



Assessment of listing proposals submitted for CITES CoP20

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Scientific Opinion of the Panel on CITES of the
Norwegian Scientific Committee for Food and Environment

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Assessment of listing proposals submitted for CITES CoP20

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Assessment of listing proposals submitted for CITES CoP20

Preparation of the opinion

The Norwegian Scientific Committee for Food and Environment (Vitenskapskomiteen for mat og miljø, VKM) appointed a project group to draft the opinion. The project group consisted of seven VKM members and one VKM staff. The Committee, by the VKM Panel on CITES¹, approved the final opinion.

Authors of the opinion

The authors have contributed to the opinion in a way that fulfils the authorship principles of VKM (VKM, 2023²). The principles reflect the collaborative nature of the work, and the authors have contributed as members of the project group appointed specifically for the assignment.

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Competence of VKM experts

Persons working for VKM, either as appointed members of the Committee or as external experts, do this by virtue of their scientific expertise, not as representatives for their employers or third-party interests. The Civil Services Act instructions on legal competence apply for all work prepared by VKM.

¹ Two members of the VKM Panel on CITES were not involved in the approval of the opinion.

² VKM (2023). Kriterier for forfatterskap og faglig ansvar i VKMs uttalelser.

https://vkm.no/download/18.31466e2518a903f269871472/1695193122273/Forfatterskapskriterier%20i%20VKM_august%202023.pdf

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Summary

The Norwegian Scientific Committee for Food and Environment (VKM) – CITES Scientific Authority of Norway – has assessed all 51 listing proposals submitted by Parties ahead of the 20th Conference of the Parties to CITES (CoP20), to be held in Samarkand, Uzbekistan (24 November – 5 December 2025). The assessments were conducted in accordance with the listing criteria set out in CITES Resolution Conf. 9.24 (Rev. CoP17), using available scientific and trade data. The proposals cover a broad taxonomic and geographic scope, including mammals, birds, reptiles, amphibians, marine organisms (notably sharks and rays), invertebrates, and plants. Of the 51 proposals evaluated, 41 received positive findings, indicating that the proposals meet the requirements of the Convention and the criteria for listing. Four proposals received negative findings, indicating that proposals do not meet requirements of the Convention or criteria in Resolution Conf. 9.24 (Rev. CoP17). The remaining six proposals received inconclusive findings, indicating that the available data did not allow a definitive determination of compliance with the listing criteria. The assessments will be used in the preparation of a draft for mandate and Norwegian positions for the CoP, which will be submitted to the Ministry of Climate and Environment for a final decision.

Key words: Appendices, amendment, assessment, CITES, Conference of the Parties, CoP20, proposals, VKM.

Sammendrag på norsk

Vitenskapskomiteen for mat og miljø (VKM) – Norges vitenskapelige myndighet under CITES – har vurdert alle de 51 listeforslagene som er fremmet av partene til det 20. partsmøtet under CITES (CoP20), som avholdes i Samarkand, Usbekistan (24. november – 5. desember 2025). Vurderingene er gjennomført i henhold til kriteriene fastsatt i CITES Resolution Conf. 9.24 (Rev. CoP17), basert på tilgjengelig vitenskapelige data og handelsdata. Forslagene spenner over et bredt spekter av arter fra ulike regioner, inkludert pattedyr, fugler, reptiler, amfibier, marine arter (særlig haier og rokker), virvelløse dyr og planter. Av de 51 vurderte forslagene, fikk 41 en positiv vurdering, noe som indikerer at forslagene oppfyller konvensjonens krav og kriterier for listeføring. Fire forslag fikk en negativ vurdering noe som indikerer at de ikke oppfyller konvensjonens krav og kriterier for listeføring. De siste seks forslagene ble vurdert som uavklarte, noe som indikerer at tilgjengelige data ikke var tilstrekkelige til å fastslå om de oppfyller konvensjonens krav og kriterier for listeføring. Vurderingene vil bli benyttet av Miljødirektoratet i utarbeidelse av forslag til mandat og norsk posisjon, som forelegges Klima- og miljødepartementet for endelig beslutning.

Abbreviations

CITES – Convention on International Trade in Endangered Species of Wild Fauna and Flora

CoP – Conference of the Parties

IUCN – International Union for Conservation of Nature

IUCN SSC – IUCN Species Survival Commission

VKM – Vitenskapskomiteen for mat og miljø / Norwegian Scientific Committee for Food and Environment

Background as provided by the Norwegian Environment Agency

The 20th Meeting of the Parties (CoP20) will be held in Samarkand, Uzbekistan, 23 November - 5 December 2025. The CoP will, among other things, consider the proposals the parties have submitted for changes to the CITES Appendices. All proposals will be considered in accordance with the guidelines in Resolution 9.24 (Rev. CoP17), which are the listing criteria.

The assessment and report from VKM on the listing proposals will be used in the preparation of a draft for mandate and Norwegian positions for the CoP, which will be submitted to the Ministry of Climate and Environment for a final decision.

Terms of reference as provided by the Norwegian Environment Agency

Assessment of new proposals for Appendix I and II of CITES

The Norwegian Environment Agency requests VKM to assess all listing proposals submitted by the parties for CoP20. The parties' deadline for submitting proposals was 27 June 2025, cf. Notification 2024/117³.

The assessment should follow the format of Annex 1 (enclosed in the Terms of Reference) and should be approximately two pages per proposal. Some proposals may include more than one species. Assessments of these may exceed two pages if necessary.

The listing criteria in Resolution Conf. 9.24 (Rev. CoP17) are the primary basis for the parties' assessment of proposals, see <https://cites.org/sites/default/files/documents/COP/19/resolution/E-Res-09-24-R17.pdf>. It follows that the assessment from VKM should be based on these criteria and include an assessment of which criteria are met for each proposal.

The Norwegian Environment Agency points out that there will be analyses of the proposals from several other organisations, including the FAO and the CITES Secretariat, which will also contribute to the CoP's assessments of the proposals.

Information on previously adopted or rejected proposals can be found on the CITES Secretariat's website (<https://cites.org>). In addition, we refer to relevant information about the species in <https://speciesplus.net/> or <https://trade.cites.org/>, and any assessments made by organisations such as IUCN (<https://www.iucnredlist.org>) and TRAFFIC (<https://www.traffic.org>).

Species of particular interest

Listing proposals have been published on <https://cites.org/>. We request specific elaboration of listing proposals of species found in Norway or in Norwegian waters in VKM's assessment.

³ <https://cites.org/sites/default/files/notifications/E-Notif-2024-117.pdf>

1 Introduction

This report presents VKM's compiled assessment of all species listing proposals submitted for the 20th Conference of the Parties to the Convention on International Trade in Endangered Species (CITES CoP20).

The Norwegian Scientific Committee for Food and Environment (VKM) is the CITES Scientific Authority of Norway. At the request of the Norwegian Environment Agency, VKM has assessed the listing proposals submitted by the Parties to the upcoming CoP20.

The 20th Conference of the Parties (CoP20) will take place in Samarkand, Uzbekistan, November 24 – December 5, 2025. CoP20 will, among other things, consider the proposals the Parties have submitted for amendment of the CITES Appendices⁴. All proposals have been assessed in accordance with the guidelines in Resolution Conf. 9.24 (Rev. CoP17), which provide the criteria for listing of species.

VKM's assessment will be used in the preparation of a draft for mandate and Norwegian positions for the CoP, which will be submitted to the Ministry of Climate and Environment for a final decision.

A total of 51 listing proposals have been submitted ahead of CoP20. The proposals cover a wide range of species of both fauna and flora, inhabiting a wide range of different habitats. Sharks and rays, including wedgefishes and guitarfishes, as well as eels, are among the most threatened groups of vertebrates (Dulvy et al., 2022⁵). Many species from these groups are included in the CoP20 proposals.

The role of CITES in marine conservation has long been the subject of debate (Vincent et al., 2014⁶), but in recent years an increasing number of marine species have been listed in the CITES Appendices.

At CITES CoP19 in 2022, Parties adopted proposals to list 95 species of sharks and guitarfishes. This included all hammerhead sharks, the entire requiem shark family, and the guitarfish family. Among the listing proposals for CoP20, there are several new proposals for sharks and rays, including wedgefishes and guitarfishes. Sharks and rays are specifically threatened with overexploitation, but regulation of trade is hard to implement (Cardenosa et al., 2022⁷; Vincent et al., 2022⁸), and the effects of regulation take some time to show effect (Bond et al. 2025⁹).

⁴ For the full agenda, see <https://cites.org/eng/cop/20/agenda-documents>

⁵ Dulvy, N. K., Pacoureau, N., Rigby, C. L., Pollom, R. A., Jabado, R. W., Ebert, D. A., Finucci, B., Pollock, C. M., Cheok, J., Derrick, D. H., & Herman, K. B. (2021). Overfishing drives over one-third of all sharks and rays toward a global extinction crisis. *Current Biology*, 31(21), 4773–4787.

⁶ Vincent, A. C. J., de Mitcheson, Y. J. S., Fowler, S. L., & Lieberman, S. (2014). The role of CITES in the conservation of marine fishes subject to international trade. *Fish and Fisheries*, 15(4), 563–592. <https://doi.org/10.1111/faf.12035>

⁷ Cardeñosa, D., Shea, S. K., Zhang, H., Fischer, G. A., Simpfendorfer, C. A., & Chapman, D. D. (2022). Two thirds of species in a global shark fin trade hub are threatened with extinction: Conservation potential of international trade regulations for coastal sharks. *Conservation Letters*, 15(5), e12910.

⁸ Vincent, A. C. J., Foster, S. J., Fowler, S. L., Lieberman, S., & Sadovy de Mitcheson, Y. (2022). Implementing CITES Appendix II listings for marine fishes: A novel framework and a constructive analysis. *Fisheries Centre Research Report*, 30(3), 189 pp.

⁹ Bond, M. E., Booth, H., Tanna, A., Fowler, S. L., Polo-Silva, C. J., Shea, K. S., ... & Jabado, R. W. (2025). Trade regulations drive improved global shark and ray management. *Marine Policy*, 106733.

At CoP19, Parties also adopted five proposals to list seven genera of timber trees – comprising over 150 species - in Appendix II. For CoP20, several proposals have been submitted to delist certain populations of these species to facilitate trade. Parties will have to consider these proposals in light of the CITES Convention text and relevant Resolutions.

Range states of several species have also submitted proposals to “up-list” species, i.e., transfer species from Appendix II to I. Species on Appendix I are subject to the strictest trade regulations, aimed at preventing further threats to their survival.

2 Methodology and data

2.1 Criteria

Species proposed for listing were evaluated against all relevant criteria in Resolution Conf. 9.24 (Rev. CoP17)¹⁰ regardless of those cited in the proposals.

2.2 Data and information gathering

To assess the proposals against CITES listing criteria, data on each species were compiled from IUCN Red List assessments, scientific literature, grey literature, news reports, and relevant information included in the proposals. Trade data were sourced from multiple databases, including the CITES Trade Database and USFWS LEMIS.

2.3 Nomenclature and taxonomy

Unless otherwise noted, the nomenclature used in this assessment follows that of Species+ (UNEP, 2025¹¹) or as provided in IUCN Red List assessments.

2.4 Findings

The conclusion of each listing proposal assessment is categorized as either positive, negative, or inconclusive (Table 2.4.1).

Table 2.4-1. Categorization of findings in the assessment.

Finding	Description
Positive	The proposal meets the requirements of the Convention and the criteria set out in Resolution Conf. 9.24 (Rev. CoP17), including relevant biological, trade, and/or precautionary considerations.
Negative	The proposal does not meet requirements of the Convention or criteria in Resolution Conf. 9.24 (Rev. CoP17).
Inconclusive	Based on the available information, it is not possible to determine whether the proposal meets the requirements of the Convention and Resolution Conf. 9.24 (Rev. CoP17); further data or clarification is needed.

¹⁰ <https://cites.org/sites/default/files/documents/COP/19/resolution/E-Res-09-24-R17.pdf>

¹¹ UNEP (2025). The Species+ Website. Nairobi, Kenya. Compiled by UNEP-WCMC, Cambridge, UK. Available at: www.speciesplus.net.

3 Assessments of listing proposals

The individual listing proposal assessments (Table 3-1) are presented below and follow a standardized format. Each assessment includes: (1) a summary of the proposal and its proponents, followed by a review of data on nomenclature and taxonomy, distribution, conservation status, population trends, habitat status, and trade levels; (2) additional information from CITES reviews or relevant nature management issues in range states, where applicable; (3) an evaluation of whether the proposal meets the listing criteria, based on the reviewed evidence, concluding with a finding—positive, negative, or inconclusive (for definitions, see Table 2.4.1); and (4) a reference list detailing the sources used in the assessment.

Table 3-1. Information on listing proposals and VKM’s findings.

Listing proposal #	Species covered by proposal (scientific name)	Proposal	Proponents	Finding
1	<i>Damaliscus pygargus pygargus</i>	Delete from Appendix II	South Africa	Positive
2	<i>Gazella dorcas</i>	Include in Appendix II	Benin, Burkina Faso, Mali, Mauritania, Niger, Nigeria, Senegal, Sudan, Tunisia	Positive
3	<i>Saiga tatarica</i>	Amend the annotation by adding the wording "except for specimens from the population <i>Saiga tatarica</i> of Kazakhstan"	Kazakhstan	Positive
4	<i>Giraffa camelopardalis</i>	Delete the populations of Angola, Botswana, Eswatini, Malawi, Mozambique, Namibia, South Africa and Zimbabwe from Appendix II	Namibia, South Africa, United Republic of Tanzania, Zimbabwe	Inconclusive
5	<i>Okapia johnstoni</i>	Include in Appendix I	Democratic Republic of the Congo	Positive
6	<i>Hyaena hyaena</i>	Include in Appendix I	Israel, Tajikistan	Inconclusive
7	<i>Arctocephalus townsendi</i>	Transfer from Appendix I to Appendix II	Mexico, United States of America	Positive
8	<i>Monachus tropicalis</i>	Delete from Appendix I	Mexico, United States of America	Positive
9	<i>Ceratotherium simum simum</i>	Amend the annotation of the population of <i>Ceratotherium simum simum</i> of Namibia listed in Appendix II For the exclusive purpose ...	Namibia	Inconclusive

10	<i>Diceros bicornis</i>	Transfer the population of <i>Diceros bicornis bicornis</i> of Namibia from Appendix I to Appendix II with the following annotation ...	Namibia	Inconclusive
11	<i>Choloepus didactylus; Choloepus hoffmanni</i>	Include in Appendix II	Brazil, Costa Rica, Panama	Negative
12	<i>Cercocebus chrysogaster</i>	Transfer from Appendix II to Appendix I	Democratic Republic of the Congo	Positive
13	<i>Loxodonta africana</i>	To allow Namibia to trade in registered stocks of raw ivory (whole tusks and pieces) of Namibian origin ...	Namibia	Inconclusive
14	<i>Loxodonta africana</i>	Amend annotation A10 pertaining to the elephant populations of Botswana, Namibia, South Africa and Zimbabwe ...	Botswana, Cameroon, Côte d'Ivoire, Namibia, Zimbabwe	Positive
15	<i>Bycanistes</i> spp.; <i>Ceratogymna</i> spp.	Include in Appendix II	Cameroon, Congo, Gabon, Niger, Nigeria, Senegal, Sierra Leone, Togo	Positive
16	<i>Gyps africanus, Gyps rueppelli</i>	Transfer from Appendix II to Appendix I	Benin, Burkina Faso, Burundi, Cameroon, Chad, Congo, Gambia, Guinea, Niger, Nigeria, Senegal, Sierra Leone, Togo	Positive
17	<i>Falco peregrinus</i>	Transfer from Appendix I to Appendix II	Canada, United States of America	Negative
18	<i>Sporophila angolensis; Sporophila atrirostris; Sporophila crassirostris; Sporophila funerea; Sporophila maximiliani</i>	Include <i>Sporophila maximiliani</i> in Appendix I and include <i>Sporophila angolensis, Sporophila atrirostris, Sporophila crassirostris, Sporophila funerea</i> and <i>Sporophila nuttingi</i> in Appendix II	Brazil	Positive
19	<i>Caribicus warreni</i>	Include in Appendix I	Dominican Republic	Positive
20	<i>Phyllurus amnicola</i>	Include in Appendix II	Australia	Positive
21	<i>Phyllurus caudiannulatus</i>	Include in Appendix II	Australia	Positive

22	<i>Amblyrhynchus</i> spp.	Transfer from Appendix II to Appendix I	Ecuador	Inconclusive
23	<i>Conolophus</i> spp.	Transfer from Appendix II to Appendix I	Ecuador	Positive
24	<i>Bitis harena</i> ; <i>Bitis parviocula</i>	Include in Appendix I	Ethiopia	Positive
25	<i>Crotalus</i> spp.; <i>Sistrurus</i> spp.	Include in Appendix II	Bolivia (Plurinational State of), Mexico	Positive
26	<i>Kinixys homeana</i>	Transfer from Appendix II to Appendix I	Cameroon, Guinea, Nigeria, Togo	Positive
27	<i>Pelophylax epeiroticus</i> ; <i>Pelophylax lessonae</i> ; <i>Pelophylax ridibundus</i> ; <i>Pelophylax shqipericu</i>	Include in Appendix II (Entry into effect of the inclusion in Appendix II would be delayed by 18 months, i.e until 5 June 2027.)	European Union, Israel, North Macedonia	Inconclusive
28	<i>Carcharhinus longimanus</i>	Transfer from Appendix II to Appendix I	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	Positive
29	<i>Galeorhinus galeus</i> ; <i>Mustelus</i> spp.	Include in Appendix II	Brazil, Ecuador, European Union, Panama, Senegal	Positive
30	<i>Mobulidae</i> spp.	Transfer from Appendix II to Appendix I	Bahamas, Belize, Brazil, Comoros, Dominican Republic, Ecuador, Fiji, Gabon, Jamaica, Maldives, Panama, Samoa, Senegal, Seychelles, Sudan, Togo	Positive
31	<i>Rhincodon typus</i>	Transfer from Appendix II to Appendix I	Argentina, Bahamas, Bangladesh, Belize, Comoros, Dominican Republic, Ecuador, Fiji, Gabon, Maldives, Panama, Philippines, Samoa, Senegal, Seychelles, Sri Lanka, Togo	Positive

32	<i>Glaucostegus</i> spp.	Add the following annotation "A zero annual export quota for wild-taken specimens traded for commercial purposes"	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	Positive
33	Rhinidae spp.	Add the following annotation "A zero annual export quota for wild-taken specimens traded for commercial purposes"	Bangladesh, Benin, Brazil, Burkina Faso, Burundi, Central African Republic, Comoros, Congo, Gabon, Gambia, Guinea, Guinea-Bissau, Maldives, Mali, Niger, Nigeria, Panama, Senegal, Sierra Leone, Sudan, Togo	Positive
34	Centrophoridae spp.	Include in Appendix II	Brazil, Comoros, Dominican Republic, Ecuador, European Union, Lebanon, Nigeria, Panama, Senegal, Syrian Arab Republic, United Kingdom of Great Britain and Northern Ireland	Positive
35	<i>Anguilla</i> spp.	Include in Appendix II (Entry into effect would be delayed by 18 months, i.e. until 5 June 2027.)	European Union, Honduras, Panama	Positive
36	<i>Actinopyga echinites</i> ; <i>Actinopyga lecanora</i> ; <i>Actinopyga mauritiana</i> ; <i>Actinopyga miliaris</i> ; <i>Actinopyga palauensis</i> ; <i>Actinopyga varians</i>	Include in Appendix II	European Union	Positive
37	<i>Holothuria lessoni</i>	Include in Appendix II	European Union	Positive
38	<i>Acanthoscurria chacoana</i> ; <i>Acanthoscurria insubtilis</i> ; <i>Acanthoscurria musculosa</i> ; <i>Acanthoscurria theraphosoides</i> ; <i>Avicularia hirschii</i> ; <i>Avicularia rufa</i> ; <i>Avicularia avicularia</i> ; <i>Catumiri argentinense</i> ; <i>Cyriocosmus berate</i> ; <i>Cyriocosmus perezmilei</i> ; <i>Grammostola rosea</i> ; <i>Hapalotremus albipes</i> ; <i>Holothele longipes</i> ; <i>Pamphobeteus antinous</i> ; <i>Umbyquyra acuminatum</i>	Include in Appendix II	Argentina, Bolivia (Plurinational State of), Panama	Positive

39	<i>Haliotis midae</i>	Include the population of South Africa with the annotation "dried specimens only"	South Africa	Positive
40	<i>Panax quinquefolius</i>	Amend annotation #3 to exempt finished products packaged and ready for retail trade of thin-sliced roots derived from artificially propagated of <i>Panax quinquefolius</i>	United States of America	Positive
41	<i>Jubaea chilensis</i>	Include in Appendix I	Chile	Positive
42	<i>Beaucarnea glassiana</i> ; <i>Beaucarnea hookeri</i>	Include in Appendix II as part of the listing of the genus <i>Beaucarnea</i> spp.	Mexico, Switzerland	Positive
43	<i>Commiphora wightii</i>	Include in Appendix II	European Union	Positive
44	<i>Euphorbia bupleurifolia</i>	Transfer from Appendix II to Appendix I	South Africa	Positive
45	<i>Afzelia bipindensis</i>	Delete the populations of Cameroon, the Central African Republic, Congo, the Democratic Republic of the Congo, Equatorial Guinea and Gabon from Appendix II	Burundi, Cameroon, Central African Republic, Congo, Democratic Republic of the Congo, Equatorial Guinea, Gabon	Negative
46	<i>Paubrasilia echinata</i>	Transfer from Appendix II to Appendix I	Brazil	Positive
47	<i>Pterocarpus soyauxii</i>	Delete the populations of Angola, Cameroon, the Central African Republic, Congo, the Democratic Republic of the Congo, Equatorial Guinea and Gabon from Appendix II	Burundi, Cameroon, Central African Republic, Congo, Democratic Republic of the Congo, Equatorial Guinea, Gabon	Negative

48	<i>Aloe bergeriana</i> ; <i>Aloe jeppeae</i> ; <i>Aloe subspicata</i> ; <i>Aloe welwitschii</i>	Amend the listing of Aloe spp. in Appendix II to also include the four species previously treated in the non-listed genus <i>Chortolirion</i> , but now included in Aloe section Chortolirion, namely <i>Aloe bergeriana</i> , <i>Aloe jeppeae</i> , <i>Aloe subspicata</i> , and <i>Aloe welwitschia</i>	South Africa, Switzerland, Zimbabwe	Positive
49	<i>Podocarpus parlatorei</i>	Transfer from Appendix I to Appendix II	Argentina	Positive
50	<i>Avonia quinaria</i>	Transfer from Appendix II to Appendix I	South Africa	Positive
51	<i>Aloe ferox</i> ; <i>Euphorbia antisiphilitica</i>	Amend annotation #4 as follows: f) finished products packaged and ready for retail trade of <i>Aloe ferox</i> and <i>Euphorbia antisiphilitica</i> packaged and ready for retail trade;	United Kingdom of Great Britain and Northern Ireland	Positive

CoP20 Prop. 1 *Damaliscus pygargus*

1. Review of listing proposal under CITES

Presentation of proposal: The proponents argue that *Damaliscus pygargus pygargus* (Bontebok) is no longer threatened by trade and propose to delete it from Appendix II as per CITES Resolution Conf. 9.24 (Rev. CoP17).

Proponents: South Africa.

Summary of available information

Species name: Scientific name: *Damaliscus pygargus pygargus* (Pallas, 1767); Common name: Bontebok; Norwegian name: Bontebukk. The subspecies *D. p. phillipsi* (Blesbok) is abundant and is considered of Least Concern. *D. pygargus pygargus* readily hybridizes with *D. p. phillipsi* with the (fertile) hybrids often being larger than either subspecies (Fabricius et al., 1989).

Distribution: *Damaliscus pygargus pygargus* is endemic and occurs naturally in the coastal lowland habitats of the Western Cape, South Africa. They are grazers that primarily feed on short grasses. While their natural range is restricted, they have also been introduced to other areas within South Africa, including private farms and reserves (Radloff et al., 2016)

Conservation status: *Damaliscus pygargus pygargus* is currently classified as Vulnerable under criteria B1ab(ii,iii)+2ab(ii,iii), due to its restricted geographic range, small occupancy within this range and fragmented habitats that are also declining. The species was last assessed by IUCN in 2015 (Radloff et al., 2017). It is threatened by habitat loss, and hybridization with *D. p. phillipsi*. Once nearly extinct (fewer than 20 individuals by the early 1900s), conservation efforts led to the creation of Bontebok National Park in 1931. Fewer than 1,000 genetically pure individuals remain within the natural range, while the majority *Damaliscus pygargus pygargus* now lives at private farms, where hybridization is common, affecting up to 33% of the population (van Wyk et al., 2013). Conservation efforts focus on preventing hybridization, preserving genetic integrity, and protecting natural habitats. Populations outside the natural range are not considered in conservation assessments due to hybridization risks and potential outbreeding depression (Radloff et al., 2016).

Population trend: The current population trend of *D. p. pygargus* is stable, but with ongoing habitat declines (Radloff et al., 2017). Formally protected subpopulations are maintained and managed at ecological stocking rates (Radloff et al., 2016). According to the proponents, the *D. p. pygargus* subpopulations have been increasing with current estimates constituting between 74-77% of the national bontebok population living outside the natural range (CITES CoP20 Prop. 1), although these numbers will include an unknown number of *D. p. phillipsi* hybrids (Wyk et al., 2013).

Habitat status: The habitat is limited, fragmented and decreasing (Radloff et al., 2017). All *D. p. pygargus* subpopulations are fenced in (Radloff et al., 2016). Approximately ~5 reserves have *D. p. pygargus* inside its natural range (Radloff et al., 2016). Numerous reserves breed *D. p. pygargus* outside of the natural range on managed grasslands (van Wyk et al., 2013; Radloff et al., 2016).

Trade levels: *Damaliscus p. pygargus* horns and skins are traded through trophy hunting, while live animals are sold at game auctions. Most of these trophies come from captive breeding populations on private ranches (Radloff et al., 2016) with South Africa being exclusive exporter of ~100 to 300 specimens per year in the period 2017-2023, based on CITES registrations. No illegal offtake has been reported in national or provincial parks (Radloff et al., 2016). A minor number of individuals have been taken from sub-populations in the natural range with population growth for breeding on ranches with the wild population remaining stable (Radloff et al., 2016).

2. Potential other information by CITES reviews and on nature management issues in range states

Damaliscus p. pygargus was included into the CITES Appendix I listing in 1975 and transferred to Appendix II in 1981 (UNEP, 2025). *Damaliscus p. pygargus* is nationally protected through the National Environmental Management: Biodiversity Act (Act No. 10 of 2004) (NEMBA) regulating keeping, hunting, catching, breeding, selling, of *D. p. pygargus*. The Scientific Authority of South Africa (SASA) issued a non-detrimental finding (NDF) for *D. p. pygargus* in 2015 and concluded that trade poses a moderate risk. The risk was considered to be due to a lack of monitoring and the absence an explicit management plan for the wild populations (SASA, 2015). The SASA recommended the creation a Biodiversity Management Plan (BMP-S) to improve how *D. p. pygargus* populations are monitored and management. This plan has been implemented and legislated in 2019, providing the foundation for the monitoring, management and conservation of the species (DEFF, 2019). With the implementation of this management plan, the SASA concluded trade of *D. p. pygargus* from game reserves will be non-detrimental. Note that although there is limited trade in pure *D. p. pygargus* as most ranches promote the Blesbok-Bontebok hybrids, these hybrids are considered similar in status as pure *D. p. pygargus* following CITES Resolution Conf. 10.17 (Rev. CoP14). Removing *D. p. pygargus* from the Appendices will thus remove the hybrids with no conservation value from CITES and reduce the administrative burden and cost for ranchers, hunters and CITES management authorities.

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological and trade criteria for inclusion in Appendix II (Resolution Conf. 9.24 (Rev. CoP 17) Annex 2a)

- A) *Trade regulation needed to prevent future inclusion in Appendix I*
 B) *Regulation of trade required to ensure that harvest from the wild is not reducing population to level where survival might be threatened by continued harvest or other influences*

Precautionary measures (Resolution Conf. 9.24 (Rev. CoP 17) Annex 4)

Analysis based on information presented in section 1 and 2

- **Biological criteria:** The wild population of *D. p. pygargus* has been intensively managed since 1900s. While numbers have remained low inside the natural range, these numbers have remained stable since 2004. A national management plan conserving the habitat and genetic integrity of the species has been adopted in 2019.
- **Trade criteria:** *D. p. pygargus* is largely bred and stocked (as hybrids) in reserves with a specific purpose for trophy hunting. Most of such hunting takes place outside the natural range and exports over the last decade have therefore not impacted the wild *D. p. pygargus* population from which these animals have been bred.
- **Precautionary measures:** The proposal satisfies Precautionary measure Annex 4 A. 4, which states that “No species should be deleted from Appendix II if such deletion would be likely to result in it qualifying for inclusion in the Appendices in the near future.”

Finding: Positive

An increase in purpose-bred specimens with low conservation value for trade purposes and the implementation of a natural management plan ensuring monitoring and conservation and genetic integrity of the wild populations of *Damaliscus pygargus pygargus* implies that trade will be non-detrimental. The species does not meet the criteria for Appendix II anymore (e.g., it's not threatened by trade); and it is unlikely to meet those criteria again soon. It thus meets the criteria for removal from Appendix II described in Annex 2(a) A and B as well as Annex 4 A.4 of Resolution Conf. 9.24 (Rev. CoP17).

4. References

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CoP20 Prop. 2 *Gazella dorcas*

1. Review of listing proposal under CITES

Presentation of proposal: Inclusion of *Gazella dorcas* in Appendix II following Article II, 2a of the Convention. In accordance with Resolution Conf. 9.24 (Rev. CoP17) the criteria for inclusion in Appendix II are assessed based on Annex 2a.

Proponents: Benin, Burkina Faso, Côte d'Ivoire, European Union, Liberia, Mali, Mauritania, Niger, Nigeria, Senegal, Sudan, Tunisia.

Summary of available information

Species name: *Gazella dorcas* (Linnaeus, 1758); Common name: Dorcas gazelle; Norwegian common name: dorkasgaselle.

Several subspecies have been described based on morphological differences, but analysis of mitochondrial DNA did not confirm structure (Lerp et al., 2011).

Distribution: *Gazella dorcas* inhabits desert and arid shrubland across northern parts of Africa, the African Horn and extending into southern parts of Israel and Jordan. The species occurs in Algeria, Burkina Faso, Chad, Djibouti, Egypt, Eritrea, Ethiopia, Israel, Jordan, Libya, Mali, Mauritania, Morocco, Niger, Somalia, Sudan, Tunisia and Western Sahara. It is possibly extinct in Nigeria and extinct and reintroduced in Senegal (UNEP, 2025).

Conservation status: *Gazella dorcas* is listed as Vulnerable under criteria A2cd (reduction in population size observed combined with habitat reduction and exploitation) on the IUCN Red List of Threatened Species, the last assessment was made in 2016 (IUCN, 2017). The Northwest African populations are listed on Appendix I of the Convention of Migratory Species (CMS) and Algeria and Tunisia on Annex C of the EU Wildlife Trade Regulations. The species is listed on CITES Appendix III in Algeria, Tunisia and Denmark (UNEP, 2025).

Population trend: The population trend is decreasing. The overall population is severely fragmented (IUCN, 2017). Unregulated hunting is considered the main cause of decline (IUCN, 2017; Coad et al., 2021).

Habitat status: The habitat of *G. dorcas* is increasingly fragmented as a result of agriculture expansion, overgrazing by livestock and drought (IUCN, 2017).

Trade levels: *Gazella dorcas* is hunted for meat and the skin and other body parts are used for manufacturing goods, decorations and medicine (e.g. Coad et al., 2021). According to the proposal and references therein the species is kept as a pet within and outside range states (CITES CoP20 Prop. 2). In a survey of Moroccan markets, the volume of *G. dorcas* observed was considered high enough to suggest that trade could have a significant negative impact on the species (Bergin & Nijman, 2014). It is assumed that illegal killing increased in Libya and Mali as a consequence of armed conflicts (Coad et al., 2021 and references therein).

2. Potential other information by CITES reviews and on nature management issues in range states.

A proposal for inclusion of *G. dorcas* in Appendix I was submitted by Algeria but withdrawn at CoP14 in 2007 (CITES CoP14 Prop. 11).

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological and trade criteria for inclusion in Appendix II (Resolution Conf. 9.24 (Rev. CoP 17) Annex 2a)

- A) Trade regulation needed to prevent future inclusion in Appendix I
 B) Regulation of trade required to ensure that harvest from the wild is not reducing population to level where survival might be threatened by continued harvest or other influences

Analysis based of information presented in section 1 and 2

- **Biological criteria:** The wild population of *G. dorcas* is decreasing and severely fragmented, its habitat is reducing and increasingly fragmented.
- **Trade criteria:** The main cause of population decline is hunting, while live animals are also traded.

Finding: Positive

Harvesting and trade are negatively impacting wild populations of this species that is in decline due to a combination of anthropogenic factors. Continued unregulated trade could lead to reduction of the population size to a level that threatens the future survival of *Gazella dorcas* in the wild and it thus meets the criteria for inclusion in Appendix II described in Annex 2a A and B of Resolution Conf. 9.24 (Rev. CoP17).

4. References

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CoP20 Prop. 3 *Saiga tatarica*

1. Review of listing proposal under CITES

Presentation of proposal: Proposal to amend the annotation for *Saiga tatarica* in Appendix II in accordance with Resolutions Conf. 9.24 (Rev. CoP17) and Conf. 11.21 (Rev. CoP18) by adding the wording "(except for the population of Kazakhstan)". The full text of the revised annotation will read as follows: "Zero export quota for wild specimens traded for commercial purposes, except for specimens from the population *Saiga tatarica* of Kazakhstan."

Proponent: Kazakhstan.

Summary of available information

Species name: *Saiga tatarica* (Linnaeus, 1766). Common names: saiga antelope, steppe saiga, saiga; Norwegian common name: saiga.

Two subspecies, *Saiga tatarica tatarica* (the majority of the global population), and *Saiga tatarica mongolica* (western Mongolia) are recognised by IUCN (IUCN, 2023).

Distribution: *Saiga tatarica* inhabits open, dry steppe landscapes in Central Asia. It occurs in Kazakhstan, Mongolia, Russian Federation, Turkmenistan and Uzbekistan. It is extinct in China, Poland, Republic of Moldova and Ukraine (UNEP, 2025).

Conservation status: *Saiga tatarica* is listed as Near Threatened under criteria A4bde (observed and estimated reduction in population size over three generations, potentially influenced by exploitation and pathogens) on IUCN Red List of Threatened Species, the last assessment was made in 2023 (IUCN SSC Antelope Specialist Group, 2023). In the previous assessment from 2018 it was listed as Critically Endangered (IUCN SSC Antelope Specialist Group, 2023). The species has been listed on CITES Appendix II since 1995, all range states have zero export quotas for 2025 (UNEP, 2025). It is listed on the Convention on the Conservation of Migratory Species of Wild Animals (CMS) Appendix II. The species is listed on Annex B of the EU Wildlife Trade Regulations A with zero export quota for wild specimens traded for commercial purposes (UNEP, 2025). *S. tatarica* is not listed as Endangered in the Red Book in Kazakhstan as it is in the other range states, but efforts to prevent illegal hunting are made (CMS, 2023).

Population trend: The population trend of *S. tatarica* is increasing, but extreme fluctuations cause a high level of uncertainty (IUCN SSC Antelope Specialist Group, 2023). It is estimated that 98% of the global population is found in Kazakhstan where an eleven-fold population increase has taken place between 2015 and 2022 (IUCN SSC Antelope Specialist Group, 2023). The species is susceptible to mass mortality events from disease outbreaks (e.g. in 2015, 80% of a population in Kazakhstan died), and severe climate events such as drought and extreme winter conditions (IUCN SSC Antelope Specialist Group, 2023).

Habitat status: *Saiga tatarica* is a migratory species but its distribution is now divided into five main populations found in disjunct geographic areas (IUCN SSC Antelope Specialist Group, 2023). Habitat loss and degradation are threats in parts of the range (IUCN SSC Antelope Specialist Group, 2023). The recent rise of the numbers of *S. tatarica* in Kazakhstan has led to increased conflict with agricultural land users and local communities (CMS, 2023).

Trade levels: *Saiga tatarica* is hunted illegally for trade in horns (that are used in traditional medicine in Asia), hides and meat (CMS, 2023; IUCN SSC Antelope Specialist Group, 2023). A report on sustainable use was published by the Saiga Conservation Alliance in 2020 (Milner-Gulland et al., 2020).

2. Potential other information by CITES reviews and on nature management issues in range states

At CITES CoP18 it was proposed by Mongolia and USA to transfer *S. tatarica* from Appendix II to Appendix I. An amended proposal was accepted in which it remained on Appendix II but with the following annotation: A2: A zero export quota for wild specimens traded for commercial purposes (CITES CoP18 Prop. 2).

At CITES CoP19 decisions 19.213-19.217 (<https://cites.org/eng/dec/index.php/44341>) have been followed up by a strategy for the management and conservation for *S. tatarica* in Kazakhstan and as part of this, allowing 'strictly controlled legal trade' is suggested (CMS, 2023).

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP17))

Biological and trade criteria for inclusion in Appendix II (Resolution Conf. 9.24 (Rev. CoP 17) Annex 2a)

- A) Trade regulation needed to prevent future inclusion in Appendix I
- B) Regulation of trade required to ensure that harvest from the wild is not reducing population to level where survival might be threatened by continued harvest or other influences

Precautionary measures (Resolution Conf. 9.24 (Rev. CoP 17) Annex 4)

Analysis based on information presented in section 1 and 2

- **Biological criteria:** The population trend is increasing.
- **Trade criteria:** Measures are in place to prevent illegal hunting.

Finding: Positive

Decisions 19.213-217 (CoP19) on future management and conservation of *Saiga tatarica* have been implemented. Strictly controlled legal trade is part of the suggested action plan for Kazakhstan. The suggested amendment to exempt Kazakhstan from the zero quota for commercial purposes will be in accordance with Resolutions Conf. 9.24 (Rev. CoP17) and Conf. 11.21 (Rev. CoP18).

4. References

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CoP20 Prop. 4 *Giraffa camelopardalis*

1. Review of listing proposal under CITES

Presentation of proposal: Exclude the populations of Angola, Botswana, Eswatini, Malawi, Mozambique, Namibia, South Africa and Zimbabwe from the Appendix II listing of *Giraffa camelopardalis* as these populations do not meet the criteria for listing in accordance with Article II, paragraph 2 (a), of the Convention: neither criterion A nor criterion B of Resolution Conf. 9.24 (Rev. CoP17), Annex 2a is met nor either of the criteria in Annex 2b.

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

Summary of available information

Species name: Scientific name: *Giraffa camelopardalis* (Linnaeus, 1758), Common name: Giraffe, Norwegian name: Sjriff. Scientific name of subspecies: *Giraffa camelopardalis ssp. angolensis* Lydekker, 1903, Common name: Angolan giraffe (Marais et al., 2020). Taxonomic note: Genetic analyses (Fennessy et al., 2016) indicate a division into four distinct giraffe species, however the global IUCN assessment is based upon consensus that a single species of giraffes exists (Muller et al., 2018). According to the Giraffe Conservation Foundation the southern giraffe (*G. giraffa*) includes the subspecies *G. c. angolensis* and *G. g. giraffa*, South African giraffe (Marneweck et al., 2025). Taxonomic confusion on the occurrence of the subspecies in southern Africa exists and phylogenetic and taxonomic studies are ongoing (Marais et al., 2020). As of August 2025, the IUCN SSC Giraffe and Okapi Specialist Group published a revised taxonomy and now recognizes the four distinct giraffe species (GOSG, 2025). CITES lists only *Giraffa camelopardalis* (Linnaeus, 1758) in its list of CITES species (UNEP, 2025).

Distribution: *Giraffa camelopardalis* is distributed throughout sub-Saharan Africa across the following range states: Botswana, Cameroon, Central African Republic, Chad, the Democratic Republic of the Congo, Ethiopia, Gambia, Kenya, Namibia, Niger, Somalia, South Africa, South Sudan, United Republic of Tanzania, Uganda, Zambia and Zimbabwe. It is extinct from Burkina Faso, Eritrea, Guinea, Mali, Mauritania, Nigeria and Senegal, and extinct and reintroduced in Angola, Eswatini, Malawi, Mozambique and Rwanda (UNEP, 2025). The subspecies *Giraffa camelopardalis ssp. angolensis* is found in Angola, Botswana and Namibia, its presence is uncertain in Zimbabwe and it has been introduced to parts of Namibia and South Africa (Marais et al., 2020). According to the proponent *G. giraffa* is in addition found in Eswatini, Malawi, Mozambique and Zambia (CITES CoP20 Prop. 4).

Conservation status: The IUCN Red List assessment lists *G. camelopardalis* as Vulnerable A2acd (observed reduction in population size, based on available habitat and potential exploitation) based on an assessment conducted 2016 (Muller et al., 2018). The species is listed on Appendix II of CMS and Annex B of the EU Wildlife Trade Regulations (UNEP, 2025).

