

# BRIEFING DOCUMENT

FOR THE 20TH MEETING OF  
THE CONFERENCE OF THE PARTIES TO CITES

SAMARKAND, UZBEKISTAN  
24 NOVEMBER - 05 DECEMBER 2025



**TRAFFIC**

# CONTENTS

page 4

## INTRODUCTION

page 5

## OVERVIEW

page 8

## TRAFFIC RECOMMENDATIONS ON SELECTED AGENDA DOCUMENTS FOR CITES COP20

Doc.13	CITES Strategic Vision	p. 9
Doc.14	Efficiency of the Convention	p. 10
Doc.15.1, 15.2	CITES and One Health	p. 11
Doc.27, 28	Indigenous People and Local Communities	p. 12
Doc. 29.1, 29.2	Livelihoods	p. 13
Doc.31	Demand reduction	p. 14
	Elephants	p. 15
Doc.35.2	Review of the National Ivory Action Plans Process	p. 15
Doc.42	Review of the ETIS Programme	p. 16
Doc.43	ETIS categorisation of Parties	p. 16
Doc. 44, 76.2	Domestic Ivory Markets	p. 16
Doc. 76.1, 76.3	Ivory Stockpiles	p. 17
Doc. 76.5	Etis Report to CoP	p. 17
Doc. 76.6	Elephant Range State Dialog Meeting	p. 18
Doc. 35.3	Totoaba ( <i>Totoaba macdonaldi</i> )	p. 20
Doc. 39	Enforcement Matters	p. 20
	Big Cats	p. 22
Doc. 41	Big Cat Task Force	p. 22
Doc.45	Cheetahs	p. 23
Doc. 77	Asian Big Cats	p. 23
Doc. 80	Lions	p. 24
Doc. 81	Jaguars	p. 24
Doc.46	Marine Turtles	p. 25
Doc.47.1, 47.2	Freshwater Turtles	p. 26
Doc.49	Legal Acquisition Findings	p. 26
Doc.50	Non-Detriment Findings	p. 27
Doc.51	Areas beyond national jurisdiction	p. 28
Doc.52	Introduction from the Sea	p. 28
Doc.59	Stocks and Stockpiles	p. 29
Doc.61	Rapid Movement of Wildlife	p. 29
Doc.67.2	Ranching	p. 30
Doc.73	Endemic Species	p. 30
Doc.74	West African Vultures	p. 31
Docs. 83	Songbirds	p. 31
Doc. 84	Rhinos	p. 32
Doc. 85.1, 85.2	Saiga	p. 33
Doc. 87	Eels	p. 34
Doc. 88.1	Sharks and Rays	p. 35
Doc.88.2	Deepwater Sharks	p. 35
Doc. 90	Sea Cucumbers	p. 36

Doc. 93	Agarwood	p. 37
Doc.95	Rosewood	p. 37
Doc. 97	Brazilwood	p. 38
Doc. 100	Medicinal and Aromatic Plants	p. 39
Doc. 102	'Look-Alike' Criterion	p. 40
Doc. 105.1, 105.2	Periods of Transition	p. 40

page 42

## TRAFFIC RECOMMENDATIONS ON PROPOSALS TO AMEND APPENDICES AT CITES COP20

Prop. 1	Bontebok	p. 44
Prop. 2	Dorcas Gazelle	p. 44
Prop. 3	Saiga Antelope	p. 45
Prop. 4	Giraffe	p. 46
Prop. 5	Okapi	p. 47
Prop. 6	Striped Hyaena	p. 48
Prop. 7	Guadalupe Fur Seal	p. 49
Prop. 8	Caribbean Monk Seal	p. 49
Prop. 9	Southern White Rhinoceros	p. 50
Prop. 10	South-Western Black Rhinoceros	p. 51
Prop. 11	Hoffman's Two-toed Sloth, Linné's Two-toed Sloth	p. 52
Prop. 12	Golden-Bellied Mangabey	p. 52
Prop. 13	African Elephants	p. 53
Prop. 14	African Elephants	p. 54
Prop. 15	Hornbill genera	p. 55
Prop. 16	White-Backed Vulture, Ruppell's Vulture	p. 56
Prop. 17	Peregrine Falcon	p. 57
Prop. 18	Great-billed Seed-finch	p. 57
Prop. 19	Giant Hispaniolan Galliwasp	p. 58
Prop. 20	Mount Elliot Leaf-tailed Gecko	p. 58
Prop. 21	Ringed Thin-tail Gecko	p. 59
Prop. 22	Galápagos Marine Iguana	p. 59
Prop. 23	Galápagos Land iguanas	p. 60
Prop. 24	Bale Mountain Adder, Ethiopian Mountains Adder	p. 60
Prop. 25	Rock Rattlesnake, Central Plateau Pygmy Rattlesnake	p. 61
Prop. 26	Home's Hinge-back Tortoise	p. 61
Prop. 27	Water Frogs	p. 62
Prop. 28	Oceanic Whitetip Shark	p. 63
Prop. 29	Tope and Smoothhounds	p. 64
Prop. 30	Manta and Devil Rays	p. 65
Prop. 31	Whale Shark	p. 66
Prop. 32	Giant Guitarfishes	p. 66
Prop. 33	Wedgefishes	p. 67
Prop. 34	Gulper Sharks	p. 68
Prop. 35	Eels	p. 69
Prop. 36	Sea Cucumbers	p. 70
Prop. 37	Golden Sandfish	p. 71
Prop. 38	Tarantula species	p. 72
Prop. 39	South African Abalone	p. 73
Prop. 40	American Ginseng	p. 74
Prop. 41	Chilean Palm	p. 74
Prop. 42	Ponytail Palms	p. 75
Prop. 43	Indian Bdellium - Tree	p. 75
Prop. 44	Cycad Spurge	p. 76
Prop. 45	Red Doussié	p. 77
Prop. 46	Brazilwood	p. 78
Prop. 47	<i>Pterocarpus soyauxii</i>	p. 79
Prop. 48	<i>Aloe</i>	p. 80
Prop. 49	Parlatore's Podocarp	p. 80
Prop. 50	<i>Avonia quinaria</i>	p. 81
Prop. 51	Amend annotation #4	p. 81





Black Casqued Hornbill - *Ceratogymna atrata*

# INTRODUCTION

**The years since the last CoP have seen an increase in cooperation among global biodiversity agendas, raising the profile of wildlife trade as integral to conservation of planet and people.**

Since the last meeting of the Conference of the Parties (CoP19) in November 2022, the global wildlife trade landscape has continued to evolve. Key developments include major policy updates, enforcement actions, advances in science and technology, and shifting market dynamics. As trade and travel restrictions from the COVID-19 pandemic were lifted, trafficking in some wildlife

products resurged, though increased enforcement during this period has resulted in significant seizures. At the same time technology is playing an increasingly important role in enforcement. Artificial intelligence tools are now being used to detect illegal trade online, identify wildlife products in both physical and online markets, and analyse forensic evidence, innovations that help close long-standing gaps in species identification, origin tracing, and enforcement capacity, even as challenges remain in scaling and adoption.

Policy efforts since CoP19 have focused on strengthening traceability systems as a

cornerstone of sustainable legal trade, improving Non-Detriment Finding (NDF) methodologies, and expanding the number of species with available NDF guidance. Efforts are also underway to better integrate wildlife trade into global biodiversity frameworks, ensuring that regulation evolves in step with threats such as habitat loss, climate change, and infrastructure development. As in previous CoPs, delegates will need to navigate challenging discussions on issues where consensus has been difficult to achieve, making compromise, shared understanding, and collaboration essential. With many Parties and NGOs facing resource constraints, cooperation is more critical than ever. The unprecedented number of agenda items and proposals submitted at this COP for consideration underscores both the urgency of the issues at hand and the determination of the CITES community to take decisive action.

The timing of CoP20 is significant, taking place just days after the UN Climate Change Conference in Belém, Brazil, at a moment when the links between climate change and biodiversity loss, including from unsustainable trade, are receiving unprecedented global attention. Since CoP19, the Kunming-Montreal Global Biodiversity Framework (KM-GBF) has set an ambitious path over the next three decades, particularly through Targets 5 and 9 on sustainable use and tackling wildlife trafficking. CITES now has an opportunity to demonstrate its critical role in advancing these global goals, aligning trade regulation with the wider agenda for human and environmental health, livelihoods, and resilient ecosystems. In line with TRAFFIC's 2030 Strategy, this moment calls for practical, evidence-based action that ensures wildlife trade supports both conservation and sustainable development.

# OVERVIEW

**This year's CoP seeks to build on the achievements of CoP19, as well as highlighting some conservation successes. CoP20 also highlights the need for greater management and support for sustainable, legal trade, and combatting illegal trade, by putting traceability, Non-Detriment Findings, and compliance front and center.**

CoP19, held in Panama City in 2022, marked significant progress in strengthening compliance and enforcement measures, advancing guidance on Non-Detriment Findings (NDFs) for species management, and expanding listings for high-profile taxa including sharks, rays, and tree species. Many of the decisions adopted at CoP19 focused on improving implementation and transparency, with measures to strengthen reporting requirements, address non-compliance,

and build capacity among Parties. CoP20 will build on this foundation, with particular attention to how these measures are being implemented on the ground, especially in range States and consumer markets where illegal trade continues to pose serious threats.

A key theme continuing into CoP20 is the global effort to both strengthen the regulation of legal wildlife trade and combat illegal trade. Parties will focus on ensuring that legal trade in species is sustainable, traceable, and aligned with conservation objectives, while also closing loopholes that enable illicit trade. This includes reviewing progress on enforcement initiatives, improving systems for monitoring and reporting legal trade, exploring new strategies for demand reduction, and developing more robust stockpile management practices. Together, these efforts

aim to create a framework where legal trade supports species recovery and community livelihoods, while illegal trade is effectively deterred.

