted in seizures of over 3,000 plants with wild characteristics. In 2019, the South African Police Service initiated "project Crassula" to investigate succulent plant trade, and since then, a further 21,000 live plants have been seized. There has been a recent notable decline in exports reported in the CITES Trade Database since 2019, likely as a result of increased enforcement efforts and closure of the nursery concerned. South Africa last reported direct commercial exports of 312 live plants in 2019, with none reported in CITES trade data between 2020 and 2023.

The species reportedly exists in accessible areas within South Africa, and although it is a protected plant and requires a permit for collection, enforcement at present is apparently still not adequate to protect it from illegal harvest.

Illegal wild harvest of the species is thought to have led to population declines in South Africa, and larger adult size classes (the size targeted for trade), are reported to be entirely absent or drastically reduced in almost all populations, with some now regarded as non-viable. The National Red List assessment for South Africa in 2022 assessed the species as endangered based on inferred population reductions exceeding 50% over three generations (two past and one future). No evidence of trade in Namibia was found although there are anecdotal reports of collection there.

It is thought that artificial propagation of this species is unlikely to be able to produce the large quantities of individuals exported from South Africa in recent years given their extremely slow growth rates, with the caudex taking at least 8-12 years to enlarge even under ideal conditions. Other factors affecting the population are slow regeneration rates, habitat degradation, the likely impact of climate change (including increased droughts), and the potential for mining in known habitats.

Analysis: *Avonia quinaria* has a restricted area of distribution, largely in South Africa, with fragmented populations believed to have decreased significantly. It is intrinsically vulnerable due to its slow

growth. Little information is available for the species in Namibia, although it is reported as occurring only marginally in the country. The species has been affected by collection for the ornamental plant trade at least in part for export, with many populations reportedly largely or entirely depleted of mature plants. It therefore **appears to meet the criteria for inclusion in Appendix I** under Res. Conf. 9.24 (Rev. CoP17) based on criterion B.

If adopted, currently exempted products including seeds and seedlings would also be subject to the Appendix-I listing; nurseries artificially propagating the species for commercial purposes would need to be registered with the CITES Secretariat in accordance with Res. Conf. 9.19 (Rev. CoP15) on *Registration of nurseries that artificially propagate specimens of Appendix-I plant species for export purposes*.

The transfer of the genus *Avonia* to *Anacampseros* has been proposed in the revision to Standard nomenclature at CoP20 (see document CoP20 Doc. 110). If accepted this species would be referred to as *Anacampseros quinaria*.

Amend annotation #4

Proponent: United Kingdom of Great Britain and Northern Ireland (as Chair of the Working Group on Annotations)

Summary: The proposal seeks to amend Annotation #4 paragraph f) in line with the consensus recommendation made by the Standing Committee at its 78th meeting (Geneva, 2025), following discussion in the Working Group on Annotations. The proposed amendments are as follows (with added text shown underlined and deleted text shown in ~~strike through~~):

f) finished products packaged and ready for retail trade of *Aloe ferox* and *Euphorbia antisyphilitica* ~~packaged and ready for retail trade~~;

The proposed amendment addresses a minor ambiguity in the existing wording, it being unclear whether it is currently intended to apply to all finished products of *Aloe ferox* or those specifically packaged and ready for retail trade. It also harmonises use of this language with its use in paragraph g of Annotation #4. The term “finished ‘products packages and ready for retail trade” is defined in paragraph 8 of the interpretation section of the Appendices as:

“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 proposed amendment will have no substantive impact on the trade in the species referred to in the annotation (*Aloe ferox* and *Euphorbia antisyphilitica*). Use of the term would also be in line with its use in annotations #2 and #13.

Although the proposed amendment would make no substantive difference to the listing, at the 78th meeting of the Standing Committee it was considered necessary to submit a proposal in line with Resolution Conf. 11.21 (Rev. CoP19) on *Use of Annotations in Appendices I and II*, as annotations to species listed in the Appendices are considered substantive annotations that are integral parts of species listings and they may be adopted, deleted or amended only by the Conference of the Parties.

Analysis: The proposed amendment has been discussed and agreed by the Annotations Working Group of the Standing Committee. Its **adoption would make no substantive change to the listings** of the species to which it applies and **clarifies and harmonises its use** within the annotation and with the definition of the term in the interpretation section of the Appendices.

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TRAFFIC works to ensure that trade in wild species is legal and sustainable, for the benefit of people and the planet. With 50 years of expertise, TRAFFIC is a trusted advisor and partner to governments, businesses, law enforcement, and communities worldwide—tackling the root causes of illegal trade in wild species.

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