The subspecies *G. c. angolensis* is listed as Least Concern on the IUCN Red List of Threatened Species, the assessment was conducted in 2018 (Marais et al., 2020). The proposed new species, *G. giraffa*, has not been assessed for the IUCN Red List, but the Giraffe Conservation Foundation recommends in their report State of Giraffe 2025 that it should be listed as a species of Least Concern (Marneweck et al., 2025).

Population trend: The global population trend is decreasing, is severely fragmented and goes through extreme fluctuations (Muller et al., 2018). The population trend of *G. c. angolensis* is increasing (Marais et al., 2020), for *G. giraffa* the population size in 2025 has been estimated at 68,837 (51,973 – 90,313) individuals, and a steep increase (+49% in 5 years, +117% in 30 years) is expected (Marneweck et al., 2025).

Habitat status: Habitat loss is the main threat to *G. camelopardalis* (Muller et al., 2018). According to State of Giraffe 2025, *G. giraffa* is the most abundant giraffe species inhabiting public, private, and communal land across its range (Marneweck et al., 2025).

Trade levels: International legal trade will be registered as *G. camelopardalis*. Legal hunting occurs in Namibia.

2. Potential other information by CITES reviews and on nature management issues in range states

Giraffa camelopardalis was included in CITES Appendix II in 2019 after proposal by Central African Republic, Chad, Kenya, Mali, Niger and Senegal at CoP18 (CITES CoP18 Prop. 5). The range states Botswana, the Democratic Republic of the Congo, Eswatini, Namibia, South Africa, United Republic of Tanzania, Zambia and Zimbabwe hold reservations against the listing.

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP17))

Biological and trade criteria for inclusion in Appendix II (Resolution Conf. 9.24 (Rev. CoP 17) Annex 2a)

- A) Trade regulation needed to prevent future inclusion in Appendix I
 B) Regulation of trade required to ensure that harvest from the wild is not reducing population to level where survival might be threatened by continued harvest or other influences

Special cases (Resolution Conf. 9.24 (Rev. CoP 17) Annex 3)

Precautionary measures (Resolution Conf. 9.24 (Rev. CoP 17) Annex 4)

Analysis based on information presented in section 1 and 2

- **Biological criteria:** The population is not small or in decline.
- **Trade criteria:** The level of international trade in *G. c. giraffa* is unknown but is not likely to be a current threat.
- **Special cases:** The proposed amendment would lead to a split-listing of *Giraffa camelopardalis*.
- **Precautionary measures:** The populations of *Giraffa camelopardalis* in Angola, Botswana, Eswatini, Malawi, Mozambique, Namibia, South Africa and Zimbabwe are not likely to result in it qualifying for inclusion in the Appendices in the near future and therefore the precautionary measure described in Annex 4 A4 of (Resolution Conf. 9.24 (Rev. CoP17)) is met.

Finding: Inconclusive

The proposed new species *G. giraffa* was formally acknowledged by IUCN in August 2025 but not yet by CITES. The proposed exclusion from Appendix II of the populations of *Giraffa camelopardalis* in Angola, Botswana, Eswatini, Malawi, Mozambique, Namibia, South Africa and Zimbabwe which are increasing and do not longer satisfy the listing criteria for on Appendix II, would in accordance with Article II, paragraph 2 (a), of the Convention. However, the proposed amendment would lead to a split-listing of *Giraffa camelopardalis*, and “Listing of a species in more than one Appendix should be avoided in general in view of the enforcement problems it creates.” (Resolution Conf. 9.24 (Rev. CoP17) Annex 3).

4. References

CITES CoP18 Prop. 5

<https://cites.org/sites/default/files/eng/cop/18/prop/060319/E-CoP18-Prop-05.pdf>

CITES CoP20 Prop. 4 <https://cites.org/sites/default/files/documents/E-CoP20-Prop-04.pdf>

Fennessy, J., Bidon, T., Reuss, F., Kumar, V., Elkan, P., Nilsson, M. A., Vamberger, M., Fritz, U., & Janke, A. (2016). Multi-locus analyses reveal four giraffe species instead of one. *Current Biology*, 26(18), 2543–2549. <https://doi.org/10.1016/j.cub.2016.07.036>

- Giraffe & Okapi Specialist Group (GOSG). (2025). *An evaluation of the taxonomic status of giraffe (Giraffa spp.)*. IUCN SSC Giraffe and Okapi Specialist Group.
https://www.giraffids.org/uploads/1/5/0/7/150770488/gosgtaxonomictask_force_iucn_giraffe_taxonomyassessment_final.pdf
- Marais, A., Fennessy, J., Fennessy, S., Brand, R., & Carter, K. (2020). *Giraffa camelopardalis ssp. angolensis* (amended version of 2018 assessment). *The IUCN Red List of Threatened Species 2020*: e.T88420726A176393590. <https://doi.org/10.2305/IUCN.UK.2020-3.RLTS.T88420726A176393590.en>
- Marneweck, C. J., Brown, M. B., Ekanjio, P., Fennessy, S., Hoffman, R., Kipchumba, A., Muneza, A., Otten, F., & Fennessy, J. (Eds.). (2025). *State of Giraffe 2025: An update from the Giraffe Africa Database (GAD)*. Giraffe Conservation Foundation.
<https://doi.org/10.5281/zenodo.15688798>
- Muller, Z., Bercovitch, F., Brand, R., Brown, D., Brown, M., Bolger, D., Carter, K., Deacon, F., Doherty, J. B., Fennessy, J., Fennessy, S., Hussein, A. A., Lee, D., Marais, A., Strauss, M., Tutchings, A., & Wube, T. (2018). *Giraffa camelopardalis* (amended version of 2016 assessment). *The IUCN Red List of Threatened Species 2018*: e.T9194A136266699.
<https://doi.org/10.2305/IUCN.UK.2016-3.RLTS.T9194A136266699.en>
- UNEP. (2025). The Species+ Website. Nairobi, Kenya. Compiled by UNEP-WCMC, Cambridge, UK. Available at: www.speciesplus.net. [Accessed 08/07/2025].

CoP20 Prop. 5 *Okapia johnstoni*

1. Review of listing proposal under CITES

Presentation of proposal: Inclusion of Okapi (*Okapia johnstoni*) in Appendix I in accordance with Article II, paragraph 1 of the Convention, and criteria in Annex 1, paragraph A (i) and B (iv) of Resolution Conf. 9.24 (Rev. CoP17).

Proponents: Democratic Republic of the Congo (DRC).

Summary of available information

Species name: Scientific name: *Okapia johnstoni* (P.L. Sclater, 1901); Common name: okapi; Norwegian name: okapi.

Distribution: *Okapia johnstoni* inhabits dense, undisturbed high canopy forest in DRC, it is extinct from Uganda (Mallon et al., 2015).

Conservation status: Listed as Endangered A2abcd+4abcd (population reduction of more than 50% over the last three generations connected to habitat loss and exploitation) on the IUCN Red List of Threatened Species, it was last assessed in 2015 (Mallon et al., 2015).

Population trend: The population of *O. johnstoni* is decreasing (Mallon et al., 2015).

Habitat status: Deforestation is a major threat to *O. johnstoni* as the species is extremely sensitive to disturbance and feeds on species of the forest floor (Mallon et al., 2015). The proposal presents charts over increasing rates of tree loss in the last strongholds of the species for the period 2001 to 2023 (CITES CoP20 Prop. 5).

Trade levels: *Okapia johnstoni* is hunted illegally for meat (that is highly priced on the bush meat market) and skin, and armed groups connected to illegal mining and logging activities in the habitat are the largest threats towards its future survival (Mallon et al., 2015). Body parts are exported illegally, particularly to Uganda (CITES CoP20 Prop. 5 and references therein).

2. Potential other information by CITES reviews and on nature management issues in range states

Okapia johnstoni is protected by law in DRC. Several management measures and efforts for population monitoring are described in the proposal (CITES CoP20 Prop. 5), e.g. collaboration with Uganda to hinder illegal trade over the border (Vasquez, 2022).

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological criteria for inclusion in Appendix I (Resolution Conf. 9.24 (Rev. CoP17) Annex 1)

- A) Small wild population
- B) Restricted area of distribution
- C) Marked decline in number of wild individuals

Trade criteria for inclusion in Appendix I (Article II, paragraph 1 of the Convention)

The species is or may be affected by trade

Analysis based on information presented in section 1 and 2

- **Biological criteria:** The species that is endemic to dense forests in DRC and its habitat, for which it is highly specialised, is experiencing marked decline.
- **Trade criteria:** The species is hunted and traded illegally, including export to Uganda.

Finding: Positive

Okapia johnstoni is threatened with extinction and its population is negatively affected by trade, also across borders, despite regional efforts of control. The fundamental principle for inclusion in CITES Appendix I described in Article II, paragraph 1 is thereby met. The species is endemic to DRC and its habitat in decline and more criteria of Annex 1, paragraph A, and B and C of Resolution Conf. 9.24 (Rev. CoP17) than suggested by the proponent seem to be met.

4. References

CITES CoP20 Prop. 5 <https://cites.org/sites/default/files/documents/E-CoP20-Prop-05.pdf>

Mallon, D., Kümpel, N., Quinn, A., Shurter, S., Lukas, J., Hart, J.A., Mapilanga, J., Beyers, R. & Maisels, F. (2015) *Okapia johnstoni*. The IUCN Red List of Threatened Species 2015: e.T15188A51140517. <https://dx.doi.org/10.2305/IUCN.UK.2015-4.RLTS.T15188A51140517.en>. Accessed on 22 July 2025.

Vasquez, D. (2022, September 27). *A united front against okapi trafficking*. Wildlife Conservation Network. <https://wildnet.org/a-united-front-against-okapi-trafficking/>

CoP20 Prop. 6 *Hyaena hyaena*

1. Review of listing proposal under CITES

Presentation of proposal: Transfer of the striped hyena (*Hyaena hyaena*) from Appendix III to Appendix I in accordance with the Resolution Conf. 9.24 (Rev. CoP17), Annex 1: Criteria C.

Proponents: Israel, Tajikistan.

Summary of available information

Species name: *Hyaena hyaena* (Linnaeus, 1758). Common name: Striped hyena. Norwegian name: Stripehyene.

Distribution: *Hyaena hyaena* inhabits open savannah landscapes and has a wide, but patchy distribution throughout Africa (North, North-East and Sahel), the Middle East, Caucasus, Central-Asia and South-Asia. The current range states are Afghanistan, Algeria, Armenia, Azerbaijan, Benin, Burkina Faso, Cameroon, Central African Republic, Chad, Djibouti, Egypt, Eritrea, Ethiopia, Georgia, Ghana, Guinea, India, Islamic Republic of Iran, Iraq, Israel, Jordan, Kenya, Kuwait, Lebanon, Libya, Mali, Mauritania, Morocco, Nepal, Niger, Nigeria, Oman, Pakistan, Saudi Arabia, Senegal, Sierra Leone, Somalia, South Africa, Sudan, Syrian Arab Republic, Tajikistan, Tunisia, Türkiye, Turkmenistan, Uganda, United Arab Emirates, United Republic of, Tanzania, Uzbekistan and Yemen (UNEP, 2025).

Conservation status: *Hyaena hyaena* is listed as Near Threatened on the global IUCN Red List of Threatened Species, the last assessment was made in 2014 (AbiSaid & Dloniak, 2015). The Mediterranean population was assessed as Vulnerable under criterion C1 (estimated less than 10,000 mature individuals and continuing decline) in 2008 (Jdeidi et al., 2010). Both assessments need updating (AbiSaid & Dloniak, 2015; Jdeidi et al., 2010). The species is listed on CITES Appendix III, and Annex C of the EU Wildlife Trade Regulations, in estimated continuing decline Pakistan (UNEP, 2025).

Population trend: The population trend is decreasing, but the population rate is difficult to assess as the species occurs at low densities, is nocturnal and its range overlaps with that of other hyena species (AbiSaid & Dloniak, 2015).

Habitat status: The proponents refer to IUCN Action Plan for Hyenas, dated 1998, that states that fragmentation of the global population of *H. hyaena* is suspected, but that the degree and the rate of habitat loss are unknown (Hofer & Mills, 1998). The species seems to be adaptable to human presence, but persecution is a major threat (AbiSaid & Dloniak, 2015).

Trade levels: The proposal states that the level of legal international trade is low, and refer to grey literature for evidence of illegal trade in striped hyenas and their body parts (CITES CoP20 Prop. 6). According to AbiSaid & Dloniak (2015), and references therein, illegal trade in body parts occurs.

2. Potential other information by CITES reviews and on nature management issues in range states

Not applicable.

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological criteria for inclusion in Appendix I (Resolution Conf. 9.24 (Rev. CoP17) Annex 1)

- A) *Small wild population*
- B) *Restricted area of distribution*
- C) *Marked decline in number of wild individuals*

Trade criteria for inclusion in Appendix I (Article II, paragraph 1 of the Convention)

The species is or may be affected by trade

Analysis based on information presented in section 1 and 2

- **Biological criteria:** The global population of *H. hyaena* is decreasing and its habitat declining, but at unknown rates.
- **Trade criteria:** The volume of legal international trade is low, but evidence of illegal trade exists.

Finding: *Inconclusive*

There is presently insufficient information to conclude if the criteria for inclusion in Appendix I as described in Resolution Conf. 9.24 (Rev. CoP17) Annex I: Criteria C (a marked decline in the population size in the wild) are met for *Hyaena hyaena*.

4. References

AbiSaid, M., & Dloniak, S. M. D. (2015). *Hyaena hyaena*. *The IUCN Red List of Threatened Species 2015*: e.T10274A45195080. <https://doi.org/10.2305/IUCN.UK.2015-2.RLTS.T10274A45195080.en>

CITES CoP20 Prop. 6 <https://cites.org/sites/default/files/documents/E-CoP20-Prop-06.pdf>

Hofer, H., & Mills, M. G. L. (1998). *Hyaenas: Status survey and conservation action plan*. IUCN/SSC Hyaena Specialist Group. <https://portals.iucn.org/library/node/7402>

Jdeidi, T., Masseti, M., Nader, I., de Smet, K., & Cuzin, F. (2010). *Hyaena hyaena* (Mediterranean assessment). *The IUCN Red List of Threatened Species 2010*: e.T10274A3188449. <https://www.iucnredlist.org/species/10274/3188449>

UNEP. (2025). The Species+ Website. Nairobi, Kenya. Compiled by UNEP-WCMC, Cambridge, UK. Available at: www.speciesplus.net. [Accessed 07/07/2025].

CoP20 Prop. 7 *Arctocephalus townsendi*

1. Review of listing proposal under CITES

Presentation of listing proposal: To transfer the Guadalupe Fur Seal (*Arctocephalus townsendi*) from Appendix I to Appendix II, in accordance with paragraph 1 in Article II of the Convention, that it does not meet the biological criteria set out in Annex 1 of Resolution Conf. 9.24 (Rev. CoP17), and in accordance with precautionary measures A1 and A2 of Annex 4 of the same Resolution.

Proponents: Mexico and the United States of America.

Summary of available information

Species name: Scientific name: *Arctocephalus townsendi* (Merriam, 1897) Common name: Guadalupe fur seal. Norwegian name: Guadalupe pelsse.

Distribution: *Arctocephalus townsendi* inhabits coastal North Pacific waters in Mexico and USA (UNEP, 2025). The stronghold of the species is the Guadalupe Island (Mexico), where almost all breeding occurs, and some breeding on the San Benito Islands (Aurióles-Gamboa, 2015).

Conservation status: *Arctocephalus townsendi* is listed as Least Concern by IUCN based on an assessment from 2015 (Aurióles-Gamboa, 2015). Previous assessments from 1986 to 1996 listed the species as Vulnerable, whereas the preceding assessment from 2008 listed it as Near Threatened.

Population trend: The population is increasing (Aurióles-Gamboa, 2015). As a result of intensive hunting, the species was presumed extinct by the late 1920s and until a small population was rediscovered on Guadalupe Island in 1954. This population has rebounded from about 200 to an estimated 34,000–44,000 individuals, with an annual growth rate of 10–11% (García-Aguilar et al., 2018). A second population on the San Benito Archipelago has also shown sustained growth, though breeding numbers fluctuate (Elorriaga-Verplancken et al., 2021). The species is rapidly expanding its numbers with the population estimated to be ~one-fifth of pre-exploitation levels (Elorriaga-Verplancken et al., 2021). The carrying capacity is currently not met and the breeding areas are in national parks that are protected (García-Aguilar et al., 2018).

Habitat status: The feeding grounds around Guadalupe Island and the San Benito Islands is influenced by human activities leading to oil spill and other pollution (Aurióles-Gamboa, 2015).

Trade levels: From 2005 until today, 15 transactions have been recorded for *A. townsendi* in the CITES Trade Database (CITES Trade Database, 2025), and most of them for scientific purposes. No data is available on illegal trade (McCue et al., 2021).

2. Potential other information by CITES reviews and on nature management issues in range states

Utilization or hunting is prohibited in Mexico and the United States (Aurióles-Gamboa, 2015). In response to Notification to the Parties No. 2017/069, Mexico and the United States of America agreed to undertake a review of the Guadalupe fur seal (*Arctocephalus townsendi*) as part of the Periodic Review of species listed in the CITES Appendices, in line with Resolution Conf. 14.8 (Rev. CoP19), during the 29th meeting of the Animals Committee (Geneva, Switzerland, July 2017). The findings of this review were later presented at the 33rd meeting of the Animals Committee (CITES, 2024), which endorsed the recommendation to submit a proposal for transferring *Arctocephalus townsendi* from Appendix I to Appendix II. It is proposed to keep the species in Appendix II for at least two intervals between meetings of the Conference of the Parties to allow monitoring of any potential international trade during this period (CITES CoP20 Prop. 7).

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological criteria for inclusion in Appendix I (Resolution Conf. 9.24 (Rev. CoP17) Annex 1)

- A) Small wild population
- B) Restricted area of distribution
- C) Marked decline in number of wild individuals

Trade criteria for inclusion in Appendix I (Article II, paragraph 1 of the Convention)

The species is or may be affected by trade

Precautionary measures (Resolution Conf. 9.24 (Rev. CoP 17) Annex 4)

Analysis based on information presented in section 1 and 2

- **Biological criteria:** The population of *A. townsendi* has been growing extensively since 1954 and is now considered of Least Concern by IUCN. The population trends are upwards, and the species is expanding its range. The species is not likely to return to Appendix I due to a change in circumstances.
- **Trade criteria:** The species is fully protected in Mexico and The United States under various national legal schemes. There is no data to suggest illegal trade and legal trade is limited and restricted to purpose code S.
- **Precautionary measures:** The precautionary measures ref. Resolution Conf. 9.24 (Rev. CoP17) paragraph A2 apply and the precautionary safeguards are met. In accordance with paragraph A1.

Finding: Positive

The biological criteria for inclusion on Appendix I (Annex 1 paragraphs ABC, Resolution Conf. 9.24 (Rev. CoP17)) no longer apply for *Arctocephalus townsendi* as the population has recovered and is growing. There is currently no threat of trade (Article II, paragraph 1, Convention text). The precautionary criteria (Annex 4, paragraph A2, Resolution Conf. 9.24 (Rev. CoP17)) are satisfied.

4. References

Aurioles-Gamboa, D. (2015). *Arctocephalus townsendi*. *The IUCN Red List of Threatened Species 2015: e.T2061A45224420*. <https://doi.org/10.2305/IUCN.UK.2015-2.RLTS.T2061A45224420.en>

CITES CoP20 Prop. 7 <https://cites.org/sites/default/files/documents/E-CoP20-Prop-07.pdf>

CITES. (2024). *Periodic review of Arctocephalus townsendi* (AC33 Doc. 45.3). Thirty-third meeting of the Animals Committee, Geneva, Switzerland. <https://cites.org/sites/default/files/documents/E-AC33-45-03.pdf>

CITES Trade Database. (2025). Compiled by UNEP-WCMC for the CITES Secretariat. Available at: <https://trade.cites.org>. Accessed [18/09/2025].

Elorriaga-Verplancken, F. R., Paniagua-Mendoza, A., Hernández-Camacho, C. J., Webber, M. A., Cruz-Vallejo, R., Nevels, C. R., & González-López, I. (2021). A new Guadalupe fur seal colony in the Gulf of California? Ecological and conservation implications. *Aquatic Mammals*, 47(1), 1–9. <https://doi.org/10.1578/AM.47.1.2021.1>

García-Aguilar, M. C., Elorriaga-Verplancken, F. R., Rosales-Nanduca, H., & Schramm, Y. (2018). Population status of the Guadalupe fur seal (*Arctocephalus townsendi*). *Journal of Mammalogy*, 99(6), 1522–1528. <https://doi.org/10.1093/jmammal/gvy132>

McCue, L. M., Fahy, C. C., Greenman, J., & Wilkinson, K. (2021). *Status review of the Guadalupe fur*

seal (Arctocephalus townsendi). National Marine Fisheries Service, Protected Resources Division, West Coast Region. <https://www.fisheries.noaa.gov/resource/document/status-review-report-guadalupe-fur-seal>

UNEP. (2025). The Species+ Website. Nairobi, Kenya. Compiled by UNEP-WCMC, Cambridge, UK. Available at: www.speciesplus.net. [Accessed 18/09/2025].

CoP20 Prop. 8 *Monachus tropicalis*

1. Review of listing proposal under CITES

Presentation of listing proposal: Delete the extinct species Caribbean Monk Seal (*Monachus tropicalis*) from Appendix I as it no longer meets the biological criteria (Annex 1) nor the precautionary criteria for possibly extinct species (Annex 4D) to Resolution Conf. 9.24 (Rev. CoP17) and include the following note in the Appendices (see details in sections 1 and 8.6): "*Monachus* spp. (except '*Monachus tropicalis*' which is extinct and was removed from the Appendices on [insert date])".

Proponents: Mexico and the United States of America.

Summary of available information

Species name: Scientific name: *Monachus tropicalis* (Gray, 1850) or *Neomonachus tropicalis* (Scheel, 2014); Common name: Caribbean monk seal, West Indian seal, West Indian monk seal; Norwegian name: Karibisk munkesel.

Two other monk seals *Monachus schauinslandi* (Hawaiian monk seal) and *Monachus monachus* (Mediterranean monk seal) are recognized in the genus. *Monachus tropicalis* was reclassified as *Neomonachus tropicalis* in 2014 (Scheel et al., 2014) and is now listed under that name in the IUCN database.

Distribution: The inferred historical distribution of the species was the Gulf of Mexico and coasts of the Caribbean Sea, from Central America to South America (Timm et al., 1997).

Conservation status: The species has been listed as Extinct at the IUCN Red List of Threatened Species since 1994, it was last assessed as Extinct in 2014 (Lowry, 2015).

Population trend: Not applicable.

Habitat status: Not applicable.

Trade levels: The CITES Trade Database lists a single transaction of 6 pre-Convention specimens (source code O) for scientific purposes (purpose code S) from the United States of America to Germany (CITES Trade Database, 2025).

2. Potential other information by CITES reviews and on nature management issues in range states

As part of the Periodic Review of species listed in Appendices I and II, the Animals Committee at AC27 (2014), accepted the United States of America's recommendation to delete *Monachus tropicalis* from Appendix I (CITES, 2014). At AC33 (CITES, 2024) the Committee endorsed Mexico's proposal to submit this deletion to CoP20, reaffirming the recommendation based on the findings from AC27.

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological criteria for inclusion in Appendix I (Resolution Conf. 9.24 (Rev. CoP17) Annex 1)

- A) Small wild population
- B) Restricted area of distribution
- C) Marked decline in number of wild individuals

Trade criteria for inclusion in Appendix I (Article II, paragraph 1 of the Convention)

The species is or may be affected by trade

Precautionary measures (Resolution Conf. 9.24 (Rev. CoP 17) Annex 4)

Analysis based on information presented in section 1 and 2

- **Biological criteria:** The species is extinct.
- **Trade criteria:** There is no trade.
- **Precautionary measures:** The precautionary measures of Annex 4D of Resolution Conf. 9.24 (Rev. CoP17) are satisfied. Specifically regarding D2, the extinct species *M. tropicalis* is removed but the genus listing of *Monachus* is maintained. The proposed note "*Monachus* spp. (except '*Monachus tropicalis*' which is extinct and was removed from the Appendices on [insert date])" will avoid difficulties implementing the Convention or interpreting the Appendices (ref. Resolution Conf. 9.24 (Rev. CoP17) Annex 4 criterion D section 3 and 4).

Finding: Positive

Removal of the extinct species *Monachus tropicalis* from Appendix I satisfies the biological criteria (Annex 1, paragraphs ABC, Resolution Conf. 9.24 (Rev. CoP17)) based on the most recent data. Furthermore, the taxon is not threatened by trade (CITES Art. II, par. 1). It should be noted that the genus *Monachus* is listed in CITES, with all taxa in the genus listed on Appendix I. Removal of this extinct taxon from the list of CITES Species has no impact on the current genus listing ref. Resolution Conf. 9.24 (Rev. CoP17) Annex 4 criterion D section 2. The proposed note "*Monachus* spp. (except '*Monachus tropicalis*' which is extinct and was removed from the Appendices on [insert date])" will avoid difficulties implementing the Convention or interpreting the Appendices (ref. Resolution Conf. 9.24 (Rev. CoP17) Annex 4 criterion D section 3 and 4).

4. References

- CITES. (2014). *Periodic review – Monachus tropicalis* (AC27 Doc. 24.3.4). Twenty-seventh meeting of the Animals Committee, Geneva, Switzerland.
<https://cites.org/sites/default/files/eng/com/ac/27/E-AC27-24-03-04.pdf>
- CITES. (2024). *Summary record of the 33rd meeting of the Animals Committee* (AC33-SR). Geneva, Switzerland. <https://cites.org/sites/default/files/eng/com/ac/33/E-AC33-SR-DRAFT.pdf>
- CITES Trade Database (2025). Compiled by UNEP-WCMC for the CITES Secretariat. Available at: <https://trade.cites.org>. Accessed [18/09/2025].
- Lowry, L. (2015). *Neomonachus tropicalis*. *The IUCN Red List of Threatened Species 2015: e.T13655A45228171*. <https://doi.org/10.2305/IUCN.UK.2015-2.RLTS.T13655A45228171.en>
- Scheel, D. M., Slater, G. J., Kolokotronis, S. O., Potter, C. W., Rotstein, D. S., Tsangaras, K., ... & Helgen, K. M. (2014). Biogeography and taxonomy of extinct and endangered monk seals illuminated by ancient DNA and skull morphology. *ZooKeys*, 409, 1–33.
<https://doi.org/10.3897/zookeys.409.6244>
- Timm, R. M., Salazar, R. M., & Peterson, A. T. (1997). Historical distribution of the extinct tropical seal, *Monachus tropicalis* (Carnivora: Phocidae). *Conservation Biology*, 11(2), 549–551.
<https://hdl.handle.net/1808/4476>

CoP20 Prop. 9 *Ceratotherium simum simum*

1. Review of listing proposal under CITES

Presentation of proposal: Amendment of 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 Private Landowners originating in the State (excluding seized rhinoceros horn and rhinoceros horns of unknown origin); subject to the following: i) only stocks registered with the Government; ii) only horns with RHODIS certificates; iii) only to trading partners that have been verified by the Secretariat, in consultation with the Standing Committee, to have sufficient national legislation and 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.

Proponents: Namibia.

Summary of available information

Species name: Scientific name: *Ceratotherium simum simum* (Burchell, 1817), Common name: Southern white rhinoceros, Southern square-lipped rhinoceros (UNEP, 2025). Norwegian name: Hvitt neshorn.

Distribution: The subspecies is found in savanna habitats in South Africa and has been reintroduced in Botswana, Eswatini, Mozambique, Namibia and Zimbabwe, it is extinct in Angola and introduced in Kenya, Côte d'Ivoire, Uganda and Zambia (UNEP, 2025).

Conservation status: *Ceratotherium simum simum* is listed as Near Threatened by the IUCN Red list of Threatened Species, it was last assessed in 2020 (Emslie, 2020). The population in Namibia is listed on Annex B of the EU Wildlife Trade Regulations (UNEP, 2025).

Population trend: The global population trend is decreasing (Emslie, 2020). A decline of 11.2 % was observed from 2023 to the end of 2024 when 15,750 individuals of *C. s. simum* were recorded in 13 Africa countries (CITES CoP20 Doc. 84, Annex 3). Namibia holds 9.5% of the total population and the estimated population size in 2024 was 1,500 (CITES CoP20 Doc. 84, Annex 3). According to the proponent the reintroduced population in Namibia increased from 16 to 1,500 individuals in the period 1975 to 2024 (CITES CoP20 Prop. 9).

Habitat status: The majority of Namibia's *C. simum simum* population is found on privately owned land, according to the proponent the main threat is illegal hunting for horns (CITES CoP20 Prop. 9) as is also the case for the subspecies in general (Emslie, 2020). Trophy hunting is permitted in South Africa and Namibia (CITES CoP20 Doc. 84, Annex 3).

Trade levels: Only hunting trophies can currently be sold legally, the international demand for horn is high and dehorning of animals for the prevention of illegal hunting has led to an increasing stockpile of horn in Namibia (CoP20 Prop. 9). Namibia did not report data on stockpiles to the CITES Secretariat in 2023 and 2024, and overall, there is considerable uncertainty around stockpile data (CITES CoP20 Doc. 84, Annex 3). Most of the horns traded are sourced from illegally hunted animals but also horns from stolen stockpiles and trophy hunting are entering the market (CITES CoP20 Doc. 84, Annex 3). Since 2015 (see CITES CoP15 Doc. 45.1 (Rev. 1)), estimates of rhino horn sourced into the illegal trade have been reported and for the period 2021-2023 the number of rhino horns sourced into illegal trade was between 2,028 and 2,559 (CITES CoP20 Doc. 84, Annex 3). According to the proponent, since 2013, 162 individuals have been illegally hunted and presumably the horns been traded (CITES CoP20 Prop. 9).

2. Potential other information by CITES reviews and on nature management issues in range states

At CITES CoP19, a proposal by Botswana and Namibia to transfer the Namibian population of *C. simum simum* from CITES Appendix I to Appendix II was accepted (CITES CoP19 Prop. 2). The populations of South Africa and Eswatini are also listed on Appendix II (UNEP, 2025). A proposal by Eswatini to remove the existing annotation for the population (CITES CoP19 Prop. 3) was rejected (UNEP, 2025).

Resolution Conf. 9.14 (Rev. CoP19) on Conservation of and trade in African and Asian rhinoceroses, the CITES Secretariat presents to the Conference of Parties a report on African and Asian Rhinoceroses – Status, Conservation and Trade by the IUCN Species Survival Commission (IUCN SSC) African and Asian Rhino Specialist Groups and TRAFFIC (CITES CoP20 Doc. 84, Annex 3).

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP17))

Biological and trade criteria for inclusion in Appendix II (Resolution Conf. 9.24 (Rev. CoP 17) Annex 2a)

A) Trade regulation needed to prevent future inclusion in Appendix I

B) Regulation of trade required to ensure that harvest from the wild is not reducing population to level where survival might be threatened by continued harvest or other influences

Precautionary measures (Resolution Conf. 9.24 (Rev. CoP 17) Annex 4).

Based in Annex 4 C this proposal to amend a special measure pursuant to paragraph A. 2. iii. needs to be approved by the CoP based on an assessment of management measures described in the proposal and efficacy of enforcement controls.

Analysis based on information presented in section 1 and 2

- **Biological criteria:** The reintroduced population of the subspecies in Namibia is mainly privately owned and has increased.
- **Trade criteria:** Illegal hunting for international trade of horn is the main threat to the subspecies in Namibia and other range states.
- **Precautionary measures:** The proponent has provided detailed precautionary measures to meet the requirements outlined in Annex 4 A 2 iii of Resolution 9.24 (Rev. Cop 17). There is, however, uncertainty pertaining to the stockpile *Ceratotherium simum simum* horn held by Namibia.

Finding: Inconclusive

International trade of *Ceratotherium simum simum* from South Africa and Eswatini are controlled following the same annotation that Namibia proposes to amend. The proponent suggests to allow trade in rhino horn stocks and proposes several measures to avoid illegalities. The uncertainty pertaining to stockpile data is, however, high and the proposed amendment could make the surveillance of the illegal marked even harder and there is a risk that release of legal supply could contribute to the continuing global illegal trade.

4. References

CITES CoP15 Doc. 45.1 Rev. 1 <https://cites.org/sites/default/files/eng/cop/15/doc/E15-45-01.pdf>

CITES CoP19 Prop. 3 <https://cites.org/sites/default/files/documents/E-CoP19-Prop-03.pdf>

CITES CoP20 Doc. 84, Annex 3) <https://cites.org/sites/default/files/documents/E-CoP20-084-A3.pdf>

CITES CoP20 Prop. 9 <https://cites.org/sites/default/files/documents/E-CoP20-Prop-09.pdf>

Emslie, R. (2020). *Ceratotherium simum ssp. simum*. *The IUCN Red List of Threatened Species 2020: e.T39317A45814320*. <https://doi.org/10.2305/IUCN.UK.2020-1.RLTS.T39317A45814320.en>

Resolution Conf. 9.14 (Rev. CoP19)

<https://cites.org/sites/default/files/documents/COP/19/resolution/E-Res-09-14-R19.pdf>

UNEP (2025). The Species+ Website. Nairobi, Kenya. Compiled by UNEP-WCMC, Cambridge, UK.
Available at: www.speciesplus.net. [Accessed 18/09/2025].

CoP20 Prop. 10 *Diceros bicornis*

1. Review of listing proposal under CITES

Presentation of proposal: Transfer of 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 this trade are used exclusively for rhinoceros conservation and community development programmes within or adjacent to the rhinoceros range. All other specimens shall be deemed to be specimens of species included in Appendix I and the trade in them shall be regulated accordingly.

Proponents: Namibia.

Summary of available information

Species name: Scientific name: *Diceros bicornis bicornis* (Linnaeus, 1758), Common names: South-western black rhino, South-western black rhinoceros (Emslie, 2020a), Norwegian name: Sort neshorn.

Distribution: *Diceros bicornis bicornis* is distributed on savannah, shrubland and desert in Angola, Namibia and South Africa, the subspecies is extinct in Botswana (Emslie, 2020a).

Conservation status: The subspecies is listed as Near Threatened by the IUCN Red list of Threatened Species, it was last assessed in 2020 (Emslie, 2020a). It is listed on Annex A of the EU Wildlife Trade Regulations (UNEP, 2025). The species *Diceros bicornis* is listed as Critically Endangered by the IUCN Red list of Threatened Species (Emslie, 2020b).

Population trend: By the end of 2024, a population of 6,788 *D. bicornis*, including all subspecies, was distributed in 13 African countries, an increase of 5.2% compared to 2023 (CITES CoP20 Doc. 84, Annex 3). The population increase for the period 1973–2017 (three generations), was estimated as 380% (Emslie, 2020a). Namibia holds 80.8% of the total population of *D. b. bicornis* and the population size was estimated to 2,097 individuals in 2024 (CITES CoP20 Doc. 84, Annex 3).

Habitat status: The species is a browser that can adapt to various habitats, however there is continuing decline in area, extent and/or quality of habitat (Emslie, 2020a).

Trade levels: The main threat to the subspecies is illegal hunting for horn for the international market (Emslie, 2020a). Only hunting trophies can currently be sold legally and Namibia has an export quota for 5 hunting trophies of adult males in 2025 (UNEP, 2025). The international demand for horn is high and most of the horns that are traded internationally are sourced from illegally hunted animals but also horns from stolen stockpiles and trophy hunting are entering the market (Emslie, 2020a; CITES CoP20 Doc. 84, Annex 3). According to the proponent the demand for horn can be met by releasing stockpile (CITES CoP20 Prop. 10). Namibia did not report data on stockpiles to the CITES Secretariat in 2023 and 2024, and overall, there is considerable uncertainty around stockpile data (CITES CoP20 Doc. 84, Annex 3). Since 2015 (see CITES CoP15 Doc. 45.1 (Rev. 1), estimates of rhino horn sourced into the illegal trade have been reported and for the period 2021–2023 the number of rhino horns sourced into illegal trade was between 2,028 and 2,559 (CITES CoP20 Doc. 84, Annex 3). According to the proponent, 72 individuals have been illegally killed in Namibia since 2014 (CITES CoP20 Prop. 10).

2. Potential other information by CITES reviews and on nature management issues in range states

The species is listed on CITES Appendix I as part of the family listing of *Rhinocerotidae* spp. that includes all species and populations except populations of Eswatini, Namibia and South Africa of *Ceratotherium simum simum* (UNEP, 2025).

A proposal to transfer the population of *D. bicornis* in Zimbabwe from Appendix I to Appendix II was rejected at CoP8 (CITES CoP8 Prop. 18).

Resolution Conf. 9.14 (Rev. CoP19) on Conservation of and trade in African and Asian rhinoceroses, the CITES Secretariat presents to the Conference of Parties a report on African and Asian Rhinoceroses – Status, Conservation and Trade by the IUCN Species Survival Commission (IUCN SSC) African and Asian Rhino Specialist Groups and TRAFFIC (CITES CoP20 Doc. 84, Annex 3).

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP17))

Biological criteria for inclusion in Appendix I (Resolution Conf. 9.24 (Rev. CoP17) Annex 1)

- A) *Small wild population*
- B) *Restricted area of distribution*
- C) *Marked decline in number of wild individuals*

Trade criteria for inclusion in Appendix I (Article II, paragraph 1 of the Convention)

The species is or may be affected by trade

Special cases (Resolution Conf. 9.24 (Rev. CoP 17) Annex 3)

Analysis based on information presented in section 1 and 2

- **Biological criteria:** The subspecies has increased rapidly in numbers over the last three generations.
- **Trade criteria:** Illegal hunting for international trade of horn is the main threat to the subspecies in Namibia and other range states.
- **Special cases:** The proposed amendment would lead to a split-listing of *Diceros bicornis*

Finding: Inconclusive

The proposed transfer from Appendix I to Appendix II would lead to split-listing of *Diceros bicornis*, and “Listing of a species in more than one Appendix should be avoided in general in view of the enforcement problems it creates.” (Res. Conf. 9.24 (Rev. CoP17) Annex 3). The proponent also suggests allowing trade in rhino horn stocks and proposes several measures to avoid illegalities. The uncertainty pertaining to stockpile data is, however, high and the proposed amendment could make the surveillance of the illegal marked even harder. There is also a risk that release of legal supply could contribute to the continuing global illegal trade.

4. References

CITES CoP8 Prop. 18 <https://cites.org/sites/default/files/documents/E-CoP8-Prop-18.pdf>

CITES CoP15 Doc. 45.1 (Rev. 1) <https://cites.org/sites/default/files/eng/cop/15/doc/E15-45-01.pdf>

CITES CoP20 Doc. 84, Annex 3) <https://cites.org/sites/default/files/documents/E-CoP20-084-A3.pdf>

CITES CoP20 Prop. 10 <https://cites.org/sites/default/files/documents/E-CoP20-Prop-10.pdf>

Emslie, R. (2020a). *Diceros bicornis* ssp. *bicornis*. *The IUCN Red List of Threatened Species 2020: e.T39318A45814419*. <https://doi.org/10.2305/IUCN.UK.2020-1.RLTS.T39318A45814419.en>

Emslie, R. (2020b). *Diceros bicornis*. *The IUCN Red List of Threatened Species 2020*:
e.T6557A152728945. <https://doi.org/10.2305/IUCN.UK.2020-1.RLTS.T6557A152728945.en>

UNEP. (2025). The Species+ Website. Nairobi, Kenya. Compiled by UNEP-WCMC, Cambridge, UK.
Available at: www.speciesplus.net. [Accessed 18/09/2025].

CoP20 Prop. 11 *Choloepus didactylus* and *Choloepus hoffmanni*

1. Review of listing proposal under CITES

Presentation of proposal: Inclusion of the species *Choloepus hoffmanni* in Appendix II, in accordance with Article II, 2a of the Convention, and inclusion of the species *Choloepus didactylus* in Appendix II, in accordance with Article II, Annex 2b, of the Convention.

Proponents: Brazil, Costa Rica and Panama.

Summary of available information

Species name: Scientific name: *Choloepus hoffmanni* W. Peters, 1858, Common name: Hoffmann's two-toed sloth; Scientific name: *Choloepus didactylus* (Linnaeus, 1758), Common name: Linnaeus' two-toed sloth. Norwegian name (both species): tofingret dovendyr.

Distribution: *Choloepus hoffmanni* is mainly found in tropical forest, in two disjunct areas of Central and South America in the range states: Bolivia (Plurinational State of), Brazil, Colombia, Costa Rica, Ecuador, Honduras, Nicaragua, Peru and Venezuela (Bolivarian Republic of) (UNEP, 2025).

Conservation status: *Choloepus hoffmanni* is listed as Least Concern on the IUCN Red List of Threatened Species, it was last assessed in 2022 (Plese et al., 2022). According to the proponent, the species is considered Near Threatened in Brazil, Threatened in Costa Rica and Endangered in Honduras (CoP20 Prop. 11, and references therein). *Choloepus didactylus* is also listed as Least Concern by IUCN (Chiarello et al., 2022).

Population trend: The population trend is decreasing (Plese et al., 2022).

Habitat status: The main threat to the species is habitat loss due to deforestation (Plese et al., 2022).