Aquatic species will again be a central focus. Proposals to list additional sharks, rays, sea cucumbers, and eels are on the table, building on the historic expansion of shark listings at CoP19. Discussions will emphasise strengthening species identification, traceability, enforcement, and management capacity. There is also growing attention on improving data quality, particularly through the use of Annex 5 guidelines for assessing population trends, and aligning CITES implementation with regional and global fisheries management frameworks.

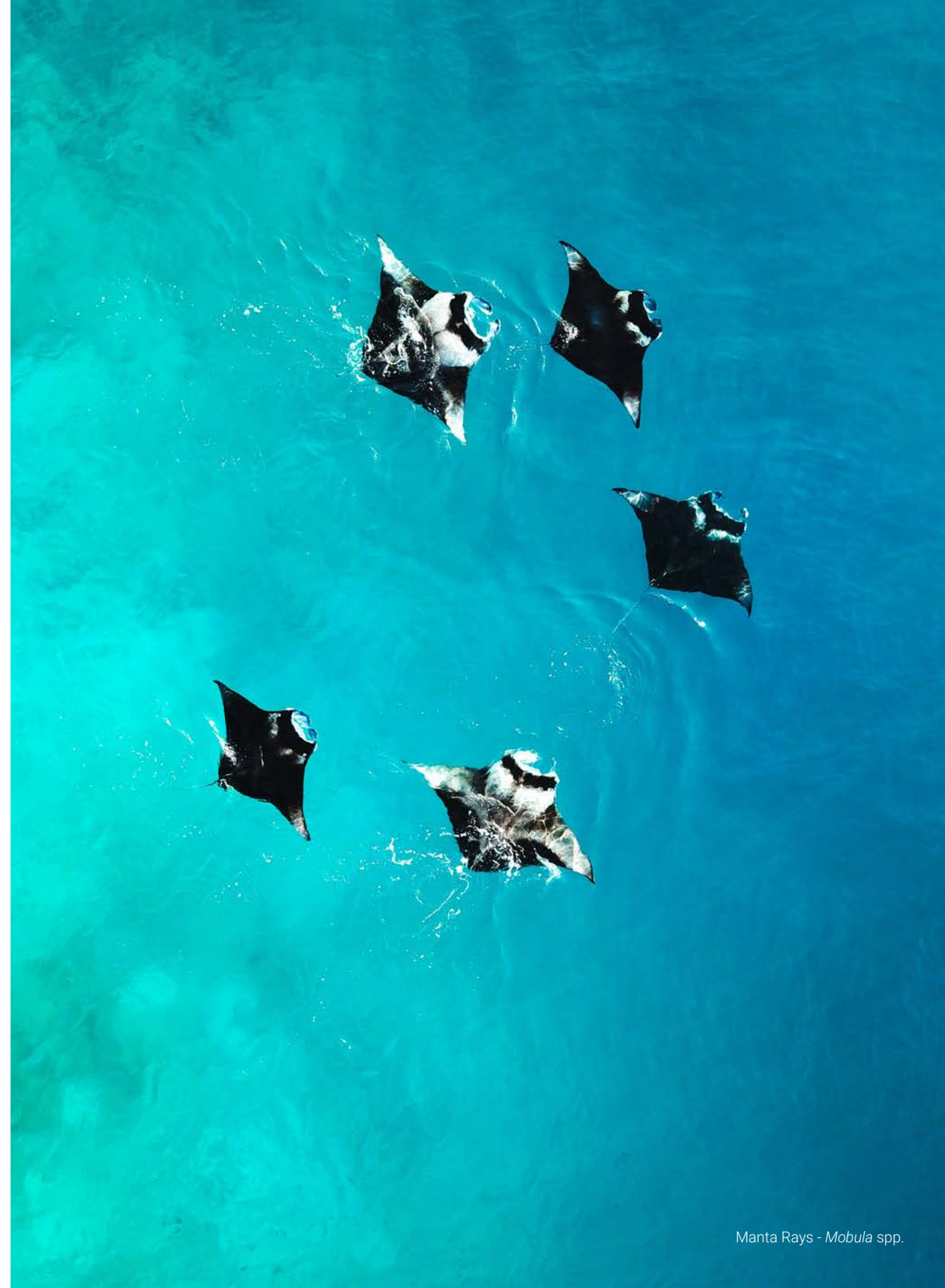
Timber trade regulation remains a major theme. Following the significant expansion of Appendix II tree listings at CoP19, CoP20 will assess the impact of these listings and consider further proposals, particularly for high-value tropical hardwoods. This reflects the increasing recognition of the connection between sustainable forest management, climate commitments, and biodiversity conservation.

What sets CoP20 apart is the scale and ambition of its agenda. A record number of proposals and working documents have been submitted, underscoring the urgency of global biodiversity challenges and the growing expectation that CITES deliver meaningful action. Parties will explore new approaches to traceability, including digital permitting systems and enhanced reporting standards. A key discussion point will be how to integrate CITES objectives with the Kunming-Montreal Global Biodiversity Framework and other multilateral environmental agreements, ensuring that wildlife trade governance supports broader biodiversity and climate goals.

Finally, CoP20 is expected to feature robust discussions on balancing species conservation with sustainable use and livelihoods. There is increasing recognition of the role of local communities, Indigenous Peoples, and the private sector in achieving conservation outcomes. Debates are likely to focus not only on species listings but also on how to make trade a tool for supporting both people and nature, reinforcing CITES' relevance in today's rapidly changing global context.



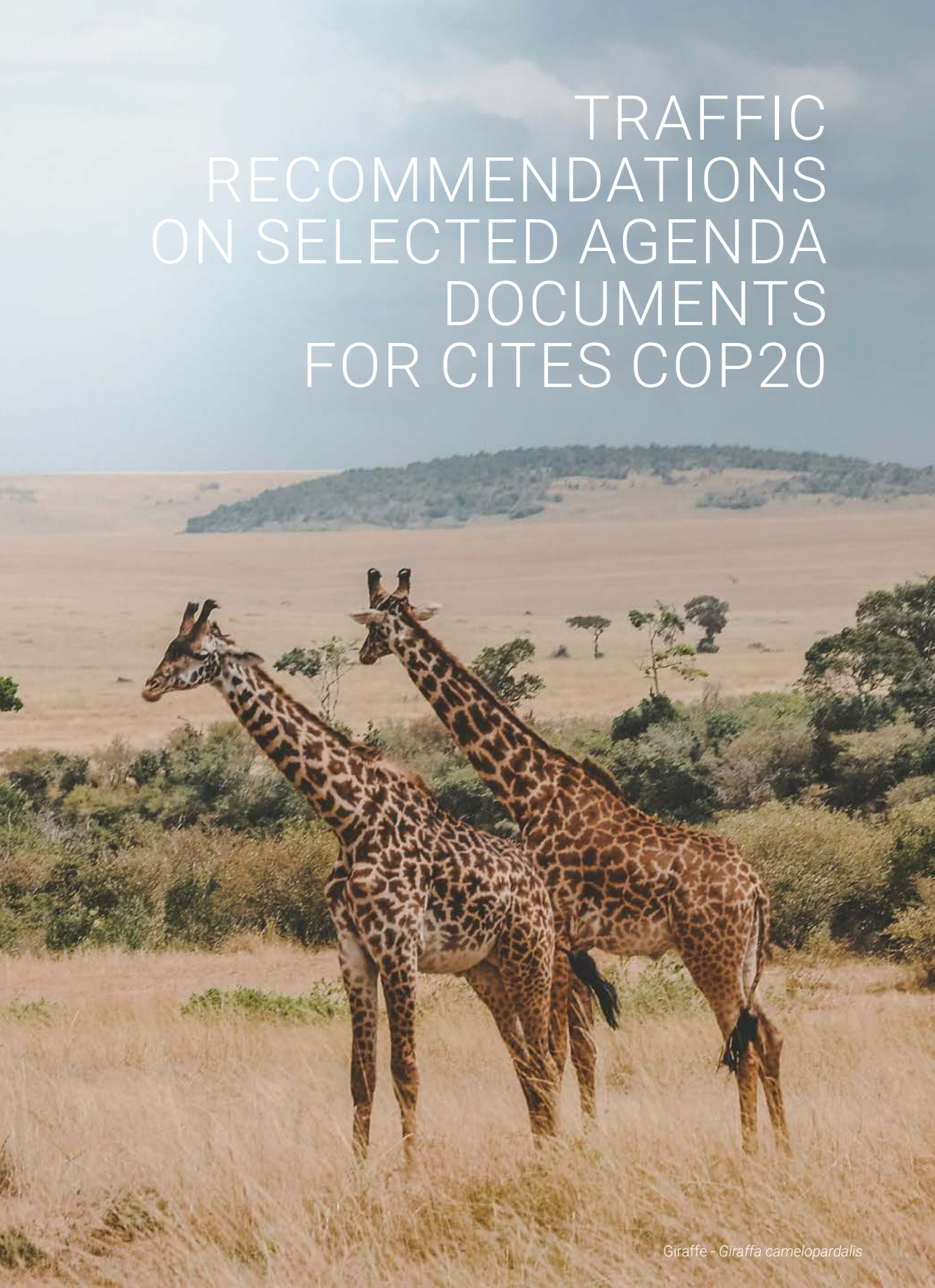
See [tinyurl.com/TRAFFIC-cites-CoP20](https://tinyurl.com/TRAFFIC-cites-CoP20) for further information, including more detailed briefings on some of the priority areas the CoP will be tackling, as well as real time updates, commentary, and perspectives on various CITES topics.