Trade levels: *Choloepus hoffmanni* is hunted for meat and is traded as a pet in Colombia and Honduras, according to Plese et al., (2022, and references therein) and the proponent (CITES CoP20 Prop. 11, and references therein), domestic illegal trade is an increasing threat. For *Choloepus didactylus* domestic illegal trade seems to be increasing in Bolivia (Chiarello et al., 2022).

2. Potential other information by CITES reviews and on nature management issues in range states

Choloepus hoffmanni was listed on CITES Appendix III by Costa Rica in the period 1976-2019 (UNEP, 2025).

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological and trade criteria for inclusion in Appendix II (Resolution Conf. 9.24 (Rev. CoP 17) Annex 2a)

- A) Trade regulation needed to prevent future inclusion in Appendix I
- B) Regulation of trade required to ensure that harvest from the wild is not reducing population to level where survival might be threatened by continued harvest or other influences

Biological and trade criteria for inclusion in Appendix II (Resolution Conf. 9.24 (Rev. CoP 17) Annex 2b)

- A) Specimens in trade resemble those of species listed in Appendix II under Resolution Conf. 9.24 (Rev. CoP17) Annex 2 a or listed in Appendix I

Analysis based on information presented in section 1 and 2

- **Biological criteria:** Both species were listed as Least Concern in 2022, with population decrease mainly caused by habitat loss.
- **Trade criteria:** Some illegal trade has been documented in some range states, but there is little evidence for international trade.

Finding: Negative

Choloepus hoffmanni does not currently appear to meet the principles for inclusion in CITES Appendix II, in accordance with Article II of the Convention, nor the criteria of Annex 2a of Resolution Conf. 9.24 (Rev. CoP17). *Choloepus didactylus* does not appear to meet the principles for inclusion in CITES Appendix II, in accordance with Article II, nor the criteria of Annex 2b of Resolution Conf. 9.24 (Rev. CoP17).

4. References

- Chiarello, A., Plese, T., De Thoisy, B., Pool, M., Aliaga-Rossel, E., Santos, P., & Moraes-Barros, N. (2022). *Choloepus didactylus*. The IUCN Red List of Threatened Species 2022: e.T4777A210443323. <https://dx.doi.org/10.2305/IUCN.UK.2022-2.RLTS.T4777A210443323.en>
- CITES CoP20 Prop. 11 <https://cites.org/sites/default/files/documents/F-CoP20-Prop-11.pdf>
- Plese, T., Chiarello, A., Turcios Casco, M., Aguilar Borbón, A., Santos, P., Aliaga-Rossel, E., & Moraes-Barros, N. (2022). *Choloepus hoffmanni*. The IUCN Red List of Threatened Species 2022: e.T4778A210443596. <https://dx.doi.org/10.2305/IUCN.UK.2022-2.RLTS.T4778A210443596.en>
- UNEP. (2025). The Species+ Website. Nairobi, Kenya. Compiled by UNEP-WCMC, Cambridge, UK. Available at: www.speciesplus.net. [Accessed 18/09/2025].

CoP20 Prop. 12 *Cercocebus chrysogaster*

1. Review of listing proposal under CITES

Presentation of proposal: Transfer of *Cercocebus chrysogaster* (golden-bellied mangabey) from Appendix II to Appendix I in accordance with Resolution Conf. 9.24 (Rev. CoP17), Annex 1, Criterion B i) (restricted area of distribution, fragmentation, and occurrence only in two sites), iii) (high vulnerability to intrinsic and extrinsic factors) and iv) (significant decrease in the area and quality of habitat and in the wild population), as well as Criterion C i) (marked decline in the population size that is ongoing and has occurred in the past) and ii) (inferred from a decrease in the habitat, levels of exploitation, and high vulnerability to intrinsic and extrinsic factors).

Proponents: Democratic Republic of the Congo.

Summary of available information

Species name: Scientific name: *Cercocebus chrysogaster* Lydekker, 1900, Common name: golden-bellied mangabey, Norwegian name for genus *Cercocebus*: mangabeyer. Taxonomic note: *Cercocebus chrysogaster* was until 2007 subspecies *Cercocebus agilis chrysogaster*, the taxonomic change was adopted at CITES CoP14 (UNEP, 2025).

Distribution: The forest living, semi-terrestrial species is endemic to the Democratic Republic of the Congo where two separated populations exist (Hart & Thomson, 2020).

Conservation status: *Cercocebus chrysogaster* is listed as Endangered A4cd (reduction in population size of more than 50% expected over three generations coupled to habitat reduction and exploitation) on the IUCN Red List of Threatened Species, the last assessment was made in 2020, its previous status was Data Deficient (Hart & Thomson, 2020). It is listed on Annex B of the EU Wildlife Trade Regulations as part of the Order primates (UNEP, 2025).

Population trend: The population trend is decreasing and a reduction of at least 50% is expected over the three-generation time period 1999-2029, the population is severely fragmented and its size unknown (Hart & Thomson, 2020).

Habitat status: The habitat of *C. chrysogaster* is in decline due to logging, the distribution range is smaller than previously believed (Hart & Thomson, 2020).

Trade levels: The species is traded as bushmeat domestic and regionally, and hunting is considered the main threat to their survival (Hart & Thomson, 2020 and references therein). International trade is primarily in live animals and according to the proponent its popularity as a pet is increasing (CITES CoP20 Prop. 12). For the period 2018 (first record) to 2023, 139 individuals from the wild were registered exported for commercial purposes, the number of registered imports for the same period was 73 (CITES Trade Database, 2025). Illegal trade of juveniles across borders has been documented (Fobar, 2020).

2. Potential other information by CITES reviews and on nature management issues in range states

The species is listed on Class B of the African Convention on the Conservation of Nature and Natural Resources (Hart & Thomson, 2020, and references therein).

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological criteria for inclusion in Appendix I (Resolution Conf. 9.24 (Rev. CoP17) Annex 1)

- A) *Small wild population*
- B) *Restricted area of distribution*
- C) *Marked decline in number of wild individuals*

Trade criteria for inclusion in Appendix I (Article II, paragraph 1 of the Convention)

The species is or may be affected by trade

Analysis based on information presented in section 1 and 2

- **Biological criteria:** The population in the wild is expected to decline more than 50% over three generations, it is fragmented into two widely separated populations in the Congo Basin.
- **Trade criteria:** Some international trade for commercial purposes occurs and some illegal trade has been documented.

Finding: *Positive*

Cercocebus chrysogaster is included in CITES Appendix II, international trade is regulated and hunting for the domestic bushmeat market seems to be a greater threat to its future survival than international trade. However, the biological criteria for inclusion in Appendix I according to Resolution Conf. 9.24 (Rev. CoP17) Annex 1, particularly B and C, are met as the species is threatened with extinction and affected by trade.

4. References

CITES CoP20 Prop. 12 <https://cites.org/sites/default/files/documents/E-CoP20-Prop-12.pdf>

CITES Trade Database (2025). Compiled by UNEP-WCMC for the CITES Secretariat. Available at: <https://trade.cites.org>. Accessed [18/09/2025].

Fobar, R. (2020, February 19). *Largest confiscation of smuggled monkeys sheds light on African trafficking*. National Geographic. <https://www.nationalgeographic.com/animals/article/animals-from-africa-s-biggest-trafficked-primate-confiscation-fo>

Hart, J. A., & Thompson, J. (2020). *Cercocebus chrysogaster*. The IUCN Red List of Threatened Species 2020: e.T4207A17956177. <https://dx.doi.org/10.2305/IUCN.UK.2020-2.RLTS.T4207A17956177.en>

UNEP (2025). The Species+ Website. Nairobi, Kenya. Compiled by UNEP-WCMC, Cambridge, UK. Available at: www.speciesplus.net. [Accessed 18/09/2025].

CoP20 Prop. 13 *Loxodonta africana*

1. Review of listing proposal under CITES

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

Proponents: Namibia.

Summary of available information

Species name: Scientific name: *Loxodonta africana*, Common names: African savannah elephant, African elephant, Norwegian name: savanneelefant.

Distribution: The proposal concerns the population in Namibia, which is one of 37 range states of *L. africana* in Africa (Gobush et al., 2022).

Conservation status: *Loxodonta africana* is listed as Endangered A2bd (population reduction of more than 50% over three generations related to the level of exploitation) on IUCN Red List of Threatened Species, it was last assessed in 2020 (Gobush et al., 2022). The species is listed in Annex A of the EU Wildlife Trade Regulations, except the populations of Botswana, Namibia, Zimbabwe, and South Africa that are listed in Annex B. It is listed on Appendix II by CMS.

Populations of Botswana, Namibia, South Africa and Zimbabwe are included in CITES Appendix II subject to annotation 2 (Annotation A10), all other populations are included in Appendix I (UNEP, 2025).

Population trend: The global population trend is decreasing, and the population goes through extreme fluctuations (Gobush et al., 2022). The population of *L. africana* in Namibia is not small or in decline (Thouless et al., 2016). According to the proponent the Namibian population was estimated at 25,664 individuals in 2023 (CITES CoP20 Prop. 13, Table 1).

Habitat status: Not relevant.

Trade levels: For 2025, Namibia has a quota for tusks and other trophies from 90 animals (UNEP, 2025). Throughout its range, illegal hunting for ivory is a major threat to *L. africana* (Gobush et al., 2022; Thouless et al., 2016). Illegal hunting as cause of mortality has decreased since 2011, but large seizures of ivory have been made indicating that stocked ivory is traded internationally (UNODC, 2024).

According to the proposal, Namibia has 46,268.30 kg government owned stock of registered raw ivory (whole tusks and pieces) of Namibian origin, that they seek to be able to trade for commercial purposes (CITES CoP20 Prop. 13).

2. Potential other information by CITES reviews and on nature management issues in range states

At CoP19, Parties renewed two Decisions related to this provision of Resolution Conf. 10.10 (Rev. CoP19) on Trade in elephant specimens: 19.156 Parties are urged to: a) comply with the provisions of paragraph 7 e) of Resolution Conf. 10.10 (Rev. CoP19) on Trade in elephant specimens concerning reporting on stockpile inventories to ensure the required information is submitted to the Secretariat every year; b) ensure that adequate funding, capacity building and training are available to ensure ivory stockpiles are inventoried, secured, and when appropriate, disposed of properly.

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP17))

Biological criteria for inclusion in Appendix I (Res. Conf. 9.24 (Rev. CoP17) Annex 1)

- A) Small wild population
- B) Restricted area of distribution
- C) Marked decline in number of wild individuals

Trade criteria for inclusion in Appendix I (Article II, paragraph 1 of the Convention)

The species is or may be affected by trade

Precautionary measures (Resolution Conf. 9.24 (Rev. CoP 17) Annex 4)

Based in Annex 4 C this proposal to amend a special measure pursuant to paragraph A. 2. iii. needs to be approved by the CoP based on an assessment of management measures described in the proposal and efficacy of enforcement controls.

Analysis based on information presented in section 1 and 2

- **Biological criteria:** The population of *L. africana* in Namibia is not small, restricted, or in decline.
- **Trade criteria:** The demand for ivory is high internationally and illegal trade occurs.
- **Precautionary measures:** The proponent has provided detailed precautionary measures to meet the requirements outlined in Annex 4 A 2 iii of Resolution 9.24 (Rev. Cop 17). There is, however, uncertainty regarding the current stockpiles of ivory in Namibia.

Finding: *Inconclusive*

The proponent suggests allowing trade in stocks of ivory and proposes several measures to avoid illegalities. The uncertainty pertaining to stockpile data is, however, high and the proposed amendment could make the surveillance of illegal international trade even harder. There is also a risk that release of legal supply could contribute to the continuing global illegal trade.

4. References

CITES CoP20 Prop. 13. <https://cites.org/sites/default/files/documents/E-CoP20-Prop-13.pdf>

Gobush, K. S., Edwards, C. T. T., Balfour, D., Wittemyer, G., Maisels, F., & Taylor, R. D. (2022). *Loxodonta africana* (amended version of 2021 assessment). *The IUCN Red List of Threatened Species 2022*: e.T181008073A223031019. <https://dx.doi.org/10.2305/IUCN.UK.2022-2.RLTS.T181008073A223031019.en>

Resolution Conf. 10.10 (Rev. CoP19)

<https://cites.org/sites/default/files/documents/COP/19/resolution/E-Res-10-10-R19.pdf>

Thouless, C. R., Dublin, H. T., Blanc, J. J., Skinner, D. P., Daniel, T. E., Taylor, R. D., Maisels, F., Frederick, H. L., & Bouché, P. (2016). *African Elephant Status Report 2016: An update from the African Elephant Database* (Occasional Paper Series of the IUCN Species Survival Commission No. 60). IUCN, Gland, Switzerland. <https://www.savetheelephants.org/wp-content/uploads/2017/09/2016-AfESG-African-Elephant-Status-Report.pdf>

UNEP. (2025). The Species+ Website. Nairobi, Kenya. Compiled by UNEP-WCMC, Cambridge, UK. Available at: www.speciesplus.net. [Accessed 18/09/2025].

United Nations Office on Drugs and Crime (UNODC). (2024). *World Wildlife Crime Report 2024: Trafficking in protected species*. United Nations Publications. https://digitallibrary.un.org/record/4047217/files/Wildlife2024_Final.pdf

CoP20 Prop. 14 *Loxodonta africana*

1. Review of listing proposal under CITES

Presentation of proposal: Amend annotation A10 (formerly Annotation 2) pertaining to the elephant populations of Botswana, Namibia, South Africa and Zimbabwe to harmonize the conditions of trade in live African elephants.

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

Summary of available information

Species name: Scientific name: *Loxodonta africana* (Blumenbach, 1797); Common names: African savannah elephant, African elephant; Norwegian name: savanneelefant.

Distribution: The species inhabits 37 range states in Africa.

Conservation status: *Loxodonta africana* is listed as Endangered A2bd (population reduction of more than 50% over three generations related to the level of exploitation) on IUCN Red List of Threatened Species, it was last assessed in 2020 (Gobush et al., 2022). The species is listed in Annex A of the EU Wildlife Trade Regulations, except the populations of Botswana, Namibia, Zimbabwe, and South Africa listed in Annex B (UNEP, 2025). It is listed on Appendix II by CMS.

Population trend: The populations of *L. africana* in Botswana, Namibia, South Africa and Zimbabwe are not small or in decline (Thouless et al., 2016).

Habitat status: Not applicable.

Trade levels: Quotas for 2025: Botswana for tusks and other trophies from 400 animals, Cameroon for tusks as hunting trophies from 40 animals, Namibia: tusks and other trophies from 90 animals, United Republic of Tanzania for tusks and other trophies from 50 wild-sourced animals, Zambia for tusks as part of hunting trophies from 80 animals and Zimbabwe for tusks as hunting trophies from 500 animals (UNEP, 2025).

2. Potential other information by CITES reviews and on nature management issues in range states

At CoP18 a proposal to amend Annotation 2 by Botswana, Namibia and Zimbabwe was rejected (CITES CoP18 Prop. 11).

Botswana, Democratic Republic of the Congo, Eswatini, Namibia, South Africa, United Republic of Tanzania, Zambia and Zimbabwe hold reservation against the CoP18 update of the references to the Resolutions mentioned in Annotation 2 (now A10) relating to the populations of *Loxodonta africana* in Botswana, Namibia, South Africa and Zimbabwe (UNEP, 2025).

At CoP19 a proposal to amend Annotation 2 (now A10) by Zimbabwe was rejected (CITES CoP19 Prop. 4) as it was considered a risk that the Precautionary measures, as detailed in Annex 4 of Resolution Conf. 9.24 (Rev. CoP17) was not met if allowing trade in ivory. In the present proposal (CITES CoP20 Prop. 14), Paragraph g) pertaining to trade in raw and government owned ivory has been deleted.

At a Dialogue Meeting held in Botswana in September 2024, attended by 31 of the 37 African elephant range states, it was agreed (by consensus) to the amendments to Annotation A10 pertaining to the elephant populations of Botswana, Namibia, South Africa and Zimbabwe to harmonize the conditions of trade in live African elephants (CITES CoP20 Doc. 76.6, Annex 2). These amendments are identical to those of the proposal (CITES Cop20 Prop. 14).

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP17))

Biological criteria for inclusion in Appendix I (Res. Conf. 9.24 (Rev. CoP17) Annex 1)

- A) *Small wild population*
- B) *Restricted area of distribution*
- C) *Marked decline in number of wild individuals*

Trade criteria for inclusion in Appendix I (Article II, paragraph 1 of the Convention)

The species is or may be affected by trade

Precautionary measures (Resolution Conf. 9.24 (Rev. CoP 17) Annex 4)

Analysis based on information presented in section 1 and 2

- **Biological criteria:** The populations in question are not small or in decline.
- **Trade criteria:** Trade is strictly regulated.
- **Precautionary measures (if relevant):** The suggested amendment of Annotation 2 (A10), as agreed upon by range states at the 2024 Dialogue Meeting, will meet the Precautionary measures, as detailed in Annex 4 of Resolution Conf. 9.24 (Rev. CoP17).

Finding: *Positive*

Proposal 14 submitted to CoP20 seeks to amend annotation A10 to the Appendix II listing of the African elephant populations of Botswana, Namibia, South Africa, and Zimbabwe, primarily by deleting paragraphs g) and h) concerning trade in raw ivory, and making editorial and clarifying changes to paragraphs b), e), and f), as well as removing outdated references to Resolutions and Decisions. The deletion of paragraphs g) and h) ensures that raw ivory remains treated as Appendix I, requiring a separate proposal under Article XV for any commercial trade. The proposal introduces a substantive change by permitting commercial trade in leather goods from Zimbabwe, aligning it with the other Parties and simplifying the annotation in accordance with Decision 19.167. This change is similar to an Appendix I to II transfer and the proposal should therefore be evaluated with reference to the criteria in Resolution Conf. 9.24 (Rev. CoP17) Annex 1 and the precautionary measures set out in Annex 4 of that Resolution. Zimbabwe's elephant population is large, stable, and well-managed, and does not meet the biological criteria for Appendix I. The proposal satisfies all relevant criteria under Resolution Conf. 9.24 (Rev. CoP17) Annex 4.

4. References

CITES CoP18 Prop. 11

<https://cites.org/sites/default/files/eng/cop/18/prop/19032019/E-CoP18-Prop-11.pdf>

CITES CoP19 Prop. 4 https://cites.org/sites/default/files/documents/E-CoP19-Prop-04_1.pdf

CITES CoP20 Prop. 14

<https://cites.org/sites/default/files/documents/COP/20/prop/E-CoP20-Prop-14.pdf>

CITES CoP20 Doc. 76.6, Annex 2

<https://cites.org/sites/default/files/documents/COP/20/agenda/E-CoP20-076-06.pdf>

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CoP20 Prop. 15 *Bycanistes* spp. and *Ceratogymna* spp.

1. Review of listing proposal under CITES

Presentation of proposal: Include the genus *Ceratogymna* and the genus *Bycanistes* in Appendix II in accordance with Article II, paragraph 2(a) of the Convention and Resolution Conf. 9.24 (Rev. CoP17), Annex 2(a) Criterion B and in accordance with Article II, paragraph 2(b) of the Convention and Resolution Conf. 9.24 (Rev. CoP17), Annex 2(b) Criterion A.

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

Summary of available information

Species name: The nomenclature used below is identical to the nomenclature used in the proposal, which according to the proposal “follows the current CITES standard nomenclature reference for birds: Dickinson (2003)”. More recent taxonomic references and scientific literature recognize taxonomic and nomenclatural changes within the genus *Bycanistes*; see comment on page 2 in CITES CoP20 Prop. 15 and Table 1 in the proposal for scientific names and synonyms.

Scientific names			Common names	
Genus	Species	Subspecies	English	Norwegian
<i>Ceratogymna</i> (Bonaparte, 1854)	<i>Ceratogymna atrata</i> (Temminck, 1835)		Black-casqued Hornbill	svarthornfugl
<i>Ceratogymna</i> (Bonaparte, 1854)	<i>Ceratogymna elata</i> (Temminck, 1831)		Yellow-casqued Hornbill	høvdinghornfugl
<i>Bycanistes</i> (Cabanis & Heine, 1860)	<i>Bycanistes brevis</i> (Friedmann, 1929)		Silvery-cheeked Hornbill	sølvkinnhornfugl
	<i>Bycanistes bucinator</i> (Temminck, 1824)		Trumpeter Hornbill	trompethornfugl
	<i>Bycanistes cylindricus</i>	<i>B. c. cylindricus</i> (Temminck, 1831)	Brown-cheeked Hornbill	brunkinnhornfugl
		<i>B. c. albotibialis</i> (Cabanis & Reichenow, 1877)		
	<i>Bycanistes fistulator</i>	<i>B. f. fistulator</i> (Cassin, 1852)	Piping Hornbill	pipehornfugl
		<i>B. f. sharpii</i> (Elliot, 1873)		
		<i>B. f. duboisi</i> (Slater, 1922)		
	<i>Bycanistes subcylindricus</i>	<i>B. s. subcylindricus</i> (Slater, 1870)	Black-and-white-casqued Hornbill	gråkinnhornfugl
		<i>B. s. subquadratus</i> (Cabanis, 1880)		

Distribution: All the species have a distribution range that encompasses several countries on the African continent. See Table 2 in CITES CoP20 Prop. 15.

Conservation status: *Ceratogymna elata* and *Bycanistes cylindricus* are listed as Vulnerable (criteria (A2cd+3cd+4cd) on the IUCN Red List due to population declines: main criterion (A) Population size reduction measured over the longer of 10 years or 3 generations, in the past (A2), in the future (A3), as well as a period that includes both the past and the future (A4) (BirdLife International, 2016; BirdLife International, 2018). The other species are listed as Least Concern (see also Table 2 in CITES CoP20 Prop. 15). Not listed in Bern, EU, or CMS.

Population trend: All but one of the species appear to have declining population trends. See Table 2 in CITES CoP20 Prop. 15. *Bycanistes subcylindricus* with unknown trend. *Ceratogymna elata* and *Bycanistes cylindricus* are suspected to be undergoing rapid population declines (BirdLife International, 2016; BirdLife International, 2018). Overall, populations of African hornbill species are declining, and their geographic ranges are contracting (Lado et al., 2025).

Habitat status: Fragmented for *Ceratogymna elata* and *Bycanistes cylindricus*. Increasingly fragmented for the other species. As largely forest dwelling species, most *Ceratogymna* spp. and *Bycanistes* spp. are threatened by habitat loss/degradation and fragmentation (Table 2 in CITES CoP20 Prop. 15). African hornbills are threatened by logging and wood harvesting and habitat degradation, in addition to hunting and collecting for trade/commercial purposes (Jensen & Arcilla, 2024; Su et al., 2024; Lado et al., 2025; Tinsman et al., 2025)

Trade levels: Trade appears to be significant and rising over time, involving both live birds and body parts, particularly skulls and casques, with African hornbills representing the large majority of traded hornbill species (Tinsman et al. 2025). There is strong evidence of a substantial international trade in African hornbills of the genera *Ceratogymna* and *Bycanistes*, which is currently not regulated by CITES (Jensen & Arcilla, 2024; Lado et al., 2025; Su et al., 2024; Tinsman et al., 2025). Whereas most of the Asian hornbills were listed in CITES Appendix II in 1992, international trade in African hornbills remains unregulated and under-documented. Consequently, legal trade data are minimal or absent. Almost all trade involves wild specimens and there is no or essentially no captive-bred trade (Su et al., 2024; Lado et al., 2025; Tinsman et al., 2025).

Trade in wild-caught hornbills is considered detrimental, especially when combined with hunting and habitat pressures. According to Tinsman et al. (2025), trade in the species *Ceratogymna elata* and *Bycanistes cylindricus* currently poses an existential threat to these species. Furthermore, Tinsman et al. (2025) argue that “every African genus of hornbill is traded internationally. To avoid shifting demand onto a few remaining unprotected species (...) we call for CITES parties to list the hornbill families in Appendix II at the next Conference of the Parties.”

2. Potential other information by CITES reviews and on nature management issues in range states

The proposal has a strong scientific underpinning that builds on the findings in a recent publication by Tinsman et al. (2025) in the journal *Biological Conservation*. See also Table 3 in CITES CoP20 Prop. 15 for an overview of apparent national legal protections of African hornbills across their distribution ranges, which is based on Tinsman et al., 2025).

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological and trade criteria for inclusion in Appendix II (Resolution Conf. 9.24 (Rev. CoP 17) Annex 2a)

- A) Trade regulation needed to prevent future inclusion in Appendix I
 B) Regulation of trade required to ensure that harvest from the wild is not reducing population to level where survival might be threatened by continued harvest or other influences

Biological and trade criteria for inclusion in Appendix II (Resolution Conf. 9.24 (Rev. CoP 17) Annex 2b)

- A) Specimens in trade resemble those of species listed in Appendix II under Resolution Conf. 9.24 (Rev. CoP17) Annex 2 a or listed in Appendix I

Analysis based on information presented in section 1 and 2

- **Biological criteria:** All but one of the species appear to have declining population trends.
- **Trade criteria:** The following biological and trade criteria are met:
 - 1) Regulation of trade required to ensure that harvest from the wild is not reducing population to level where survival might be threatened by continued harvest or other influences.
 - 2) Specimens in trade resemble those of species listed in Appendix II under Resolution Conf. 9.24 (Rev. CoP17) Annex 2a.

Finding: *Positive*

The criteria for including the genus *Ceratogymna* and the genus *Bycanistes* in Appendix II are met in accordance with Resolution Conf. 9.24 (Rev. CoP17), Annex 2a, Criterion B, as well as Annex 2b, Criterion A.

4. References

BirdLife International. (2016). *Ceratogymna elata*. In *The IUCN Red List of Threatened Species* (2016: e.T22682627A92954374). International Union for Conservation of Nature. <https://dx.doi.org/10.2305/IUCN.UK.2016-3.RLTS.T22682627A92954374.en>

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CITES CoP20 Prop. 15 <https://cites.org/sites/default/files/documents/E-CoP20-Prop-15.pdf>

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CoP20 Prop. 16 *Gyps africanus* and *Gyps rueppelli*

1. Review of listing proposal under CITES

Presentation of proposal: Transfer of the species *Gyps africanus* and *Gyps rueppelli* from Appendix II to Appendix I in accordance with Article II 1, Annex 1 A of the Convention.

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

Summary of available information

Species name:

Scientific name: *Gyps africanus* (Salvadori, 1865). Common name: White-backed Vulture, African White-backed Vulture. Norwegian name: hvitryggribb.

Scientific name: *Gyps rueppelli* (Brehm, 1852). Common name: Rüppell's Vulture, Rüppell's Griffon, Rüppell's Griffon Vulture. Norwegian name: skjellgribb

Distribution:

Gyps africanus is the most widespread and common vulture in Africa (BirdLife International, 2021a). It occurs from Senegal, Gambia and Mali in the west, throughout the Sahel region to Ethiopia and Somalia in the east, through East Africa into Mozambique, Zimbabwe, Botswana, Namibia and South Africa in the south. Range states: Angola, Benin, Botswana, Burkina Faso, Burundi, Cameroon, Central African Republic, Chad, Côte d'Ivoire, Democratic Republic of the Congo, Djibouti, Equatorial Guinea, Eritrea, Eswatini, Ethiopia, Gabon, Gambia, Ghana, Guinea, Guinea Bissau, Kenya, Liberia, Malawi, Mali, Mauritania, Mozambique, Namibia, Niger, Nigeria, Rwanda, Senegal, Sierra Leone, Somalia, South Africa, South Sudan, Sudan, Togo, Uganda, United Republic of Tanzania, Zambia, Zimbabwe.

Gyps rueppelli occurs throughout the Sahel region of Africa from Senegal, Gambia and Mali in the west to Sudan, South Sudan and Ethiopia in the east. Also south through the savanna regions of East Africa in Kenya, Tanzania and Mozambique (BirdLife International, 2021b). Range states: Benin, Burkina Faso, Cameroon, Central African Republic, Chad, Côte d'Ivoire, Democratic Republic of the Congo, Djibouti, Egypt, Eritrea, Ethiopia, Gambia, Ghana, Guinea, Guinea Bissau, Kenya, Mali, Mauritania, Niger, Nigeria, Portugal, Rwanda, Saudi Arabia, Senegal, Sierra Leone, Somalia, South Sudan, Sudan, Togo, Uganda, United Republic of Tanzania, Zambia, Zimbabwe. In North Africa *Gyps rueppelli* was considered casual or a vagrant (Morocco, Algeria, Tunisia and Egypt) but this species appears to have been colonizing the African Mediterranean region in the last 10 years (Westrip et al., 2022).

Conservation status:

Gyps africanus. The IUCN Red List of Threatened Species (BirdLife International, 2021a): listed as CR globally due to population reduction, under criteria A2abcd+3bcd+4abcd.

Gyps rueppelli. The IUCN Red List of Threatened Species (BirdLife International, 2021b): listed as CR globally due to population reduction, under criteria under criteria A2abcd+3bcd+4abcd and listed as CR in the Mediterranean region under criteria D (very small population size).

Gyps africanus and *Gyps rueppelli* are listed in Appendices I (since 1979) and II (since 2017) of the Convention on Migratory Species (CMS). The following CMS Instruments apply to both species:

- Memorandum of Understanding on the Conservation of Migratory Birds of Prey in Africa and Eurasia.
- Multi-species Action Plan to Conserve African-Eurasian Vultures (Vulture MsAP) - CMS Technical Series No.35/Raptors MOU Technical Publication No.5

- [CMS Resolution 12.10 \(Rev.COP14\) - Conservation of African-Eurasian vultures](#)
- [West African Vulture Conservation Action Plan 2023-2043](#)

Both species are also listed in the EU Wildlife Trade Regulations (Commission Regulation (EU), 2023), Annex B, Order listing Falconiformes spp. (which includes all species in the Order Accipitriformes, which is the Order that *Gyps* spp. belong to).

Population trend: Decreasing trends for both species (Ogada et al., 2016; Shaw et al., 2023). *Gyps africanus* is the most widespread and common vulture in Africa but overall, it appears to have undergone a very rapid decline of 63-89% over three generations (BirdLife International, 2021a). *Gyps rueppelli* was formerly abundant but has undergone declines of ca. 5.8% per year, equating to 92.5% (range: 88-98%) over three generations (43.3 years) (BirdLife International, 2021b). Extremely rapid declines have been reported for *Gyps rueppelli* in the Sahel zone in West Africa; abundant in the 1970s but no birds observed under vehicle-based transect surveys in 2006 (BirdLife International, 2021b). Intentional and unintentional (targeted at mammalian predators) poisoning represents major threats.

Habitat status: Increasingly fragmented (Ogada et al., 2016; Shaw et al., 2023). Both *Gyps africanus* and *Gyps rueppelli* are susceptible to habitat conversion to agro-pastoral systems and reduced abundance of wild ungulates leading to a reduced availability of carrion (BirdLife International, 2021a; BirdLife International, 2021b).

Trade levels: Trade in *Gyps africanus* and *Gyps rueppelli* is extensive across West, Central, and parts of Southern and Eastern Africa, driven mainly by belief-based use, as well as for wild meat (Botha et al., 2017; BirdLife International, 2021a; BirdLife International, 2021b, Chandra et al., 2024). Donald et al. (2024) used seven global data sets on birds in trade to identify species and groups of species at particular risk. The trade prevalence score was the sum of the number of data sets that each species was recorded in and so ranged from 0 to 7. *Gyps rueppelli* got the highest possible score (7) and *Gyps africanus* got the second highest possible score (6). Almost all vultures in trade are wild-sourced, with no evidence of significant captive-breeding. Offtakes of wild individuals and trade in wild-sourced birds is considered highly detrimental to wild populations of both species (Ogada et al., 2017; Shaw et al., 2024). Cross-border trade is well-established, linking at least 10–12 African countries, and much of it is illegal, conducted without CITES permits and in contravention of national laws. This trade is a major driver of population declines and local extirpations, often associated with poisoning events to obtain carcasses. While some low-level legal trade in wild-sourced specimens exists for scientific or personal purposes, it is dwarfed by the scale of the illegal trade.

2. Potential other information by CITES reviews and on nature management issues in range states

Overview of legal instruments for species-specific measures on the national level can be found in Annex 3 of CITES CoP20 Prop. 16.

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological criteria for inclusion in Appendix I (Resolution Conf. 9.24 (Rev. CoP17) Annex 1)

- A) *Small wild population*
- B) *Restricted area of distribution*
- C) *Marked decline in number of wild individuals*

Trade criteria for inclusion in Appendix I (Article II, paragraph 1 of the Convention)

The species is or may be affected by trade

Analysis based on information presented in section 1 and 2

- **Biological criteria:** *Gyps africanus* and *Gyps rueppelli* populations have undergone marked declines in number of wild individuals the last 50 years and the decline is ongoing.
- **Trade criteria:** Trade is a major threat to both *Gyps africanus* and *Gyps rueppelli*.

Finding: Positive

Extinction risk of *Gyps africanus* and *Gyps rueppelli* is critically high, and continued trade will likely exacerbate these extinction risks. The criteria for transfer of the species *Gyps africanus* and *Gyps rueppelli* from Appendix II to Appendix I in accordance with Article II, paragraph 1 of the Convention and biological criteria as set out in Annex 1 A of Resolution Conf. 9.24 (Rev. CoP17), are met.

4. References

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- CITES CoP20 Prop. 16. <https://cites.org/sites/default/files/documents/E-CoP20-Prop-16.pdf>
- Convention on the Conservation of Migratory Species of Wild Animals (2015). *Birds of Prey (Raptors)*. CMS Raptors MOU. <https://www.cms.int/raptors/en/legalinstrument/birds-prey-raptors>
- Commission Regulation (EU) 2023/966 of 15 May 2023 amending Council Regulation (EC) No 338/97 to reflect the amendments adopted at the 19th meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora. *Official Journal of the European Union*, L 133, 1–124. Retrieved from <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32023R0966>
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J., Croes, B. M., Odino, M., Kapila, S., Wairasho, P., Rutz, C., Botha, A., Gallo-Orsi, U., Murn, C., Maude, G., & Thomsett, S. (2024). African savanna raptors show evidence of widespread population collapse and a growing dependence on protected areas. *Nature Ecology & Evolution*, 8(1), 45-56. <https://doi.org/10.1038/s41559-023-02236-0>

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CoP20 Prop. 17 *Falco peregrinus*

1. Review of listing proposal under CITES

Presentation of listing proposal: To transfer *Falco peregrinus* from Appendix I to Appendix II in accordance with the Precautionary Measures of Resolution Conf. 9.24 (Rev. CoP17) Annex 4.

Proponents: Canada and United States of America.

Summary of available information

Species name: Scientific name: *Falco peregrinus* (Tunstall, 1771). Common name: Peregrine falcon (other names listed in CITES website: Barbary Falcon, Peregrine, Duck Hawk). Norwegian name: Vandrefalk.

Distribution: *Falco peregrinus* has one of the most extensive geographic distributions of any bird species, occurring on every continent except Antarctica, with 196 sovereign countries and 18 territories or regions listed as range states (UNEP, 2025; see Appendix).

Conservation status: Listed as Least Concern on the IUCN's most recent global (BirdLife International, 2021a), European (BirdLife International 2021b) and Mediterranean (Westrip et al., 2022) Red List assessments. *Falco peregrinus* was also assessed as Least Concern on the global IUCN Red List also in 2014, 2015 and 2016. *Falco peregrinus* is listed in:

- Convention on Migratory Species (CMS) Appendices I (since 1979) and II (since 2017).
- EU Wildlife Trade Regulations (Commission Regulation (EU) 2023), Annex B, Order listing Falconiformes spp.
- Bern Convention Appendix II. Appendix II (strictly protected fauna species) includes all species in the order Falconiformes

Population trend: Global and European populations appear to be Increasing (BirdLife International 2021a; 2021b), whereas population trend in the Mediterranean region is unknown (Westrip et al., 2022). The global population of *Falco peregrinus* is generally considered to be increasing, largely due to recovery following the ban on DDT in the 1970s. DDT caused eggshell thinning in *Falco peregrinus*, leading to poor breeding success and severe population declines.

Habitat status: Not fragmented. Historically, populations were limited mainly by pesticide exposure, not habitat. Today, habitat can affect local distribution, but it is not the primary limiting factor on a global scale (BirdLife International, 2021a).

Trade levels: *Falco peregrinus* frequently enter the wildlife trade for use as display animals, by falconers or hobbyists for sport and recreation (Panter et al., 2023). Panter et al. (2023) analysed global records of legal, commercial trade in CITES-listed raptors between 1975 and 2020 and reported an overall increase in trade volume over time. During this period, *Falco peregrinus* ranked among the ten most frequently traded CITES-listed diurnal and nocturnal raptor species. A total of 13,390 live *Falco peregrinus* individuals were recorded in commercial trade, representing 7.1% of the global trade in raptors.

Donald et al. (2024) used seven global data sets on birds in trade – which included records of both international and domestic, legal and illegal trade – to identify species and groups of species at particular risk. They used the frequency with which species were recorded in the data sets as the basis for a trade prevalence score. *Falco peregrinus* got the highest possible score.

There remains a sustained and significant demand for live *Falco peregrinus* for use in falconry (BirdLife International, 2021a; Garrido et al., 2021). This demand is particularly pronounced in the Arab Gulf region, where falconry constitutes a deeply rooted cultural tradition that continues to be actively

practiced (Krawietz, 2016). As of August 17, 2025, a Google Scholar search using the terms “*Falco peregrinus* trade wild” yielded approximately 4,160 results, while a broader search using “trade falcon Middle East” returned around 629,000 results. These figures offer a rough indication of the scale of scholarly attention and the extent of documented interest in falcon trade. A quick and simple Google Scholar search result on August 17, 2025, showed that illegal trapping and irregulated trade of *Falco peregrinus* remain persistent issues across multiple regions (e.g., Wyatt, 2011; Brochet et al., 2019; Ahmad & Khan, 2020; Khoury et al., 2020) and social media platforms are used for the illegal trade of *Falco peregrinus* and other falcon species (Nijman et al., 2022; Sardari et al., 2022). Notably, none of these peer-reviewed publications are referenced in CITES CoP20 Prop. 17.

2. Potential other information by CITES reviews and on nature management issues in range states

Canada submitted a proposal to transfer *Falco peregrinus* from Appendix I to Appendix II at CITES CoP17 (CITES CoP17 Prop. 17; Government of Canada, 2016). This proposal was not supported by Norway at CoP17 (Earth Negotiations Bulletin, 2016).

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological criteria for inclusion in Appendix I (Resolution Conf. 9.24 (Rev. CoP17) Annex 1)

- A) *Small wild population*
- B) *Restricted area of distribution*
- C) *Marked decline in number of wild individuals*

Trade criteria for inclusion in Appendix I (Article II, paragraph 1 of the Convention)

The species is or may be affected by trade

Precautionary measures (Resolution Conf. 9.24 (Rev. CoP 17) Annex 4)

Analysis based on information presented in section 1 and 2

- **Biological criteria:** The following biological criteria are NOT met on a global scale: A) Small wild population; B) Restricted area of distribution; C) Marked decline in number of wild individuals.
- **Trade criteria:** Under the current level of legal and illegal trade, the species is not threatened.
- **Precautionary measures:** Resolution Conf. 9.24 (Rev. CoP17) Annex 4, criteria A.2.a.i and a.iii do not apply. In regard to criterion a.ii, there is reason to question whether all range states are adequately implementing the requirements of the Convention, particularly those outlined in CITES Article IV. Concerns also remain about the effectiveness of enforcement controls and overall compliance with the Convention’s requirements in all the range states.

Finding: Negative

The biological and trade criteria for the inclusion of *Falco peregrinus* in Appendix I are no longer met. However, according to Resolution Conf. 9.24 (Rev. CoP 17) Annex 4: Precautionary Measures, species listed in Appendix I should only be transferred to Appendix II if at least one of the safeguards outlined in Annex 4.A.2. is fulfilled. Assessment of 4.A.2.a.i and iii do not apply, and based on the documented extent of illegal capture and trade in the Middle East, countries surrounding the Arabian Gulf, and certain Asian countries, it appears that these precautionary safeguards of 4.A.2.a.ii.B are not being met.

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Appendix

Range states of *Falco peregrinus*, according to the [Species+ website](#): Afghanistan, Albania, Algeria, Andorra, Angola, Anguilla (United Kingdom, distribution uncertain), Antigua and Barbuda, Argentina, Armenia, Aruba, Australia, Austria, Azerbaijan, Bahamas, Bahrain, Bangladesh, Barbados, Belarus, Belgium, Belize, Benin, Bermuda (United Kingdom), Bhutan, Bolivia, Bosnia and Herzegovina, Botswana, Brazil, British Virgin Islands (United Kingdom, distribution uncertain), Brunei Darussalam, Bulgaria, Burkina Faso, Burundi, Cabo Verde, Cambodia, Cameroon, Canada, Cayman Islands (United Kingdom), Central African Republic, Chad, Chile, China, Christmas Island, Colombia, Comoros, Congo, Costa Rica, Côte d'Ivoire, Croatia, Cuba, Cyprus, Czech Republic, Democratic People's Republic of Korea, Democratic Republic of the Congo, Denmark, Djibouti, Dominica, Dominican Republic, Ecuador, Egypt, El Salvador, Equatorial Guinea, Eritrea, Estonia, Eswatini, Ethiopia, Falkland Islands (Malvinas), Faroe Islands, Fiji, Finland, France, French Guiana [FR], Gabon, Gambia, Georgia, Germany, Ghana, Gibraltar (United Kingdom), Greece, Greenland, Grenada, Guadeloupe (distribution uncertain), Guam, Guatemala, Guernsey (United Kingdom), Guinea, Guinea Bissau, Guyana, Haiti, Honduras, Hong Kong, SAR, Hungary, Iceland, India, Indonesia, Iran, Iraq, Ireland, Israel, Italy, Jamaica, Japan, Jersey (United Kingdom), Jordan, Kazakhstan, Kenya, Kuwait, Kyrgyzstan, Lao People's Democratic Republic, Latvia, Lebanon, Lesotho, Liberia, Libya, Liechtenstein, Lithuania, Luxembourg, Macao SAR, Madagascar, Malawi, Malaysia, Maldives, Mali, Malta, Martinique (distribution uncertain), Mauritania, Mauritius, Mayotte, Mexico, Mongolia, Montenegro, Montserrat (United Kingdom), Morocco, Mozambique, Myanmar, Namibia, Nepal, Netherlands, Netherlands Antilles, New Caledonia, Nicaragua, Niger, Nigeria, North Macedonia, Norway, Oman, Pakistan, Palau, Panama, Papua New Guinea, Paraguay (distribution uncertain), Peru, Philippines, Pitcairn Islands (United Kingdom), Poland, Portugal, Puerto Rico, Qatar, Republic of Korea, Republic of Moldova, Romania, Russian Federation, Rwanda, Saint Kitts and Nevis, Saint Lucia, Saint Pierre and Miquelon, Saint Vincent and the Grenadines, Samoa, Sao Tome and Principe, Saudi Arabia, Senegal, Serbia, Seychelles, Sierra Leone, Singapore, Slovakia, Slovenia, Solomon Islands, Somalia, South Africa, South Georgia and South Sandwich Islands (United Kingdom), Spain, Sri Lanka, Sudan, Suriname, Sweden, Switzerland, Syrian Arab Republic, Taiwan, Tajikistan, Thailand, Togo, Trinidad and Tobago, Tunisia, Türkiye, Turkmenistan, Turks and Caicos Islands (United Kingdom), Uganda, Ukraine, United Arab Emirates, United Kingdom of Great Britain and Northern Ireland, United Republic of Tanzania, United States of America, Uruguay, Uzbekistan, Vanuatu, Venezuela, Viet Nam, Virgin Islands of the USA, Yemen, Zambia, Zimbabwe.

CoP20 Prop. 18 *Sporophila* spp.

1. Review of listing proposal under CITES

Presentation of listing proposal: Inclusion of the species *Sporophila maximiliani* in Appendix I, in accordance with the Annex 1, criteria A (I, II), B (I, IV) and C (I,II) of Resolution Conf. 9.24 (Rev. CoP17). Inclusion in Appendix II of the species *Sporophila angolensis*, *Sporophila atrirostris*, *Sporophila crassirostris*, *Sporophila funerea* and *Sporophila nuttingi*, in accordance with criterion A of Annex 2b of Resolution Conf. 9.24 (Rev. CoP17).

Proponents: Brazil.

Summary of available information

Species name:

Table 1. The species included in the listing proposal.

Scientific name	Synonym	Common name(s)	Norwegian name	Listing proposal
<i>Sporophila maximiliani</i> (Cabanis, 1851)	<i>Oryzoborus maximiliani</i> (Cabanis, 1851)	Great-billed Seed Finch	storfrøspurv	Include in Appendix I in accordance with the Annex 1, criteria A (I, II), B (I, IV) and C (I,II)
<i>Sporophila angolensis</i> (Linnaeus, 1766)	<i>Oryzoborus angolensis</i> (Linnaeus, 1766)	Chestnut-bellied Seed Finch, Lesser Seed Finch	småfrøspurv	Include in Appendix II in accordance with criterion A of Annex 2b
<i>Sporophila atrirostris</i> (Sclater & Salvin, 1878)	<i>Oryzoborus atrirostris</i> (Sclater & Salvin, 1878)	Black-billed Seed Finch	svartnebbfrøspurv	Include in Appendix II in accordance with criterion A of Annex 2b
<i>Sporophila crassirostris</i> (Gmelin, 1789)	<i>Oryzoborus crassirostris</i> (Gmelin, 1789)	Large-billed Seed Finch	tykknebbfrøspurv	Include in Appendix II in accordance with criterion A of Annex 2b
<i>Sporophila funereal</i> (Sclater, 1859)	<i>Oryzoborus funereus</i> (Sclater, 1859)	Thick-billed Seed Finch	sørgefrøspurv	Include in Appendix II in accordance with criterion A of Annex 2b
<i>Sporophila nuttingi</i> (Ridgway, 1884)	<i>Oryzoborus nuttingi</i> (Ridgway, 1884)	Nicaraguan Seed Finch	rosennebbfrøspurv	Include in Appendix II in accordance with criterion A of Annex 2b

Distribution: All *Sporophila* species in the listing proposed occur naturally in three or more countries in Central and/or South America. See Table 2.

Table 2. Distribution, conservation and habitat status, and population trend for the species in Table 1.

Sources: Most recent IUCN Red List assessment of the species, unless otherwise stated.

Scientific name	Geographic range (native)	IUCN Red List status	Population trend	Habitat status
<i>Sporophila maximiliani</i>	Bolivia; Brazil; French Guiana; Guyana; Suriname; Venezuela	Endangered. Criterion C2a(i): small population size and decline	Decreasing	Fragmented. Continuing decline in area, extent and/or quality of habitat
<i>Sporophila angolensis</i>	Argentina; Belize; Bolivia, Brazil; Colombia; Ecuador; French Guiana; Guatemala; Guyana; Honduras; Nicaragua; Panama; Paraguay; Peru; Suriname; Trinidad and Tobago; Venezuela	Least Concern	Increasing Decreasing according to Silva et al. (2023)	Unknown
<i>Sporophila atrirostris</i>	Bolivia, Ecuador; Peru	Least Concern	Stable	Unknown
<i>Sporophila crassirostris</i>	Brazil; Colombia; Ecuador; French Guiana; Guyana; Peru; Suriname; Trinidad and Tobago; Venezuela	Least Concern	Increasing	Unknown
<i>Sporophila funerea</i>	Belize; Colombia; Costa Rica; Ecuador; Guatemala; Honduras; Mexico; Nicaragua; Panama	Least Concern	Decreasing	Unknown
<i>Sporophila nuttingi</i>	Costa Rica; Nicaragua; Panama	Least Concern	Decreasing	Unknown

Conservation status: IUCN Red List status for each species is shown in Table 2.

Population trend: Population trends as reported in the IUCN Red List is included in Table 2.

Habitat status: Habitat loss and fragmentation have contributed to the decline of *Sporophila maximiliani* populations across its geographic range, but commercial capture and trade in wild specimens are the main causes of population decline. Habitat status for the other *Sporophila* spp. in Table 1 is listed as unknown in the most recent IUCN Red List assessments (see Table 2).

Trade levels: *S. maximiliani* is highly valued for songbird competitions and as pet; demand is culturally ingrained in Brazil and several other South American countries (BirdLife International, 2019). There is robust empirical evidence from multiple sources indicating that trade is a threat to the survival of *Sporophila maximiliani* in the wild (Birdlife International, 2019; Silva et al., 2022). A recent global assessment of wild bird trade prevalence analysed seven international datasets on birds in trade to identify species or groups at elevated risk (Donald et al., 2024). Trade prevalence scores, ranging from 0 to 7, were assigned to all bird species based on the frequency of occurrence in these datasets. Of the 896 species with the highest trade prevalence scores (4 or above) – representing approximately 8% of all bird species globally – *Sporophila maximiliani* was identified as one of only 11 globally threatened species not currently listed in CITES Appendices I or II. Species from the family Thraupidae, which includes all *Sporophila* species, are among the most frequently recorded in trade, underscoring the vulnerability of this taxonomic group (Donald et al., 2024). Such illegal trade is also widespread on social media platforms (López et al., 2025).

Availability of trade data: Legal and illegal trade are documented in multiple. Evidence of gaps, inconsistencies, and laundering between official export records and import databases.

Captive breeding and legal trade: Brazil allows trade in captive-bred *S. maximiliani* through SISPASS and SISFAUNA; >5,000 individuals are in licensed breeding facilities.

Wild-caught trade and impacts: Capture of wild individuals continues despite prohibitions, with hundreds seized in Brazil between 2019–2024. With ~250 mature individuals left in the wild, even small-scale offtake is considered highly detrimental. Wild-caught trade undermines conservation efforts and reintroduction initiatives.

Extent of illegal trade: Illegal trade is substantial and widespread, including laundering into legal markets and trafficking across South American borders. Significant discrepancies between export and import databases.

Resembling species: *S. angolensis* and *S. crassirostris* are traded legally and illegally, including wild-sourced exports. No documented international trade for *S. atrirostris*, *S. funerea*, or *S. nuttingi*, but confusion with *S. maximiliani* increases the risk.

In conclusion: Illegal trade in wild sourced *S. maximiliani* and similar species is substantial, ongoing, and detrimental to wild populations.

2. Potential other information by CITES reviews and on nature management issues in range states

CITES CoP20 Prop. 18, section 7 and 8 presents an overview of legal and management measures in range states.

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological criteria for inclusion in Appendix I (Res. Conf. 9.24 (Rev. CoP17) Annex 1)

- A) *Small wild population*
- B) *Restricted area of distribution*
- C) *Marked decline in number of wild individuals*

Trade criteria for inclusion in Appendix I (Article II, paragraph 1 of the Convention)

The species is or may be affected by trade

Biological and trade criteria for inclusion in Appendix II (Res. Conf. 9.24 (Rev. CoP 17) Annex 2b)

- A) *Specimens in trade resemble those of species listed in Appendix II under Resolution Conf. 9.24 (Rev. CoP17) Annex 2 a or listed in Appendix I*

Analysis based on information presented in section 1 and 2

Sporophila maximiliani:

- **Biological criteria:** A) the wild population is small and B) has undergone and is undergoing a rapid decline in number of wild individuals.
- **Trade criteria:** The species is negatively affected by trade.

Other *Sporophila* spp. in Table 1.

- **Biological and trade criteria.** Specimens in trade resemble those of *Sporophila maximiliani*. Identifying *Sporophila maximiliani* morphologically is challenging due to sexual dimorphism, indistinct juvenile traits, and the uniformly dull brown plumage of females across the genus, which complicates recognition, especially for non-experts.

Finding: *Positive*

The criteria for including *Sporophila maximiliani* in Appendix I in accordance with Resolution Conf. 9.24 (Rev. CoP 17) Annex 1, criteria A (I, II), B (I, IV) and C (I,II), are met. The criteria for including *Sporophila angolensis*, *Sporophila atrirostris*, *Sporophila crassirostris*, *Sporophila funerea* and *Sporophila nuttingi* in Appendix II in accordance with Resolution Conf. 9.24 (Rev. CoP 17) criterion A of Annex 2b, are met.

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CoP20 Prop. 19 *Caribicus warreni*

1. Review of listing proposal under CITES

Presentation of proposal: Inclusion of the population of the Hispaniolan giant galliwasp (*Caribicus warreni*), endemic to Hispaniola (Dominican Republic and Haiti), in Appendix I of the Convention according to the provisions of Resolution Conf. 9.24, Annex I a, criterion A.

Proponents: Dominican Republic.

Summary of available information

Species name: Scientific name: *Caribicus warreni* (Schwartz, 1970); Common name: Hispaniolan giant galliwasp; Haitian giant galliwasp (English), Lucia gigante de la Hispaniola, Lucio (Spanish) (Landestoy et al. 2016); Synonyms: *Diploglossus warreni* (Schwartz, 1970); *Diploglossus carraui* (Incháustegui, Schwartz & Henderson 1985); *Diploglossus carraui* (Schwartz & Henderson, 1991); *Diploglossus warreni* (Schwartz & Henderson, 1991); *Celestus warreni* (Powell et al., 1996); *Celestus carraui* (Powell et al., 1996); *Celestus warreni carraui* (Hallermann & Böhme, 2002); *Celestus warreni warreni* (Hallermann & Böhme, 2002); *Celestus warreni* (Langner, 2019); *Caribicus warreni* (Schools & Hedges, 2021); *Caribicus warreni* (Schools & Hedges, 2024).

Distribution: *Caribicus warreni* inhabits small caves, rocks, tree trunks and leaf litter, broad leaved forests, rainforests, cloud forests, and riparian forests, but has also been reported in banana plantations and cocoa farms (Landestoy et al., 2016; CITES CoP20 Prop. 19). It is endemic to Hispaniola and has been reported in the Dominican Republic, Haiti and Tortuga Island (Schwartz 1970; Landestoy et al., 2016).

Conservation status: The IUCN Red List assessed the species as Vulnerable under criteria B1ab(iii) in 2016 (Landestoy et al. 2016; CITES CoP20 Prop. 19). This species has a limited distribution with fragmented subpopulations. Threats include expanding agricultural activities, charcoal production and predation by cats, dogs and mongooses, illegal pet trade and local community killing these lizards after mistakenly considering them venomous (Landestoy et al., 2016; 2022; CITES CoP20 Prop. 19).

Population trend: *Caribicus warreni* population trend is decreasing and the population is severely fragmented. The subpopulations in the Dominican Republic (formerly recognized as a separate species *Celestus carraui*) are almost extinct. The last collection and sightings were in 2014 in the Puerto Plata area and in San Francisco de Macoris province, a new locality record extending the species' distribution. In Haiti, the species is known with confidence from only a single locality despite intensive surveys and is considered very rare here. The life span and generation time of this species is still poorly understood, and captive specimen have reached 11 years (McGinnity, 2002).

Habitat status: *Caribicus warreni* is threatened by habitat loss due to deforestation for agricultural activities. Introduction and spread of mongoose have led to the decline of the species in Hispaniola (Landestoy et al. 2016; CITES CoP20 Prop. 19)

Trade levels: This species is impacted by illegal pet trade (Landestoy et al., 2016). According to the proponent, the Ministry of Environment and Natural Resources of the Dominican Republic has not issued any export permits, but individuals can be found in US pet shops (CITES CoP20 Prop. 19).

2. Potential other information by CITES reviews and on nature management issues in range states

Caribicus warreni is classified as Critically endangered (CR) in the Red List of endangered, threatened or protected species of fauna in the Dominican Republic (CITES CoP20 Prop. 19), based on criterion A3ad+B1ab(iii), and is considered a priority species for conservation.

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological criteria for inclusion in Appendix I (Resolution Conf. 9.24 (Rev. CoP17) Annex 1)

- A) Small wild population
- B) Restricted area of distribution
- C) Marked decline in number of wild individuals

Trade criteria for inclusion in Appendix I (Article II, paragraph 1 of the Convention)

The species is or may be affected by trade

Analysis based on information presented in section 1 and 2

- **Biological criteria:** The covered range of the species is very restricted and under significant threats. The wild population is very small and declining.
- **Trade criteria:** Illegal trade occurs, and the species is negatively impacted by trade.

Finding: Positive

Caribicus warreni is critically endangered and affected by illegal pet trade. The species fulfils biological and trade criteria for inclusion in Appendix I based on Resolution Conf. 9.24 (Rev. CoP17) Annex 1.

4. References

CITES CoP20 Prop. 19 <https://cites.org/sites/default/files/documents/E-CoP20-Prop-19.pdf>

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CoP20 Prop. 20 *Phyllurus amnicola*

1. Review of listing proposal under CITES

Presentation of proposal: Include *Phyllurus amnicola* in Appendix II, in accordance with Resolution Conf. 9.24 (Rev. CoP17), Article II 2 (a).

Proponents: Australia.

Summary of available information

Species name: *Phyllurus amnicola* Couper, Schneider, Hoskin & Covacevich, 2000 (Couper et al. 2000). English: Mount Elliot leaf-tailed gecko (UNEP, 2025).

Distribution: *Phyllurus amnicola* is endemic to Australia in the state of Queensland, where it is known from four localities on and around Mount Elliot (Couper et al., 2000; Bertola et al., 2018; CoP20 Prop. 20; Hoskin et al., 2018). The species is found between boulders in the rain forest along creek lines and on boulder slopes (Queensland Museum, 2016; CITES CoP20 Prop. 20).

Conservation status: The IUCN Red List assessed the species as is listed as Near Threatened under criteria B1a, as it has a limited distribution and is declining (Hoskin et al., 2018). Threats include illegal harvesting of wild specimens, and fire reducing pathways between habitats (Bertola et al., 2018; Hoskin et al., 2018; CITES CoP20 Prop. 20).

Population trend: The current population trend of *P. amnicola* is unknown, but the population is severely fragmented (Hoskin et al., 2018). According to the proponent decline of one population followed a near-extinction event caused by illegal collection (Hoskin et al., 2018). *Phyllurus amnicola* is expected to be abundant in suitable habitat except one population associated with low rainforest coverage (CITES CoP20 Prop. 20). Genetic analysis revealed population genetic structuring, including deeply divergent mitochondrial lineages (Bertola et al., 2018). This suggest a long period of isolation between subpopulation despite areas being close (Hoskin et al., 2018).

Habitat status: *Phyllurus amnicola* is threatened by habitat loss and fragmentation, as well as decrease of connectivity pathways between suitable habitats due to global warming and fire (Bertola et al. 2018, Hoskin et al., 2018; CITES CoP20 Prop. 20).

Trade levels: There is no legal trade, but *P. amnicola* is impacted by illegal harvesting linked to illegal pet trade (Hoskin et al., 2018; CITES CoP20 Prop. 20). According to the proponent, the Australian leaf-tailed geckos (*Phyllurus* spp.) are highly desirable in international pet markets due to their unique morphological characteristics and rarity (CITES CoP20 Prop. 20).

2. Potential other information by CITES reviews and on nature management issues in range states

Phyllurus amnicola is listed as Vulnerable under Queensland state legislation, Nature Conservation Act 1992 (NC Act) due to ongoing threats from changed fire regimes, invasive grasses, climate change and illegal collection (Queensland Museum, 2016; CoP20 Prop. 20). The species is listed on CITES Appendix III, under the genus listing of *Phyllurus* spp., effective 22 June 2022 (UNEP, 2025).

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological and trade criteria for inclusion in Appendix II (Resolution Conf. 9.24 (Rev. CoP 17) Annex 2a)

- A) Trade regulation needed to prevent future inclusion in Appendix I
 B) Regulation of trade required to ensure that harvest from the wild is not reducing population to level where survival might be threatened by continued harvest or other influences

Analysis based on information presented in section 1 and 2

- **Biological criteria:** *Phyllurus amnicola* is endemic in a very restricted area. Its habitat is under significant threats from anthropogenic effects.
- **Trade criteria:** The species is affected by illegal pet trade.

Finding: Positive

Phyllurus amnicola is vulnerable to extinction and its populations are small and fragmented. The species is affected by the illegal pet trade. The species fulfils the biological and trade criteria for inclusion in Appendix II, in accordance with Resolution Conf. 9.24 (Rev. CoP17), Article II 2 (a).

4. References

CITES CoP20 Prop. 20 <https://cites.org/sites/default/files/documents/E-CoP20-Prop-20.pdf>

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CoP20 Prop. 21 *Phyllurus caudiannulatus*

1. Review of listing proposal under CITES

Presentation of proposal: Include *Phyllurus caudiannulatus* in Appendix II, in accordance with Resolution Conf. 9.24 (Rev. CoP17), Article II 2 (a).

Proponents: Australia.

Summary of available information

Species name: *Phyllurus caudiannulatus* Covacevich, 1975. Common name: Ringed thin-tail gecko (UNEP, 2025).

Distribution: *Phyllurus caudiannulatus* is restricted to rainforests, where it forages at night on the trunks of trees, including fig trees, and on rocks (Couper et al., 2018). It is endemic to Australia, to the state of Queensland (Couper et al., 2018). The species is known from three localities separated by a maximum distance of approximately 15 km, with minimal connectivity or dispersal between them (; DCCEEW, 2024; CITES Cop20 Prop. 21). Australia is the only range state (UNEP, 2025).

Conservation status: The IUCN Red List assessed the species as Near Threatened under criteria B1a as it has a limited distribution (Couper et al., 2018). Its habitat is under threat of climate change and fire (CITES Cop20 Prop. 21). The species is suspected to be under threat of predation by feral cats and foxes, as well as impact from Cane Toads (Queensland Government, n.d.).

Population trend: *Phyllurus caudiannulatus* population size is unknown (CITES Cop20 Prop. 21).

Habitat status: The habitat of *Phyllurus caudiannulatus* is threatened by climate change leading to habitat loss and fragmentation, as well as potential decrease of pathways between suitable habitats. Weed invasion, clearing of rainforest, hoop pine harvesting and replanting have also been identified as potential threats to its habitats (DCCEEW 2024; CITES Cop20 Prop. 21).

Trade levels: According to the proponent, *P. caudiannulatus* is negatively impacted by illegal pet trade (CITES Cop20 Prop. 21) and species belonging to *Phyllurus spp.* are highly sought after by collectors due to their unique appearance and rarity (CITES Cop20 Prop. 21). Specimen have been found on the European and American pet markets (Couper et al., 2018; DCCEEW, 2024) despite the species being recognised as a protected species and no permits have been granted for the species to be taken from the wild for the purpose of export (CITES Cop20 Prop. 21).

2. Potential other information by CITES reviews and on nature management issues in range states

Phyllurus caudiannulatus is listed as Endangered by Australian national environment legislation, the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) and Queensland state, the Nature Conservation Act 1992 (NC Act) legislation. The species is additionally listed as Near Threatened B1a in the IUCN Red List (Couper et al., 2018), and listed on CITES Appendix III, under Genus listing *Phyllurus spp.*, effective from 22 June 2022 (UNEP, 2025).

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological and trade criteria for inclusion in Appendix II (Resolution Conf. 9.24 (Rev. CoP 17) Annex 2a)

- A) Trade regulation needed to prevent future inclusion in Appendix I
 B) Regulation of trade required to ensure that harvest from the wild is not reducing population to level where survival might be threatened by continued harvest or other influences

Analysis based on information presented in section 1 and 2

- **Biological criteria:** The range of *Phyllurus caudiannulatus* is restricted and only three subpopulations are known. Habitat loss and fragmentation are major threats.
- **Trade criteria:** All species belonging to *Phyllurus* spp. are affected by illegal pet trade and individuals of *Phyllurus caudiannulatus* have been found in the European and American illegal pet trade.

Finding: Positive

Phyllurus caudiannulatus is near threatened, has fragmented populations, and is restricted to small areas. From its presence in the international illegal pet trade, it can be inferred that wild populations are impacted by trade. The species satisfies the criteria for listing in Appendix II, as set out in Resolution Conf. 9.24 (Rev. CoP17) Annex 2 a and in accordance with Article II 2 (a) of the Convention.

4. References

CITES Cop20 Prop. 21 <https://cites.org/sites/default/files/documents/E-Cop20-Prop-21.pdf>

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CoP20 Prop. 22 *Amblyrhynchus* spp.

1. Review of listing proposal under CITES

Presentation of proposal: Transfer from Appendix II to Appendix I of the genus *Amblyrhynchus* spp., represented by the Galápagos marine iguana (*Amblyrhynchus cristatus*), in accordance with Article II.1 of the Convention and Annex 1a of Resolution Conf. 9.24 (Rev. CoP17).

Proponents: Ecuador.

Summary of available information

Species name: Scientific name: *Amblyrhynchus cristatus* Bell, 1825; Common name: Galapagos marine iguana, marine iguana, sea iguana, Fernandina marine iguana (UNEP, 2025); Norwegian name: Haviguan (Store Norske Leksikon, 2025).

Distribution: The Galápagos marine iguana is endemic to the Galápagos Archipelago. It occurs on the large islands of Española, Fernandina, Floreana, Genovesa, Isabela, Marchena, Pinta, San Cristobál, Santa Cruz, Santa Fé, and Santiago, the medium-sized islands of Baltra, Bartolomé, Pinzón, Plaza Norte, Plaza Sur, Rábida, and Seymour Norte. Smaller, but ecologically significant populations are found on Darwin, Roca Redonda, and Wolf, as well as on numerous satellite islets (MacLeod et al., 2020). Ecuador is the only range state (UNEP, 2025).

Conservation status: *Amblyrhynchus cristatus* is classified as Vulnerable (VU) in the IUCN Red List of Threatened Species (MacLeod et al., 2020) under criteria A2abce+4abce due to an estimated population decline of at least 30%, both in the past and projected into the future. The species is listed in Annex B of the EU Wildlife Trade Regulations (UNEP, 2025).

Population trend: The population trend is decreasing. It is estimated to have declined by at least 30% over the past three generations and a future decline of at least 30% is projected over the next three generations due to negative impact of invasive alien predators (MacLeod et al., 2020). The population size is poorly known with estimates ranging from 19,800 (after strong El Nino periods) to 210,000 (after several years of abundant La Nina conditions) mature individuals (MacLeod et al., 2020).

Habitat status: The total population has an estimated area of occupancy of 4,368 km², and is divided into 11 subpopulations (MacLeod et al., 2020). The total population was assessed as severely fragmented in 2020, and the area, extent and/or quality of the habitat was assessed as being in decline (MacLeod et al., 2020).

Trade levels: Ecuador, the only range state, maintains strict legal prohibitions on the export of endemic species from the Galápagos Islands to the mainland or abroad, including *Amblyrhynchus cristatus*. In accordance with this legislation, no specimens of *A. cristatus* have ever been recorded as legally exported from Ecuador (Auliya et al., 2025; CITES Trade Database, 2025). Nevertheless, importing Parties have reported 11 live individuals, most declared as captive-bred and exported for commercial, personal, zoo, or breeding purposes (CITES SC74 Inf. 26; Auliya et al., 2025; CITES Trade Database, 2025). Captive-bred exports began in 2012, initially from Mali to Switzerland, followed by exports from Austria to Japan in 2013, and from Switzerland to Uganda in 2014. Since 2015, exports have originated from Uganda and Mali. As Ecuador has not legally exported to these countries, the legality of the breeding stock and traded juveniles is in question. Illegal trade is considered a concern (CITES SC74 Inf. 26; Auliya et al., 2025), and the rarity and high market value (up to USD 25,000 per individual) makes this species a target (Associated Press, 2015 cited in CITES CoP20 Prop. 22). Although current population levels do not seem to be significantly impacted by trade, the species' entry into the pet trade is considered concerning, as it facilitates the concealment of illegal wild collection (MacLeod et al., 2020; Auliya et al., 2025).

2. Potential other information by CITES reviews and on nature management issues in range states

CITES SC74 Inf. 26 presented by Ecuador in 2022 addresses the issue of illegal trade in Galápagos iguanas, including *Amblyrhynchus cristatus*, emphasizing the responsibility of importing countries to refrain from issuing permits that could facilitate criminal activity. It underscores the role of transnational criminal networks in the trafficking of these species and stresses the need to verify the legal origin of founder stock prior to permit issuance. Additionally, the document calls on importing countries to notify the CITES Management Authority of Ecuador about any import requests involving these species. These points were re-iterated in May 2025 in CITES E-Notif 2025-063, published at the request of the Management Authority of Ecuador, the Ministry of Environment, Water and Ecological Transition (MAATE) and also stressed in a recent paper by Auliya et al. (2025), which urges CITES Parties to transfer all four species of Galápagos iguanas from CITES Appendix II to Appendix I at CITES CoP20.

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological criteria for inclusion in Appendix I (Resolution Conf. 9.24 (Rev. CoP17) Annex 1)

- A) *Small wild population*
- B) *Restricted area of distribution*
- C) *Marked decline in number of wild individuals*

Trade criteria for inclusion in Appendix I (Article II, paragraph 1 of the Convention)

The species is or may be affected by trade

Analysis based on information presented in section 1 and 2

- **Biological criteria:** *Amblyrhynchus cristatus* exceeds the small population threshold but is severely fragmented, increasing vulnerability. Its distribution may be considered restricted due to fragmentation and endemism to the Galápagos archipelago. The population is declining, but the rate is below the marked decline threshold. It does not conclusively meet Appendix I biological criteria as set out in Resolution Conf. 9.24 (Rev. CoP17), Annex 1, but may qualify under Criterion B due to endemism, severe fragmentation, extreme population fluctuations, and ongoing decline in numbers, range, and habitat quality.
- **Trade criteria:** *Amblyrhynchus cristatus* is known to be in trade, and albeit current population levels do not seem to be significantly impacted, there is concern that trade may have a detrimental impact on the status of the species.

Finding: Inconclusive

Amblyrhynchus cristatus appears not to conclusively satisfy the biological criteria for inclusion in Appendix I as set out in Resolution Conf. 9.24 (Rev. CoP17), Annex 1, whereas the trade criterion appears to be satisfied. Under a precautionary approach (Resolution Conf. 9.24 (Rev. CoP17) Annex 4), *A. cristatus* might be considered as satisfying the criteria for inclusion in Appendix I, as set out in Resolution Conf. 9.24 (Rev. CoP17) Annex 1 and in accordance with Article II.1 of the Convention.

4. References

Associated Press. (2015, August 25). Man arrested in Galapagos for trafficking in endangered iguanas. *Global News*. <https://globalnews.ca/news/2207390/man-arrested-in-galapagos-for-trafficking-in-endangered-iguanas>

Auliya, M., Nijman, V., Altherr, S., Aguilera, W. T., Ariano-Sánchez, D., Cantu, J. C., ... & Weissgold, B. (2025). Trafficking of Galápagos iguanas as an example of a global problem: CITES permits, laundering and the role of transit countries in Europe and Africa. *Biological Conservation*, 305, 111104. <https://doi.org/10.1016/j.biocon.2024.111104>

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CoP20 Prop. 23 *Conolophus* spp.

1. Review of listing proposal under CITES

Presentation of proposal: Transfer from Appendix II to Appendix I of the genus *Conolophus*, which includes the three species of Galápagos land iguanas (*C. subcristatus*; *C. marthae*; *C. pallidus*), in accordance with Article II.1 of the Convention and Annex 1a of Resolution Conf. 9.24 (Rev. CoP17).

Proponents: Ecuador.

Summary of available information

Species name:

Scientific name: *Conolophus subcristatus* (Gray, 1831); Common name: common land iguana (UNEP, 2025), Galápagos land iguana (Kumar et al., 2020).

Scientific name: *Conolophus marthae* Gentile & Snell, 2009; Common name: Galapagos pink land iguana, pink iguana (UNEP, 2025).

Scientific name: *Conolophus pallidus* Heller, 1903; Common name: Santa Fe land iguana, Barrington land iguana (UNEP, 2025).

Distribution: The three species of Galápagos land iguanas are all found within the Galápagos Archipelago, Ecuador. *Conolophus subcristatus* is native to the islands Isabela, Fernandina, Santa Cruz, and Plaza Sur; extirpated from Rábida (known only from historical subfossil records); introduced to Seymour Norte (1930s) and Venecia (1977); and extirpated from Baltra by 1954, with reintroduction initiated in 1991 (Kumar et al., 2020). *Conolophus marthae* is a recently described species restricted to the single location Volcán Wolf on northern Isabela (Gentile, 2012) whereas *Conolophus pallidus* is endemic to the island Santa Fé (also known as Barrington) (Gentile & Grant, 2020). Ecuador is the only range state (UNEP, 2025).

Conservation status:

Conolophus subcristatus is listed as Vulnerable (VU) on the IUCN Red List (Kumar et al., 2020) under criteria A2abce; B1ab(i–v)+2ab(i–v); C1, due to past population decline, habitat loss, range reduction, and external pressures. It occupies a small, fragmented, and deteriorating range, with few mature individuals expected to decline further. The species is listed in Annex B of the EU Wildlife Trade Regulations (UNEP, 2025).

Conolophus marthae is listed as Critically Endangered (CR) on the IUCN Red List (Gentile, 2012) under criteria B1ab(iii,v)+2ab(iii,v); C2a(ii), due to its extremely limited and shrinking range, declining habitat quality, and very small population confined to a single locality. This makes it extremely vulnerable to extinction from sudden threats. It is listed in Annex B of the EU Wildlife Trade Regulations (UNEP, 2025).

Conolophus pallidus is listed as Vulnerable (VU) on the IUCN Red List (Gentile & Grant, 2020; assessed in 2019) under criteria A1ce; D2, due to past population decline from habitat degradation and external pressures—now considered reversible—and its restricted range, making it highly vulnerable to sudden threats. It is listed in Annex B of the EU Wildlife Trade Regulations (UNEP, 2025).

Population trend:

Conolophus subcristatus: The population trend is decreasing. It is estimated to have declined $\geq 30\%$ over the past three generations, with a projected 10–15% decline over the next three (Kumar et al., 2020). In 2020, the estimated population was 10,216 mature individuals (range: 8,618–18,117), based on mostly outdated data, with a decreasing trend. The species is divided into 13 subpopulations with varying statuses: some nearly extirpated, others declining, stable, or increasing.

Conolophus marthae: The population trend was assessed by IUCN as unknown in 2012 due to limited long-term data (Gentile, 2012). The population is very small—estimated at 150–270 mature individuals (Gentile, 2012; Rueda et al., 2023; Garizio et al., 2024). Garizio et al. (2024) reported a stable population trend from 2006–2021 and the first evidence of successful recruitment, though insufficient to increase population size.

Conolophus pallidus: The species declined by over 50% up until 1972 due to habitat degradation from introduced goats. The population has since increased, and by 2005 the population was roughly estimated at 3,500–4,000 mature individuals (Gentile & Grant, 2020), but this estimate is outdated. In 2020, both population size and trend were assessed as unknown. Molecular analyses revealed very low genetic diversity compared to *Conolophus subcristatus* (Gentile & Grant, 2020).

Habitat status:

Conolophus subcristatus: The population has a range of 540 km² divided into 13 subpopulations, isolated by lava flows or by being on separate islands. It was assessed as severely fragmented in 2020 (Kumar et al., 2020) with ongoing declines in habitat area, extent, and quality (Kumar et al., 2020).

Conolophus marthae: The very small population is restricted to the single location Volcán Wolf on northern Isabela within a range < 25 km², with a core area < 10 km² (Gentile, 2012). Hence, all individuals are found in one subpopulation. As of the latest IUCN assessment, the area, extent and/or quality of the habitat is in continuing decline (Gentile, 2012).

Conolophus pallidus: The species is endemic to Santa Fé (Barrington), confined to a single subpopulation within a 40 km² range (Gentile & Grant, 2020). As of the latest IUCN assessment, it is unknown whether habitat area, extent, or quality is in continuing decline (Gentile & Grant, 2020).

Trade levels: Ecuador, the only range state, maintains strict legal prohibitions on the export of endemic species from the Galápagos Islands to the mainland or abroad, including all species of *Conolophus*. In accordance with this legislation, no *Conolophus* specimens have ever been recorded as legally exported from Ecuador (Auliya et al., 2025; CITES Trade Database, 2025). Nevertheless, importing Parties have reported 442 live individuals, mostly *Conolophus subcristatus* but also some *Conolophus marthae*, declared as captive-bred and exported for commercial, personal, or breeding purposes (CITES SC74 Inf. 26; Rueda et al., 2023; Auliya et al., 2025; CITES Trade Database, 2025). Captive-bred exports began in 2010, initially from Mali and Switzerland, with all exports since 2017 originating from Uganda. As Ecuador has not legally exported to these countries, the legality of the breeding stock and traded juveniles is in question. Illegal trade is considered a concern (CITES SC74 Inf. 26; Auliya et al., 2025), and the high market value (up to USD 25,000 per individual) makes these species a target for illegal trade (Associated Press, 2015 cited in CITES CoP20 Prop. 23). Although current population levels do not seem to be significantly impacted by trade, the species' entry into the pet trade has raised concern, as it facilitates the concealment of illegal wild collection (Kumar et al., 2020; Auliya et al., 2025).

2. Potential other information by CITES reviews and on nature management issues in range states

CITES SC74 Inf. 26 presented by Ecuador in 2022 addresses the issue of illegal trade in Galápagos iguanas, including all *Conolophus* species, emphasizing the responsibility of importing countries to refrain from issuing permits that could facilitate criminal activity. It underscores the role of transnational criminal networks in the trafficking of these species and stresses the need to verify the legal origin of founder stock prior to permit issuance. Additionally, the document calls on importing countries to notify the CITES Management Authority of Ecuador about any import requests involving these species. These points were re-iterated in in May 2025 in CITES E-Notif 2025-063, published at the request of the Management Authority of Ecuador, the Ministry of Environment, Water and Ecological Transition (MAATE) and also stressed in a recent paper by Auliya et al. (2025), which urges

CITES Parties to transfer all four species of Galápagos iguanas from CITES Appendix II to Appendix I at CITES CoP20.

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological criteria for inclusion in Appendix I (Resolution Conf. 9.24 (Rev. CoP17) Annex 1)

- A) *Small wild population*
- B) *Restricted area of distribution*
- C) *Marked decline in number of wild individuals*

Trade criteria for inclusion in Appendix I (Article II, paragraph 1 of the Convention)

The species is or may be affected by trade

Analysis based on information presented in section 1 and 2

- **Biological criteria:**

Conolophus subcristatus: The species exceeds the small population threshold, but is in continuing decline, though below the marked decline threshold. Its area of distribution is restricted, severely fragmented and endemic to the Galápagos archipelago, with deteriorating habitat, increasing its vulnerability to intrinsic and extrinsic factors. The species satisfies the criteria for inclusion in Appendix I as set out in Resolution Conf. 9.24 (Rev. CoP17) Annex 1, paragraph B.

Conolophus marthae: The species has a very small population confined to a single, highly restricted location with deteriorating habitat, making it extremely vulnerable to intrinsic and extrinsic factors. It satisfies the biological criteria for inclusion in Appendix I as set out in Resolution Conf. 9.24 (Rev. CoP17) Annex 1, paragraphs A and B.

Conolophus pallidus: The species consists of a single, small population confined to one island, making it highly vulnerable to intrinsic and extrinsic factors, with extremely low genetic diversity adding to its vulnerability. It satisfies the biological criteria for inclusion in Appendix I as set out in Resolution Conf. 9.24 (Rev. CoP17) Annex 1, paragraphs A and B.

- **Trade criteria:**

Conolophus subcristatus: Albeit Ecuador has never reported legal exports, hundreds of live individuals have been recorded by importers, raising concerns about illegal sourcing—especially of juveniles, which are easier to conceal and more desirable in trade. High market value further increases the risk. While trade has not significantly impacted population levels, the species' presence in the pet market suggests trade may have a detrimental impact on the species.

Conolophus marthae: Two individuals have been registered as imported from a non-range state with no legal exports from Ecuador, raising concerns about illegal trade. The species' extreme rarity, distinct appearance, and high market value make it a potential target for illegal collection. Even low levels of trade could have serious, detrimental impacts to its survival in the wild.

Conolophus pallidus: There is no evidence of current legal or illegal trade, but its rarity and expected high market value make it a potential target for illegal collection. There is thus demonstrable potential international demand for the species, that may be detrimental to its survival in the wild.

Finding: Positive

Conolophus subcristatus, *C. marthae*, and *C. pallidus* satisfy the criteria for inclusion in Appendix I, as set out in Resolution Conf. 9.24 (Rev. CoP17) Annex 1 and in accordance with Article II.1 of the Convention.

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CoP20 Prop. 24 *Bitis harena* and *B. parviocula*

1. Review of listing proposal under CITES

Presentation of proposal: To include *Bitis parviocula* and *Bitis harena*, both endemic snakes of Ethiopia, in Appendix I in accordance with Resolution Conf. 9.24 (Rev CoP17) Annex 1 Criteria A i) and v), B i) iii) and iv), and C ii).

Proponent: Ethiopia.

Summary of available information

Species name:

Scientific name: *Bitis parviocula* (Böhme, 1977), Common name: Ethiopian mountain adder

Scientific name: *Bitis harena* (Gower, 2016), Common name: Harena forest viper.

The *Bitis* genus includes other well-known vipers like the Gaboon viper (*Bitis gabonica*) and the puff adder (*Bitis arietans*). *Bitis parviocula* and *B. harena* exhibit a high degree of morphological similarity (Gower et al., 2016).

Distribution: *Bitis parviocula* is known from only five localities in southwest Ethiopia (Spawls, 2021). *B. harena* is known from a single specimen from southcentral Ethiopia (Gower et al., 2016).

Conservation status: *Bitis parviocula* is IUCN listed as Endangered under criteria B2ab(iii), due to its restricted distribution with a few, fragmented locations that are continuing to decline in habitat quality (Spawls, 2021). *Bitis harena* was first described in 2016 (Gower et al., 2016) and has not yet been assessed.

Population trend: The population trend of *B. parviocula* is decreasing and the population is severely fragmented (Spawls, 2021). *B. harena* (single specimen) was observed in the Bale Mountains National Park (Gower et al., 2016). Population trends are not available.

Habitat status: These species live in an area that is under pressure due to encroaching human activities, mainly deforestation, agriculture (e.g. coffee) and urbanization. The species are therefore experiencing a loss of natural suitable habitat (Spawls 2021; Gebrewold et al., 2022).

Trade levels: There is no local utility or trade. Nonetheless, *B. parviocula* are rare and highly sought after in the international pet trade, with individuals fetching prices up to USD 7500 (CITES CoP20 Prop. 24). According to Spawls (2021, with reference to S. Spawls pers. comm. 2014), a shipment of 30 individuals was exported from Ethiopia to the United States around 2005, however this is disputed by the proponent (CITES CoP20 Prop. 24). There is a limited but significant trade in *B. parviocula* on <https://faunaclassifieds.com>. No data was found to suggest that *B. harena* is bred in captivity or traded.