Manta Rays - *Mobula* spp.



# TRAFFIC RECOMMENDATIONS ON SELECTED AGENDA DOCUMENTS FOR CITES COP20



Giraffe - *Giraffa camelopardalis*

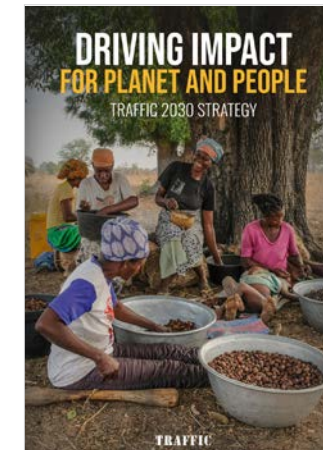
## CITES STRATEGIC VISION

### CoP20 Doc.13

A few weeks after CoP19, governments convened in Montreal, Canada at the Convention on Biological Diversity (CBD) CoP15 to adopt the post-2020 Kunming-Montreal Global Biodiversity Framework (KM-GBF). Against this backdrop, the CITES CoP20 Strategic Vision provides an important mapping of CITES priorities against the goals and targets of the KM-GBF, helping to align wildlife trade governance with broader global biodiversity commitments. This mapping is significant because it highlights synergies across frameworks, supporting policy coherence and the streamlined design of national strategies, including National Biodiversity Strategies and Action Plans (NBSAPs). It encourages Parties, through their CITES and CBD focal points, to use data gathered for NDFs in CBD reporting and to identify further opportunities to strengthen cooperation and coordination among biodiversity-related conventions and focal points.

Importantly, Document 13 emphasises that wildlife trade regulation, once considered largely a conservation or enforcement issue, must now be understood as central to biodiversity, climate resilience, sustainable development, and cross-cutting global agendas such as One Health, climate action, and financing mechanisms. In this way, the Vision reinforces CITES's relevance in the wider policy landscape and provides a tool for more coordinated and strategic action.

Progress in tackling unsustainable and illegal wildlife trade should be measured first at the national level through robust indicators on wild species use and trade. These indicators are vital for tracking impact, guiding policy, and contributing credible data to the global monitoring of the Kunming-Montreal Global Biodiversity Framework. TRAFFIC is collaborating with Parties and international partners, including members of the Collaborative Partnership on Sustainable Wildlife Management (CPW), to co-develop the "Sustainable Use of Wild Species" indicator, which will help measure progress toward Target 5 of the GBF. TRAFFIC is eager to work with CITES Parties to ensure these efforts are closely linked with their CITES obligations ensuring that commitments translate into meaningful outcomes for biodiversity, wildlife trade governance, and sustainable use. TRAFFIC supports the amendment to the Resolutions proposed in the document.



### Driving Impact for Planet and People TRAFFIC 2030 Strategy

#### Document link:

[tinyurl.com/TRAFFIC2030Strategy](https://tinyurl.com/TRAFFIC2030Strategy)



### SIDE EVENT:

#### Samarkand Declaration and Action Plan: Central Asia Wildlife Trade

This side event, organised by the Ministry of Ecology, Environmental Protection and Climate Change of the Republic of Uzbekistan, will showcase the Samarkand Declaration and Action Plan (2025–2032). These landmark commitment and initiative represent a historic commitment by Kazakhstan, Kyrgyzstan, Tajikistan, Turkmenistan and Uzbekistan to a unified Central Asian regional framework to strengthen biodiversity protection and combat illegal and unsustainable wildlife trade.

#### Side Events link:

[tinyurl.com/TRAFFICcites-cop20-side-events](https://tinyurl.com/TRAFFICcites-cop20-side-events)



## EFFICIENCY OF THE CONVENTION

### CoP20 Doc.14

Over the years, there has been a steadily expanding workload at CITES meetings, which places a growing strain on both the Committees and the Secretariat. The result has been that important agenda items are sometimes rushed or left undiscussed by the close of meetings. At the same time, with increasingly limited budgets, many Resolutions and Decisions are adopted without realistic prospects for implementation. This situation is unsustainable. However, while the draft Decision seeks to improve efficiency through a prioritisation exercise, the approach outlined may not provide the best solution.

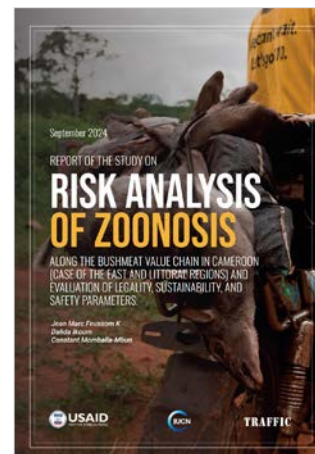
The proposed system, particularly the use of tick-box assessments, risks being subjective. TRAFFIC recommends that prioritisation in the annotation balance factors such as urgency, conservation impact, compliance relevance and the level of preparedness, with a focus on areas where CITES intervention can achieve the greatest impact in the shortest timeframe. Nevertheless, prioritisation may necessarily be addressed through the budgeting process, with additional initiatives pursued only when extrabudgetary resources are secured. Without sufficient resources, even the most carefully designed prioritisation mechanism will have limited practical effect. TRAFFIC is especially concerned that Parties' priorities may repeatedly go unimplemented simply because they do not pass through this proposed process.

## CITES AND ONE HEALTH

### CoP20 Doc.15.1, CoP20 Doc.15.2

In the post-Covid era, the urgency of addressing zoonotic disease risks linked to international wildlife trade has been widely acknowledged by CITES Parties and partners, with broad recognition of the need to strengthen CITES' role within the wider global health and biodiversity agenda. The draft Decisions outlined in these documents represent an important step toward maintaining momentum, but stakeholder discussions have also highlighted ongoing concerns about overstepping CITES' mandate, duplicating efforts already led by other international bodies, and stretching already limited resources without assured external support.

To move forward effectively, TRAFFIC would recommend that actions remain firmly grounded in CITES' core mandate of regulating international trade in listed species, while strategically leveraging existing frameworks such as the Quadripartite One Health collaboration (FAO, UNEP, WHO, WOA) and other biodiversity conventions, including the CBD Global Action Plan on Biodiversity and Health. This means prioritising the use of established guidelines like the World Organisation for Animal Health (WOAH)'s wildlife health standards, embedding One Health provisions into existing CITES Resolutions, and strengthening inter-agency collaboration, both internationally and at the national level, between CITES authorities, veterinary services, and public health institutions. Additional priorities could include targeted capacity building for Parties on high-risk species, improving transport protocols, ensuring financial sustainability, and maintaining the CITES webpage as a central hub for timely information sharing.



### Risk Analysis of Zoonosis Along the Bushmeat Value Chain in Cameroon

#### Report link:

[tinyurl.com/risk-analysis-zoonosis](https://tinyurl.com/risk-analysis-zoonosis)





## INDIGENOUS PEOPLE AND LOCAL COMMUNITIES

CoP20 Doc.27, CoP20 Doc.28

TRAFFIC agrees that greater participation of Indigenous Peoples (IP) and Local Communities (LC) in CITES processes would enrich the information base for decision-making and support fair and effective implementation of outcomes. We therefore encourage Parties to consider including IP and LC representatives in national delegations or accrediting them through observer organisations, allowing them to engage directly with Party delegates, respond to debates in real time, and contribute to both in-session and intersessional working groups.

At the same time, we note the parallels with processes under the CBD, including the recent decision to establish SB8j as a subsidiary body on traditional knowledge, practices and innovations of IP and LC, intended to “create a high-level institutional space to fully realise the participation of Indigenous Peoples and local communities in the work of the Convention and effectively contribute to its decision-making processes.” TRAFFIC is mindful of the power and knowledge asymmetries that persist in global policy fora, which can hinder equitable access and meaningful participation by many Peoples and Local Forest-dependent Communities (PLFCs). However, we are concerned that a separate, parallel committee or sub-committee would not provide these advantages at present.

With respect to CoP20 Doc. 27, TRAFFIC supports *the publication of the non-binding Guidance on consultation with IPs and LCs on proposals to amend the Appendices*, the adoption of the draft Decisions in Annex 2, and a distinctions-based approach to terminology, favouring the use of “Indigenous Peoples, and Local Communities.” On paragraph b) of draft Decision 20.BB, TRAFFIC emphasises the importance of not only avoiding duplication but ensuring that national-level engagement ideas are made easily accessible, for example through a dedicated section on the CITES website to centralise relevant guidance and support continuity for Parties.

We support strengthening engagement through existing CITES structures and exploring pragmatic measures proposed while prioritising robust national-level engagement. We emphasise the importance of continued meaningful consultations with IPs and LCs.

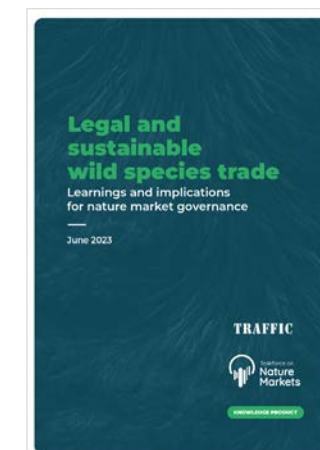
## LIVELIHOODS

CoP20 Doc. 29.1, CoP20 Doc. 29.2

TRAFFIC welcomes the continued work on CITES and livelihoods and recognises the leadership of Zambia and Peru as co-chairs of the intersessional working group. We note that divergent views at SC78 made consensus on the six strategies for maximising the benefits to Indigenous peoples and local communities from trade in CITES-listed species challenging and therefore commend Zambia’s proposal as a constructive compromise and sensible way forward that reflects those discussions, addresses concerns, and seeks common ground. We support the proposed amendments to Resolution Conf. 16.6 (Rev. CoP18) that integrate these updated strategies, now framed as strategies for facilitating the participation of rural communities in legal and sustainable trade in CITES-listed species as an Annex. In our view, the revised formulation offers a concise and pragmatic framework for Parties, while maintaining the essential elements to strengthen community engagement in CITES implementation.