2. Potential other information by CITES reviews and on nature management issues in range states

The exploitation of wild animals has been banned in Ethiopia since 1957 (Imperial Ethiopian Government, 1957). In 2004, the possession, collection, transport, and export of endemic species such as *B. parviocula* and *B. harena* were prohibited (Federal Democratic Republic of Ethiopia, 2004). According to Article 9 of Proclamation No. 541/2007, permits authorizing the collection of wildlife and their products can only be granted for scientific or academic purposes (Federal Democratic Republic of Ethiopia, 2007). No such permits have ever been issued for either species.

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological criteria for inclusion in Appendix I (Resolution Conf. 9.24 (Rev. CoP17) Annex 1)

- A) Small wild population
- B) Restricted area of distribution
- C) Marked decline in number of wild individuals

Trade criteria for inclusion in Appendix I (Article II, paragraph 1 of the Convention)

The species is or may be affected by trade

Analysis based on information presented in section 1 and 2

- **Biological criteria:** *Bitis parviocula* and *Bitis harensis* are both endemic to Ethiopia and their range is restricted to very limited locations on either side of the Ethiopian Rift Valley. *Bitis parviocula* is listed as Endangered with decreasing population. There is insufficient data for *Bitis harensis* as it is known from a single collection. Both species experience habitat contraction due to human activities.
- **Trade criteria:** The species cannot legally be traded yet *B. parviocula* does appear in the international pet trade. Its rarity in the trade can thus lead to increased incentives for the illegal collection and smuggling of individuals for these species subsequent greenwashing in international trade networks one out of the country.

Finding: Positive

Both species consist of small wild populations with a restricted area within Ethiopia that is under pressure from anthropogenic activity. *Bitis parviocula* is endangered with extinction, while *Bitis harensis* is known from a single specimen only. Neither species can be legally traded but *B. parviocula* is traded illegally in the international pet trade. The biological and trade criteria for inclusion in Appendix I as set out in Resolution Conf. 9.24 (Rev. CoP17) Annex 1 are met.

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CoP20 Prop. 25 *Crotalus* spp. and *Sistrurus* spp.

1. Review of listing proposal under CITES

Presentation of proposal: Inclusion of the species *Crotalus lepidus* and *Crotalus ravus* in Appendix II, in accordance with Article II, subparagraphs 2a) and 2b) of the Convention and Resolution Conf. 9.24 (Rev.CoP17) satisfying Annex 2a Criterion B, and inclusion of the genera *Crotalus* and *Sistrurus* in Appendix II in accordance with Annex 2b Criterion A.

Proponents: Plurinational State of Bolivia and Mexico.

Summary of available information

Species name:

Scientific name: *Crotalus lepidus* (Kennicott, 1861). Common name: Rock rattlesnake.

Scientific name: *Crotalus ravus* (Cope, 1865). Common name: Central Plateau pygmy rattlesnake (CITES CoP20 Prop. 25).

According to the proponent, most *Crotalus* and *Sistrurus* specimens in international trade are extremely difficult to identify to species level especially when only parts, derivatives, or incomplete skins are available (CITES CoP20 Prop. 25).

Distribution:

Crotalus lepidus occurs in the southern United States and Mexico. Its potential range in Mexico covers about 670,000 km², or 34.1% of the Mexican territory (Rautsaw et al., 2022).

C. ravus is a snake species endemic to Mexico, inhabiting elevations between 1,450 and 3,500 in the Transverse Volcanic Belt and has a very limited distribution of 34,674 km², covering <2% of the Mexican territory (Rautsaw et al., 2022).

Rattlesnakes (genera *Crotalus* and *Sistrurus*) are native to the Americas, ranging from southern Canada to northern Argentina (Campbell & Lamar, 2004). Their greatest diversity and abundances occur in the arid and semi-arid regions of the southwestern U.S. and northern Mexico, though they also inhabit grasslands, forests, and tropical areas, albeit at considerably lower levels of abundance and with fewer species occurring farther north and south (Blair & Sánchez-Ramírez, 2016; Guerra et al., 2023).

Conservation status: Both *C. lepidus* and *C. ravus* have most recently been assessed for The IUCN Red List of Threatened Species in 2007. Both species have been listed as Least Concern (Canseco-Márquez & Mendoza-Quijano, 2007; Hammerson et al., 2007). These assessments are nearly 20 years old and there is limited current data. A national Mexican assessment in 2018 considered *C. ravus* as endangered and *C. lepidus* as threatened in Mexico (SEMARNAT, 2018).

Population trend: There are no current population studies for *C. ravus* and *C. lepidus* over their entire range. In the overall *Crotalus* genus the trends for all species are stable or declining based on the older 2007 IUCN assessments. There is a lack of recent IUCN data, with the national Mexican assessments implying declining populations for *C. ravus* and *C. lepidus* (cf. CITES CoP20 Prop 25).

Habitat status: The habitats of *C. ravus* and *C. lepidus* in Mexico are undergoing rapid degradation and fragmentation. The main threats to *C. ravus* are habitat loss from forest clearing, urbanisation, killing by humans, illegal capture, and high vulnerability to climate change, while *C. lepidus* faces similar habitat loss and is heavily targeted for medicinal and cosmetic trade, likely sourced directly from the wild (Cantú & Sánchez, 2024).

Trade levels: *Crotalus ravus* and *C. lepidus* are widely legally and illegally traded both domestically and internationally as live individuals (pet trade), skins, dried meat, derivatives, and medicinal products,

with markets in Mexico, the USA, and countries across Latin America, Asia, and the Middle East and Europe (Cantú & Sánchez, 2024). Rattlesnake parts and leather are extensively used in traditional medicine, ornamentation, and fashion—practices rooted in pre-Columbian culture and still common today in both rural and urban communities (Cantú & Sánchez, 2024; SEMARNAT, 2018). Between 2010 and 2024, PROFEPA recorded the legal international trade of 10,803 rattlesnake imports—mainly skins and derivatives of *C. adamanteus*, *C. atrox*, and *C. horridus*—and 8,076 exports/re-exports of least 19 species such as *C. lepidus*, *C. ravus*, and *C. willardi obscurus* (CITES CoP20 Prop. 25). Illegal trade is more difficult to quantify but *C. ravus* is regularly observed in live seizures (PROFEPA, 2023a; 2023b; 2024). Many of the (illegally) traded specimens are likely collected from wild populations, though live specimens for pet trade can come from captive bred specimens.

2. Potential other information by CITES reviews and on nature management issues in range states

According to CITES CoP20 Prop. 25 (see references therein), Mexico manages rattlesnake species through a legal framework that includes the General Law of Ecological Balance and Environmental Protection (LGEEPA), the General Wildlife Law (LGVS), and NOM-059-SEMARNAT-2010. Under the LGVS, use and harvesting of these species is strictly regulated and allowed only under specific conditions, mainly through authorised Wildlife Conservation Management Units (UMA) or Captive Management Facilities (PIMVS), with approved management plans. The General Directorate of Wildlife (DGVS-SEMARNAT) oversees permits, and violations—including illegal origin, lack of traceability, or improper documentation—are punishable under Article 420 of the Mexican Federal Penal Code.

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological and trade criteria for inclusion in Appendix II (Resolution Conf. 9.24 (Rev. CoP 17) Annex 2a)

- A) *Trade regulation needed to prevent future inclusion in Appendix I*
- B) *Regulation of trade required to ensure that harvest from the wild is not reducing population to level where survival might be threatened by continued harvest or other influences*

Biological and trade criteria for inclusion in Appendix II (Resolution Conf. 9.24 (Rev. CoP 17) Annex 2b)

- A) *Specimens in trade resemble those of species listed in Appendix II under Res. Conf. 9.24 (Rev. CoP17) Annex 2 a or listed in Appendix I*

Analysis based on information presented in section 1 and 2

- **Biological criteria:**

C. lepidus has a wide distribution and the status of the population is unclear. It is currently considered threatened in Mexico which is a major stronghold of this species. Habitat degradation and fragmentation are extensive. It is likely that populations are diminishing.

C. ravus has a very limited distribution and the status of the population is unclear. It is currently considered endangered in Mexico, where it is endemic. Habitat degradation and fragmentation are extensive. It is likely that populations are diminishing.

While both species have been listed as Least Concern in 2007, these assessments are outdated.

- **Trade criteria:** There is extensive legal and illegal trade on a global scale in *C. lepidus* and *C. ravus*, but all species in the genera *Crotalus* and *Sistrurus* are affected. Specimens are traded mostly as derived parts and products, and regardless of species are also collected for the pet trade. Regulation of trade will facilitate quantification and monitoring for international trade. The significance of derived parts and products, combined with the difficulty in distinguishing species in these two genera, qualifies all species in both genera for listing in Appendix II in accordance with Resolution Conf. 9.24 (Rev. CoP17) Annex 2b A.

Finding: Positive

Considering the uncertainty regarding trade volume and conservation status of the species, *Crotalus lepidus* and *C. ravus* meet the criteria for listing in CITES Appendix II under the precautionary approach, as set out in Annex 4 of Resolution Conf. 9.24 (Rev. CoP17). Continued unregulated trade in *C. lepidus* and *C. ravus* could lead to increased extinction risk and future inclusion in CITES Appendix I. The fundamental principle in Article II, subparagraph 2(a) of the convention and the criteria A and B in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17) are thus met. Species in the genera *Crotalus* and *Sistrurus* are often traded as a generic group and thereby qualify for Appendix II listing in accordance with Criterion A in Annex 2b of Resolution Conf. 9.24 (Rev. CoP17). In line with the precautionary approach outlined in Annex 4 of Resolution Conf. 9.24 (Rev. CoP17), regulation would be justified to prevent further decline and ensure sustainable trade.

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CoP20 Prop. 26 *Kinixys homeana*

1. Review of listing proposal under CITES

Presentation of proposal: Transfer the species *Kinixys homeana* from Appendix II to Appendix I in accordance with Article II 1 of the Convention and satisfying Criterion A in Annex 1 of Resolution Conf. 9.24 (Rev. CoP17)

Proponents: Cameroon, Guinea, Nigeria and Togo.

Summary of available information

Species name: Scientific name: *Kinixys homeana*, Bell, 1827, Common names: Home's hinged-backed tortoise, Home's hinged tortoise, Home's hinge-back tortoise (UNEP, 2025).

Distribution: The species is found in forests in Western and Central Africa, in the continuous Guinea-Congo West Africa rainforest region (Luiselli et al., 2021a). The range states are Benin, Cameroon, Côte d'Ivoire, Equatorial Guinea, Ghana, Liberia, Nigeria, Sierra Leone and Togo the presence of the species is uncertain in Democratic Republic of the Congo and Gabon (UNEP, 2025).

Conservation status: *Kinixys homeana* is listed as Critically Endangered A2bcd+4bcd (population reduction of more than 80% over the last three generations connected to habitat loss and exploitation) on the IUCN Red List of Threatened Species (Luiselli et al., 2021a), the assessment was made in 2019. It is listed as part of the family *Testudinidae* spp. on Annex B of the EU Wildlife Trade Regulations (UNEP, 2025).

Population trend: The population is decreasing, and the population is severely fragmented (Luiselli et al., 2021a). It is likely that the species has been extirpated from areas where it is captured easily (Misfud & Stapleton, 2014).

Habitat status: Habitat loss is a main threat to the species (Luiselli et al., 2021a), Its habitat choice is influenced by human hunting behaviour, and it will prefer denser vegetation types in areas where it is hunted (Luiselli, 2003).

Trade levels: The species is used as food locally in parts of its range and is traded internationally as a pet and for food and medicine (Luiselli et al., 2021a). It has been estimated that exploitation for international trade (pets, food, medicine) accounts for 10% of the extinction risk in *K. homeana* (Luiselli et al., 2021b). The species is heavily exploited for the international pet trade in Togo, Ghana and Benin (Luiselli et al., 2021a). In the period 2013 – 2017 a total of 141 live animals and 11 carapaces were seized in the United States of America (CITES Trade Database, 2025).

2. Potential other information by CITES reviews and on nature management issues in range states

Benin, Ghana (all sources -under CITES suspension) and Togo (live, ranched, and wild) have zero export quotas. Three of the range states are under CITES periodic Review of significant trade: Ghana from 2023, Benin and Togo since 2011 (UNEP, 2025)

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological criteria for inclusion in Appendix I (Resolution Conf. 9.24 (Rev. CoP17) Annex 1)

- A) *Small wild population*
- B) *Restricted area of distribution*
- C) *Marked decline in number of wild individuals*

Trade criteria for inclusion in Appendix I (Article II, paragraph 1 of the Convention)

The species is or may be affected by trade

Analysis based on information presented in section 1 and 2

- **Biological criteria:** The species is Critically Endangered and the population in steep decline.
- **Trade criteria:** International trade is a major threat in some range states.

Finding: *Positive*

The species is critically endangered by extinction and is affected by trade and thereby the criteria for Appendix I listing, following Article II of the convention and Annex 1 A of Resolution Conf. 9.24 (Rev. CoP17) are met.

4. References

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CoP20 Prop. 27 *Pelophylax* spp.

1. Review of listing proposal under CITES

Presentation of proposal: Inclusion of *Pelophylax epeiroticus*, *P. ridibundus* and *P. shqipericus* in CITES Appendix II in accordance with Article II, paragraph 2(a) of the Convention and satisfying Criterion B in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17), and for reasons of similarity, inclusion of *P. lessonae* in Appendix II in accordance with Article II, paragraph 2 (b) of the Convention and satisfying Criterion A in Annex 2b of Resolution Conf. 9.24 (Rev. CoP17). Entry into effect would be delayed by 18 months, i.e., until 5 June 2027.

Proponents: European Union, Israel and North Macedonia.

Summary of available information

Species name:

Scientific name: *Pelophylax epeiroticus* (Schneider, Sofianidou, & Kyriakopoulou-Sklavounou, 1984); Common name: Epirus water frog (Mizsei et al., 2024a); Norwegian name: NA.

Scientific name: *Pelophylax ridibundus* (Pallas, 1771); Common names: Marsh frog, Eurasian marsh frog (IUCN SSC Amphibian Specialist Group, 2023); Norwegian name: latterfrosk (Dervo & van der Kooij, 2023); Taxonomic note: a recent taxonomic revision (Frost, 2025), reflected in CITES CoP20 Prop. 27, reclassifies several taxa previously treated as separate species as subspecies of *P. ridibundus*. In CITES CoP20 Prop. 27, *P. ridibundus* is thus considered a single species with high phylogeographic diversity, encompassing the previously recognized species of *P. bedriagae*, *P. caralitanus*, *P. cerigensis*, *P. cypriensis*, *P. kurtmuelleri*, *P. persicus*, and *P. terentievi* (Dufresnes et al., 2024; Frost, 2025; CITES CoP20 Prop. 27). Annex 1 of the supporting statement of CITES Cop20 Prop. 27 provides an extract from Frost (2025), edited by the Nomenclature Specialist for the Animals Committee, that is proposed as the CITES Nomenclature Standard Reference for the genus and species of *Pelophylax*.

Scientific name: *Pelophylax shqipericus* (Hotz, Uzzell, Günther, Tunner, & Heppich, 1987); Common names: Albanian water frog, Balkan frog, Skutari water frog, Virpazar frog (Mizsei et al., 2024b); Norwegian name: NA.

Scientific name: *Pelophylax lessonae* (Camerano, 1882); Common name: Pool frog (Andreone et al., 2024); Norwegian name: damfrosk (Dervo et al., 2021).

Distribution:

The genus *Pelophylax* is broadly distributed across Eurasia and northern Africa. According to CITES CoP20 Prop. 27 and literature cited therein, the range states are as listed below.

Pelophylax epeiroticus: Albania, Greece.

Pelophylax ridibundus: Afghanistan, Albania, Armenia, Austria, Azerbaijan, Bahrain, Belarus, Belgium (introduced), Bosnia and Herzegovina, Bulgaria, China, Croatia, Cyprus, Czech Republic, Denmark, Egypt, Estonia (introduced), Finland (introduced), France, Georgia, Germany, Greece, Hungary, Iran (Islamic Republic of), Iraq, Israel, Italy (introduced), Jordan, Kazakhstan, Kosovo, Kyrgyzstan, Latvia, Lebanon, Liechtenstein, Lithuania, Luxembourg, Malta (introduced), Montenegro, Netherlands, North Macedonia, Palestine, Pakistan (uncertain), Poland, Republic of Moldova, Romania, Russian Federation, Saudi Arabia, Serbia, Slovakia, Slovenia, Spain (introduced), Switzerland (introduced), Syrian Arab Republic, Tajikistan, Türkiye, Turkmenistan, Ukraine, United Kingdom of Great Britain and Northern Ireland (hereafter the United Kingdom or UK) (introduced), Uzbekistan.

Pelophylax shqipericus: Albania, Montenegro, Italy (introduced), Croatia (introduced).

Pelophylax lessonae: Austria, Belarus, Belgium, Bosnia and Herzegovina, Bulgaria, Croatia, Czech Republic, Denmark, Estonia, Finland (introduced), France, Germany, Hungary, Italy, Latvia, Liechtenstein, Lithuania, Luxembourg, Netherlands, Norway, Poland, Republic of Moldova, Romania, Russian Federation, Serbia, Slovakia, Slovenia, Spain (introduced), Sweden, Switzerland, Ukraine, United Kingdom (introduced).

Conservation status:

Pelophylax epeiroticus is listed as Near Threatened (NT) on the IUCN Red List of Threatened Species (Mizsei et al., 2024a; assessed in 2023; scope: Global, Europe & Mediterranean) under criterion B1ab(iii), due to its restricted range, limited number of locations, and ongoing habitat degradation. Notably, estimates of its area of occupancy are lacking due to missing georeferenced data from Albania. A reassessment is warranted should such data become available, as the global value is expected to fall below the threshold for Vulnerable (VU). In the EU27 regional assessment, the species is classified as Vulnerable (VU) under criterion B2ab(iii), due to its small area of occupancy, occurrence in fewer than ten threat-defined locations, and continuing decline in habitat extent and quality (Mizsei et al., 2024a). The species is listed in Appendix III of the Bern Convention as a protected fauna species.

Pelophylax ridibundus is listed as Least Concern (LC) in the IUCN Red List of Threatened Species (IUCN SSC Amphibian Specialist Group, 2023a; assessed in 2021 prior to taxonomic revision in 2025) due to its wide distribution, large population, and high ecological adaptability and tolerance. The species is listed in Appendix III of the Bern Convention as a protected fauna species and on Annex V of the EU Natural Habitats Directive. Notably, a recent taxonomic revision (Frost, 2025), reflected in CITES CoP20 Prop. 27, reclassifies several taxa previously treated as separate species as subspecies of *P. ridibundus*. Six of these subspecies were recently assessed independently by IUCN, three of which were listed as Threatened (see Table 1).

Table 1. IUCN Red List assessments of *Pelophylax* species. Latest IUCN Red List assessments for *Pelophylax* species previously assessed as separate species, including their geographic distribution (extant and resident), conservation status, assessment criteria, and year of assessment.

Species	Distribution (extant and resident)	Population trend	Habitat in continuing decline	Harvesting and/or trade is a threat	Category	Criteria	Year of assessment	Source
<i>Pelophylax bedriagae</i>	Bulgaria, Egypt, Greece, Iran, Israel, Lebanon, Palestine, Syria, Türkiye	Stable	Not stated, but has tolerance to a broad range of habitats	Yes	Least Concern (LC)	—	2021	IUCN SSC Amphibian Specialist Group (2022)
<i>Pelophylax caralitanus</i>	Türkiye	Decreasing	Yes	Yes	Vulnerable (VU)	A4cd	2022	IUCN SSC Amphibian Specialist Group (2023b)
<i>Pelophylax cerigensis</i>	Greece	Unknown	Yes	No	Endangered (EN)	B1ab(iii)+2ab(iii)	2023	Spaneli & Sotiropoulos (2024)
<i>Pelophylax cypriensis</i>	Cyprus	Decreasing	Yes	Unknown extent, but likely to be in trade	Vulnerable (VU)	B1ab(iii)	2023	Zotos et al. (2024)
<i>Pelophylax kurtmuelleri</i>	Albania, Bulgaria, Greece	Decreasing	Unknown, but has tolerance to a broad range of habitats	Yes	Least Concern (LC)	—	2023	Andreone et al. (2024)
<i>Pelophylax terentievi</i>	Afghanistan, China, Tajikistan	Decreasing	Not stated	Yes	Least Concern (LC)	—	2021	IUCN SSC Amphibian Specialist Group (2023c)

Pelophylax shqipericus is listed as Vulnerable (VU) on the IUCN Red List of Threatened Species (Mizsei et al., 2024b; assessed in 2023) under criterion B1ab(iii) due to its limited extent of occurrence, severely fragmented distribution, and ongoing decline in habitat extent and quality. The species is listed in Annex D of the EU Wildlife Trade Regulations to monitor trade volumes of non-CITES listed species into the EU as well as in Appendix III of the EU Bern Convention (Convention on the Conservation of European Wildlife and Natural Habitats) as a protected fauna species.

Pelophylax lessonae: not assessed for biological or trade criteria but is considered under lookalike provisions.

Population trend:

Pelophylax epeiroticus has a decreasing population trend, with some subpopulations likely declining due to habitat deterioration. Although data are limited, the species is considered common in Albania. It is unknown whether the species is undergoing a continuing decline of mature individuals (Mizsei et al., 2024a and references therein).

Pelophylax ridibundus was most recently assessed by IUCN as having a stable population trend, being common to abundant throughout its range, and not being severely fragmented (IUCN SSC Amphibian Specialist Group, 2023; assessed in 2021 prior to taxonomic revision in 2025). However, a recent taxonomic revision (Frost, 2025), reflected in CITES CoP20 Prop. 27, reclassifies several taxa previously treated as separate species as subspecies of *P. ridibundus*. Six of these subspecies were previously assessed independently by IUCN and four of these exhibit decreasing population trends (see Table 1). Notable declines have been reported in Türkiye, eastern Europe, and parts of the Middle East and North Africa, primarily due to harvest pressure and habitat loss. Populations of *P. ridibundus* [as *P. bedriagae*] in Egypt are near extinction and one local extinction of the species has been documented in Türkiye (CITES CoP20 Prop. 27 and references therein).

Pelophylax shqipericus has a decreasing population trend, with mature individuals in continuing decline due to anthropogenic habitat alterations as well as over-collection for the pet trade (Mizsei et al., 2024b).

Pelophylax lessonae: not assessed for biological or trade criteria but is considered under lookalike provisions.

Habitat status:

Pelophylax epeiroticus is undergoing a continuing decline in habitat area, extent, and/or quality. Its ability to adapt to these changes is unknown, as is whether the population is severely fragmented (Mizsei et al., 2024a).

Pelophylax ridibundus was most recently assessed by IUCN to be a highly opportunistic species that thrives in both natural and modified aquatic habitats. The population was assessed to not be severely fragmented (IUCN SSC Amphibian Specialist Group, 2023; assessed in 2021 prior to taxonomic revision in 2025). However, a recent taxonomic revision (Frost, 2025), reflected in CITES CoP20 Prop. 27, reclassifies several taxa previously treated as separate species as subspecies of *P. ridibundus*. Six of these subspecies were previously assessed independently by IUCN— three of which exhibit continuing declines in habitat area, extent, and/or quality (Table 1).

Pelophylax shqipericus is undergoing a continuing decline in habitat area, extent, and/or quality due to anthropogenic wetland modifications. The species' ability to adapt to these habitat changes is unknown. The global population is assessed as severely fragmented, primarily due to human-induced alterations to wetland habitats (Mizsei et al., 2024b).

Pelophylax lessonae: not assessed for biological or trade criteria but is considered under lookalike provisions.

Trade levels:

Pelophylax species are primarily traded as frogs' legs—skinned and processed—or as live individuals for consumption. The frog-leg trade is characterized by a substantial level of mislabelling of specimens as skinned and processed products are impossible to assign to species without genetic methods (Auliya et al., 2023). Trade for pet or ornamental purposes has also been documented, though at significantly lower levels (CITES CoP20 Prop. 27). While trade volumes remain uncertain due to the absence of species-specific Harmonised System (HS) tariff codes, available national data indicate substantial international trade, predominantly in frogs' legs. Türkiye harvested over 400 metric tonnes of *P. ridibundus* annually between 2014 and 2023, primarily for export. EU imports averaged 160 metric tonnes annually from 2015 to 2024, with Türkiye and Albania identified as key suppliers (CITES CoP20 Prop. 27).

Pelophylax epeiroticus is used for food and appears in pet trade; however, this is not considered a major threat, and such practices are not common (Europe Red List Assessment Workshop, September 2019 cited in Mizsei et al., 2024a).

Pelophylax ridibundus is used for food and appears in the frog-leg trade. No major threats were reported for this species in the latest IUCN assessment conducted prior to taxonomic revision (IUCN SSC Amphibian Specialist Group, 2023 and references therein). However, a recent taxonomic revision (Frost, 2025), reflected in CITES CoP20 Prop. 27, reclassifies several taxa previously treated as separate species as subspecies of *P. ridibundus*. Six of these subspecies were previously assessed independently in the IUCN Red List, four of which listed overharvesting and/or trade as threats (Table 1). Frog-leg trade together with pollution and harvesting for food is reported to be leading to significant declines in parts of Asia, former Yugoslavia, Türkiye, and possibly Romania (Auliya et al., 2023; IUCN SSC Amphibian Specialist Group, 2023 and references therein).

Pelophylax shqipericus is subject to overharvesting for human consumption at both national and international levels and is also collected for the international pet trade (Altherr et al., 2022; Mizsei et al., 2024b). Overharvesting for human consumption and the pet trade are listed as key threats (Mizsei et al., 2024b) and offtake levels for trade purposes are considered unsustainable (Gratwicke et al., 2010; Auliya et al., 2023).

2. Potential other information by CITES reviews and on nature management issues in range states

Relevant information reviewed above. See section 8 and Annex 3 of the supporting statement of CITES CoP20 Prop. 27 for details on regulation and management in range states.

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))***Biological and trade criteria for inclusion in Appendix II (Resolution Conf. 9.24 (Rev. CoP 17) Annex 2a)***

- A) Trade regulation needed to prevent future inclusion in Appendix I
 B) Regulation of trade required to ensure that harvest from the wild is not reducing population to level where survival might be threatened by continued harvest or other influences

Biological and trade criteria for inclusion in Appendix II (Resolution Conf. 9.24 (Rev. CoP 17) Annex 2b)

- A) Specimens in trade resemble those of species listed in Appendix II under Res. Conf. 9.24 (Rev. CoP17) Annex 2 a or listed in Appendix I

Analysis based on information presented in section 1 and 2

- **Biological criteria:**

Pelophylax epeiroticus has a restricted area of distribution, is undergoing a continuing decline in number of individuals, and its habitat is deteriorating. These factors suggest biological vulnerability consistent with Criterion B in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17).

Pelophylax ridibundus as defined in the latest assessment by IUCN exhibits a stable population trend, is considered common to abundant across its range, and not severely fragmented. However, a recent taxonomic revision, reflected in CoP20 Prop. 27, reclassifies several taxa previously treated as separate species as subspecies of *P. ridibundus*. Six of these subspecies were previously assessed independently by IUCN; three of these are listed as Threatened, four have been assessed to be undergoing continuing decline in number of individuals, and three have been assessed to have deteriorating habitats. These regional impacts document localized biological vulnerability warranting consideration under Criterion B in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17).

Pelophylax shqipericus has a decreasing population size, a restricted and severely fragmented distribution, and its habitat is deteriorating. These factors satisfy the biological criteria as set out in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17).

- **Trade criteria:**

Pelophylax epeiroticus is harvested for food and appears in pet trade. Current trade levels are assessed as low and not believed to be a major threat. The species' restricted distribution and deteriorating habitat may increase its susceptibility to any trade impacts.

Pelophylax ridibundus is widely involved in the frog-leg trade, and in combination with pollution and harvesting for food, this trade has been linked to significant regional declines in parts of Asia, former Yugoslavia, Türkiye, and possibly Romania.

Pelophylax shqipericus is subject to overharvesting for human consumption at both national and international levels and is also collected for the international pet trade.

Finding: Inconclusive

Pelophylax epeiroticus appears not to conclusively satisfy the criteria for listing in CITES Appendix II as set out in Criterion B in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17). While current trade levels are limited, the species is present in trade and biologically vulnerable. Under a precautionary approach (Resolution Conf. 9.24 (Rev. CoP17) Annex 4), *P. epeiroticus* might be considered as satisfying the criteria for inclusion in Appendix II as set out in Criterion B in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17) in accordance with Article II, paragraph 2(a) of the Convention.

Pelophylax ridibundus is stable and abundant over much of its range, but recent taxonomic revisions have incorporated several taxa with ongoing population declines, deteriorating habitats, and which are threatened by overharvesting and trade. The species appears not to conclusively satisfy the criteria for listing in CITES Appendix II as set out in Annex 2a of Res. Conf. 9.24 (Rev. CoP17). Under a precautionary approach (Resolution Conf. 9.24 (Rev. CoP17) Annex 4), *P. ridibundus* might be considered as satisfying the criteria for inclusion in Appendix II as set out in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17) in accordance with Article II, paragraph 2(a) of the Convention.

Pelophylax shqipericus satisfies the criteria for listing in Appendix II as set out in Criterion B in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17) in accordance with Article II, paragraph 2(a) of the Convention based on its biological vulnerability and documented trade impacts.

If *P. epeiroticus*, *P. ridibundus*, or *P. shqipericus* becomes listed, then any of the proposed *Pelophylax* species—including *P. lessonae*—may satisfy the look-alike criterion (Criterion A in Annex 2b of Resolution Conf. 9.24 (Rev. CoP17)) due to the similarities of specimens in trade (frog-legs) in accordance with Article II, paragraph 2 (b) of the Convention.

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CoP20 Prop. 28 *Carcharhinus longimanus*

1. Review of listing proposal under CITES

Presentation of proposal: Transfer of *Carcharhinus longimanus* (Oceanic whitetip shark) from Appendix II to Appendix I in accordance with Resolution Conf. 9.24 (Rev. CoP17), Annex 1, paragraph C.

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

Summary of available information

Species name: *Carcharhinus longimanus* (Poey 1861), Common names: Oceanic whitetip shark, whitetip shark, white-tipped shark, whitetip oceanic shark, Scientific synonyms: *Pterolamiops longimanus* (Poey, 1861), *Carcharius obtusus* (Garman, 1881), *Carcharius insularum* (Zinder, 1904), *Pterolamiops magnipinnis* (Smith, 1958), and *Pterolamiops budkeri* (Fourmanoir, 1961).

Distribution: Algeria, American Samoa, Angola, Anguilla (United Kingdom), Antigua and Barbuda, Argentina, Aruba, Australia, Bahamas, Barbados, Belize, Bermuda (United Kingdom), Bonaire, Saint Eustatius and Saba, Brazil, British Virgin Islands (United Kingdom), Cabo Verde, Cayman Islands (United Kingdom), Chile, China, Christmas Island, Clipperton, Cocos (Keeling) Islands, Colombia, Comoros, Costa Rica, Croatia, Cuba, Curaçao, Cyprus, Democratic People's Republic of Korea, Djibouti, Dominica, Dominican Republic, Ecuador, Egypt, El Salvador, Equatorial Guinea, Eritrea, Ethiopia, Fiji, France, French Guiana [FR], French Polynesia, Gabon, Greece, Guadeloupe, Guam, Guatemala, Haiti, Honduras, India, Indonesia, Iran (Islamic Republic of), Italy, Jamaica, Japan, Kenya, Kiribati, Lebanon, Libya, Madagascar, Malaysia, Maldives, Malta, Marshall Islands, Martinique, Mauritius, Mayotte, Mexico, Micronesia (Federated States of), Montserrat (United Kingdom), Morocco, Mozambique, Myanmar, Namibia, Nauru, New Caledonia, New Zealand, Niue, Northern Mariana Islands, Oman, Palau, Panama, Papua New Guinea, Peru, Philippines, Pitcairn Islands (United Kingdom), Portugal, Puerto Rico, Republic of Korea, Réunion, Saint-Barthélemy, Saint Helena and Dependencies (United Kingdom), Saint Kitts and Nevis, Saint Lucia, Saint-Martin, Saint Vincent and the Grenadines, Samoa, Sao Tome and Principe, Saudi Arabia, Senegal, Seychelles, Sint Maarten, Solomon Islands, Somalia, South Africa, Spain, Sri Lanka, Sudan, Syrian Arab Republic, Taiwan, Province of China, Thailand, Timor-Leste, Tonga, Trinidad and Tobago, Tunisia, Türkiye, Tuvalu, United Republic of Tanzania, United States Minor Outlying Islands, United States of America, Vanuatu, Venezuela (Bolivarian Republic of), Virgin Islands of the USA, Wallis and Futuna Islands, Western Sahara, Yemen; but with some countries having uncertain distributions (UNEP, 2025). *Carcharhinus longimanus* is distributed worldwide in epipelagic tropical, subtropical and temperate waters (Young et al., 2017; Rigby et al., 2019; CITES Cop20 Prop. 28). It is highly migratory (Rigby et al., 2019).

Conservation status: *Carcharhinus longimanus* has been assessed by the IUCN Red List of Threatened Species in 2018 and is listed as Critically Endangered under criteria A2bd (Rigby et al. 2019). It is listed as Endangered A2b in Europe, assessed in 2014 (Walls et al., 2015). The species was listed on Appendix I of the Convention on the Conservation of Migratory Species of Wild Animals (CMS) I in 2020. All tuna regional fisheries management organisations have prohibited retention of oceanic whitetips by contracting parties (Young & Carlson, 2020). The species was uplisted to Annex II of the Protocol concerning Specially Protected Areas and Wildlife (SPAW) in the Wider Caribbean Region in 2023 and has been fully protected in more than 31 range States (CITES Cop20 Prop. 28).

Population trend: The population trend of *Carcharhinus longimanus* is decreasing, the population is severely fragmented and goes through extreme fluctuations (Rigby et al., 2019). Rigby et al. (2019) estimated that the global population has undergone a reduction of >98%. Furthermore, they estimate

a reduction in excess of 80% reduction over three generation lengths (61.2 years). Preliminary genetic studies suggest genetic structure between the Western Atlantic and the Indo-Pacific, and this requires further investigation (Camargo et al., 2016; Ruck et al., 2016; Young et al., 2017; Rigby et al., 2019). Population trends are available through CPUE (standardized catch-per-unit effort) in the Northwest Atlantic, Southwest Atlantic, Hawaii, WCPO (Western Central Pacific Ocean) and Spanish longline fishery in the Indian Ocean (Ramos-Cartelle et al., 2012; Brodziak & Walsh 2013; Tolotti et al., 2013; Rice et al., 2015; Young et al., 2017; Rigby et al. 2019) and through stock assessment biomass in the WCPO (Rice & Harley, 2012).

Habitat status: *Carcharhinus longimanus* habitat is under threat from climate change (CITES CoP20 Prop. 28). This includes ocean warming, acidification, and deoxygenation which reduce the depth range of pelagic sharks, reduce foraging opportunities and increase overlap with epipelagic fisheries (Vedor et al., 2021; Kim et al., 2023; Waller et al., 2024).

Trade levels: *Carcharhinus longimanus* is used for its meat, fins, liver oil, and skin (Ebert & Stehmann, 2013), and ongoing legal trade in low levels of oceanic whitetip shark fins have been reported to CITES since the CoP16 Appendix II listing entered into force (CITES CoP20 Prop. 28). In some regions, the meat of juvenile *C. longimanus* is sold fresh for human consumption at local markets (Rigby et al., 2019). Illegal trade is harder to assess, but some direct evidence of illegal trade is available through recent product seizures in Hong Kong SAR, USA and Ecuador (Bonaccorso et al., 2021; CITES CoP20 Prop. 28).

2. Potential other information by CITES reviews and on nature management issues in range states

Carcharhinus longimanus is fully protected in 31 national or territorial jurisdictions and the EU (European Union), either specifically or as part of general prohibition on the targeting and commercialization of sharks (CITES CoP20 Prop. 28). Retention of oceanic whitetips is prohibited by all Tuna Regional Fisheries Management Organizations that have jurisdiction across its global range (Young & Carlson, 2020). The species was included on Appendix II of CITES at CoP16 in 2013 with the listing coming into effect on 14 September 2014 (UNEP, 2025).

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological criteria for inclusion in Appendix I (Resolution Conf. 9.24 (Rev. CoP17) Annex 1)

- A) *Small wild population*
- B) *Restricted area of distribution*
- C) *Marked decline in number of wild individuals*

Trade criteria for inclusion in Appendix I (Article II, paragraph 1 of the Convention)

The species is or may be affected by trade

Analysis based on information presented in section 1 and 2

- **Biological criteria:** The range of *Carcharhinus longimanus* is not restricted, but the wild population has been marked by a very sharp decline and a reduction of more than 80% over three generations. The species is critically endangered with extinction.
- **Trade criteria:** Trade is a major driver of population decline in *Carcharhinus longimanus* and documentation of illegal trade exists.

Finding: Positive

Populations of this species are rapidly declining, and the species is critically endangered with extinction. Although trade in the species is regulated through CITES Appendix II listing, the level of illegal trade suggests that this has little impact on slowing overexploitation and population decline. The species fulfils the biological and trade criteria for transfer from Appendix II to Appendix I in accordance with Resolution Conf. 9.24 (Rev. CoP17), Annex 1, paragraph C.

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CoP20 Prop. 29 *Galeorhinus galeus* and *Mustelus* spp.

1. Review of listing proposal under CITES

Presentation of proposal: Inclusion of the School Shark (*Galeorhinus galeus*), Patagonian Narrownose Smoothhound (*Mustelus schmitti*), and the Common Smoothhound (*Mustelus mustelus*) in CITES Appendix II in accordance with Article II paragraph 2(a) of the Convention. Inclusion of all other species in genus *Mustelus* (smoothhounds) in Appendix II, in accordance with Article II paragraph 2 (b) of the Convention.

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

Summary of available information

Species name: Scientific name: *Galeorhinus galeus* (Linnaeus, 1758), Common names: tope, school shark, snapper shark, soupfin shark (Walker et al., 2020), Norwegian name: gråhai; Scientific name: *Mustelus schmitti* Springer, 1939, Common name: narrownose smoothhound; Scientific name: *Mustelus mustelus* (Linnaeus, 1758), Common name: common smoothhound, Norwegian name: glatthai; Norwegian name for genus *mustelus*: glatthai. Taxonomic note: *Mustelus mustelus* can be confused with *M. asterias* and *M. punctulatus* (Jabado et al., 2021).

Distribution: *Galeorhinus galeus* inhabits benthic and pelagic zones of cold to warm temperate waters of most oceans except the Northwest and Western Central Atlantic, the Northwest Pacific, and the Western Indian Ocean (Walker et al., 2020). *Mustelus schmitti* occurs on the continental shelf of the Southwest Atlantic in Argentina, Brazil and Uruguay (Pollom et al., 2020). *Mustelus mustelus* is found on the continental shelf of the east Atlantic Ocean, including the Mediterranean Sea (Jabado et al., 2021).

Conservation status:

Galeorhinus galeus is listed as Critically Endangered A2bd (population reduction of more than 80% over the last three generations, connected to exploitation) on the IUCN Red List of Threatened Species in the last global assessment from 2020 (Walker et al., 2020). The species has been listed on Appendix II of the Convention on Migratory Species (CMS) since 2020 (UNEP, 2025).

Mustelus schmitti is listed as Critically Endangered A2bd (population reduction of more than 80% over the last three generations, connected to exploitation) on the IUCN Red List of Threatened Species in the last global assessment from 2019 data (Pollom et al., 2020).

Mustelus mustelus is listed as Endangered A2bd (population reduction of more than 50% over the last three generations, connected to exploitation) on the IUCN Red List of Threatened Species in the last global assessment from 2020 (Jabado et al., 2021).

The genus *Mustelus* has another 26 species, of these three are listed as Critically Endangered, four as Endangered, and four as Vulnerable on the IUCN Red List ([IUCN Red List of Threatened Species](#)).

Population trend: Globally, the populations of the three species are decreasing and severely fragmented (Jabado et al., 2021; Pollom et al., 2020; Walker et al., 2020). *Galeorhinus galeus* has undergone a decline of more than 80% over the last three generations, or 79 years (Walker et al., 2020). *Mustelus mustelus* is suspected to have undergone a population reduction of 50–79% over the past three generation lengths, or 53 years (Jabado et al., 2021). *Mustelus schmitti* has undergone a decline of more than 80% over the last three generations, or 28 years (Pollom et al., 2020).

Habitat status: According to the proposal and references therein (CITES CoP20 Prop. 29) nursery areas for the species are increasingly threatened by coastal development and climate change.

Trade levels: *Galeorhinus galeus* has been traded for liver oil, but meat and fins are the main commodities today (Walker et al., 2020). Trade in *Mustelus* spp. has increased to replace *G. galeus* and the international trade in all species is largely unregulated (CITES CoP20 Prop. 29 and references therein). The generic use of the species makes it that the species are often not distinguished when landed and sold (CITES CoP20 Prop. 29).

2. Potential other information by CITES reviews and on nature management issues in range states

Overview of legal instruments in the National/regional level for species-specific measures can be found in Annex VI of CITES CoP20 Prop. 29.

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological and trade criteria for inclusion in Appendix II (Resolution Conf. 9.24 (Rev. CoP 17) Annex 2a)

- A) Trade regulation needed to prevent future inclusion in Appendix I
- B) Regulation of trade required to ensure that harvest from the wild is not reducing population to level where survival might be threatened by continued harvest or other influences

Biological and trade criteria for inclusion in Appendix II (Resolution Conf. 9.24 (Rev. CoP 17) Annex 2b)

- A) Specimens in trade resemble those of species listed in Appendix II under Resolution Conf. 9.24 (Rev. CoP17) Annex 2 a or listed in Appendix I

Analysis based on information presented in section 1 and 2

- **Biological criteria:** The three species are all threatened with extinction, either endangered or critically endangered. Rapid population decline is the common denominator for the extinction risk assessments. The species are mostly similar in morphology and not distinguished at species- or genus-level in trade, which in turn poses considerable risk to all species in the genus *Mustelus*.
- **Trade criteria:** Trade is the main threat to the continued survival of the three species. This trade is largely unregulated and a combination of targeted fisheries as well as commercialization of bycatch.

Finding: Positive

Continued unregulated trade in *Galeorhinus galeus*, *Mustelus schmitti* and *Mustelus mustelus* could lead to increased extinction risk and future inclusion in CITES Appendix I thus qualifying for Appendix II listing. The fundamental principle in Article II of the convention and the criteria A and B in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17) are met. The other species in the genus *Mustelus* are often traded as a generic group and thereby satisfy the criteria for Appendix II listing in accordance with Article II paragraph 2(b) of the Convention and satisfying Criterion A in Annex 2b of Resolution Conf. 9.24 (Rev. CoP17).

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CoP20 Prop. 30 *Mobulidae* spp.

1. Review of listing proposal under CITES

Presentation of proposal: Transfer of the family *Mobulidae* (manta and devil rays) from Appendix II to Appendix I in accordance with Article II, paragraph 1 of the Convention and satisfying Criterion C (i & ii) in Annex 1 of Resolution Conf. 9.24 (Rev. CoP17).

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

Summary of available information

Species name: Scientific name: *Mobula alfredi* (Krefft, 1868), Common name: reef manta ray; Scientific name: *Mobula birostris* (Walbaum, 1792), Common names: giant manta ray, oceanic manta ray, Pacific manta ray; Scientific name: *Mobula tarapacana* (Philippi, 1892), Common names: box ray, Chilean devil ray, sicklefin devil ray, spiny mobula, greater Guinean mobula, devil ray; Scientific name: *Mobula mobular*, Common name: giant devil ray; *Mobula thurstoni* (Lloyd, 1908), Common names: bentfin devil ray, smoothtail devil ray, Thurston's devil ray, lesser devil ray, smoothtail mobula; *Mobula eregoodoo* (Cantor, 1849), Common names: pygmy devil ray, longhorned pygmy devil ray; *Mobula kuhlii* (Müller & Henle, 1841), Common names: shortfin devil ray, lesser devil ray; *Mobula hypostoma* (Bancroft, 1831), Common names: lesser guinean devil ray, lesser devil ray, Atlantic devil ray; *Mobula munkiana*, Common names: Munk's devil ray, pygmy devil ray, smoothtail mobula, manta de monk, pygmy devil ray. Norwegian name for genus *Mobula*: djevelrokker. Taxonomic note: genus *Manta* was included in *Mobula* in 2023, following taxonomic changes adopted at CoP19 (AC32 Doc. 37). The proposal follows the CITES nomenclature adopted at AC33 Doc. 48.

Distribution: Family *Mobulidae* consists of nine highly migratory species found in a wide range of marine habitats in tropical and subtropical waters worldwide where they feed mainly on zooplankton, the species are known to aggregate in large groups at feeding grounds seasonally (e.g., Couturier et al., 2012). The range states for all nine species can be found in Species+ (UNEP, 2025).

Conservation status: Population reduction connected to exploitation is common for all the species in family *Mobulidae*.

Mobula alfredi – Vulnerable A2bcd+3d, assessed in 2018 (Marshall et al., 2022a).

Mobula birostris – Endangered A2bcd+3d, assessed in 2019 (Marshall et al., 2022b).

Mobula tarapacana – Endangered A2bcd+3d, assessed in 2018 (Marshall et al., 2022c).

Mobula mobular – Endangered A2bd+3d, assessed in 2018 (Marshall et al., 2022d)

Mobula thurstoni – Endangered A2bd+3d, assessed in 2018 (Marshall et al., 2022e).

Mobula eregoodoo – Endangered A2bd+3d, assessed in 2022 (Rigby et al., 2022a).

Mobula kuhlii – Endangered A2bd+3d, assessed in 2022 (Rigby et al., 2022b).

Mobula hypostoma – Endangered A2bcd+3d, assessed in 2018 (Marshall et al., 2022f).

Mobula munkiana – Vulnerable A2d+3d, assessed in 2018 (Marshall et al., 2022g).

Population trend: The populations of all species are decreasing, severely fragmented, and go through extreme fluctuations and the exact rates of decline are difficult to assess (see IUCN assessments). Rates of species-specific declines for parts of the ranges, and documentation thereof, are presented in Table 1 of CITES CoP20 Prop. 30. Species-specific population declines ranging between 78% and 98% were reported for all *Mobula* species, and from 78% to 99% for undifferentiated genus-level studies (CITES CoP20 Prop. 30, Table 1).

Habitat status: The species are particularly vulnerable as they aggregate in predictable sites where they can be targeted for fisheries (Couturier et al., 2012).

Trade levels: Species in the family *Mobulidae* are fished for meat, skin, cartilage, liver oil, and gill plates (Couturier et al., 2012). There has been an increasing demand for dried gill rays on the Asian market over the last decades, and meat is also traded internationally (O'Malley et al., 2017, Palacios et al., 2024). Unregulated and unreported international trade is common also after the inclusion in CITES Appendix II (Okes & Sant, 2022; Palacios et al., 2024).

2. Potential other information by CITES reviews and on nature management issues in range states

The genus *Manta* (now included in *Mobula*) was listed on CITES Appendix II after proposal by Brazil, Colombia and Republic of Ecuador at CoP 16 (CITES CoP16 Prop. 46). Genus *Mobula* species were listed on Appendix II of CITES after CoP17 in 2016 as proposed by Bahamas, Bangladesh, Benin, Brazil, Burkina Faso, Comoros, Costa Rica, Ecuador, Egypt, European Union, Fiji, Ghana, Guinea, Guinea-Bissau, Maldives, Mauritania, Palau, Panama, Samoa, Senegal, Seychelles, Sri Lanka and the United States of America (CoP17 Prop. 44). Guyana holds a reservation against the Appendix II listing of genus *Manta* (now included in *Mobula*) (UNEP, 2025). Review of Significant Trade (RST) in 2023 highlighted the increase and high volume in trade of the gill plates and fins of these threatened species globally, notably in Sri Lanka, India, and Yemen (CITES Secretariat & UNEP-WCMC, 2023).

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological criteria for inclusion in Appendix I (Resolution Conf. 9.24 (Rev. CoP17) Annex 1)

- A) *Small wild population*
- B) *Restricted area of distribution*
- C) *Marked decline in number of wild individuals*

Trade criteria for inclusion in Appendix I (Article II, paragraph 1 of the Convention)

The species is or may be affected by trade

Analysis based on information presented in section 1 and 2

- **Biological criteria:** Seven out of nine species are endangered with extinction, whereas the remaining two are vulnerable. All species are experiencing marked population declines.
- **Trade criteria:** Fisheries (both targeted catch and bycatch) and unregulated international trade are main drivers of the population declines. Appendix II listing has not resulted in a decrease in trade.

Finding: Positive

All species of the family *Mobulidae* are threatened with extinction (either endangered or vulnerable), and all species populations are in continuing decline. Recent marked declines have been observed for several species in parts of their ranges. All species are negatively affected by trade and continued commercial trade could drive them further towards extinction. The species meet the fundamental principles for inclusion in CITES Appendix I according to Article II, paragraph 1 of the Convention. Criterion C (i & ii) are met, since the species tend to aggregate, they may also meet Criterion A iii in Annex 1 of Resolution Conf. 9.24 (Rev. CoP17).

4. References

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CoP20 Prop. 31 *Rhincodon typus*

1. Review of listing proposal under CITES

Presentation of proposal: Transfer of the whale shark (*Rhincodon typus*) from Appendix II to Appendix I in accordance with Resolution Conf. 9.24 (Rev. CoP17), Annex 1: Criterion C.

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

Summary of available information

Species name: Scientific name: *Rhincodon typus* Smith, 1828, Common name: Whale shark, Norwegian name: Hvalhai.

Distribution: *Rhincodon typus* has a circumtropical distribution (except the Mediterranean Sea) in both coastal and oceanic habitats of the following range states: American Samoa, Angola, Anguilla, Antigua and Barbuda, Argentina, Aruba, Australia, Bahamas, Bahrain, Bangladesh, Barbados, Belize, Benin, Brazil, Brunei Darussalam, Cabo Verde, Cambodia, Cameroon, Cayman Islands, Chile, China, Colombia, Congo, Congo, The Democratic Republic of the, Cook Islands, Costa Rica, Cuba, Curaçao, Côte d'Ivoire, Djibouti, Dominica, Ecuador, Egypt, El Salvador, Equatorial Guinea, Eritrea, Ethiopia, Fiji, French Guiana, French Polynesia, Gabon, Gambia, Ghana, Grenada, Guadeloupe, Guatemala, Guinea, Guinea-Bissau, Guyana, Haiti, Honduras, India, Indonesia, Iran, Islamic Republic of, Iraq, Israel, Jamaica, Japan, Jordan, Kenya, Kiribati, Liberia, Madagascar, Malaysia, Maldives, Marshall Islands, Martinique, Mauritania, Mexico, Micronesia, Federated States of , Montserrat, Morocco, Mozambique, Myanmar, Namibia, Nauru, New Caledonia, Nicaragua, Nigeria, Niue, Oman, Pakistan, Panama, Papua New Guinea, Peru, Philippines, Pitcairn, Portugal, Puerto Rico, Qatar, Saint Helena, Ascension and Tristan da Cunha, Saint Kitts and Nevis, Saint Lucia, Saint Martin (French part), Saint Vincent and the Grenadines, Samoa, Sao Tome and Principe, Saudi Arabia, Senegal, Sierra Leone, Sint Maarten (Dutch part), Solomon Islands, Somalia, South Africa, Sudan, Suriname, Taiwan, Province of China, Tanzania, United Republic of, Thailand, Togo, Tokelau, Tonga, Turks and Caicos Islands, Tuvalu, United Arab Emirates, United States, Uruguay, Vanuatu, Venezuela, Bolivarian Republic of, Viet Nam, Virgin Islands, British, Virgin Islands, U.S., Wallis and Futuna, Western Sahara and Yemen (UNEP, 2025).

Conservation status: *Rhincodon typus* is listed as Endangered under criteria A2bd+4bd (estimated, inferred, projected or suspected population size reduction of $\geq 50\%$ over a three generations, based on abundance and levels of exploitation) on the IUCN Red List of Threatened Species, the last assessment was made in 2016 (Pierce & Norman, 2016). The level of concern was raised from Vulnerable on the previous Red List assessment in 2005 (Pierce & Norman, 2016). The species is listed on Appendix I of the Convention of Migratory Species (CMS) and on Annex B of the EU Wildlife Trade Regulations (UNEP, 2025).

Population trend: The population trend is decreasing and undergoes extreme fluctuations, with fisheries (targeted and by-catch) and vessel strikes being the major causes of decline (Pierce & Norman, 2016). The population trend varies in different parts of the range, with a combined estimated decline of more than 50% over the last 75 years (Pierce & Norman, 2016). NB! This estimate is based on 2016 data and could be outdated. Many aspects of the species life-history, e.g. its reproductive periodicity, are unknown (Pierce & Norman, 2016).

Habitat status: *Rhincodon typus* is known to aggregate in several areas of the distribution range, little is known about their reproductive biology, and the migration patterns and demographic structure are not fully understood (Rowat & Brooks, 2012). The species is vulnerable to increased activity in the marine environment, particularly in the aggregation zones (Rowat & Brooks, 2012).

Trade levels: Some targeted fisheries occur for national utilization (Pierce & Norman, 2016). As described by the proponents, little legal international trade is registered (CITES CoP20 Prop. 31), but illegal trade of fins is suspected (Pierce & Norman, 2016).

2. Potential other information by CITES reviews and on nature management issues in range states

The species has been listed on CITES Appendix II since 2003 (CITES CoP12 Prop. 35), Iceland, Indonesia, Japan, Norway and the Republic of Korea hold reservations against the listing (UNEP, 2025).

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological criteria for inclusion in Appendix I (Resolution Conf. 9.24 (Rev. CoP17) Annex 1)

- A) *Small wild population*
- B) *Restricted area of distribution*
- C) *Marked decline in number of wild individuals*

Trade criteria for inclusion in Appendix I (Article II, paragraph 1 of the Convention)

The species is or may be affected by trade

Analysis based on information presented in section 1 and 2

- **Biological criteria:** The species is in decline and its habitat increasingly disturbed.
- **Trade criteria:** Targeted fisheries and by-catch are major threats and illegal international trade suspected.

Finding: Positive

The global population of *Rhincodon typus* has been through a marked decline over the last 75 years, but data on the recent population trend is missing while the decline is expected to be on-going. The quality of the habitat is also suspected to be in continuing decline. The species thus meets Criterion C i) and ii), since the species tend to aggregate, it may also meet Criterion A iii) of Resolution Conf. 9.24 (Rev. CoP17), Annex 1. Since the productivity of the species is low, the special consideration for decline to commercially exploited aquatic species described in Annex 5 of Resolution Conf. 9.24 (Rev. CoP17) is considered to be satisfied.

4. References

CITES CoP12 Prop. 35 <https://cites.org/sites/default/files/eng/cop/12/prop/E12-P35.pdf>

CITES CoP20 Prop. 31 <https://cites.org/sites/default/files/documents/E-CoP20-Prop-31.pdf>

Pierce, S. J., & Norman, B. (2016). *Rhincodon typus*. *The IUCN Red List of Threatened Species 2016*: e.T19488A2365291. <https://dx.doi.org/10.2305/IUCN.UK.2016-1.RLTS.T19488A2365291.en> (Accessed July 9, 2025).

Rowat, D., & Brooks, K. S. (2012). A review of the biology, fisheries and conservation of the whale shark *Rhincodon typus*. *Journal of Fish Biology*, 80, 1019–1056. <https://doi.org/10.1111/j.1095-8649.2012.03252.x>

UNEP. (2025). The Species+ Website. Nairobi, Kenya. Compiled by UNEP-WCMC, Cambridge, UK. Available at: www.speciesplus.net. [Accessed 23/09/2025].

CoP20 Prop. 32 *Glaucostegus* spp.

1. Review of listing proposal under CITES

Presentation of proposal: Maintenance of the genus *Glaucostegus* (giant guitarfish) in Appendix II with the inclusion of the following annotation: "a zero annual export quota for wild-taken specimens traded for commercial purposes".

Proponent: Benin.

Summary of available information

Species name: Scientific name: *Glaucostegus cemiculus* (Geoffroy Saint-Hilaire, 1817), Common name: blackchin guitarfish; *Glaucostegus granulatus* (Cuvier Halavi guitarfish er, 1829). Common name: sharpnose guitarfish; Scientific name: *Glaucostegus halavi* (Forsskal, 1775), Common name: Halavi guitarfish; Scientific name: *Glaucostegus obtusus* (Muller & Henle, 1841), Common names: grey guitarfish, widenose guitarfish; Scientific name: *Glaucostegus thouin* (Anonymous, 1798). Common name: clubnose guitarfish; Scientific name: *Glaucostegus typus* (Bennet, 1830), Common names: common shovelnose ray, giant guitarfish, giant shovelnose ray; Scientific name: *Glaucostegus younholeei* (Habib and Islam, 2021), Common name: *Bangladeshi guitarfish* (not in Species+). Norwegian name of genus: gitarfisk.

According to the proponent all of the species are look-alikes (CITES CoP20 Prop. 33).

Distribution: Species of the genus *Glaucostegus* are found in tropical coastal waters covering the Mediterranean Sea, the coasts of Africa, the Arabian Sea, the Indian Ocean and the Indo-West Pacific (CoP20 Prop. 32 and references therein).

Conservation status: The seven species are listed as Critically Endangered on the IUCN Red List of Threatened Species. After the listing of genus *Glaucostegus* on CITES Appendix II in 2018 (CITES CoP18 Prop. 44) the conservation status of *G. granulatus* (Kyne et al. 2022a), *G. halavi* (Kyne & Jabado, 2019a), *G. obtusus* (Kyne & Jabado, 2021a), *G. thouin* (Kyne et al., 2021b) and *G. typus* (Kyne et al., 2019) has been raised from Vulnerable to Critically Endangered and *G. cemiculus* (Kyne & Jabado, 2019b) from Endangered to Critically Endangered. *Glaucostegus younholeei* (Kyne et al., 2022b) was first described in 2021 and assessed by IUCN in 2022. Genus *Glaucostegus* is listed on Annex B of the EU Wildlife Trade Regulations (UNEP, 2025). The global population of *G. cemiculus* is listed on CMS Appendix II and the Mediterranean Sea population on Appendix I (UNEP, 2025).

The genus is among the most threatened groups of vertebrates globally (Pytko et al., 2024).

Population trend: The population trend is decreasing for all species that have undergone a greater than 80% population reduction due to actual levels of exploitation over the past three generations (CITES CoP20 Prop. 32 and IUCN assessments).

Habitat status: Habitat degradation and modification are likely among the main causes for the decline (CITES CoP20 Prop. 32 and references therein).

Trade levels: The species of the genus *Glaucostegus* are exploited, mainly for fins and meat, but also other products are traded (Pytko et al., 2024). The mortality caused by targeted fisheries and by-catch is high and seems to be largely unmonitored (Pytko et al., 2024). The presence of the species on international shark fin markets suggests ongoing illegal trade (CITES CoP20 Prop. 32 and references therein).

2. Potential other information by CITES reviews and on nature management issues in range states

Genus *Glaucostegus* was listed on CITES Appendix II at CoP18 in 2018 after proposal by Bangladesh, Benin, Bhutan, Brazil, Burkina Faso, Cabo Verde, Chad, Côte d'Ivoire, Egypt, European Union, Gabon,

Gambia, Maldives, Mali, Mauritania, Monaco, Nepal, Niger, Nigeria, Palau, Senegal, Sierra Leone, Sri Lanka, Syrian Arab Republic, Togo and Ukraine (CITES CoP18. Prop. 43; UNEP, 2025).

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP17))

Biological criteria for inclusion in Appendix I (Resolution Conf. 9.24 (Rev. CoP17) Annex 1)

- A) *Small wild population*
- B) *Restricted area of distribution*
- C) *Marked decline in number of wild individuals*

Trade criteria for inclusion in Appendix I (Article II, paragraph 1 of the Convention)

The species is or may be affected by trade

Analysis based on information presented in section 1 and 2

- **Biological criteria:** The seven species of genus *Glaucostegos* have experienced marked declines (more than 80% over the last three generations) and have since 2019 been listed as Critically Endangered.
- **Trade criteria:** Unregulated and illegal trade is causing high mortality and further decline of the species.

Finding: Positive

The marked declines in the populations of the species of genus *Glaucostegos* satisfy the criteria for Appendix I listing as set out in Resolution Conf. 9.24 (Rev. CoP17) Annex 1, criterion C. The proposed zero export quota for wild-taken specimens traded for commercial purposes will improve regulation of trade but is not likely to sufficiently mitigate population decline.

4. References

CITES CoP18 Prop. 43

<https://cites.org/sites/default/files/eng/cop/18/prop/060319/E-CoP18-Prop-43.pdf>

CITES CoP20 Prop. 32 <https://cites.org/sites/default/files/documents/E-CoP20-Prop-32.pdf>

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Kyne, P. M., & Jabado, R. W. (2021a). *Glaucostegus obtusus* (amended version of 2019 assessment). *The IUCN Red List of Threatened Species 2021*: e.T60170A207283191. <https://dx.doi.org/10.2305/IUCN.UK.2021-3.RLTS.T60170A207283191.en> (Accessed July 13, 2025).

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CoP20 Prop. 33 *Rhinidae* spp.

1. Review of listing proposal under CITES

Presentation of proposal: Maintenance of the Family *Rhinidae* (wedgetfish) in Appendix II with the inclusion of the following annotation: "a zero annual export quota for wild-taken 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 and Togo.

Summary of available information

Species name: Scientific name: *Rhina ancylostomus* Bloch & Schneider, 1801, Common name: shark ray; Scientific name: *Rhynchobatus australiae* Whitley, 1939, Common names: bottlenose wedgetfish, white-spotted wedgetfish, ; Scientific name: *Rhynchobatus cooki* Last, Kyne & Compagno, 2016, Common name: clown wedgetfish ; Scientific name: *Rhynchobatus djiddensis* (Forsskål, 1775), Common names: giant guitarfish, white-spotted wedgetfish; Scientific name: *Rhynchobatus immaculatus* Last, Ho & Chen, 2013, Common name: Taiwanese wedgetfish; Scientific name: Scientific name: *Rhynchobatus laevis* (Bloch & Schneider, 1801), Common name: smoothnose wedgetfish; Scientific name: *Rhynchobatus luebberti* Ehrenbaum, 1915, common name: African wedgetfish; Scientific name: *Rhynchobatus palpebratus* Compagno & Last, 2008, Common name: eyebrow wedgetfish; Scientific name: *Rhynchobatus springeri* Compagno & Last, 2010, Common name: broadnose wedgetfish; Scientific name: *Rhynchobatus mononoke* Koeda, Itou, Yamada & Motomura, 2020 (not in Species+); Scientific name: *Rhynchorhina mauritaniensis* Séret & Naylor, 2016, Common name: false shark ray; and any other putative species of Family Rhinidae. Taxonomic notes: *Rhina ancylostomus* was originally listed as *Rhina ancylostoma*, which was subject to a nomenclature change in 2023, following taxonomic changes adopted at CoP19 (UNEP, 2025).

Distribution: Species of the family *Rhinidae* are found in tropical coastal waters covering the eastern Atlantic, across the Western and Eastern Indian Ocean, into Southeast Asia and Oceanic, extending far into the Pacific (CITES CoP20 Prop. 33 and references therein).

Conservation status: The species are listed as Critically Endangered, except *Rhynchobatus palpebratus* that is listed as Near Threatened A2bd (population decline of 20-30% over the last three generations, assessed in 2018, Kyne & Rigby, 2019) on the IUCN Red List of Threatened Species. After the listing of family *Rhinidae* on CITES Appendix II in 2018 (CITES CoP18 Prop. 44) the conservation status of *R. australiae* (Kyne et al., 2019a), *R. ancylostomus* (Kyne et al., 2019b), *R. djiddensis* (Kyne et al., 2019c), *R. laevis* (Kyne et al., 2019d), *R. cooki* (Kyne et al., 2019e), and *R. springeri* (Kyne, 2019) has been raised from Vulnerable to Critically Endangered and *R. luebberti* (Kyne & Jabado, 2019a) from Endangered to Critically Endangered. *Rhynchobatus immaculatus* (Kyne & Ebert, 2019), *R. mauritaniensis* (Kyne & Jabado, 2019b), *R. mononoke* (Jabado et al., 2024), and *R. palpebratus* (Kyne & Rigby, 2019) were assessed for the first time. The family *Rhinidae* is listed on Annex B of the EU Wildlife Trade Regulations (UNEP, 2025). *Rhynchobatus australiae* is listed on CMS Appendix II.

The family is among the most threatened group of vertebrates globally (Pytka et al., 2024).

Population trend: The population trend is decreasing for all species and 10 of 11 species have undergone a greater than 80% population reduction due to actual levels of exploitation over the past three generations (CITES CoP20 Prop. 33 and IUCN assessments).

Habitat status: Habitat degradation and modification are likely among the main causes for the decline (CITES CoP20 Prop. 33 and references therein).

Trade levels: The species of the family *Rhinidae* are exploited, mainly for fins and meat, but also other products are traded (Pytka et al., 2024). The mortality caused by targeted fisheries and by-catch is high and seems to be largely unmonitored (Pytka et al., 2024). The presence of the species on international shark fin markets suggests ongoing illegal trade (CITES CoP20 Prop. 33 and references therein).

2. Potential other information by CITES reviews and on nature management issues in range states

Family *Rhinidae* was listed on CITES Appendix II at CITES CoP18 in 2018 after proposal by Bangladesh, Benin, Bhutan, Brazil, Burkina Faso, Cabo Verde, Chad, Côte d'Ivoire, Egypt, Ethiopia, European Union, Fiji, Gabon, Gambia, India, Jordan, Kenya, Lebanon, Maldives, Mali, Mexico, Monaco, Nepal, Niger, Nigeria, Palau, Philippines, Saudi Arabia, Senegal, Seychelles, Sri Lanka, Sudan, Syrian Arab Republic, Togo and Ukraine (CITES CoP18 Prop. 44).

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP17))

Biological criteria for inclusion in Appendix I (Resolution Conf. 9.24 (Rev. CoP17) Annex 1)

- A) Small wild population
- B) Restricted area of distribution
- C) Marked decline in number of wild individuals

Trade criteria for inclusion in Appendix I (Article II, paragraph 1 of the Convention)

The species is or may be affected by trade

Analysis based on information presented in section 1 and 2

- **Biological criteria:** Ten of eleven species have experienced marked declines (more than 80% over the last three generations) and have since 2019 been listed as Critically Endangered.
- **Trade criteria:** Unregulated and illegal trade is causing high mortality and further decline of the species.

Finding: Positive

The marked declines in the populations of most species of the family *Rhinidae* qualify for CITES Appendix I listing Resolution Conf. 9.24 (Rev. CoP17) Annex 1, Criterion C. The proposed zero export quota for wild-taken specimens traded for commercial purposes will improve regulation of trade but is not likely to sufficiently mitigate population decline.

4. References

CITES CoP18 Prop. 44

<https://cites.org/sites/default/files/eng/cop/18/prop/19032019/E-CoP18-Prop-44.pdf>

CITES CoP20 Prop. 33 <https://cites.org/sites/default/files/documents/E-CoP20-Prop-33.pdf>

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CoP20 Prop. 34 *Centrophoridae* spp.

1. Review of listing proposal under CITES

Presentation of proposal: Inclusion of the dwarf gulper shark (*Centrophorus atromarginatus*), and the gulper shark (*Centrophorus granulosus*) in Appendix II in accordance with Article II paragraph 2(a) of the Convention and satisfying the criteria A and B in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17).

Inclusion of all other species in the family *Centrophoridae* (gulper sharks) and any other putative species within the family *Centrophoridae* in Appendix II in accordance with Article II paragraph 2(b) of the Convention and satisfying Criterion A in Annex 2b of Resolution Conf. 9.24 (Rev. CoP17).

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

Summary of available information

Species name: Scientific name: *Centrophorus atromarginatus* Garman, 1913; Common name: dwarf gulper shark; Scientific name: *Centrophorus granulosus* (Bloch & Schneider, 1801); Common name: gulper shark.

Other species in the family *Centrophoridae*: *C. harrissoni*, *C. isodon*, *C. lesliei*, *C. longipinnis*, *C. lusitanicus*, *C. moluccensis*, *C. seychellorum*, *C. squamosus* (brunhå), *C. tessellatus*, *C. uyato*, *C. westraliensis*, *Deania calceus* (gråhå), *D. profundorum*, *D. quadrispinosa* and any other putative species.

Distribution: *Centrophorus atromarginatus* is a groundfish found patchily distributed on the upper continental slopes in the Pacific, and the Indian Oceans. The range states are India, Indonesia, Japan, Oman, Papua New Guinea, Somalia, Sri Lanka and Taiwan, Province of China (Rigby et al., 2024). *Centrophorus granulosus* can be found at greater depth and has a patchy, but global distribution in the Atlantic and Indo-Pacific Oceans (Finucci et al., 2024a).

Conservation status: *Centrophorus atromarginatus* is listed as Critically Endangered A2bd (population reduction of more than 80% over the last three generation connected to exploitation) on the IUCN Red List of Threatened Species, it was last assessed in 2019 (Rigby et al., 2024). *Centrophorus granulosus* is listed as Endangered A2bd (population reduction of more than 50% over the last three generation connected to exploitation) globally and was last assessed in 2024 (Finucci et al., 2024a). The species is regionally assessed as Critically Endangered in Europe (Guallart et al., 2015) and the Mediterranean (Guallart et al., 2016). Of the other species in the family *Centrophoridae*, seven are currently listed as Endangered and four as Vulnerable on the IUCN Red List (CITES CoP20 Prop. 34 and references therein).

Population trend: The populations of both *C. atromarginatus* and *C. granulosus* are decreasing, severely fragmented and undergo extreme fluctuations (Finucci et al., 2024a, Rigby et al., 2024). *Centrophorus atromarginatus* has experienced population decline of more than 80% over the last three generations, or 83 years (Rigby et al., 2024). For *C. granulosus* a population reduction of 50–79% has been estimated over the last three generations, or approximately 83 years (Finucci et al., 2024a).

Habitat status: The habitat of all the species in the family *Centrophoridae* is increasingly negatively impacted by fisheries (e.g. Finucci et al., 2024b).

Trade levels: Both *C. atromarginatus* and *C. granulosus* are subjects to targeted fisheries and by-catch by various fishing gear (Finucci et al., 2024a; Rigby et al., 2024), the meat is used locally, and liver oil (rich in squalene) is traded internationally. According to the proponents (CITES CoP20 Prop. 34) taxonomic uncertainty and identification the group is often reported under a generic category in catch and landings data (i.e., *Centrophorus* spp.). Finucci et al. (2024b) shows that unregulated trade of liver oil causes increased extinction risk of deepwater sharks.

2. Potential other information by CITES reviews and on nature management issues in range states

While no national or international legislations are in place to protect *C. atromarginatus*, *C. granulatus* (and *C. squamosus*) was included in the Convention for the Protection of the Marine Environment of the North-East Atlantic (OSPAR) in 2008 and since 2020 directed fisheries and by-catch retention are banned (CITES CoP20 Prop. 34 and references therein).

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological and trade criteria for inclusion in Appendix II (Resolution Conf. 9.24 (Rev. CoP 17) Annex 2a)

- A) Trade regulation needed to prevent future inclusion in Appendix I
- B) Regulation of trade required to ensure that harvest from the wild is not reducing population to level where survival might be threatened by continued harvest or other influences

Biological and trade criteria for inclusion in Appendix II (Resolution Conf. 9.24 (Rev. CoP 17) Annex 2b)

- A) Specimens in trade resemble those of species listed in Appendix II under Resolution Conf. 9.24 (Rev. CoP17) Annex 2 a or listed in Appendix I

Analysis based on information presented in section 1 and 2

- **Biological criteria:** The species are undergoing rapid declines and the populations severely fragmented. *Centrophorus atromarginatus* has experienced population decline of more than 80% over the last three generations, or 83 years. *C. granulatus* has experienced population reductions of 50–79% over the last three generations, or approximately 83 years.
- **Trade criteria:** Unregulated trade is a major threat to the species.

Finding: Positive

Continued unregulated trade in *Centrophorus atromarginatus* and *Centrophorus granulatus* could lead to increased extinction risk and future inclusion in CITES Appendix I, the fundamental principle in Article II of the Convention and the criteria A and B in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17) is thus met. The other species in the family *Centrophoridae* are often traded as a generic group and thereby qualify for Appendix II listing in accordance with Article II paragraph 2(b) of the Convention and satisfying Criterion A in Annex 2b of Resolution Conf. 9.24 (Rev. CoP17). The rate of declines observed are in line with the special consideration for listing in Appendix II for commercially exploited aquatic species described in Annex 5 of Resolution Conf. 9.24 (Rev. CoP17).

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CoP20 Prop. 35 *Anguilla* spp.

1. Review of listing proposal under CITES

Presentation of proposal: To include *Anguilla japonica* and *Anguilla rostrata* in CITES Appendix II, in accordance with Article II, Paragraph 2 (a) of the Convention and Criterion B of Annex 2a, and to include all non-CITES species of the genus *Anguilla* in CITES Appendix II in accordance with Article II, Paragraph 2 (b) of the Convention and satisfying Criterion A of Annex 2b of Resolution Conf. 9.24 (Rev. CoP17) for reasons of similarity to *A. anguilla*, or to one of the proposed species (*Anguilla japonica* and *Anguilla rostrata*) in live/processed form. Entry into effect would be delayed by 18 months, i.e. until 5 June 2027.

Proponents: European Union, Honduras and Panama.

Summary of available information

Species name: Scientific name: *Anguilla japonica* Temminck & Schlegel 1846, common name: Japanese eel, Norwegian name: japansk ål; Scientific name: *Anguilla rostrata* (Lesueur 1817), common name: American eel, Norwegian name: amerikansk ål.

It is proposed to also include the entire genus *Anguilla* spp. with 13 species and their subspecies described in detail in Annex 1 of the proposal (CITES CoP20 Prop. 35 Annex 1).

Distribution: *Anguilla japonica* is known to spawn by the Mariana Ridge and its range states are China (Hong Kong, Taiwan), Japan; Republic of Korea (Pike et al., 2020). The spawning site of *A. rostrata* is unknown it is found along the coast and in streams from West Greenland along the Atlantic coast of Canada and USA to the northern part of South America and on Islands of the Caribbean and West Indies (Pike et al., 2023).

Anguilla spp. are globally distributed, except for the South Atlantic and eastern Pacific Oceans (Gollock et al., 2018).

Conservation status: *Anguilla japonica* is listed as Endangered A2bcd (population reduction of at least 50% over the last three generations connected to habitat decline and levels of exploitation) by the IUCN Red List of Threatened Species, the assessment was made in 2018 (Pike et al., 2020). *Anguilla rostrata* is listed as Endangered A2bd (population reduction of at least 50% over the last three generations connected to levels of exploitation) by IUCN, the assessment was made in 2020 (Pike et al., 2023).

Population trend: The population of *A. japonica* is decreasing (Pike et al., 2020). The current population trend of *A. rostrata* is stable, but varies within the distribution range (Pike et al., 2023).

Habitat status: Anguillid eels inhabit a range of aquatic and marine habitat types throughout their various life stages. Their habitats are undergoing declines in quality and extent due to e.g. dams, and other barriers towards migration, and pollution (CITES CoP20 Prop. 35 and references therein).

Trade levels: Anguillid eels are in high demand for direct consumption and for stocking eel farms, on both domestic and international markets (CoP20 Prop. 35 and references therein). It has been documented that when one *Anguilla* species becomes over-exploited the demand will increase for others (Gollock et al., 2018). Over the last two decades, a dramatic increase in demand for glass eels of *A. rostrata* to supply East Asian farms, due to the decline in the availability of *A. anguilla* and *A. japonica*, has been reported (Choo et al., 2025). It is evident that *A. anguilla* still is traded illegally on the international market in large quantities (CITES, 2022).

2. Potential other information by CITES reviews and on nature management issues in range states

Anguilla anguilla was included in CITES Appendix II in 2009 after proposal by Germany, on behalf of the European Community, at CoP14 in 2007 (CITES CoP14 Prop. 18).

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological and trade criteria for inclusion in Appendix II (Resolution Conf. 9.24 (Rev. CoP 17) Annex 2a)

- A) Trade regulation needed to prevent future inclusion in Appendix I
 B) Regulation of trade required to ensure that harvest from the wild is not reducing population to level where survival might be threatened by continued harvest or other influences

Biological and trade criteria for inclusion in Appendix II (Resolution Conf. 9.24 (Rev. CoP 17) Annex 2b)

- A) Specimens in trade resemble those of species listed in Appendix II under Resolution Conf. 9.24 (Rev. CoP17) Annex 2 a or listed in Appendix I

Analysis based on information presented in section 1 and 2

- **Biological criteria:** The populations of *A. japonica* and *A. rostrata* have declined more than 50% over the last three generations, and both species are threatened with extinction. The habitats of all of the species of the genus *Anguilla* are declining in extent and quality.
- **Trade criteria:** Unregulated trade is the major threat to *A. japonica* and *A. rostrata* and is expected to impact other species of anguillid eels if the decline continues.

Finding: Positive

To include *Anguilla japonica* and *Anguilla rostrata* in CITES Appendix II will be in accordance with Article II, Paragraph 2 (a) (to prevent that unregulated trade leads to increased risk of extinction) and satisfy Annex 2a Criterion B of Resolution Conf. 9.24 (Rev. CoP17) that regulation of trade in the species is required to ensure that the harvest of specimens from the wild is not reducing the wild population to a level at which its survival might be threatened by continued harvesting or other influences.

To include all species of genus *Anguilla* in CITES Appendix II will be in accordance with Article II Paragraph 2 (b) that also other species which must be subject to regulation and satisfy Criterion A of Annex 2b of Resolution Conf. 9.24, for species resembling species included in Appendix II under the provisions of Article II, paragraph 2 (a).

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CITES CoP14 Prop. 18 <https://cites.org/sites/default/files/eng/cop/14/prop/E14-P18.pdf>

CITES CoP20 Prop. 35 https://cites.org/sites/default/files/documents/E-CoP20-Prop-35_0.pdf

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CoP20 Prop. 36 *Actinopyga* spp.

1. Review of listing proposal under CITES

Presentation of proposal: Inclusion of *Actinopyga echinites*, *A. mauritiana*, *A. miliaris* and *A. varians* in Appendix II, in accordance with Article II, Paragraph 2a of the Convention and satisfying criterion B of Annex 2a of Resolution Conf. 9.24 (Rev. CoP17), and for reasons of similarity, inclusion of *A. lecanora* and *A. palauensis* in Appendix II in accordance with Article II, Paragraph 2 (b) of the Convention and satisfying Criterion A of Annex 2b of Resolution Conf. 9.24 (Rev. CoP17).

Proponent: European Union.

Summary of available information

Species names:

Actinopyga echinites (Jaeger, 1833); Common name: brownfish, deepwater redfish

Actinopyga mauritiana (Quoy & Gaimard, 1834); Common name: surf redfish

Actinopyga miliaris (Quoy & Gaimard, 1834); Common name: hairy blackfish

Actinopyga varians Cherbonnier, 1980; Common name: Pacific white-spotted sea cucumber

Actinopyga lecanora (Jaeger, 1833); Common name: white-bottomed sea cucumber, stonefish

Actinopyga palauensis (Panning, 1944); Common name: Panning's blackfish

Distribution: *Actinopyga echinites*, *A. mauritiana*, *A. miliaris* and *A. lecanora* occur along the eastern coastline of the African continent including the Red Sea area from Egypt (Suez) to Mozambique, including Madagascar and surrounding islands. Furthermore, it is found within the Indo-Pacific Ocean with a range from Myanmar to Guam (north) and Fiji (south-east), including the coastline northern Australia. *Actinopyga varians* has a limited distribution outside Tonga and outside French Polynesia. *Actinopyga palauensis* occurs on the coastline of Tonga and Niue, Palau, along the coastline of Australia from Cape Melville to Woodwark and along the coastline of New Caledonia.

Conservation status:

Actinopyga echinites is listed as Vulnerable under criteria A2bd (reduction in population size observed combined with habitat reduction and exploitation) on the IUCN Red List of Threatened Species, the last assessment was made in 2010 (Conand et al., 2013a).

Actinopyga mauritiana is listed as Vulnerable under criteria A2bd (reduction in population size observed combined with habitat reduction and exploitation) on the IUCN Red List of Threatened Species, the last assessment was made in 2010 (Conand et al., 2013b). Some countries have banned harvesting (such as India) and other have regulated harvesting (Conand et al., 2013b)

Actinopyga miliaris is listed as Vulnerable under criteria A2bd (reduction in population size observed combined with habitat reduction and exploitation) on the IUCN Red List of Threatened Species, the last assessment was made in 2010 (Conand et al., 2013c). Some countries have banned harvesting (such as India) and other have regulated harvesting (Conand et al., 2013c)

Actinopyga varians is listed as Data Deficient on the IUCN Red List of Threatened Species, the last assessment was made in 2012 (Samyn et al., 2013). The species is not reported as commercially important, and no conservation measurements have been taken (Samyn et al., 2013).

Actinopyga lecanora is listed as Data Deficient on the IUCN Red List of Threatened Species, the last assessment was made in 2010 (Conand et al., 2013d). The species is harvested throughout its

distribution (Kinch et al. 2008), but in several countries size limitation and gear restriction are implemented as conservation actions (Kinch et al., 2008; Conand et al., 2013d).

Actinopyga palauensis is listed as Least Concern on the IUCN Red List of Threatened Species and there are no known conservation measures taken for this species (Conand et al., 2013e).

Population trend: *Actinopyga echinites*, *A. mauritiana* and *A. militaris* are reported to be declining in numbers of mature individuals. Their populations are reported to have extreme fluctuations and are severely fragmented. Taken together the current population trend is decreasing (Conand et al., 2013a; Conand et al., 2013b; Conand et al., 2013c).

Actinopyga varians, *A. lecanora* and *A. palauensis* are reported to be declining in numbers of mature individuals and their populations are reported to have extreme fluctuations, but given data deficiency, the current population trend is unknown (Conand et al., 2013d; Conand et al., 2013e; Samyn et al., 2013).