TRAFFIC underscores the importance of recognising the long-term rights of communities that manage wildlife resources; empowering communities as stakeholders in decision-making with due regard to traditional knowledge; simplifying and clarifying permitting processes to facilitate legal, sustainable and traceable trade; and strengthening community governance and partnerships with government, civil society and the private sector. Equally important are robust, transparent and equitable benefit-sharing arrangements that help ensure communities can realise fair outcomes from legal and sustainable trade.

TRAFFIC also supports the dissemination by the CITES Secretariat of the accompanying Guidance, which provides practical direction for Parties. Finally, we support adoption of the draft Decisions in CoP20 Doc. 29.1 to advance case studies on certification and labelling systems. Drawing on our experience with the FairWild Standard and certification in Nepal, we recognise the potential of these mechanisms to deliver measurable benefits for species, ecosystems and the communities that depend on them.



**Legal and sustainable wild species trade: Learnings and implications for nature market governance**

**Report link:**  
[tinyurl.com/sustainable-wild-species-trade](https://tinyurl.com/sustainable-wild-species-trade)



## DEMAND REDUCTION

### CoP20 Doc.31

Resolution Conf. 17.4 (Rev. CoP19) on demand reduction strategies provides Parties with practical guidance to design and deliver behaviour change initiatives that reduce consumer demand and shift consumer choice away from illegal wildlife products. Developed by TRAFFIC under contract with the CITES Secretariat, the Guidance introduces a Five-Step Framework and 10-Behaviour Change Benchmarks to support non-specialists in creating targeted, impactful interventions. Delivering against CITES Decisions 19.55a and 19.57 TRAFFIC prepared a Chinese translation of the Guidance which was subsequently adopted by the CITES Secretariat and housed on their dedicated CITES.org demand reduction resource page, on which TRAFFIC advised. Momentum was supported by initiatives such as the European Union's translation of the CITES Guidance into German, Italian, Dutch, and Portuguese, delivering against Decision 19.57.

To build capacity in using the Guidance and in line with Decision 19.55b, TRAFFIC led the technical elements of the regional training workshop for Asia, held in Singapore (October 2023) with 27 participants from 14 Parties; and for Africa, held in Lusaka, Zambia (September 2024) with over 30 participants from 18 Parties. A workshop for Latin America is currently under development. Training was also provided at the national level in China attended by 75 people (both physically in the Workshop venue and online: April, 2025). These sessions not only trained participants in applying the Five-Step Framework but also facilitated valuable exchanges of national experiences in planning and implementing demand reduction strategies, and the development of national Workplans with support from experts.

In line with Decision 19.55c, TRAFFIC led the Asian regional pilot of the demand reduction Guidance with a focus on the use of Totoaba fish maws in China, thus also delivering against Decision 19.75c. This set the foundation for follow-up activities under a new 'Demand Reduction Alliance' initiative supported by the EU under their GUARD Wildlife initiative running until December 2027. TRAFFIC also supported the Nigeria Conservation Foundation's leadership of the African regional pilot of the demand reduction Guidance with a focus on the belief-based use of Vulture parts and products, thus also delivering against Decision 19.192f. Document CoP20 Doc.31 seeks to compile and share these success stories, highlighting achievements to date and inspiring further action. TRAFFIC remains committed to supporting Parties in their implementation of the Resolution, ensuring that demand reduction strategies continue to strengthen CITES's response to illegal trade and deliver measurable conservation outcomes.



#### Behavior Change Series for Wildlife Conservation

Document link:  
[tinyurl.com/behavior-change-series](https://tinyurl.com/behavior-change-series)



#### SIDE EVENT: A Decade of Demand Reduction

This side event offers a review of the decade-long global effort to curb the illegal wildlife trade by actively reducing consumer demand. Experts will share success stories and challenges, focusing the discussion on effective methodologies for changing buyer behaviour and assessing the true impact of these strategies on targeted species to inform future market mitigation measures and policy for all participating parties.

Side Events link:  
[tinyurl.com/TRAFFICcites-cop20-side-events](https://tinyurl.com/TRAFFICcites-cop20-side-events)



African Elephant - *Loxodonta africana*

## REVIEW OF THE NATIONAL IVORY ACTION PLANS PROCESS

### CoP20 Doc.35.2

TRAFFIC welcomes the findings of the review of the National Ivory Action Plan process and the recommendations to amend Res. Con. 10.10 (Rev. CoP19), including the provision to update existing NIAPs if new or emerging Elephant poaching or ivory trafficking trends result in a Secretariat's recommendation to the Standing Committee. TRAFFIC also welcomes the proposed change to Pillar 5 to "Outreach, public awareness, and education and targeted demand reduction for illegal wildlife products," recognising that targeted demand reduction in consumer countries is vital to achieving behaviour change and reducing illegal trade. We also support draft Decision 20.AA that the Standing Committee considers further the long-term considerations in the *Review of the NIAP process* contained in Annex 3 of SC78 Doc. 33.13.2.

### SIDE EVENT: ETIS 2.0 - What's new?

This side event will present key programme developments to the Elephant Trade Information System (ETIS), following the implementation of the review recommendations adopted at CoP19. This will include the ETIS data validation process, the ETIS Alerts feature, and the network analyses designed to offer deeper insights into illegal trade dynamics. Party panellists will reflect on improvements to date and discuss future priorities for ensuring ETIS science more effectively informs policy, supports targeted law enforcement, and strengthens collaboration between the Parties.

Side Events link:  
[tinyurl.com/TRAFFICcites-cop20-side-events](https://tinyurl.com/TRAFFICcites-cop20-side-events)





REVIEW OF THE ELEPHANT TRADE INFORMATION SYSTEM (ETIS) PROGRAMME

CoP20 Doc. 42

TRAFFIC expresses its appreciation to the Parties for their financial support in implementing the ETIS review recommendations, and to the MIKE-ETIS Technical Advisory Group (TAG) and the CITES Secretariat for their valuable contributions. TRAFFIC welcomes the renewal of Decisions 19.94 to 19.96 and looks forward to further strengthening the ETIS programme, including refinement of the ETIS data validation process as proposed in draft Decision 20.AA. However, we note with concern that current projections indicate resources are insufficient to fully maintain operations beyond mid-2026, as noted in paragraphs 24–26 of CoP20 Doc. 76.1. We recommend that the high-priority ETIS review recommendation 17 be fully implemented to secure resources for the operations of the ETIS programme.

ETIS CATEGORISATION OF PARTIES

CoP20 Doc.43.

TRAFFIC welcomes the opportunity to contribute to the development of criteria for categorising Parties using ETIS data. TRAFFIC suggests that the Exclusion Criteria be reviewed for each ETIS analysis in consultation with the MIKE-ETIS TAG and the CITES Secretariat, in line with the mechanisms outlined in paragraph 5 of Annex 1 of Resolution Conf. 10.10 (Rev. CoP19). Accordingly, the recommendations in paragraph 13.a) on Exclusion Criteria could be updated to reflect the most current science for each analysis, which may include adjusting the relevant timeframes under review, or applying different thresholds for small-, medium-, and large-scale seizures. Parties may also wish to amend the recommendations in paragraph 13 of the document to reflect the Standing Committee's agreement that the contextual information used by TRAFFIC is included as part of the categorisation process.

DOMESTIC IVORY MARKETS

CoP20 Doc. 44, CoP20 Doc. 76.2

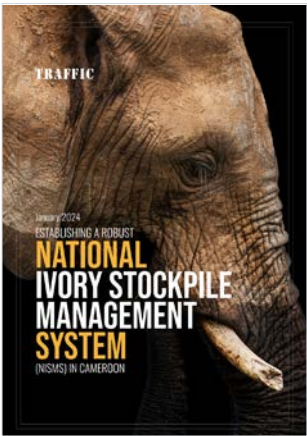
TRAFFIC supports the deletion of Decisions 19.99 to 19.101 on ivory seizures and domestic ivory markets as proposed in recommendation 24.b) of CoP20 Doc. 44. Emergent trends in illegal ivory trade connected to Parties with legal domestic markets will be identified in the ETIS analyses to the Parties that are mandated by Res. Conf. 10.10 (Rev. CoP19).

In regard to the use of the ETIS data aggregates in the draft Decision in Annexes 1 and 2 of CoP20 Doc. 76.2, TRAFFIC cautions that the intent of the publication of the data aggregates was to provide



Implementation of the priority recommendations from the review of the ETIS programme

Document link: [tinyurl.com/E-SC78-65-02-R1](https://tinyurl.com/E-SC78-65-02-R1)



Establishing a robust National Ivory Stockpile Management System in Cameroon

Report link: [tinyurl.com/nisms-cameroon](https://tinyurl.com/nisms-cameroon)



transparency on reporting and general summaries and that these data are not bias-adjusted. Therefore, interpretation based on the data aggregate s alone is limited, and TRAFFIC recommends Parties refer to the results of trend and network analyses in the ETIS report to SC and CoP which are based on bias-adjusted ETIS data.