Habitat status: The habitat of the species *Actinopyga echinites*, *A. mauritiana*, *A. militaris*, *A. varians*, *A. lecanora* and *A. palauensis* are reported to be declining in area, extent and or quality (Conand et al., 2013a; Conand et al., 2013b; Conand et al., 2013c; Conand et al., 2013d; Conand et al., 2013e; Samyn et al., 2013).

Trade levels: An estimated number of three million sea cucumbers (family Holothuriidae) are reportedly harvested globally (Purcell et al., 2013) by small-scale fisheries in the tropics (Bell et al., 2008; Purcell et al., 2024). High international demand is the main driver for the four species of Holothuriidae proposed to be included in Appendix II, after criterion B, Annex 2a (Purcell et al., 2009, 2013). Most harvested Holothuriidae are exported and do not constitute major part of local diet or trade (Purcell et al., 2025), with some exemptions such as Palau (Pakoa et al., 2009), Cook Islands (Morejohn & Argyle, 2024) and in Madagascar and Mauritius (Conand et al., 2022).

2. Potential other information by CITES reviews and on nature management issues in range states

Three other Holothuriidae species, *H. nobilis*, *H. fuscogilva* and *H. whitmaei* were listed on Appendix II at CoP18 in 2020, with effectuation in 2020. The inclusion of *Isostichopus fuscus* in CITES Appendix III, sparked a debate on whether conservation of the Holothuriidae may be addressed with their inclusion in one of the CITES Appendices (Toral-Granda, 2007). Some countries have regulated harvesting (Toral-Granda et al., 2008; Muthiga et al., 2010).

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological and trade criteria for inclusion in Appendix II (Resolution Conf. 9.24 (Rev. CoP 17) Annex 2a)

- A) Trade regulation needed to prevent future inclusion in Appendix I
- B) Regulation of trade required to ensure that harvest from the wild is not reducing population to level where survival might be threatened by continued harvest or other influences

Biological and trade criteria for inclusion in Appendix II (Resolution Conf. 9.24 (Rev. CoP 17) Annex 2b)

- A) Specimens in trade resemble those of species listed in Appendix II under Resolution Conf. 9.24 (Rev. CoP17) Annex 2 a or listed in Appendix I

Analysis based on information presented in section 1 and 2

- **Biological criteria:** The populations of the four proposed species of Holothuriidae (*Actinopyga echinites*, *A. mauritiana*, *A. militaris* and *A. varians*) and the two species included due to species similarities and difficulties in species identification (*A. lecanora* and *A. palauensis*) are either in decline or their status is unknown and they are all either Vulnerable or Data deficient on the IUCN Red List.
- **Trade criteria:** Unregulated trade is a significant threat to *Actinopyga echinites*, *A. mauritiana*, *A. militaris* and *A. varians*, and potentially impacts *A. lecanora* and *A. palauensis*.

Finding: Positive

The species *Actinopyga echinites*, *A. mauritiana*, *A. militaris* and *A. varians* satisfy the biological and trade criteria for inclusion in CITES Appendix II, respectively Article II, Paragraph 2 (a) and Annex 2a Criterion B of Conf. 9.24 (Rev. CoP17). The species *A. lecanora* and *A. palauensis* satisfy the criteria of Annex 2b Criterion A of Resolution Conf. 9.24 (Rev. CoP17) for inclusion in CITES Appendix II. Inclusion of the four species in trade without including the two species not currently affected by trade, could lead to a shift from the listed taxa to the other taxa in the genus as significant identification challenges exist due to species similarities.

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CoP20 Prop. 37 *Holothuria lessoni*

1. Review of listing proposal under CITES

Presentation of proposal: To include *Holothuria lessoni* in CITES Appendix II, in accordance with Article II, Paragraph 2 (a) of the Convention and satisfying Criterion B of Annex 2 a of Resolution Conf. 9.24 (Rev. CoP17).

Proponents: European Union.

Summary of available information

Species name: *Holothuria lessoni* (Massin, Uthicke, Purcell, Rowe & Samyn, 2009); Common name: Golden sandfish.

The taxon was previously described under the scientific name *Holothuria timama* Lesson, 1830, but this name is scientifically rejected (Massin, Uthicke, Purcell, Rowe & Samyn, 2009).

A taxonomic study based on molecular and morphological data has revised two members within the Holothuriidae (*H. scabra* and *H. lessoni* sp. nov), clearly defining species delimitations and characters between the two taxa (Massin, Uthicke, Purcell, Rowe & Samyn, 2009).

Distribution: *Holothuria lessonii* inhabits shallow waters (0-25 m depth) in the Indo-Pacific ocean and along the coastline of eastern Africa, more specifically on the northern coast of Australia, along the coastline of American Samoa, Bangladesh, British Indian Ocean Territory, Cambodia, in the southernmost part of China, along the coastlines of Christmas Island, Comoros, Fiji, India and Sri Lanka, Indonesia, Kenya; Madagascar, Malaysia, Maldives, Mauritius, Mayotte, Mozambique, Myanmar, New Caledonia, Niue, Palau, Papua New Guinea, Philippines, Réunion, Samoa, Seychelles, Singapore, Solomon Islands, Somalia, Tanzania, Thailand, Tonga, Vanuatu, Viet Nam, Wallis and Futuna.

Conservation status: *Holothuria lessoni* is listed as Endangered under criteria A2bd (reduction in population size observed, indirect observations of continuously decreasing populations combined with exploitation) on the IUCN Red List of Threatened Species, the last assessment was made in 2010 (Conand et al., 2013). The species has not previously been evaluated by either the Convention of Migratory Species (CMS) or Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

Population trend: The population trend is decreasing, and although being widely distributed, the population is severely fragmented (Conand et al., 2013). Some of the range states consider *H. lessoni* conspecific with *H. scabra* (Conand et al., 2013), making population estimations uncertain. In several areas, the species is reported in fewer numbers and at fewer localities (Kinch et al., 2008) and even depleted in some range areas due to harvesting (Purcell et al., 2009).

Habitat status: Holothuriidae are known to occupy a wide range of habitats (Ceccarelli et al., 2018), however the marine neritic areas are often subjected to anthropogenic influences (Bulleri & Chapman, 2010), indirectly influencing population size. Moreover, clear connections between habitat cc and juvenile survival have been demonstrated (Ceccarelli et al., 2018).

Trade levels: *H. lessoni* is harvested for consumption and is one of the most valuable tropical sea cucumber species in the dried seafood market, and there is a clear correlation between its high marked value and the observed decline in populations (Purcell et al., 2024). Mislabelling of dried specimens is seemingly widespread for species identification (Fabinyi et al., 2017) and country of origin (Purcell et al., 2024), making it difficult to assess the level of illegal harvest (Purcell et al., 2024).

Already in 2009 (Purcell et al., 2009) fisheries reported a discrepancy between the low catch of *H. lessoni* and the commercial value and interest in this species, suggesting that stocks of *H. lessoni* were depleted already 15 years ago, due to overexploitation. The inclusion of other Holothuriidae species in

the CITES Appendix II have demonstrated reduced trade and subsequently reduced harvesting, although an increase in marked price is often observed in these cases (Purcell et al., 2024).

2. Potential other information by CITES reviews and on nature management issues in range states

Three other Holothuriidae species, *H. nobilis*, *H. fuscogilva* and *H. whitmaei* were listed on Appendix II at CoP18 in 2020, with effectuation in 2020. This listing might have shifted trade towards *H. lessoni* due to lack of regulation.

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological and trade criteria for inclusion in Appendix II (Resolution Conf. 9.24 (Rev. CoP 17) Annex 2a)

- A) Trade regulation needed to prevent future inclusion in Appendix I
 B) Regulation of trade required to ensure that harvest from the wild is not reducing population to level where survival might be threatened by continued harvest or other influences

Analysis based of information presented in section 1 and 2

- **Biological criteria:** The wild population of *H. lessoni* is decreasing and severely fragmented.
- **Trade criteria:** Harvesting for trade and consumption is the leading cause of population decline.

Finding: Positive

Uncontrolled harvesting and trade of *Holothuria lessoni* has led to a reduction in population size. Listing of other *Holothuria* species in CITES Appendix II, adopted at CoP18, has probably exacerbated harvesting pressure on *Holothuria lessoni*. Regulation of international trade is needed to avoid threatening the future survival of the species in the wild. *Holothuria lessoni* meets the criteria for inclusion in Appendix II described in Annex 2(a) A and B of Resolution Conf. 9.24 (Rev. CoP17) and satisfies the fundamental principle for inclusion in Appendix II as described in Article II, Paragraph 2 (a) of the Convention.

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CoP20 Prop. 38 Theraphosidae species

1. Review of listing proposal under CITES

Presentation of proposal: Inclusion of the tarantula *Grammostola rosea* in CITES Appendix II under Article II, Paragraph 2(a) of the Convention, and 14 species of tarantulas of the genera *Acanthoscurria*, *Avicularia*, *Catumiri*, *Cyriocosmus*, *Haplotremus*, *Holothele*, *Pamphobeteus*, and *Umbyquyra* in accordance with Article II, Paragraph 2(b) of the Convention. In accordance with Resolution Conf. 9.24 (Rev. CoP17) the criteria for inclusion in Appendix II are assessed based on Annex 2a and 2b.

Proponents: Argentina, Bolivia and Panama.

Summary of available information

Species names:

Scientific name: *Grammostola rosea* (Walckenaer, 1837); Common name: Chilean rose hair tarantula; Norwegian common name: rød chilener. Synonyms: *Grammostola spathulata* (F. O. Pickard-Cambridge 1897), *Grammostola porteri* (Mello-Leitão, 1936).

Scientific name: *Acanthoscurria chacoana* (Brèthes, 1909); Common name: Bolivian red rump tarantula.

Scientific name: *Acanthoscurria insubtilis* (Simon, 1892); Common name: Bolivian black velvet tarantula.

Scientific name: *Acanthoscurria musculosa* (Simon, 1892); Common name: Brazilian black velvet.

Scientific name: *Acanthoscurria theraphosoides* (Doleschall, 1871); Common name: Giant black-and-white tarantula.

Scientific name: *Avicularia hirschii* (Bullmer, Thierer-Lutz y Schmidt, 2006); Common name: Ecuador pinktoe tarantula; Norwegian common name genus *Avicularia*: fogleedderkopper.

Scientific name: *Avicularia rufa* (Schiapelli y Gerschman, 1945); Common name: Yellow-banded pinktoe tarantula. Norwegian common name genus *Avicularia*: fogleedderkopper.

Scientific name: *Avicularia avicularia* (Linnaeus, 1758); Common name: Guyana pinktoe tarantula. Norwegian common name genus *Avicularia*: fogleedderkopper.

Scientific name: *Catumiri argentinense* (Mello-Leitão, 1941); Common name: Argentinian bronze tarantula.

Scientific name: *Cyriocosmus bertae* (Pérez-Miles, 1998); Common name: Peruvian dwarf beauty.

Scientific name: *Cyriocosmus perezmilei* (Kaderka, 2007); Common name: Bolivian dwarf beauty tarantula.

Scientific name: *Haplotremus albipes* (Simon, 1903); Common name: Bolivian White Leg Tarantula.

Scientific name: *Holothele longipes* (L. Koch, 1875); Common name: Trinidad Pink Tarantula.

Scientific name: *Pamphobeteus antinous* (Pocock, 1903); Common name: Bolivian blue leg bird eater, steely blue leg.

Scientific name: *Umbyquyra acuminatum* (Schmidt y Tesmoingt, 2005); No common name.

Distribution: *Grammostola rosea* is distributed in Chile, Argentina, and Bolivia (Aguilera et al., 2022). *Acanthoscurria chacoana* is recorded in Brazil, Bolivia, Argentina and Paraguay (GBIF 2023a). *Acanthoscurria insubtilis* is recorded in Peru, Bolivia, Brazil, Colombia and Bolivia (GBIF 2023b). *Acanthoscurria insubtilis* is recorded in Argentina, Brazil and Bolivia, Colombia and Uruguay (GBIF,

2023c). *Acanthoscurria theraphosoides* is recorded in French Guiana, Brazil, Peru and Venezuela (GBIF, 2023d). *Avicularia hirschii* is recorded in Colombia, Peru, Ecuador and Brazil (GBIF 2023e). *Avicularia rufa* is recorded in Brazil, Bolivia and Ecuador (GBIF, 2023f). *Avicularia aviculariais* recorded in Brazil, French Guiana, Peru, Bolivia, Peru, Trinidad and Tobago and Surinam (GBIF 2023g). *Catumiri argentinense* is recorded in Chile, Brazil and Argentina (GBIF 2023h). *Cyriocosmus bertae* has one record within Bolivia (GBIF 2023i). *Cyriocosmus perezmilei* is recorded in Peru and Bolivia (GBIF 2023j). *Haplotremus albipes* has no records in GBIF (GBIF 2023k). *Holothele longipes* is recorded in Venezuela, Trinidad and Tobago, Colombia, Venezuela, Ecuador, French Guiana, Colombia, Brazil, Panama and Peru (GBIF, 2023l). *Pamphobeteus antinous* is recorded in Peru and Bolivia (GBIF 2023m). *Umbyquyru acuminatum* is recorded in Bolivia (GBIF, 2023n).

Conservation status: There is no known conservation status on the species *G. rosea* or either of the 14 species proposed for listing due to species similarities (CITES Cop20 Prop. 38, Annex 1).

Population trend: There are no known data on population trends of *G. rosea* or either of the 14 species listed in the proposal (CITES CoP20 Prop. 38).

Habitat status: According to the proponents, the habitats of these species are generally negatively impacted by human activities (CITES CoP20 Prop. 38). The habitat is reported reduced in Bolivia due to forest loss driven by agricultural expansion (Müller et al., 2014; Quintanilla et al., 2023). In Chile, the species habitat is subjected to fragmentation and reduction (Aguilera et al., 2019).

Trade levels: Tarantula species from this region are known to be common in trade (Marshall et al., 2022; Hertzog et al., 2023). There are reports that some tarantulas are bred in captivity, however, most individuals within tarantula trade >50 % are wild captures (Marshall et al., 2022). For the period 2016-2020, the Law Enforcement Management Information System (LEMIS) from the US Fish and Wildlife Service import recorded 600,000 individuals of the genus *Grammostola* as imported, of which 89% were wild sourced (de Orca and Mendoza, 2020). 72,086 individuals of *G. rosea* (traded as *G. spathulata*) were reported to originate from countries in which they are not native (Marshall et al., 2022). 218 individuals of *G. rosea* were documented for sale in the Philippines, as well as species of the genera *Acanthoscurria*, *Avicularia*, *Cyriocosmus* and *Pamphobeteus* (Raymundo et al., 2024). Further evidence of on-line sale of *G. rosea* is presented in Annex 2 of the proposal (CoP20 Prop. 38, Annex 2). Hertzog et al. (2023) found that members of the genus *Grammostola* constitutes 11,5 % of all arachnid imports to the US. However, they did see a decline in *Grammostola* import numbers harnessing data from LEMIS (Hertzog et al., 2023). It is important to note that these are combined numbers across all species within the genus *Grammostola*, and not *G. rosea* specifically.

2. Potential other information by CITES reviews and on nature management issues in range states

G. rosea is regulated under the Hunting Law in Chile (Gobierno de Chile, 1996), lacks official status in Bolivia or Argentina. *P. antinous* is listed as Vulnerable (VU) in Peru (Guerra-Serrudo et al., 2023).

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological and trade criteria for inclusion in Appendix II (Resolution Conf. 9.24 (Rev. CoP 17) Annex 2a)

- A) Trade regulation needed to prevent future inclusion in Appendix I
 B) Regulation of trade required to ensure that harvest from the wild is not reducing population to level where survival might be threatened by continued harvest or other influences

Biological and trade criteria for inclusion in Appendix II (Resolution Conf. 9.24 (Rev. CoP 17) Annex 2b)

- A) Specimens in trade resemble those of species listed in Appendix II under Resolution Conf. 9.24 (Rev. CoP17) Annex 2 a or listed in Appendix I

Analysis based on information presented in section 1 and 2

- **Biological criteria:** The population status of *G. rosea* is unknown, and more studies are needed to assess actual population size and population drivers within its native range. It remains unclear whether the 14 species proposed for inclusion in accordance with Resolution Conf. 9.24 (Rev. CoP17) Annex 2b, criterion A do have a resemblance making them prone to species misidentification with the proposed species *G. rosea*. It is unclear if there are other species that would require listing to bring the trade in *G. rosea* under control.
- **Trade criteria:** The high numbers of reported wild captures for international trade undoubtedly affect the population, however, it remains unclear to what extent trade poses a threat to the species *G. rosea* due to lack of both population data and trade data.

Finding: Positive

Considering the high trade volume, limited population data, and potential risk of overharvesting, *Grammostola rosea* meets the criteria for listing in CITES Appendix II under the precautionary approach, as set out in Annex 4 of Resolution Conf. 9.24 (Rev. CoP17). Difficulties in identifying tarantula species in traded form, both adult and juvenile, poses challenges for enforcement, and the criteria for inclusion in Appendix II according to Resolution Conf. 9.24 (Rev. CoP17) Annex 2b, criterion A are met for 14 species of tarantulas of the genera *Acanthoscurria*, *Avicularia*, *Catumiri*, *Cyriocosmus*, *Haplotremus*, *Holothele*, *Pamphobeteus*, and *Umbyquyra*.

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CoP20 Prop. 39 *Haliotis midae*

1. Review of listing proposal under CITES

Presentation of proposal: Inclusion of *Haliotis midae* on CITES Appendix II in accordance with Article II, paragraph 2 (a) and satisfying Resolution Conf. 9.24 (Rev. CoP17) Annex 2 a, Criterion A and B, with an annotation “dried specimens only”.

Proponents: South Africa.

Summary of available information

Species name: *Haliotis midae* (Linnaeus, 1758); Common name: South African abalone, Perlemoen; Norwegian name of genus: øresnegler.

Distribution: *Haliotis midae* inhabits the south-western coast of South Africa more specifically (Western Cape, Eastern Cape Province, KwaZulu-Natal)

Conservation status: *Haliotis midae* is listed as Endangered under criteria A2ad (reduction in population size observed combined with exploitation) on the IUCN Red List of Threatened Species, the last assessment was made in 2020 (Peters, 2021).

Population trend: The population trend is decreasing in the number of mature individuals and is severely fragmented (Peters, 2021). *Haliotis midae* also has a limited geographic range and is endemic to South Africa. Difficulties in limiting illegal harvesting, which is integrated with organized criminal activities including drug trafficking (Okes et al., 2018), is considered the main cause of decline (Peters, 2021).

Habitat status: *Haliotis midae* is closely linked to two main species it feeds on, the drift kelp *Ecklonia maxima* in the Western Cape and *Plocamium* spp. in the Eastern Cape. At present, the kelp resource is stable and healthy (DAFF, 2016).

Trade levels: The high demands of *H. midae* within Far East markets, especially within China and Japan, has created an extreme pressure on this species. The meat is served as a delicacy of high status in Japan and China and are also considered to have aphrodisiac properties in Chinese medicine (Hauck, 1999). Okes et al. (2018) have reported that an average of 2000 tons per year of illegally harvested *H. midae* were imported into Hong Kong between 2000 and 2016. The high value and marked price, in particularly China, is a main driver for illegal harvest (Okes et al., 2018).

The illegally harvested *H. midae* is traded in dried form (de Greef & Raemaekers, 2014; Okes et al., 2016) and legal producers are favouring fresh, canned and frozen forms (de Greef & Raemaekers, 2014). In fact, the delisting in 2010 from CITES Appedix III were due to the problems with regulating trade related to specific variants such as dried versus living versus frozen specimens (de Greef & Raemaekers, 2014). Dried *H. midae* can easily be camouflaged as other products during illegal exports, are odorless and shrinks to 1/10 of its original mass making transport of the species efficient and discrete (Steinberg, 2005).

2. Potential other information by CITES reviews and on nature management issues in range states

Haliotis midae was listed on CITES Appendix III in 2007 but delisted in 2010 as it was considered too difficult to implement (de Greef & Raemaekers, 2014).

Namibia has established farms of *H. midae* in 2003. The discrepancy between the reported import tonnage from Namibia (>45000 tons per year average) to Hong Kong and the reported production tonnage (4 tons pr year average) within Namibia, suggest that poached abalone from South Africa is potentially being exported from/laundered via Namibia (Okes et al., 2018).

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological and trade criteria for inclusion in Appendix II (Resolution Conf. 9.24 (Rev. CoP 17) Annex 2a)

- A) Trade regulation needed to prevent future inclusion in Appendix I
 B) Regulation of trade required to ensure that harvest from the wild is not reducing population to level where survival might be threatened by continued harvest or other influences

Analysis based of information presented in section 1 and 2

- **Biological criteria:** The wild population of *Haliotis midae* is decreasing and severely fragmented.
- **Trade criteria:** The main cause of population decline is illegal harvesting of *Haliotis midae* that is traded internationally in dried form for consumption.

Finding: Positive

Continued uncontrolled harvesting and trade could lead to reduction of the population size to a level that threatens the future survival of *Haliotis midae* in the wild. It qualifies for inclusion in Appendix II in accordance with Article II, paragraph 2 (a) of the Convention and satisfying criteria A and B in Annex 2(a) of Resolution Conf. 9.24 (Rev. CoP17). While the proposed annotation limits the listing to dried specimens only, it will likely be more effective than an annotation excluding farmed specimens. The latter would create a loophole for mislabelling whereas the former regulates trade in the commonly traded illegally harvested form of the species.

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CoP20 Prop. 40 *Panax quinquefolius*

1. Review of listing proposal under CITES

Presentation of proposal: Amendment of annotation #3 for *Panax quinquefolius* to exempt finished products packaged and ready for retail trade of thin-sliced roots derived from artificially propagated plants. Currently Annotation #3, which applies to *P. quinquefolius* and *P. ginseng* (Russian populations only), regulates: “Whole and sliced roots and parts of roots, excluding manufactured parts or derivatives, such as powders, pills, extracts, tonics, teas and confectionery.” Retail trade of thin-sliced roots derived from artificially propagated plants is common but not covered by the current annotation.

Proponent: United States of America.

Summary of available information

Species name: *Panax quinquefolius* L. Synonyms: *Aralia canadensis* Tourn., *Aralia quinquefolia* Decne. & Planch., *Aureliana canadensis* Lafit., *Ginseng quinquefolium* Alph. Wood, *Panax americanum* (Raf.) Raf. Common names: American Ginseng, Ginseng, Man's Health, Sang, Tartar Root, Five-Fingers, Dwarf-Groundroot, Occidental Ginseng, Red Berry, Canadian Ginseng, American Ginseng Root (UNEP, 2025).

Distribution: The species occurs naturally in the United States of America and Canada (UNEP, 2025). Less than 1% of the global population occurs in Canada (Carignan & Branchaud, 2018). It is a shade-dependent species, growing in rich, moist, well-drained soils of deciduous hardwood forests in the eastern United States and southeastern Canada (Anderson et al., 2002).

Conservation status: In Canada, it is listed as endangered at the federal level under the Species at Risk Act and is therefore afforded protection on federal land (Government of Canada, 2002), and wild harvest is prohibited for the purposes of sale or distribution (Ontario Ministry of Natural Resources and Forestry, 2019). In USA, the U.S. Fish and Wildlife Service (50 CFR § 23.68) oversees the U.S. CEP for American ginseng, under which 22 States and one Tribe have codified regulations concerning the harvest and sale of *P. quinquefolius*. Furthermore, wild harvest is prohibited on National Park Service lands, Department of Defense properties, nearly all U.S. Forest Service (USFS) and State forests, and private conservation lands such as those managed by The Nature Conservancy.

Population trend: The species is listed as Vulnerable in the US (NatureServe, 2025) and Endangered in Canada (Environment and Climate Change Canada, 2018). Wild populations are fragmented and subject to harvest and overexploitation (Schmidt et al., 2019). The international trade is dominated by artificially propagated material with 99% of exports consisting of dried artificially propagated roots (CITES Trade Database, 2025). Nearly 70% of the domestic market is estimated to be cultivated material (PR Newswire, 2023).

Habitat status: Habitat loss occurs due to deforestation and degradation, and high densities of wild herbivores across eastern U.S. forests negatively affect understory plants including *Panax quinquefolius* (Furedi & McGraw 2004; Van der Voort, 2005). Other habitat threats include invasive species, timber harvest, and habitat loss (Wixted & McGraw, 2009; Chandler & McGraw 2015).

Trade levels: *Panax quinquefolius* is widely used internationally in herbal supplements, traditional medicine, and wellness products. Between 2020 and 2023, Canada and the United States exported more than 16,000,000 kilos of dried artificially propagated roots (CITES Trade Database, 2025). A note on trade: Material from artificial propagation is typically traded as either whole roots in bulk in 50 kg barrels or sliced dried roots for retail trade. Wild roots are typically sold whole and fetch prices far more than artificial material, with prices ranging from \$250 to \$1100 per dry pound (Davis & Persons, 2014; Maher 2014). This disparity in price ensures that wild roots are not traded as dried slices as this

removes characteristics necessary to authenticate the wild origin of the material (Davis & Persons, 2014).

2. Potential other information by CITES reviews and on nature management issues in range states

The species has been listed in Appendix II since 1975. However, over the years different annotations have been added to specify parts and derivatives, notably at CITES CoP5, CITES CoP7, CITES CoP10, and CITES CoP14.

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP17))

Biological and trade criteria for inclusion in Appendix II (Res. Conf. 9.24 (Rev. CoP 17) Annex 2a)

B) Regulation of trade required to ensure that harvest from the wild is not reducing population to level where survival might be threatened by continued harvest or other influences

Analysis based on information presented in section 1 and 2

- **Biological criteria:** Survival of the species in the wild is threatened by trade and the species has been listed on CITES Appendix II since 1975. Meanwhile, up to 99% of legal international trade is in artificially propagated material, while the trade in wild harvested material focuses on the domestic market as well as high value niche markets. Wild populations are estimated to be overexploited despite thorough legal protection at national and regional levels.
- **Trade criteria:** The proposed amendment of annotation #3 facilitates international trade in dried sliced roots of artificially propagated material. Due to the lower value of artificially propagated material this amendment is not expected to create a significant loophole for illegal trade or enforcement issues.

Finding: Positive

Panax quinquefolius is assessed as vulnerable in the US and endangered in Canada. The majority of trade is in artificially propagated material. A significant portion of this trade is in finished products packaged and ready for retail trade of thin-sliced roots derived from artificially propagated plants. Amendment of annotation #3 would exempt this material from CITES trade regulation. The amendment is not likely to affect the survival of the species in the wild (Res. Conf. 9.24 (Rev. CoP17) Annex 2a criterion B). **NB#1** The proposed amendment of annotation #3 for *P. quinquefolius* will necessitate review of the same annotation for *P. ginseng* (Only the population of the Russian Federation). **NB#2** The proposed amendment is consistent with the phrasing in the proposed amendment of annotation #4 (Resolution Conf. 11.21 (Rev. CoP19)).

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CoP20 Prop. 41 *Jubaea chilensis*

1. Review of listing proposal under CITES

Presentation of proposal: To include the species *Jubaea chilensis* in Appendix I in accordance with Article II, paragraph 1 of the Convention text and criterion A established in Annex 1 of Resolution Conf. 9.24 (Rev. CoP16).

Proponent: Chile.

Summary of available information

Species name: Scientific name: *Jubaea chilensis* (Molina) Baillon; Common name: Chilean wine palm; Norwegian name: Chilensk vinpalme.

Distribution: Northern Chile, more specifically in seasonally dry river valleys of the Coastal Cordillera of central Chile from Region of Coquimbo to Region of Maule (Chaparro, 2021).

Conservation status: *Jubaea chilensis* is listed as Endangered (EN) under criterion A2c (reduction in population size combined with a decline in area of occupancy) on the IUCN Red list of Threatened species with the last assessment conducted in 2021 (Chaparro, 2021). A recent study (Ovalle et al., 2024) recommends urgent action to protect the species from extinction, including halting land-use change, reduction of flammable invasives, quotas and certification of seed harvesting, declaring the species as national heritage, upgrading national red list from Endangered to Critically Endangered, and re-assessing its IUCN red list status.

Population trend: The population trend is decreasing and a reduction of at least 50% is expected over three generations (Chaparro, 2021). According to the proposal and references therein the populations are small and increasingly fragmented (CITES CoP20 Prop. 41). Large tracts of palm forest were lost in colonial times as mature palms were cut down for their highly prized sap (Ovalle et al., 2024). Current threats from use and trade include diminished seedling recruitment as a result of seed collection (Chaparro, 2021). This is compounded by overconsumption of seeds by exotic rat species (Núñez-Hidalgo et al., 2023).

Habitat status: The habitat of *J. chilensis* is increasingly fragmented (Chaparro, 2021). Much of the species' habitat have been lost due to agricultural expansion (Cordero et al., 2021), and lack of palm regeneration (González et al., 2009). In addition, wildfires and reduction of vegetation cover has contributed to degrade habitats of the species (González et al., 2009; Guzmán et al., 2017).

Trade levels: The fruit and seeds are harvested and sold, but this harvest is only documented to account for 1 % of the dispersal propagules (Cordero et al., 2021), however harvest for human consumption has serious consequences for the natural regeneration of the species (Chaparro, 2021). The proponent presents data on international trade collected by the Chilean Customs Service in the years 2018-2023, the revenue from export to Germany, the Netherlands, Singapore, Ireland, and Hong Kong for these years amounted to US\$ 225,372 (CITES CoP20 Prop 41, Table 2). Some seeds are illegally collected in protected areas and traded locally at fairs or to candy factories (CITES CoP20 Prop 41).

2. Potential other information by CITES reviews and on nature management issues in range states

Jubaea chilensis is protected within two national parks (Chaparro, 2021). In addition, a large number of individuals are included in ex situ collections within both the Botanical Garden of Viña del Mar and in the Botanic Garden of Universidad de Talca (Gómez & Hahn, 2008).

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological criteria for inclusion in Appendix I (Resolution Conf. 9.24 (Rev. CoP17) Annex 1)

- A) Small wild population
- B) Restricted area of distribution
- C) Marked decline in number of wild individuals

Trade criteria for inclusion in Appendix I (Article II, paragraph 1 of the Convention)

The species is or may be affected by trade

Analysis based of information presented in section 1 and 2

- **Biological criteria:** The wild population of *J. chilensis* restricted in geographic distribution and threatened by increasing fragmentation due to land use as well wildfires. The habitat is decreasing and degraded, and the recruitment is limited, a population decline of at least 50% is expected over three generations. The species has a marked decline in the number of wild individuals.
- **Trade criteria:** Seedling recruitment and rejuvenation of *J. chilensis* may suffer from trade in harvested seeds. Considerable international trade has been documented for the years 2018-2023.

Finding: Positive

Jubaea chilensis meets the criteria for inclusion in Appendix I described in Criterion C (and possibly Criterion B) of Annex 1 of Resolution Conf. 9.24 (Rev. CoP17), in accordance with Article II, paragraph 1 of the Convention.

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CoP20 Prop. 42 *Beaucarnea glassiana* and *B. hookeri*

1. Review of listing proposal under CITES

Presentation of proposal: To include the endemic Mexican species *Beaucarnea hookeri* and *Beaucarnea glassiana* in Appendix II, as part of the listing of the genus *Beaucarnea* spp., in accordance with Article II 2b) of the Convention and criterion A of Annex 2b) of Resolution Conf. 9.24 (Rev. CoP17), following the recommendation of the 27th meeting of the Plants Committee (PC27; Geneva, Switzerland, 2024) and paragraph 2f) of Resolution Conf. 12.11 (Rev. CoP19).

NB! This proposal follows a taxonomic revision of the genera *Calibanus* and *Beaucarnea*. The former is merged into *Beaucarnea* based on molecular phylogenetic insights (Rojas-Piña et al. 2014). These resulting two new names in *Beaucarnea* are not automatically covered in the genus level listing of *Beaucarnea*. Several *Beaucarnea* species are threatened by trade. As seed and seedling of these species are indistinguishable from other *Beaucarnea* species in trade, Criterion A in Annex 2 b of Resolution Conf. 9.24 (Rev. CoP17) is satisfied for their inclusion in Appendix II in accordance with Article II, paragraph 2 (b), of the Convention.

Proponents: Mexico and Switzerland.

Summary of available information

Species name: *Beaucarnea glassiana* (L.Hern. & Zamudio) V.Rojas-Piña, Homotypic synonym: *Calibanus glassianus* L.Hern. & Zamudio in Brittonia 55: 228 (2003) [Powo 2025] and *Beaucarnea hookeri* (Lem.) Baker J. Bot. 10: 327 (1872), Homotypic Synonyms: *Calibanus hookeri* (Lem.) Trel. in Proc. Amer. Philos. Soc. 50: 426 (1911), *Dasyllirion hookeri* Lem. in Ill. Hort. 6(Misc.): 24 (1859) and *Nolina hookeri* (Lem.) G.D.Rowley in Cact. Aventures 5: 3 (1990). Heterotypic Synonyms: *Calibanus caespitosus* (Scheidw.) Rose in Contr. U.S. Natl. Herb. 10: 90 (1906), *Dasyllirion caespitosum* Scheidw. in Wochenschr. Vereines Beförd. Gartenbaues Königl. Preuss. Staaten 4: 286 (1861), *Dasyllirion flexile* K.Koch in Index Seminum (B, Berolinensis) 1867(App. 1): 5 (1867) and *Dasyllirion hartwegianum* Hook. in Bot. Mag. 85: t. 5099 (1859), nom. Illeg. [Powo 2025].

Distribution: *Beaucarnea glassiana* is endemic to Northeast Mexico (Guanajuato) and *Beaucarnea hookeri* is endemic to Northeast Mexico (San Luis Potosí, Hidalgo) (Rojas-Piña et al., 2014).

Conservation status: No formal IUCN Red list assessment available. Both species are restricted to Northeast Mexico (Rojas-Piña et al., 2014). *Beaucarnea hookeri* is listed as "Threatened" on the national list of endangered species (DOF, 2019). *Beaucarnea glassiana* has not been assessed under the Mexican national list of endangered species.

Population trend: Not assessed, lacking sufficient literature.

Habitat status: Not assessed.

Trade levels: Various species of *Beaucarnea*, (Ponytail Palm, Elephant-foot Tree, Bottle Palm) are common in the horticultural trade (Cardel et al., 1997). The most traded species by far are *B. guatemalensis* and *B. recurvata* (CITES Trade Database, 2025). Even *B. stricta*, the third most traded species in the genus, is reported in the IUCN Red list assessment to be subject to illegal gathering, although the trade is reported as not frequent (Martínez Salas et al., 2020). Several million live specimens (likely some seedlings) or seeds are exported every year. Sources are reported predominantly from artificially propagated plants (CITES Trade Database, 2025).

2. Potential other information by CITES reviews and on nature management issues in range states

The genus *Beaucarnea* spp. were listed in CITES Appendix II at CoP17 (Johannesburg, South Africa, 2016) submitted as CITES CoP17 Prop. 50 by Mexico (CoP17 Com. I Rec. 7 and CoP17 Plen. Rec. 4, Rev. 1). Inclusion of all species in the genus was previously recommended by the Plants Committee at its 22nd meeting (PC22; Tbilisi, Georgia, 2015) based on the assessment presented by Mexico in document PC22 Doc. 22.2. At its 27th meeting (PC27; Geneva, Switzerland, 2024), the Plants Committee agreed to include the Mexican endemic species, *Beaucarnea hookeri* and *B. glassiana*, in a standard nomenclature reference for the genus (Rojas-Piña et al., 2014). The assessment of their inclusion in Appendix II was recommended because these species were not part of *Beaucarnea* at the time of listing of the genus in Appendix II in 2016.

All species including the here proposed *B. glassiana* and *B. hookeri* met the look-alike criterion of seeds and seedlings. The seeds and seedlings are the specimens primarily traded (Hernández-Sandoval et al., 2012).

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological and trade criteria for inclusion in Appendix II (Resolution Conf. 9.24 (Rev. CoP 17) Annex 2b)

A) *Specimens in trade resemble those of species listed in Appendix II under Resolution Conf. 9.24 (Rev. CoP17) Annex 2 a or listed in Appendix I*

Analysis based on information presented in section 1 and 2

- Resent taxonomic inclusion of the two species in the genus *Beaucarnea* that is listed in Appendix II.
- Meets the look-alike criterion of seeds and seedlings for Appendix II (criterion A of Annex 2b of Resolution Conf. 9.24 Rev. CoP17).
- Popular group of plants in horticultural trade.

Finding: Positive

A genus listing does not apply automatically to all species in a genus, but only to those species recognized by CITES to be included in the genus. This proposal is solely to include new *Beaucarnea* species within the genus listing of *Beaucarnea*. Some *Beaucarnea* species are threatened by trade and both species assessed here have a restricted distribution in the wild. Due to the difficulty of distinguishing *Beaucarnea* species, especially often traded seeds and seedlings, the genus is proposed listed based on the lookalike principles in accordance with Article II, paragraph 2 (b), of the Convention. Criterion A of Resolution Conf. 9.24 (Rev. CoP17) Annex 2 (b) is satisfied for these two new *Beaucarnea* species transferred from genus *Calibanus*.

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CoP20 Prop. 43 *Commiphora wightii*

1. Review of listing proposal under CITES

Presentation of proposal: To include *Commiphora wightii* in CITES Appendix II, in accordance with Article II, Paragraph 2 (a) of the Convention and satisfying Criteria A and B of Annex 2 a of Resolution Conf. 9.24 (Rev. CoP17).

Proponents: European Union.

Summary of available information

Species name: *Commiphora wightii* (Arn.) Bhandari

Homotypic Synonyms (Powo 2025): *Balsamodendrum wightii* Arn. in Ann. Nat. Hist. 3: 86 (1839)

Heterotypic Synonyms: *Balsamea mukul* (Hook. ex Stocks) Baill. in Hist. Pl. 5: 295 (1874), *Balsamodendrum mukul* Hook. ex Stocks in Hooker's J. Bot. Kew Gard. Misc. 1: 259 (1849), *Balsamodendrum roxburghii* Stocks in J. As. Soc. Bomb. 2: 391 (1848), nom. Illeg., *Commiphora mukul* (Hook. ex Stocks) Engl. in A.L.P.P.de Candolle & A.C.P.de Candolle, Monogr. Phan. 4: 12 (1883), *Commiphora roxburghii* Engl. in H.G.A.Engler & K.A.E.Prantl, Nat. Pflanzenfam. 3(4): 253 (1896), *Commiphora roxburghii* var. *serratifolia* Haines in Bot. Bihar Orissa 6: 1307 (1924)

Common names: bdellium (Eng. Fr. ger.), boe-jahudan (Pers.), googul, guggala (Can.), guggur, heirabola, mai-shakshi (Tam.), moql (Arab), mukul myrrh tree, myrrh

Distribution: Oman, India and Pakistan. The species is restricted to dry regions of western India (Gujarat, Rajasthan, Madhya Pradesh, Maharashtra) and adjoining regions of Pakistan (Ved et al., 2015) as well as Oman (Powo, 2025). It grows well in arid and semi-arid climates with low rainfall and is tolerant to poor soil. It prefers sandy, loamy, clayey and gravelly soil types and grows well in open canopy cover (Dixit & Rao, 2000). The species has been recorded from undulating terrain, flat and hilly areas and dry riverbeds.

Conservation status: The species is assessed as Critically Endangered (A2cd) on the IUCN Red List (Ved et al., 2015).

Population trend: Unsustainable gum extraction of *Commiphora wightii* has caused serious declines in the population, particularly in the southern Indian subpopulations. Population decline is aggravated by severe fragmentation of populations and very low rates of regeneration (Ved et al., 2015).

Habitat status: Grazing, firewood collection, alien invasive species occurrence and habitat degradation seem to occur throughout its distribution (Reddy et al., 2012). Indian populations have been modelled to become under increasing pressure through climate change (Mathur & Mathur, 2025). However, comprehensive literature for an assessment throughout the range of species distribution particularly in Pakistan is lacking.

Trade levels: High volume of trade is reported under the names guggulu or oleo-gum. The species is highly valued for traditional medicinal purpose in the Ayurvedic, Siddha and Unani system (Cunningham et al., 2018). The resin is the most commonly traded form of guggulu but also stem and roots are traded. An estimated 193 t/year of crude gum equivalent is exported from India in the form of processed products (Cunningham et al., 2018). Most of the trade today is thought to be based on wild-sourced material from Pakistan. *C. wightii* gum was reported to be difficult to distinguish from oleo-resins of other species for non-experts especially when mixed with other resin (Ahmed et al., 2011, CITES CoP20 Prop. 43).

2. Potential other information by CITES reviews and on nature management issues in range states

The species is currently not protected by national regulations but some regional legal and habitat protection measures that regulate its harvest are in place in India. The species occurs at least to some level in protected areas both in India and in Pakistan. National Medicinal Plants Board in India initiated cultivation projects that planted *C. wightii* saplings in Kachchh, Gujarat (Rahman, 2023) to alleviate pressure on wild populations. The Indian government provides subsidies under the National AYUSH mission to promote the cultivation of traditionally important medicinal plants (Anmol et al., 2024) as it recognises the pressure of destructive gum harvest, populations fragmentation and habitat loss through clearing for farming.

The European Union, in their proposal, report that India does not support listing *Commiphora wightii* in the CITES Appendices, while Pakistan supports the proposal, Oman provided information on the species' status but required more time to study the proposal.

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological and trade criteria for inclusion in Appendix II (Resolution Conf. 9.24 (Rev. CoP 17) Annex 2a)

- A) Trade regulation needed to prevent future inclusion in Appendix I
 B) Regulation of trade required to ensure that harvest from the wild is not reducing population to level where survival might be threatened by continued harvest or other influences

Analysis based on information presented in section 1 and 2

- **Biological criteria:** fragmented and declining populations, as well as reported unsustainable harvest and low recruitment.
- **Trade criteria:** Reported very high trade volumes. However, there is a lack of data on trade since the species has not been CITES listed up to now. Suspected high level of illegally wild sourced material with material harvest in Pakistan being imported to India in large quantities

Finding: Positive

Commiphora wightii is a Critically Endangered species that is in high demand in trade for traditional medicine and religious purposes. The population in the wild is in decline, highly fragmented with low regeneration rates. *Commiphora wightii* qualifies for listing in CITES Appendix II, in accordance with Article II, Paragraph 2 (a) of the Convention and satisfying Criteria A and B of Annex 2 a of Resolution Conf. 9.24 (Rev. CoP17).

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CoP20 Prop. 44 *Euphorbia bupleurifolia*

1. Review of listing proposal under CITES

Presentation of proposal: Transfer of *Euphorbia bupleurifolia* from Appendix II to Appendix I (without an annotation) in accordance with Resolution Conf. 9.24 (Rev. CoP17), Annex I, Paragraph criteria A (i)(ii), B (iv), and C (i)(ii).

NB The species is currently listed on Appendix II as part of the genus listing of succulent *Euphorbia* species. There are few known and mostly small wild population, and these have undergone decline in both the number of individuals and area of distribution owing to unsustainable levels of exploitation for the international horticultural trade in addition to use in indigenous medicine (muthi).

Proponents: South Africa.

Summary of available information

Species name: *Euphorbia proteifolia* Boiss., Synonyms: *Tithymalus bupleurifolius* (Jacq.) Haw., Heterotypic Synonyms: *Euphorbia proteifolia* Boiss. in A.P.de Candolle, Prodr. 15(2): 92 (1862) (Govaerts et al., 2021)

Common names: cycad spurge, pine cone plant (Eng.); melkbol (Afr.); intsele, insema (Xho.); inkamamasane, insema (Zul.) (SANBI, 2025)

Distribution: This species is endemic to the KwaZulu-Natal and Eastern Cape provinces of South Africa, where it occurs from Grahamstown to Pietermaritzburg (Mhlongo & Pfab, 2022).

Conservation status: No IUCN Red-Listing is available for the species. The species is assessed nationally in South Africa as Critically Endangered (A2acd+4acd) (Mhlongo & Pfab, 2022).

Population trend: Mhlongo & Pfab (2022) estimate a population reduction of 97% since 1975 due to illegal collecting. Furthermore, Mhlongo (2020) found that less than 30% of the historical localities recorded for *E. bupleurifolia* were found to have plants during field surveys in 2018. Many populations seem to be declining due to habitat destruction and illegal collection of mature individuals to supply the specialist ornamental horticultural trade as well as local traditional medicine markets. The plants are slow growing, long-lived, dwarf succulents that are endemic to South Africa. Separate populations usually consist only of few individuals. The species is reported to be experiencing a strong decline (Mhlongo & Pfab, 2022).

Habitat status: Plants grow in open grasslands, usually in stony shallow soils with a thin cover of grass and near small rocky ridges (Mhlongo & Pfab, 2022). *Euphorbia bupleurifolia* is not grazed by livestock, however the habitat is often grazed, and plants can be trampled. In parts of the range affected by housing and framing development. The species is conserved in three nature reserves, while one subpopulation occurs on a timber plantation. The main cause of population decline is like overexploitation.

Trade levels: This species is used both the international and local horticultural markets, as well as the local traditional medicine markets (Mhlongo & Pfab, 2022; Mhlongo et al., 2023; Mhlongo et al., 2024). There seem to be additionally several hybrid comment in international horticultural trade.

CITES Wildlife TradeView (2025) data suggests that international trade has declined from more than 9000 individuals recorded in 2016 to 376 in 2024. Between 2019 and 2024 only 1,733 individual plants have been traded, and with the Netherlands being reported as the main exporter (1,099 artificially propagated plants).

2. Potential other information by CITES reviews and on nature management issues in range states

CITES has listed the genus *Euphorbia* on Appendix II since 1975, but with different annotations over the years. The listing has excluded non succulent species as well as material from artificial propagation. Additionally, it has specified that certain species are listed on Appendix I (UNEP, 2025). There are no current quotas or current suspensions in place for this species (UNEP, 2025). This species is not currently included in the CITES Review of Significant Trade (UNEP, 2025). Mhlongo et al. (2023) suspect that at a significant number of the South African populations have been lost due to habitat destruction and harvesting. Furthermore, the listing proposal reports that although most legally exported material is declared as originating from artificial propagation, while at least 3,500 wild plants were seized from the largest exporting facility in 2019.

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological criteria for inclusion in Appendix I (Resolution Conf. 9.24 (Rev. CoP17) Annex 1)

- A) *Small wild population*
- B) *Restricted area of distribution*
- C) *Marked decline in number of wild individuals*

Trade criteria for inclusion in Appendix I (Article II, paragraph 1 of the Convention)

The species is or may be affected by trade

Analysis based on information presented in section 1 and 2

- **Biological criteria:** The wild population is small despite being spread over the Eastern part of South Africa and experiencing a marked decline. The habitat is grazed and trampled by livestock and is significantly reducing by human activity such as housing development and farming. The wild populations have a fragmented area of distribution that is decreasing in area size and quality of habitat as well as in the number of individuals.
- **Trade criteria:** The population is under pressure due to collection for the ornamental horticultural trade in addition to use in traditional medicine. Nursery surveys show that potentially a significant number of individuals sold as artificially propagated might be ranches (originating in the wild).

Finding: Positive

Euphorbia bupleurifolia is an endangered species suffering from a marked decline in population as a result from illegal harvesting of wild-sourced material for the international as well as national horticultural trade and traditional medicine. The biological criteria for inclusion in Appendix I (Annex 1 C, Res. Conf. 9.24 (Rev. CoP17)) are satisfied based on the most recent data. The trade criteria for listing for inclusion in Appendix I (Article II (1) of the CITES convention) are satisfied based on the most recent data.

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CoP20 Prop. 45 *Afzelia bipindensis*

1. Review of listing proposal under CITES

Presentation of proposal: Delete from CITES Appendix II the populations of *Afzelia bipindensis* in range states Cameroon, Republic of Congo, Democratic Republic of Congo, Central African Republic, Gabon, and Equatorial Guinea.

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

Summary of available information

Species name: *Afzelia bipindensis* Harms. Synonyms: *Afzelia bequaertii* De Wild., *Afzelia caudata* Hoyle, *Pahudia bipindensis* (Harms) de Wit, *Pahudia caudata* (Hoyle) de Wit. Common names: Red Doussié, Yellow Afzelia (English); Doussié, doussié rouge (French) (UNEP, 2025; African Regional Workshop, 1998).

Distribution: The species occurs in Angola, Cameroon, Central African Republic, Congo, Democratic Republic of the Congo, Gabon, Nigeria, Uganda (UNEP, 2025). It is a characteristic species of the humid dense forests of the Guineo-Congolian region.

Conservation status: The IUCN Red List assessed the species as Vulnerable (A1cd) in 1998 due to overexploitation for timber (African Regional Workshop, 1998). *A. bipindensis* was categorised as nationally vulnerable in Cameroon in 2011, due to heavy exploitation for the international timber trade (Onana & Cheek, 2011). The species was listed as nationally endangered in DRC in 2014, as a result of unsustainable logging, deforestation caused by urbanisation and agriculture, and tree bark damage by forest elephants (Kiyulu et al., 2014 ex CoP19 Prop. 46).

Population trend: *Afzelia bipindensis* shows differing population statuses and trends across its range. In Gabon and Cameroon, it occurs at low densities (Gérard & Louppe, 2010), while in the DRC it is more abundant but undergoing an accelerated decline due to illegal logging, poor forest governance, and agricultural pressures (Kiyulu et al., 2014). Angola reports stable populations under regulated harvest (CITES MA of Angola in litt. to European Commission, 2022). Overall, populations appear to be declining in West and Central Africa, though sustainable management and signs of regeneration have been noted in parts of Central Africa (Loubota Panzou et al., 2023). The proponents cite the report by Loubota Panzou et al. (2023) to support that the inverted "J" structure of the population shows that the relatively low natural density of the species is offset by effective natural regeneration. The "J" structure could also be interpreted to suggest that despite regeneration overexploitation skews by removing most trees of economic value.

Habitat status: Numerous *Afzelia* spp. range states across Africa are experiencing significant deforestation (Vancutsem et al., 2021). A long-term assessment of reduction in undisturbed tropical moist forest inferred reductions in the period 1990-2019 for the proposed range states: Cameroon (-12.7%), Republic of Congo (-8.9%), Democratic Republic of Congo (-25.2%), Central African Republic (-28.1%), Gabon (-2.9%), and Equatorial Guinea (n.a.). Cameroon, Gabon and the DRC have the largest areas of forest converted into tree plantations within Africa, at 0.07 million ha, 0.04 million ha, and 0.08 million ha respectively (Vancutsem et al., 2021).

Trade levels: *Afzelia* timbers, including *A. africana*, *A. bella*, *A. bipindensis*, *A. pachyloba*, and *A. quanzensis*, are highly valued and widely traded under the genus name or the trade name "doussié" (Gérard et al., 2017). *A. bipindensis* and *A. pachyloba* are among the most frequently harvested species in the DRC and the most commonly traded *Afzelia* spp. in Africa (Hills ex CoP19 Prop. 46, 2021).

Cameroon is the leading exporter, with Côte d'Ivoire and Ghana also noted as major sources (Hills ex CoP19 Prop. 46, 2021; Kitin et al., 2021). *A. bipindensis* timber is often mixed with *A. pachyloba* and exported from Cameroon (Gérard & Louppe, 2010). Together, these two species account for around 60% of harvested timber in Cameroon (Caspa et al., 2007).

2. Potential other information by CITES reviews and on nature management issues in range states

There are seemingly discrepancies between the data for *A. bipindensis* cited in CoP19 Proposal 46 and CoP20 Proposal 45.

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP17))

Biological and trade criteria for inclusion in Appendix II (Resolution Conf. 9.24 (Rev. CoP 17) Annex 2a)

B) Regulation of trade required to ensure that harvest from the wild is not reducing population to level where survival might be threatened by continued harvest or other influences

Biological and trade criteria for inclusion in Appendix II (Res. Conf. 9.24 (Rev. CoP 17) Annex 2b)

A) Specimens in trade resemble those of species listed in Appendix II under Res. Conf. 9.24 (Rev. CoP17) Annex 2 a or listed in Appendix I

Special cases (Resolution Conf. 9.24 (Rev. CoP 17) Annex 3)

Analysis based on information presented in section 1 and 2

- **Biological criteria:** The covered range states experience significant deforestation. Recent assessments of population structure of the species shows recruitment and regeneration but also overexploitation with a dearth of larger trees. The threats satisfy inclusion in Appendix II based on Resolution Conf. 9.24 (Rev. CoP17) Annex 2a criterion B.
- **Trade criteria:** The range states in question are home to multiple *Afzelia* species that were listed either based on Annex 2a criterion B or Annex 2b criterion A. Scientific literature shows that parts of these species are traded under the same common names. Significant challenges for enforcement remain in terms of Resolution Conf. 9.24 (Rev. CoP17) Annex 2b criterion A.
- **Special cases:** A precedent for split-listing (Resolution Conf. 9.24 (Rev. CoP17) Annex 3) was made, but one that was practical to enforce as it covered all African populations of the genus. Annex 3 stresses that split-listing should be avoided in general in view of the enforcement problems it creates. Also, that split-listings that place some populations of a species in the Appendices, and the rest outside the Appendices, should normally not be permitted. The proponents argue for split-listing as material from these range states would be sustainable and can be distinguished using available techniques. Although efforts have been made in some range states to manage this species sustainably, no data is available to support this. Apart from a specification on the restriction of the vernacular name 'doussié' to this taxon only, no methods are presented or discussed that could be reliably employed by enforcement to authenticate the species and origin of parts for export.

Finding: Negative

Adoption of this proposal would create a split-listing (Resolution Conf. 9.24 (Rev. CoP17), Annex 3) with all species of the genus listed in Appendix II except for populations of a single species from select countries. Split-listing the populations of *A. bipindensis* from these Central African range states is not justified based on current population trends and enforcement abilities.

Afzelia bipindensis was listed during CoP19, under criterion B of Annex 2(a) of Resolution Conf. 9.24 (Rev. CoP17). The proponents argue that criterion B does not apply for these range states as the species is sustainably managed, and that furthermore, identification or enforcement are negligible as the wood is identifiable and traded under a distinct name. However, the species continues to meet both biological and trade criteria for inclusion in Appendix II based on Resolution Conf. 9.24 (Rev. CoP17) Annex 2a criterion B. African populations of the genus fulfil listing criteria for inclusion in Appendix II based on Resolution Conf. 9.24 (Rev. CoP17) Annex 2b criterion A.

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CoP20 Prop. 46 *Paubrasilia echinata*

1. Review of listing proposal under CITES

Presentation of proposal: Transfer from Appendix II to Appendix I of *Paubrasilia echinata* in accordance with Resolution Conf. 9.24 (Rev. CoP17), Annex I, Paragraph A i), v) and B iii), iv).

Proponents: Brazil.

Summary of available information

Species name: Scientific name: *Paubrasilia echinata* (Lam.) Gagnon, H.C. Lima & G.P. Lewis; Synonyms: *Caesalpinia echinata* Lam., *Guilandina echinata* (Lam) Spreng, *Caesalpinia obliqua* Vog., *Caesalpinia vesicaria* Vell; Common names: Brazilwood, Pernambuco, Pernambuco wood (English).

Distribution: Brazil (UNEP, 2025).

Conservation status: The species is assessed as Endangered (A1acd) on the IUCN Red List (Varty, 1998). The most recent national assessment considers the species as Critically Endangered (CNCFlora, 2024). Legal protections have not hindered illegal selective logging of century-old Brazilwood trees inside and outside protected areas in Paraíba, Rio Grande do Norte (Rocha, 2008), and especially in southern Bahia (Guimarães, 2025).

Population trend: The original geographical distribution of Brazilwood and the size of its native populations have been reduced by logging, caused by the exploitation of its wood and the expansion of urban centres (Rocha, 2010). Estimates suggest there are around 10,000 adult individuals remaining in natural populations (CNCFlora, 2024). The species' populations have declined by 84% over the past three generations (De Lima et al., 2024).

Habitat status: The Atlantic Forest has been reduced to 12.4% of its size compared to 500 years ago, and the habitat has been reduced by logging, farming and the expansion of urban centres (Rocha, 2010). The largest remaining populations are now found mainly in fully protected conservation units or within cocoa-cabruca agroforestry systems in southern Bahia. However, these populations are rapidly declining as cocoa plantations are being converted into pastures (CNCFlora, 2024; Guimarães, 2025).

Trade levels: *P. echinata* is mainly used for the manufacture of bows for musical instruments; the wood is considered among the very best for making such bows and is highly sought after on the international market. Analysis of invoices from the past two decades shows that 94.2% of all bows produced in Brazil are exported, and furthermore that more than 90% of harvested wood is discarded as waste during the production process (Guimarães, 2025). Analysis of trade over the past 25 years, estimates that 464,515 bow blanks were traded within Brazil and 45,163 were exported, while Brazilian companies sold 7,986 finished bows in the internal market and 131,232 finished bows abroad. The estimated volume of bows and bow blanks traded in Brazil was of 70.87m³, while the volume exported was 26.46m³ (Guimarães, 2025). Illegal trade is complex with multiple detected cases of timber laundry, possession of wood from illegal sources, providing false or misleading information to environmental authorities, and the illegal transport, receipt, and sale of bows, bow blanks, and logs (Guimarães, 2025).

2. Potential other information by CITES reviews and on nature management issues in range states

NB! This proposal is similar to CoP19 Prop. 49 except that no annotation is proposed this time. The species is currently listed on Appendix II with the following annotation #10: All parts, derivatives and finished products, except re-export of finished musical instruments, finished musical instrument accessories and finished musical instrument parts.

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological criteria for inclusion in Appendix I (Resolution Conf. 9.24 (Rev. CoP17) Annex 1)

- A) *Small wild population*
- B) *Restricted area of distribution*
- C) *Marked decline in number of wild individuals*

Trade criteria for inclusion in Appendix I (Article II, paragraph 1 of the Convention)

The species is or may be affected by trade

Analysis based on information presented in section 1 and 2

- **Biological criteria:** The wild population has experienced a marked decline, is small and characterized by a habitat that is reducing and suffering from selective logging. Furthermore, the wild populations have a restricted and fragmented area of distribution that is decreasing in area and quality of habitat and in the number of individuals.
- **Trade criteria:** Current trade restrictions have not mitigated negative effects resulting from trade. The Appendix II listing and revised 2022 annotation do too little to stem illegality in trade through laundering of illegally sourced wood.

Finding: Positive

This proposal is similar to a proposal tabled by Brazil at CoP19 for Appendix I listing with the annotation: “All parts, derivatives and finished products, including bows of musical instruments, except musical instruments and their parts, composing travelling orchestras, and solo musicians carrying musical passports in accordance with Res. 16.8”. This proposal was accepted in amended form with the species remaining on Appendix II but with the following annotation: “All parts, derivatives and finished products, except re-export of finished musical instruments, finished musical instrument accessories and finished musical instrument parts”. This new proposal drops the annotation and solely proposes uplisting from Appendix II to I. Apart from the complexity of assessing whether the recent changes have had sufficient effect, the objective data satisfy the criteria for inclusion in Appendix I based on Resolution Conf. 9.24 (Rev. CoP17) Annex 1, paragraphs B and C. Practical aspects for musicians are briefly discussed and several possibilities exist that will enable international travel for musical professionals.

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CoP20 Prop. 47 *Pterocarpus soyauxii*

1. Review of listing proposal under CITES

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

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

Summary of available information

Species name: *Pterocarpus soyauxii* Taub. Synonym: *Pterocarpus casteelsi* De Wild. Common names: barwood, African coral wood, African padouk, African padauk (English); Padouk d'Afrique, padauk d'Afrique, bois corail (French).

Distribution: *P. soyauxii* occurs in evergreen or deciduous forests on firm-ground, rainforest; 50-500 m alt (African Plant Database, 2025). The species occurs in Angola, Cameroon, Central African Republic, Congo, Democratic Republic of the Congo, Equatorial Guinea, Gabon, Nigeria (UNEP, 2025). Assessment of GBIF data shows that the distribution includes Sierra Leone (GBIF, 2025). It should be noted that the populations in all range states except Nigeria and Sierra Leone are proposed to be excluded.

Conservation status: *P. soyauxii* is not classified as threatened on the IUCN Red List. It is widely represented in protected areas and sustainably managed production forests in Central Africa (Loubota Panzou et al., 2023). Recent evaluations of timber trees (DBH > 20 cm in 98 FMUs (Forest Management Unit) covering an area of 21 433 767 ha) suggest its populations are secure, with around 18 million mature individuals estimated across its range (Loubota Panzou et al., 2023).

Population trend: A study of population structures of *P. soyauxii* considered 88% of populations very good, i.e., no major regeneration problem was noticed throughout its natural distribution area. This species occurs in many forests where logging companies operate, meaning that pre-harvest inventories data are available and consequently population structures are incorporated into the management plans (Mousset Moumbolou, 2019).

Habitat status: *P. soyauxii* thrives in moist dense forests across several Central African nations. The overall deforestation rate in Central Africa has been 9.5% since 1990, substantially lower than in West and East Africa, indicating relatively stable habitat conditions (Vancutsem et al., 2021). Sustainable forestry practices and zoning policies contribute to this stability, ensuring limited impacts on wild populations (Vancutsem et al., 2021).

Trade levels: *P. soyauxii* is legally exported at significant volumes, particularly from Gabon, Congo, Cameroon, and the Democratic Republic of the Congo. A recent decline in exports is reported by the proponents resulting from the Appendix II genus listing at CoP19.

2. Potential other information by CITES reviews and on nature management issues in range states

No CITES trade suspensions are recorded for *Pterocarpus soyauxii* (UNEP, 2025). Cameroon, Congo, Democratic Republic of the Congo, Equatorial Guinea and Gabon have issued CITES trade quotas for different derivatives in the period 2023-2025 (UNEP, 2025). The EU has listed *Pterocarpus soyauxii* on Annex B of the EU Wildlife Trade Regulations, and has current negative trade decisions for wild sourced timber from Angola, specific FMUs from Cameroon, and is tracking trade from Gabon (UNEP, 2025). The proponents emphasize the species' stable conservation status, effective management practices, and the improved capacity to identify and trace the wood products associated with this species in

trade. It should be noted that all African *Pterocarpus* species have overlapping distributions with the proposed delisting range states for *P. soyauxii*, except for *P. brenanii*.

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP17))

Biological and trade criteria for inclusion in Appendix II (Resolution Conf. 9.24 (Rev. CoP 17) Annex 2b)

A) *Specimens in trade resemble those of species listed in Appendix II under Res. Conf. 9.24 (Rev. CoP17) Annex 2 a or listed in Appendix I*

Special cases (Resolution Conf. 9.24 (Rev. CoP 17) Annex 3)

Analysis based on information presented in section 1 and 2

- **Biological criteria:** Populations of the species appear to be stable in the range States covered by the proposal.
- **Trade criteria:** Trade has decreased following the CITES Appendix II listing at CITES CoP19 in 2022.
- **Special cases:** A precedent for split-listing (Resolution Conf. 9.24 (Rev. CoP17) Annex 3) was made, but one that was practical to enforce as it covered all African populations of the genus. Annex 3 stresses that split-listing should be avoided in general in view of the enforcement problems it creates. Also, that split-listings that place some populations of a species in the Appendices, and the rest outside the Appendices, should normally not be permitted. The proponents argue for split-listing based on two arguments: the material can be distinguished using available scientific techniques and the distribution range of *P. soyauxii* is distinct from those of the other concerned species. Enforcement will need to be empowered to effectively in terms of cost and speed determine the authenticity of all *P. soyauxii* material for export. Although the proponents argue that sawn wood, parquet flooring, decking boards, etc. can be reliably distinguished from those of other species of the genus using available scientific techniques, they do not propose any annotation for those parts. It is neither clear how these available scientific techniques are employable at scale and cost, nor whether other parts are identifiable with similar or other techniques. The argument regarding distribution ranges is not supported by analysis of the distribution ranges of these species. CoP19 Prop. 50 lists 12 species of *Pterocarpus* spp. with populations in Africa including *P. soyauxii*. Out of the 11 species, 10 have overlapping distributions with the range states that are proposed to be delisted for the latter.

Finding: Negative

The proponents propose to delist from Appendix II the populations of *Pterocarpus soyauxii* from specific range states. The African populations of *Pterocarpus* spp. were listed on Appendix II based on criteria set out in Resolution Conf. 9.24 (Rev. CoP17) Annex 2a B and Annex 2b A. Split-listing (Resolution Conf. 9.24 (Rev. CoP 17) Annex 3) is not warranted or enforceable as long as the material cannot be distinguished as part of enforcement efforts from other African *Pterocarpus* spp. in trade (Resolution Conf. 9.24 (Rev. CoP17) Annex 2b).

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CoP20 Prop. 48 *Aloe* spp.

1. Review of listing proposal under CITES

Presentation of proposal: To amend the listing of *Aloe* spp. in Appendix II to also include the four species previously treated in the nonlisted genus *Chortolirion*, but now included in *Aloe* section *Chortolirion*, namely *Aloe bergeriana*, *Aloe jeppeae*, *Aloe subspicata*, and *Aloe welwitschia* in accordance with the recommendation from the 27th meeting of the CITES Plants Committee and paragraph 2f) of Resolution 12.11 (Rev. CoP19) on Standard nomenclature. As these species are indistinguishable from other *Aloe* species in trade, Criterion A in Annex 2 b of Resolution Conf. 9.24 (Rev. CoP17) is satisfied for their inclusion in Appendix II in accordance with Article II, paragraph 2 (b), of the Convention.

NB! This proposal follows a taxonomic revision of the genera *Aloe* and *Chortolirion*. The former is merged into *Aloe* based on molecular phylogenetic insights, and all taxa in the genus are recombined as *Aloe* (Daru et al., 2013; Klopper et al. 2013; Manning et al. 2014). These new names in *Aloe* are not automatically covered in the genus level listing of *Aloe*. To resolve situations like these, the Depository Government should propose listing of the taxa.

Proponents: Depository Government (Switzerland) as well as South Africa and Zimbabwe.

Summary of available information

Species name: *Aloe bergeriana* (Dinter) Boatwr. & J.C.Manning, *Aloe jeppeae* Klopper & Gideon F.Sm., *Aloe subspicata* (Baker) Boatwr. & J.C.Manning, *Aloe welwitschii* Klopper & Gideon F.Sm. All species are new combinations from previous *Chortolirion* taxa: *Chortolirion bergerianum* Dinter, *Chortolirion latifolium* Zonn. & G.P.J.Fritz, *Chortolirion subspicatum* (Baker) A.Berger, *Chortolirion angolense* (Baker) A.Berger.

Distribution: *Aloe bergeriana* – Namibia, South Africa, Zimbabwe, *Aloe jeppeae* – endemic to South Africa, *Aloe subspicata* – Botswana, Eswatini, Lesotho, Namibia, South Africa, *Aloe welwitschii* – endemic to Angola (cf. CITES CoP20 Prop. 48).

Conservation status: Not applicable.

Population trend: Not applicable.

Habitat status: Not applicable.

Trade levels: Not applicable.

2. Potential other information by CITES reviews and on nature management issues in range states

Not applicable

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP17))

Biological and trade criteria for inclusion in Appendix II (Resolution Conf. 9.24 (Rev. CoP 17) Annex 2b)

A) *Specimens in trade resemble those of species listed in Appendix II under Res. Conf. 9.24 (Rev. CoP17) Annex 2 a or listed in Appendix I*

Analysis based on information presented in section 1 and 2

- **Biological criteria:** The former *Chortolirion* species have flowers that are distinguishable from other *Aloe* species for specialists, but in vegetative state these species are indistinguishable from grass aloes (Klopper et al., 2013).

Finding: Positive

A genus listing does not apply automatically to all species in genus, but only to those species recognized by CITES to be included in the genus. This proposal is solely to include four new *Aloe* species within the genus listing of *Aloe*. Some *Aloe* species are threatened by trade, but due to the difficulty of distinguishing *Aloe* species, especially in vegetative state, the genus is listed based on the lookalike principles in accordance with Article II, paragraph 2 (b), of the Convention. Criterion A of Resolution Conf. 9.24 (Rev. CoP17) Annex 2 (b) is satisfied for these four new *Aloe* species transferred from *Chortolirion*.

4. References

CITES CoP20 Prop. 48 <https://cites.org/sites/default/files/documents/E-CoP20-Prop-48.pdf>

Daru, B. H., Manning, J. C., Boatwright, J. S., Maurin, O., Mclean, N., Schaefer, H., Kuzmina, M., & Van der Bank, M. (2013). Molecular and morphological analysis of subfamily Alooideae (Asphodelaceae) and the inclusion of *Chortolirion* in *Aloe*. *Taxon*, 62(1), 62–76.
<https://doi.org/10.1002/tax.621006>

Klopper, R. R., Smith, G. F., Figueiredo, E., Grace, O. M., & Van Wyk, A. E. (2013). The correct names for species of *Aloe* sect. *Chortolirion* (Asphodelaceae: Alooideae). *Taxon*, 62(6), 1266–1267.
<https://doi.org/10.12705/626.5>

Manning, J. C., Boatwright, J. S., Daru, B. H., Maurin, O., & Van der Bank, M. (2014). A molecular phylogeny and generic classification of Asphodelaceae subfamily Alooideae: A final resolution of the prickly issue of polyphyly in the alooids? *Systematic Botany*, 39(1), 55–74.
<https://doi.org/10.1600/036364414X678044>

CoP20 Prop. 49 *Podocarpus parlatoarei*

1. Review of listing proposal under CITES

Presentation of listing proposal: Transfer *Podocarpus parlatoarei* from Appendix I to Appendix II in accordance with Resolution Conf. 9.24 (Rev. CoP17), Annex 4, Criterion A1.

Proponents: Argentina.

Summary of available information

Species name: *Podocarpus parlatoarei* Pilg. Common names: Parlatoarei's Podocarp, Pino Blanco (English); Pino del Cerro (Spanish)

Distribution: The species occurs on the eastern-most flanks of the Andes of northwestern Argentina and Bolivia, in an altitude range from roughly 950 to 3000 meters. It occurs in forests, shrubland and grassland, and establishes as a pioneer facilitating other more shade-tolerant species. Range states are Argentina, Bolivia and Peru, although neither Peru nor the IUCN experts agree on the latter (UNEP, 2025).

Conservation status: *Podocarpus parlatoarei* is listed as Near Threatened on the IUCN Red List of Threatened Species, the last assessment was made in 2012 (Quiroga & Gardner, 2013). The species was listed on Appendix I of CITES in 1975. The species is protected under national legislation in Argentina and Bolivia, and 28% of its population occurs within protected areas (Quiroga & Gardner, 2013).

Population trend: Stable, with a north-south distribution of ca. 1,000 km and at its widest it is ca. 100 km, but usually this is less (Quiroga & Gardner, 2013).

Habitat status: Populations of the species are naturally fragmented into patches of varying sizes, but pattern of distribution is stable with regard to the number of subpopulations and the range. The species is abundant, and rapidly colonizes abandoned areas, suggesting a good capacity for dispersion (CITES, 2008).

Trade levels: There is no international trade in the species, and the commercial domestic market is small. It is used by local rural communities as a source of firewood, to make wooden posts, utensils or housing, as living fencing around houses and pastures (Quiroga & Gardner, 2013).

2. Potential other information by CITES reviews and on nature management issues in range states

Argentina has previously considered submitting a proposal for downlisting of the species to Appendix II. This was reported at PC17 as a proposal for CoP15, but not submitted to that CoP (CITES, 2008).

There are no current suspensions or quotas in place for this species, nor is it currently included in the CITES Review of Significant Trade (UNEP, 2025).

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological criteria for inclusion in Appendix I (Resolution Conf. 9.24 (Rev. CoP17) Annex 1)

- A) *Small wild population*
- B) *Restricted area of distribution*
- C) *Marked decline in number of wild individuals*

Trade criteria for inclusion in Appendix I (Article II, paragraph 1 of the Convention)

The species is or may be affected by trade

Precautionary measures (Resolution Conf. 9.24 (Rev. CoP 17) Annex 4)

Analysis based on information presented in section 1 and 2

- **Biological criteria.** The latest assessment data is from 2012, but the wild populations of *P. parlatoresi* appear stable. The species has a large fragmented distribution area with a large number of populations. It has a pioneer life history adapted to secondary forest regeneration.
- **Trade criteria.** The species is not in international trade. It is used locally in a small scale. The trade does not threaten the species with extinction.
- **Precautionary measures.** The precautionary measure cited by the proponents refers to a stepwise removal of the species from the CITES appendices in which a species on Appendix I should first be moved to Appendix II and monitored for two intervals between subsequent CoP meetings.

Finding: Positive

The original need to list *Podocarpus parlatoresi* on Appendix I no longer applies as silviculture of superior timber species has satisfied the local market. The population is stable without significant use beyond limited domestic utilization. The biological criteria for listing on Appendix I (Annex 1, Criteria A,B,C, Resolution Conf. 9.24 (Rev. CoP17)) are not satisfied based on the most recent data. The trade criteria for listing on Appendix I (Article II, paragraph 1 of the Convention) are not satisfied based on the most recent data. The precautionary criteria (Annex 4, Resolution Conf. 9.24 (Rev. CoP17)) are satisfied.

4. References

- CITES. (2008). *PC17 Doc. 11. Periodic review of plant species included in the CITES appendices.* <https://cites.org/sites/default/files/eng/com/pc/17/E-PC17-11.pdf> (Accessed July 14, 2025).
- Quiroga, P., & Gardner, M. (2013). *Podocarpus parlatoresi.* *The IUCN Red List of Threatened Species 2013:* e.T32019A2808150. <https://dx.doi.org/10.2305/IUCN.UK.2013-1.RLTS.T32019A2808150.en> (Accessed July 14, 2025).
- UNEP. (2025). *The Species+ Website.* Nairobi, Kenya. Compiled by UNEP-WCMC, Cambridge, UK. <https://www.speciesplus.net> (Accessed July 14, 2025).

CoP20 Prop. 50 *Avonia quinaria*

1. Review of listing proposal under CITES

Presentation of proposal: Transfer of *Avonia quinaria* from Appendix II to Appendix I (without an annotation) in accordance with Resolution Conf. 9.24 (Rev. CoP17), Annex 1, paragraph C (i)(ii).

Proponents: South Africa.

Summary of available information

Species name: *Avonia quinaria* (E.Mey. ex Fenzl) G.D.Rowley. Synonyms: *Anacampseros quinaria* E.Mey. ex Fenzl, *Anacampseros quinaria* subsp. *alstonii* (Schönland) Dreher, *Anacampseros quinaria* subsp. *quinaria*, *Anacampseros alstonii* Schönland, *Avonia quinaria* (E.Mey. ex Fenzl) G.D.Rowley subsp. *alstonii* (Schönland) G.D.Rowley. Common names: Avonia (English).

Two subspecies are known, *Anacampseros quinaria* subsp. *alstonii* and *Anacampseros quinaria* subsp. *quinaria*. The latter occurs on the eastern edge of the Khamiesberg region while the former is found in the Bushmanland to southern Richtersveld (Mhlongo et al., 2022).

The accepted scientific name of the species is *Anacampseros quinaria* E.Mey. ex Fenzl (Anacampserotaceae) and the species is in trade using both names.

Distribution: South Africa, Namibia (UNEP, 2025). This species occurs in south-eastern Namibia, Bushmanland and north-eastern Namaqualand in the Northern Cape of South Africa (Mhlongo et al., 2025).

Conservation status: No IUCN Red-Listing is available for the species. The species is assessed nationally in South Africa as Endangered (A4bd) primarily due to illegal collection for the ornamental horticultural trade, which has caused a recent significant decline in its population of over 50% (Mhlongo et al., 2022). Previous national assessments have assessed it as Indeterminate (Hilton-Taylor, 1996) and Least Concern (Raimondo et al., 2009). The genus *Avonia* is listed on CITES Appendix II since 1975 (UNEP, 2025).

Population trend: This species has a large extent of occurrence (EOO) at 17 295 km² and an area of occupancy (AOO) of 84 km². The population is declining due to illegal collection of mature individuals to supply the specialist ornamental horticultural trade. The population will experience a decline of at least 50% over a three-generation period including two generations in the past (60 years) and one generation into the future (30 years). Subpopulations in Namibia are suspected to be declining due to illegal collection (Mhlongo et al., 2022).

Habitat status: The subpopulations of *A. quinaria* subsp. *quinaria* typically consist of small, scattered patches with a high plant density, with the next patch being some hundred metres away. In *Anacampseros quinaria* subsp. *alstonii*, a single or very few plants can be found scattered over a large area (Mhlongo et al., 2022).

Trade levels: The species is popular in horticultural trade and offered online by a large number of suppliers (Google Search, 15.07.2025). Between March 2019 and November 2022, South Africa confiscated 8449 illegally collected plants (Mhlongo et al., 2022). The listing proposal shows another 12000+ confiscations in 2023-2024. The confiscations reflect only a fraction of the trade, and many more are likely to have been removed from the wild but not intercepted by law enforcement efforts. The confiscated plants are usually mature individuals and this is likely to have detrimental impacts on the viability of the wild population. Based on the CITES trade database, South Africa is by far the largest exporter of this species, accounting for approximately 98% of all reported global exports in live plants (CITES Trade Database, 2025). An estimated 38,647 live plants have been permitted for export from the country since 1996, the vast majority (97%) between 2011 and 2021 (CITES CoP20 Prop. 50). Based

on the high numbers of plants in confiscations, it is suspected that at least 30% of the South African population of this species has been lost due to poaching since 1960 (two generations). The species remains highly desirable in the ornamental horticultural trade with an increase in confiscations reported since 2019, indicating that a further 30% loss over the next 30 years (one generation) is likely (Mhlongo et al., 2022).

2. Potential other information by CITES reviews and on nature management issues in range states

There are no current quotas or current suspensions in place for this species (UNEP, 2025). This species is not currently included in the CITES Review of Significant Trade (UNEP, 2025). Mhlongo et al. (2022) suspect that at least 30% of the South African population of this species has been lost due to poaching since 1960. Furthermore, the listing proposal reports that although most legally exported material is declared as originating from artificial propagation that one of its largest exporters (80% of plants exported during the 2011-2021 period) has recently been recently prosecuted for the trade in illegally harvested wild plants misdeclared as artificially propagated. This could reflect management issues in South Africa.

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP 17))

Biological criteria for inclusion in Appendix I (Resolution Conf. 9.24 (Rev. CoP17) Annex 1)

- A) *Small wild population*
- B) *Restricted area of distribution*
- C) *Marked decline in number of wild individuals*

Trade criteria for inclusion in Appendix I (Article II, paragraph 1 of the Convention)

The species is or may be affected by trade

Analysis based on information presented in section 1 and 2

- **Biological criteria:** The populations in South Africa are in marked decline with the species at risk of extinction. The national Red List assessment assesses the species as Endangered (A4bd), with a marked decline in its population of over 50%. Less is known about the populations in Namibia, although experts suspect the subpopulations there to also be declining.
- **Trade criteria:** The primary cause of decline is illegal collection for the ornamental horticultural trade. Confiscations show that an active and unregulated market for the species exists, which is based on wild-sourced material.

Finding: Positive

Avonia quinaria is an endangered species suffering from a marked decline in population size as a result from illegal harvesting of wild-sourced material for the international horticultural trade. Misdeclaration of artificial propagation is suspected to be used as a loophole at scale for legal export of material under CITES. The biological criteria for inclusion in Appendix I (Annex 1 C, Resolution Conf. 9.24 (Rev. CoP17)) is satisfied based on the most recent data. The trade criteria for inclusion in Appendix I (Article II, paragraph 1 of the Convention) are satisfied based on the most recent data.

4. References

CITES CoP20 Prop. 50 <https://cites.org/sites/default/files/documents/E-CoP20-Prop-50.pdf>

CITES Trade Database. (2025). Compiled by UNEP-WCMC for the CITES Secretariat.
<https://trade.cites.org> (Accessed July 15, 2025).

Hilton-Taylor, C. (1996). *Red data list of southern African plants*. Strelitzia 4. South African National Botanical Institute, Pretoria.

Mhlongo, N. N., Rodgerson, C., & Dreher, H. (2022). *Anacampseros quinaria* E.Mey. ex Fenzl. National Assessment: Red List of South African Plants version. (Accessed July 15, 2025).

Raimondo, D., von Staden, L., Foden, W., Victor, J. E., Helme, N. A., Turner, R. C., Kamundi, D. A., & Manyama, P. A. (2009). *Red List of South African Plants*. Strelitzia 25. South African National Biodiversity Institute, Pretoria.

UNEP. (2025). *The Species+ Website*. Nairobi, Kenya. Compiled by UNEP-WCMC, Cambridge, UK. <https://www.speciesplus.net> (Accessed July 15, 2025).

CoP20 Prop. 51 *Aloe ferox* and *Euphorbia antisyphilitica*

1. Review of listing proposal under CITES

Presentation of proposal: To amend the annotation for *Aloe ferox* and *Euphorbia antisyphilitica* to: f) finished products packaged and ready for retail trade of *Aloe ferox* and *Euphorbia antisyphilitica*.

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

Summary of available information

Species name: Not applicable.

Distribution: Not applicable.

Conservation status: Not applicable.

Population trend: Not applicable.

Habitat status: Not applicable.

Trade levels: Not applicable.

2. Potential other information by CITES reviews and on nature management issues in range states

Not applicable.

3. Assessment of compliance with relevant listing criteria (Resolution Conf. 9.24 (Rev. CoP17))

A Working Group on Annotations was established at PC26. This WG reported to SC, and at SC78 a consensus recommendation was made to amend Annotation #4 paragraph f) to harmonize language in the paragraphs of Annotation #4. Annotations to species listed in the Appendices may be adopted, deleted or amended only by the Conference of the Parties (Resolution Conf. 11.21 (Rev. CoP19)).

Finding: *Positive*

The paragraphs of Annotation #4 specify states (i.e., parts and derivatives) of CITES Appendix II listed species that are exempt from the listing. Paragraphs to this annotation have been modified and added over time. At this time, paragraphs (f) and (g) refer to derivatives packaged and ready for retail trade, with (f) referring to all material whereas (g) refers to material from artificial propagation only. However, the phrasing “packaged and ready for retail trade” is used inconsistently. The proposal suggests to amend paragraph (f) to make the phrasing consistent with (g). The proposed amendment will facilitate regulation of trade and enforcement of the convention.

4. References

Not applicable.