IVORY STOCKPILES

CoP20 Docs. 76.1 (Part 2) and 76.3

TRAFFIC welcomes the incorporation of the reporting requirements from Decision 18.148 (Rev. CoP19) b) into paragraph 8 of Resolution Conf. 10.10 (Rev. CoP19) as suggested in recommendation 56.d and outlined in Annex 2 of CoP20 Doc. 76.1. However, Parties may consider amending the suggested paragraph 8 to also incorporate reporting requirements from Decisions 18.148 (Rev. CoP19) a).

Parties could consider a reporting mechanism similar to the publication of the ETIS data aggregates that was requested by the Standing Committee at SC77, whereby the annual reporting status and total stockpiles held in legal and illegal government stockpiles, as well as private stockpiles, would be reported by the Parties and published by the Secretariat annually to ensure transparency.

TRAFFIC also welcomes the incorporation of Decision 19.156 b) into paragraph 7 f) of Res. Conf. 10.10 (Rev. CoP19) as suggested in recommendation 56.d and outlined in Annex 2 of CoP20 Doc. 76.2. We continue to support the Parties in the implementation of their ivory stockpile management as was recently implemented in Cameroon. TRAFFIC developed the guidelines to ensure effective stockpile management by the Parties as published by the Secretariat, and welcomes its implementation as part of Decision 20.AA in Annex 3 of CoP20 Doc. 76.1.

In regard to the renewal of Decision 18.184 (Rev. CoP19) and the addition of paragraph c) as outlined in Annex 2 of CoP20 Doc. 76.3, TRAFFIC highlights ETIS review recommendation 31, directed at TRAFFIC and the TAG as the “responsible party” to examine the relationship between ivory stockpiles and illegal ivory trade needs (CoP19 Doc. 21). Parties may wish to consider the ETIS review recommendation in amending the proposed draft Decision 18.184 (Rev.CoP19).



Practical guidance for the management of ivory stockpiles, including their disposal

Document link: [tinyurl.com/mgt-ivorystockpiles](https://tinyurl.com/mgt-ivorystockpiles)



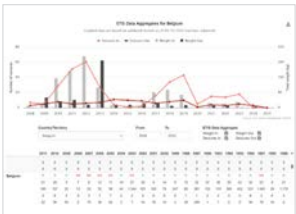
# ETIS REPORT TO COP

## CoP20 Doc. 76.5

TRAFFIC supports the amendments proposed in paragraph 31.a) and welcomes the annual exchange of information between the CITES Annual Illegal Trade Report (AITR) database and ETIS to ensure the best data informs analyses and decision-making by the Parties. In regard to the draft Decision in recommendation 31.b) on the exchange of information between the AITR and ETIS and matters contained in paragraphs 6 b) to g) of document SC78 Doc. 65.5, TRAFFIC notes the progress already made on the exchange of historical data from AITR into ETIS. The CITES Secretariat provided TRAFFIC with AITR data related to elephant specimens, which has been incorporated into ETIS. TRAFFIC has identified potential data duplication with ETIS data, which can be addressed by Parties using existing ETIS data validation mechanisms. We also note that the agreed changes to the ETIS data form by the Standing Committee are being implemented in ETIS Online to ensure interoperability of ETIS and AITR. These changes could also provide a mechanism to address concerns of double reporting if data submitted to ETIS are subsequently submitted on behalf of Parties to the AITR in the required format, fulfilling the reporting obligations for illegal seizures of Elephant specimens under Res. Conf. 11.17 (Rev. CoP19).

On the results of the ETIS analyses for the CoP period of 2021 – 2023, TRAFFIC notes the continued declining trends of small- and medium-sized raw ivory, and the stabilised trends of large raw and worked ivory seizures. TRAFFIC is encouraged that several affected Parties were relatively less implicated in illegal ivory trade; however, the persistence of large raw and worked ivory seizures, which are likely indicative of organised criminal activity, are concerning, especially the record-breaking illegal consignment of 9.9 tonnes of Elephant ivory recorded in 2024. TRAFFIC encourages the Parties to use the network analysis results, which provides a holistic view of the illegal raw and worked ivory trade and identifies important linkages and affected Parties, to identify opportunities for bilateral collaboration to implement targeted law enforcement, and would appreciate the Parties’ guidance on whether future ETIS reports to CoP should continue to include the network analysis to inform the Parties’ efforts to combat illegal ivory trade.

Lastly, TRAFFIC welcomes the opportunity to strengthen the ETIS data validation process and ensure that all relevant information can be used to inform Parties. We look forward to working intersessionally with the MIKE-ETIS TAG and the CITES Secretariat to develop a clear protocol for resolving open data validation inquiries, as outlined in draft Decisions 20.AA of CoP20 Doc. 42. In the meantime, TRAFFIC invites guidance from the Parties on how best to address data with pending inquiries so that future analyses for CoP21 are as comprehensive and informative as possible.



## The automated aggregated elephant seizures data summaries of the public section of ETIS Online

Report link:  
[tinyurl.com/ETIS-data-aggregates](https://tinyurl.com/ETIS-data-aggregates)



# ELEPHANT RANGE STATE DIALOG MEETING

## CoP20 Doc. 76.6

The draft Decisions on Elephants and ivory stockpiles aim to secure sustainable management of both Elephants and their ivory, while also establishing sustainable financing for African Elephant conservation, objectives that merit support. The Decisions reflect a consensus among African Elephant range States on the importance of diversifying funding sources and building on conservation successes, which is particularly urgent given the current funding constraints facing key monitoring systems, including the MIKE programme and ETIS. However, the process has not been without contention and treating the text as “final” could limit broader feedback and undermine wider buy-in.

To ensure effective outcomes, it will be critical that the consultant identified in draft Decision 20.AA, together with African Elephant range States and relevant CITES bodies, develop concrete, actionable financing proposals for discussion at the Elephant Range State Dialog technical workshop. Establishing an intersessional working group of range States, financial experts, and CITES committees could help evaluate mechanisms and deliver a shortlist with governance models and funding structures. TRAFFIC recommends that the involvement of donor Parties, financial institutions, and international organisations also be built into the process, ensuring that the workshop outcomes align with donor planning and resource allocation. Importantly, this work is recommended to not create a parallel process to existing mechanisms such as the African Elephant Fund (AEF) under the African Elephant Action Plan (AEAP). Instead, the workshop could explicitly feed into and reinforce the AEF’s resource mobilisation strategy, thereby building on established structures and maximising long-term impact for African Elephant conservation.



## TOTOABA (*Totoaba macdonaldi*)

### CoP20 Doc. 35.3

TRAFFIC supports the draft Decisions and commends Mexico for the progress made in implementing its compliance action plan on Totoaba. The draft decisions outlined in the document provide a strong foundation for addressing the illegal fishing and trafficking of totoaba and the associated threat to the critically endangered Vaquita. They also align closely with Mexico's ongoing efforts under its compliance plan and will contribute to and complement those initiatives. Given the high value of Totoaba fish maws in trade, coordinated action between Mexico as the source country, the United States as the primary transit country, and China as the principal destination is essential. TRAFFIC is collaborating with the Chinese government on two complementary initiatives to reduce demand for illegally imported Totoaba through behaviour change: a CITES Secretariat-funded pilot project and another project implemented in partnership with the United Nations Office on Drugs and Crime (UNODC) and funded by the European Union. TRAFFIC encourages Mexico, China, and the United States to maintain and strengthen their collaboration to curb illicit trade and develop effective management measures to protect totoaba and Vaquita, and urges the CITES Secretariat to continue its close oversight and monitoring of progress on this urgent issue.

## ENFORCEMENT MATTERS

### CoP20 Doc.39

Corruption continues to be a major enabler of illegal wildlife trade, affecting every stage of the supply chain, from poaching and illegal harvesting, through transportation, processing, export, and retail, to the laundering of profits. In response, CITES Parties at CoP17 (2016) adopted Resolution Conf. 17.6 (Rev. CoP19), the first resolution under the Convention focused specifically on prohibiting, preventing, detecting, and countering corruption linked to wildlife crime. Building on this, at CoP19, the Parties adopted a series of key Decisions: Decisions 19.77–19.79 on enforcement, 19.80 on annual illegal trade reports, 19.81–19.83 on wildlife crime facilitated through the internet, and 19.89–19.91 on the Task Force addressing illegal trade in CITES-listed tree species.

The present document also highlights measures to strengthen cooperation between CITES management and anti-corruption authorities to enable timely action when corruption is identified; to integrate financial crime investigations into wildlife crime cases where appropriate; and to expand the use of financial investigation techniques to uncover criminal networks and address illicit financial flows linked to wildlife trafficking. TRAFFIC fully supports the proposed amendments to the Resolution and draft Decisions, particularly those enhancing anti-corruption measures and those

### SIDE EVENT: The Illusion of Legality: Wildlife Laundering in International Trade

This side event will showcase global cases of wildlife laundering through CITES permits, and convene perspectives from source and destination countries to discuss concrete policy recommendations aimed at strengthening CITES procedures, closing laundering loopholes, and advancing international cooperation to safeguard biodiversity.

**Side Events link:**  
[tinyurl.com/TRAFFICcites-cop20-side-events](https://tinyurl.com/TRAFFICcites-cop20-side-events)



against online wildlife trafficking, given the increasing role of digital platforms in facilitating such activities. However, TRAFFIC also stresses that substantial research on online trade already exists, which can be reviewed to support the Resolution, and that resources would be better directed toward implementing effective measures, strengthening enforcement, and closing regulatory gaps rather than commissioning further studies.



### New guide for Philippine investigators chasing the financial footprints of wildlife traffickers

**Report link:**  
<https://tinyurl.com/Financial-Investigation-aml>



### Online Market Monitoring Report

**Report link:**  
<https://tinyurl.com/online-market-monitoring>



### SIDE EVENT: CITES Enforcement - China and the European Union: Fostering effective wildlife trade enforcement

This side event focuses on EU-China cooperation to combat illegal wildlife trade and CITES-listed species. It will begin with remarks from the EU, China, and the CITES Secretariat, emphasising their commitment in the context of their respective 50th anniversaries. The session includes presentations and a multi-stakeholder panel (including Interpol and UNODC) to review effective policy and law enforcement interventions, and set priorities for future cooperation across global trade chains.

**Side Events link:**  
[tinyurl.com/TRAFFICcites-cop20-side-events](https://tinyurl.com/TRAFFICcites-cop20-side-events)



# BIG CATS



Leopard – *Panthera pardus*

## BIG CATS TASK FORCE

### CoP20 Doc.41

At SC78, Parties agreed not to pursue a single consolidated resolution on big cats, and as a result, the current CoP cycle includes some separate documents proposing management measures for individual big cat species. While the Big Cats Task Force outcome document provides a strong foundation for action, covering issues such as reporting, legislation, corruption, demand reduction, and online trade, the proposed draft Decisions remain broad in scope and lack clear, measurable benchmarks for evaluating progress.

TRAFFIC supports the draft Decisions but emphasises the need for greater precision and urgency in follow-up and reporting. Given the scale and complexity of the threats facing big cats, TRAFFIC recommends that the Big Cats Task Force reconvene before CoP21, or preferably before SC82, to review progress and address ongoing challenges. To this end, Parties may wish to consider adopting an additional Decision mandating such as a meeting, thereby ensuring continuity, sustained momentum, and stronger enforcement outcomes for big cat conservation.

### SIDE EVENT: Tiger Trade and the Law

This side event presents the latest 'Skin and Bones' report on 25 years of global tiger trafficking seizure data. It will also launch a new report assessing the legal frameworks of 12 tiger range countries, which reveals critical inconsistencies and loopholes. The session will provide expert recommendations for CITES Parties to strengthen national legislation and effectively combat tiger crime.

**Side Events link:**  
[tinyurl.com/TRAFFICcites-cop20-side-events](https://tinyurl.com/TRAFFICcites-cop20-side-events)



## CHEETAHS

### CoP20 Doc.45

TRAFFIC supports this document, which aligns closely with the recommendations of the Big Cat Task Force outcome document, and represents an important step toward strengthening implementation and enforcement against illegal trade in Cheetah specimens. However, to fully achieve its objectives, several elements of the recommended actions (Decisions 20.AA, 20.BB, and 20.CC) could be strengthened. For example, Decision 20.AA requests Parties to report on implementation, yet previous efforts to collect such information have yielded limited responses to Notifications. To improve consistency and timeliness, Parties may wish to adopt a standardised reporting template and establish a regular review mechanism under the Standing Committee with defined timelines, ensuring Party reports are comprehensive and actionable. Secure intelligence-sharing tools, such as the Cheetah closed user group on the WCO CENComm platform, could also be more effectively leveraged to complement reporting and facilitate real-time information exchange. Finally, TRAFFIC supports the Secretariat's call for Parties, intergovernmental and non-governmental organisations, and donors to provide targeted assistance to Somalia and Yemen, whose identified needs remain critical for addressing the illegal Cheetah trade.



### Online and international trade in live Cheetahs

**Document link:**  
[tinyurl.com/online-trade-in-live-cheetahs](https://tinyurl.com/online-trade-in-live-cheetahs)



## ASIAN BIG CATS

### CoP20 Doc.77

TRAFFIC supports the deletion of the relevant Decisions, with the exception of Decision 18.105, as continued focused attention on Leopard trade remains essential. Document 71.1, consistent with previous CoP reports, highlights the chronic lack of information on Asian big cat (ABC) trade and the implementation of related CITES measures. This information gap undermines effective decision-making under CITES and allows trade to persist as a major threat to wild populations. To address this, we recommend amending Resolution Conf. 12.5 (Rev. CoP19) to establish a new reporting mechanism, modeled on that for Rhinoceroses in Resolution Conf. 9.14 (Rev. CoP19). Such a mechanism would engage consultants to collect and analyse information from reliable sources, thereby reducing the reporting burden on Parties and the Secretariat while significantly improving the effectiveness of CITES oversight.

Decision 18.105 specifically calls on Parties to give serious consideration to concerns regarding illegal Leopard trade and to take action in response. The Standing Committee at SC77 further instructed the Secretariat to report to SC78 on poaching and seizures of Leopards based on information provided by Parties. However, persistent under reporting means the Secretariat's report is unable to include necessary information and analysis. This is

### SIDE EVENT: Asian Big Cats & CITES

This side event will present key findings and recommendations from a new report examining trends in ABC legal and illegal trade and their population status. It will also assess the implementation of existing CITES measures, highlighting gaps and opportunities for strengthened action.

**Side Events link:**  
[tinyurl.com/TRAFFICcites-cop20-side-events](https://tinyurl.com/TRAFFICcites-cop20-side-events)





particularly troubling given the conservation crisis facing leopards. Population trends for all Appendix I Asian big cats are in decline, with the global conservation status of Leopards deteriorating markedly in recent years.

Retaining Decision 18.105 is therefore critical to ensure that focused attention remains on the ongoing threats to Leopards from trade. If deleted, this focus would be lost, with the issue diluted within more generic reporting on big cats under Resolution Conf. 12.5 and the Big Cats Task Force outcome document.

## LIONS

### CoP20 Doc. 80

TRAFFIC supports the draft Decisions calling for strengthened cooperation between the CITES Secretariat, the CMS Secretariat, IUCN, and other relevant bodies, including collaboration on the development of non-detriment findings and continued oversight by the Animals and Standing Committees. It is essential that trade in Lions remains under active consideration by the CITES Committees, as current evidence points to an ongoing and increasing risk. TRAFFIC emphasises the importance of ensuring that the research and recommendations contained in the reports annexed to SC70 Doc. 54.1 and SC74 Doc. 13 (Rev. 1) are fully considered when shaping future decisions.

## JAGUARS

### CoP20 Doc.81

The Jaguar (*Panthera onca*) continues to face significant threats from habitat loss, human-wildlife conflict, and the illegal trade in live animals, parts, and derivatives. Despite its CITES Appendix I protection, Jaguar poaching and trafficking remain pressing threats. TRAFFIC recommends that Parties strongly support the review and adoption of the Regional Plan of Action, the proposed CITES resolution, and the establishment of an intergovernmental platform and monitoring system focused on illegal Jaguar killings. These measures are essential to strengthen collaboration, enhance enforcement, and secure the species, its prey, and critical habitats.

TRAFFIC further encourages Parties to recognise and build on the progress made by range States since CoP19, including the situational analysis, the proposed modular monitoring system, and the draft range-wide conservation action plan. We recommend that Parties endorse the continued work of the range States to finalise these outputs, including the dedicated draft resolution on Jaguars agreed at the second range States meeting in September 2025, and consider their adoption at CoP20. This collective effort will provide a robust framework to address poaching, reduce illegal trade, and promote long-term conservation of Jaguar populations.



Central Asia Wildlife Trade Newsletter

Newsletter link:

[tinyurl.com/wt-central-asia](https://tinyurl.com/wt-central-asia)



Hawksbill Turtle - *Eretmochelys imbricata*

## MARINE TURTLES

### CoP20 Doc.46

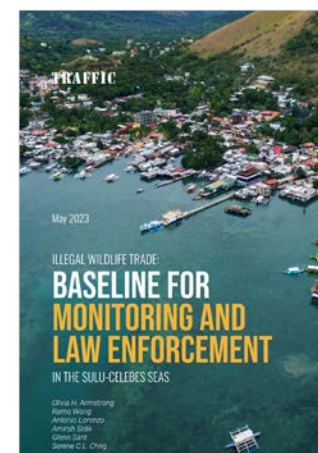
The proposed amendments to Resolution Conf. 19.5 on the conservation of and trade in Marine Turtles represent an important step toward strengthening international cooperation and enforcement. The revisions consolidate provisions on donor and in-kind support, legislation, unsustainable and illegal trade, bycatch, and forensic sampling, aligning CITES efforts more closely with broader regional and global conservation instruments. Particularly significant are the strengthened measures to improve understanding of trade dynamics, enhance law enforcement, and advance the use of forensic sampling to better identify and track illegally traded specimens. TRAFFIC supports the adoption of these amendments as a necessary step to address the persistent threats facing Marine Turtles and to ensure coherent, effective implementation of CITES commitments.

### SIDE EVENT: CITES AIA-ID Initiative

This side event, organised by China CITES SA, will provide an update on the CITES Appendix I-listed Animal species and their products (AIA-ID) database. Developed by China CITES SA with support from partners like TRAFFIC, this tool aims to assist global experts in efficiently updating and developing identification materials for all CITES Appendix I animal species.

Side Events link:

[tinyurl.com/TRAFFICcites-cop20-side-events](https://tinyurl.com/TRAFFICcites-cop20-side-events)



Illegal Wildlife Trade: Baseline for Monitoring and Law Enforcement in the Sulu-Celebes Seas

Report link:

[tinyurl.com/iwt-in-sulu-celebes-seas](https://tinyurl.com/iwt-in-sulu-celebes-seas)



FRESHWATER TURTLES

CoP20 Doc.47.1, CoP20 Doc.47.2

Madagascar is home to nine species of terrestrial and Freshwater Turtles, five of which are endemic and fully protected under national law, which prohibits commercial use. Despite these measures, all five species remain Critically Endangered on the IUCN Red List, with populations still threatened by poaching for the pet trade and human consumption. Madagascar's reported seizures, arrests, and prosecutions indicate growing enforcement efforts, but challenges remain in scaling up these actions.

Demand is a primary driver of illegal harvest of Freshwater Turtles, and therefore TRAFFIC supports the recommendations for greater international collaboration, particularly with countries in Southeast Asia, is necessary to combat trafficking networks. Other Parties affected by illegal Freshwater Turtle trade are encouraged to launch targeted national enforcement operations and participate in global efforts led by INTERPOL and the World Customs Organisation to prioritise these species.



Online Trade of Live Freshwater Turtles and Tortoises in the Philippines

Document link:  
[tinyurl.com/Online-Trade-Turtles](https://tinyurl.com/Online-Trade-Turtles)



LEGAL ACQUISITION FINDINGS

CoP20 Doc.49

TRAFFIC supports this document, which incorporates draft Decisions to enable testing and refinement of the rapid guidelines for making legal acquisition findings (LAFs), introduces technical amendments to Resolution Conf. 18.7 (Rev. CoP19) on LAFs, and provides guidance on chain of custody. We particularly commend the CITES Secretariat and FAO for their work in developing CITES-LEX, an important and useful tool that assists Parties in strengthening their legal frameworks by improving access to legislation, related information on international trade in CITES-listed species, and other resources to support legal risk assessments in the preparation of LAFs. We also highlight the importance of ensuring that CITES-LEX is updated regularly to Parties critical decision making in determining information is outdated or incomplete.

SIDE EVENT:  
Ensuring Legality and Sustainability of Wild Animal Trade

This side event will present TRAFFIC's research from the Live Animal Trade Projects in Kazakhstan, Kyrgyzstan, and Uzbekistan and activities focussing on legality and sustainability of exotic pet trade in China. The project in Central Asia use-d a four-part framework to expand knowledge of the illegal exotic pet trade, understand the role of captive breeding, assess regulatory frameworks, and promote best practices for strengthening regional efforts against illegal wildlife trade across the region. The complementary approaches in China through consumer demand reduction will demonstrate full scope of necessary interventions.

Side Events link:  
[tinyurl.com/TRAFFICcites-cop20-side-events](https://tinyurl.com/TRAFFICcites-cop20-side-events)



NON-DETRIMENT FINDINGS

CoP20 Doc.50

Ensuring that international trade is both legal and sustainable is central to the mandate of CITES. For Appendix II-listed species, trade may only proceed when the Scientific Authority of the exporting State has determined that "such export will not be detrimental to the survival of that species." The preparation of Non-detriment Findings (NDFs) is therefore a vital step in safeguarding species from overexploitation. The Secretariat has undertaken a comprehensive review of existing NDF guidance and tools, including the widely applied 9-Step Guidance, which has been used to develop NDFs for numerous flora and fauna species, including rosewoods and sharks. The 9-Step guidance was developed by TRAFFIC in collaboration with the German Federal Agency for Nature Conservation (BfN) to assist Parties' Scientific Authorities in making robust, science-based NDFs, and a fourth updated version now reflects the discussions at the 2023 Nairobi expert workshop, aligning with and complementing the official CITES NDF guidance.

TRAFFIC participated in the preparatory working groups and in the Nairobi expert workshop, and we are pleased that the 9-Step Guidance served as a foundation for the CITES NDF guidance developed through this process. In particular, Modules 10 (Tree species) and 11 (Perennial Plants) recognised the usefulness of the 9-Step Guidance and used it as a basis for their development.

In August 2025, TRAFFIC, the China CITES Scientific Authority, and Chongqing University co-organised an international workshop on CITES-listed Himalayan medicinal and aromatic plants. Participants from 10 countries and key international organisations focused on developing and applying robust NDFs for perennial species, highlighting the importance of integrating Indigenous and local knowledge, socio-ethnobotanical research, and livelihood considerations into NDF processes. In addition, TRAFFIC and BfN have partnered with the International Tropical Timber Organisation (ITTO) to deliver a series of regional NDF training initiatives, including workshops in West Africa and Latin America. TRAFFIC supports this document, particularly its inclusion of draft Decisions aimed at testing and refining the guidelines developed during the 2023 Nairobi workshop, and welcomes the proposed strategy and feedback mechanism to guide field testing and future updates to the CITES NDF guidance. TRAFFIC stands ready to support Parties and to assist with capacity-building efforts based on the currently available guidance.



9-Step Non-Detriment Findings

Website link:  
[tinyurl.com/9steps-cites-ndf](https://tinyurl.com/9steps-cites-ndf)





## AREAS BEYOND NATIONAL JURISDICTION

### CoP20 Doc.51

TRAFFIC welcomes the outcomes of the workshop on *Non-detriment findings for specimens of Appendix-II species taken from areas beyond national jurisdiction* and notes the importance of its recommendation to the Animals Committee on traceability and data collection. While traceability is sometimes viewed narrowly as an enforcement matter falling under the Standing Committee, TRAFFIC emphasises that it is equally relevant to the Animals Committee's scientific work, particularly for improving data quality and ensuring robust NDFs. The review also included observations and recommendations relating to Introduction from the Sea, which are reflected in the draft Decisions in CoP20 Doc. 52. Discussions on Doc. 51 and Doc. 52 are likely to be considered together in Committee II, and TRAFFIC stands ready to engage as needed to support strengthening of both NDF guidance and traceability frameworks.

## INTRODUCTION FROM THE SEA

### CoP20 Doc.52

Introduction from the Sea (IFS) is defined in Article 1 of the Convention, and applies to the transport into a State of specimens taken from areas of the marine environment beyond national jurisdiction. The Conference of the Parties has provided practical guidance on implementing IFS through Resolution Conf. 14.6 (Rev. CoP16), but with an increasing number of marine species being listed at successive CoPs, ensuring clear and consistent implementation has become even more critical.

TRAFFIC welcomes the initiative presented in CoP20 Doc. 52, which reviews the challenges Parties face in applying IFS provisions and proposes draft Decisions to enhance procedural clarity. Notably, Draft Decision 20.BB mandates the Standing Committee to review and recommend amendments to relevant Resolutions ahead of CoP21, aligning guidance with real-world operational experience. This presents an opportunity for Parties to clarify roles, such as the responsibilities of flag and port States, improve permit procedures, and ensure CITES remains effective in monitoring and managing IFS transactions. Strengthening these frameworks will help secure conservation outcomes for marine species increasingly subject to international trade.

## STOCKS AND STOCKPILES

### CoP20 Doc.59

Clarifying the use of the terms “stocks” and “stockpiles” is essential to guide Parties in implementing provisions related to the management of confiscated and accumulated specimens. As noted, the two terms have often been used interchangeably in Resolutions and Decisions, sometimes even for the same species (e.g., Elephants, Pangolins), leading to inconsistency. At SC78, the Secretariat recommended avoiding the term “stock” when referring to accumulated dead specimens and proposed a draft definition of “stockpiles” for inclusion in the CITES Glossary. TRAFFIC welcomes this focus on improving guidance for stockpile management and particularly notes the importance of addressing Appendix II species held by private entities, such as dried aquatic products like seahorses, shark fins, and shells, since current guidance has primarily covered government-held Appendix I stockpiles from confiscations. While this document rightly invites Parties to consider whether a new Decision is needed, it does not present one for adoption. To address this gap, TRAFFIC supports the development of a formal Decision that extends existing guidance to cover stockpiles held by private entities for both Appendix I and Appendix II species, ensuring consistency, closing loopholes, and reducing the risk of laundering or misreporting wildlife products.

## RAPID MOVEMENT OF WILDLIFE

### Cop20 Doc.61

Only 76 Parties, less than 45%, have registered scientific institutions entitled to the exemption provided under Article VII of the Convention and Resolution Conf. 12.3 (Rev. CoP19) for the non-commercial loan, donation, or exchange of research specimens, which highlights that some Parties may face challenges in understanding and implementing these exemptions and rapid-movement procedures under Resolution Conf. 11.15 (Rev. CoP18). To address this, an intersessional working group recommended Parties identify challenges they face in applying these provisions and explain why they may not be using the exemptions or rapid-movement arrangements. TRAFFIC supports the creation of new resources on the CITES website, to support capacity for rapid movement of wildlife samples and efficient non-commercial movement of musical instruments, with registers of Party-specific arrangements and links to further information. It is critical to ensure the rapid movement of biological samples, particularly in the event of a disease outbreak, where delays can undermine timely response efforts. Similarly, where Parties do not adopt the simplified procedures available for the cross-border movement of musical instruments, it can create unnecessary administrative burdens for Management Authorities, diverting resources from higher-priority tasks.

## SIDE EVENT:

**Data sharing as an effective tool to support coordinated responses to illegal wildlife trade: Global case studies through the lens of Central Asia**

This side event led by Fauna & Flora and co-hosted by TRAFFIC and other partners will showcase regional efforts to combat wildlife trafficking. It will draw on activities conducted over the past 5 years and highlighting the importance of data sharing in strengthening regional awareness of IWT patterns, trends and routes and supporting coordinated law enforcement responses to effectively tackle illegal and unsustainable wildlife trade. This will include the presentation of new digital database developed for Kyrgyzstan to enhance CITES implementation. This digital platform registers all permits and illegal trade cases, significantly improving coordination and data sharing among the country's Customs and Border services. The demonstration will share lessons learned and encourage other Central Asian governments to adopt similar tools to strengthen their regional response to wildlife crime.

### Side Events link:

[tinyurl.com/TRAFFICcites-cop20-side-events](https://tinyurl.com/TRAFFICcites-cop20-side-events)



## RANCHING

### CoP20 Doc.67.2

The application of ranching (source code R) under Resolution Conf. 11.16 (Rev. CoP15) raises important questions regarding its suitability for aquatic species. In most cases where it has been applied, the condition requiring that specimens be taken at a point where they would otherwise have had a very low probability of surviving to adulthood has not been met, and its meaning remains ambiguous. Given these concerns, TRAFFIC would propose the adoption of an additional Decision directing Parties to refrain from using source code R for aquatic species until the process outlined in Decisions 20.AA and 20.BB has been completed. Greater caution and clarity in the application of source code R are essential to ensure its use remains consistent with CITES objectives. TRAFFIC supports this document with additions.

## ENDEMIC SPECIES

### CoP20 Doc.73

This document underscores the heightened vulnerability of threatened endemic species and calls for a more consistent and robust application of existing CITES measures. Conservation actions undertaken without early and formal engagement with range States can lead to conflicting priorities and undermine cooperative efforts, highlighting the need to strengthen procedures for timely consultation with countries of origin. While Resolution Conf. 18.7 (Rev. CoP19) already provides guidance on legal acquisition and Resolution Conf. 11.3 (Rev. CoP19) outlines consultation processes, draft Decision 20.AA seeks to reinforce these provisions rather than create new obligations. To maximise its effectiveness, Parties may wish to develop clear and practical guidelines, including information exchange protocols, templates, timelines, and criteria for verifying legal export, with input from the Animals and Plants Committees to ensure consistent application.

Draft Decision 20.BB complements this approach by proposing a study on trade in threatened endemic species and its impacts on wild populations. While potentially valuable, the proposal would benefit from greater clarity on species selection criteria and a defined process for translating findings into actionable recommendations. Setting a clear timeline for review by the Standing Committee and ensuring active involvement of the Scientific Committees will be key to delivering evidence-based outcomes. In parallel, range States may be supported through strengthened legislation, enhanced traceability systems, robust species inventories, and improved enforcement capacity to ensure legal acquisition is effectively verified and endemic species are safeguarded.

### SIDE EVENT: Ranched aquatic species

This session examines ranching's evolution, its relevance for aquatic species, and associated sustainability, legal, and enforcement challenges for CITES-listed taxa like *Anguilla* spp. and *Cheilinus undulatus*.

**Side Events link:**  
[tinyurl.com/TRAFFICcites-cop20-side-events](https://tinyurl.com/TRAFFICcites-cop20-side-events)



### Wildlife crime court cases in Madagascar

**Report link:**  
[tinyurl.com/crime-court-cases-madagascar](https://tinyurl.com/crime-court-cases-madagascar)



## WEST AFRICAN VULTURES

### COP20 Doc.74

TRAFFIC supports this document, which calls for urgent, coordinated action to halt the decline of West African Vultures, which includes some of the most pressing threats to African-Eurasian Vultures, particularly belief-based use and intentional killing linked to illegal offtake, use, and trade. Key priorities include strengthening and harmonising legal frameworks, enhancing enforcement capacity, and developing practical tools, such as an identification guide for Vulture parts and derivatives, to assist law enforcement officers in disrupting illegal trade.

Regional action plans provide a vital framework for reversing these declines, but their success will rely on sustained political commitment, adequate donor support, and strong collaboration between Parties and partners. These actions must be well-resourced, collective efforts that integrate legislative reform, robust enforcement, targeted demand reduction, public awareness, and improved monitoring.

## SONGBIRDS

### CoP20 Doc.83

Trade in songbirds is widespread, occurring at local, national, and international levels, and involves many songbird families. Millions are taken from the wild each year through non-targeted techniques like mist nets for various purposes, though exact numbers are difficult to determine due in part to incomplete reporting. Domestic markets are often supplemented by international imports, creating a tightly linked global trade network. Despite making up around 60% of all bird species and a significant proportion of birds in trade, songbirds represent just 1.4% of species listed in the CITES Appendices, with listings heavily concentrated in only a few families.

TRAFFIC supports this document and suggests adoption of further Decisions on songbirds and welcomes the recommendations from the 2023 Songbird Workshop in Thailand, attended by TRAFFIC and emphasising the importance of reviewing implementation progress and capturing lessons learned. To maintain momentum, TRAFFIC recommends that the CoP adopt new draft Decisions: first, instructing the Secretariat to issue a Notification inviting Parties to report on their implementation of the workshop's recommendations; and second, tasking the Animals Committee with reviewing these reports and providing further guidance. This would establish a formal mechanism to monitor progress, close gaps, and direct future action to ensure the conservation and sustainable management of songbirds.



## RHINOS

### CoP20 Doc.84

TRAFFIC welcomes the continued decline in poaching rates of African Rhino species and the reported increase in greater one-horned Rhino populations in Asia. However, despite the relatively low poaching rate, gains in the African Rhino populations were offset by factors such as drought, management challenges, and poor reporting, and the overall African Rhino population remained the same as reported to CoP19, with the population of White Rhinos at a 10-year low. Furthermore, the reported poaching of 26 Javan Rhinos, and the critically low number of Sumatran Rhinos remain of great concern for the conservation of Asian Rhinos. Addressing the latter, TRAFFIC welcomes draft Decision 20.BB directed to Indonesia to strengthen the protection of its Rhino populations.

While reported local successes in community-based Rhino conservation should be commended, data from the IUCN–TRAFFIC status report show that illegal horn trade remains concentrated among a consistent set of Parties. These insights provide an opportunity to strengthen targeted, collaborative law enforcement efforts along key trade routes. TRAFFIC notes that, draft Decision 20.AA does not specify the affected Parties, and Parties may consider a more targeted approach to the implementation of the CITES Rhinoceros Enforcement Task Force meeting outcome document referred to in draft Decision 20.AA. Continued monitoring levels of illegal trade in Rhino specimens could be improved by better reporting. Parties may also wish to consider the incorporation of improved trend analysis methods, as detailed in Annexure 4 of CoP20 Doc. 84 A3, into future CoP reports.

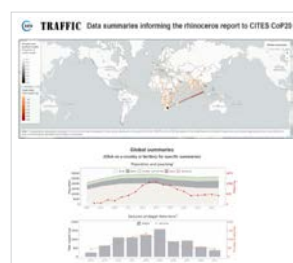
TRAFFIC highlights the low reporting rate and discrepancies in Rhino horn stockpile data, which hinder meaningful comparisons with past reports and seizure data. Greater transparency and consistency in reporting are essential, particularly given the widespread use of dehorning and the large proportion of Africa's Rhino population under private management.

TRAFFIC expresses its gratitude to the German government and WWF for their generous contributions, which, together with funds raised by the CITES Secretariat, made the preparation of this report possible. While the scope of the report was necessarily focused due to available resources, especially with regards to paragraph 7 of Res. Conf. 9.14 (Rev. CoP19), it nevertheless provides valuable insights. TRAFFIC welcomes continued efforts to monitor and report on measures taken by implicated States to end the illegal use and consumption of Rhinoceros parts and derivatives. We support the closure of markets that enable poaching or illegal trade and endorse recommendation 42.a) to maintain Decision 18.116.



### Visualizing corruption risks in the illegal rhino horn trade supply chain

**Report link:**  
[tinyurl.com/rhino-horn-trade-supply-chain](https://tinyurl.com/rhino-horn-trade-supply-chain)



### Data summaries informing the rhinoceros report to CITES CoP20

**Report link:**  
[tinyurl.com/rhinocop20report](https://tinyurl.com/rhinocop20report)



## SAIGA

### CoP20 Doc.85.1 , CoP20 Doc.85.2

Saiga antelopes are a major conservation success story. After a 95% population decline in the mid-2010s, they were classified as Critically Endangered, but numbers have since rebounded dramatically, reaching 3.9 million in Kazakhstan in 2025, with slower growth in Mongolia, the Russian Federation and Uzbekistan.

Despite this progress, key challenges remain. Range States emphasise the need for improved ranger equipment, training, stronger border controls, and coordinated action against illegal trade, including transparent reporting and robust stockpile management in range States and consumer States to prevent illegal horns from entering legal stock or future legal supply.

The Standing Committee reviewed stockpile management efforts, noting varied systems across range and consumer countries.

Doc. 85.1 by the CITES Secretariat reports on the implementation of a set of Decisions and recommends the adoption of a new set of Decisions directed to range and consumer states, the CITES Secretariat, the Animals and the Standing Committee. These Decisions will be important in supporting Parties efforts in securing stockpiles and managing trade in Saiga parts and products.

Sustainable use in Kazakhstan could be viable if local communities are involved and benefit-sharing is ensured. Restoring migration corridors and providing alternative livelihoods such as ecotourism and sustainable agriculture are also crucial to reducing poaching.

In Doc. 85.2 Kazakhstan and the Russian Federation raise concerns about the continued use of Source Code “U” (unknown) for saiga horn export and re-exports, highlighting the need for genetic testing and origin verification to prevent laundering. TRAFFIC supports efforts to phase out Source Code “U” in commercial trade and ensure only specimens that have been verified as legally sourced, enter international markets.



### Guidance for Law Enforcement Authorities On Illegal Wild Species Trade: Data Collection, Analysis and Sharing in Central Asia

**Report link:**  
<https://tinyurl.com/guidance-for-law-enforcement>



### An Assessment of Wildlife Trade in Central Asia

**Report link:**  
[tinyurl.com/wildlife-trade-in-central-asia](https://tinyurl.com/wildlife-trade-in-central-asia)



## EELS

### CoP20 Doc.87

TRAFFIC supports the intent of CoP20 Doc. 87, which provides valuable guidance to reinforce implementation of the existing Appendix II listing for *Anguilla anguilla* (European Eel) and lays the groundwork for aligned management of additional *Anguilla* species. This document clarifies applicable measures and enhances implementation protocols, advancing consistency and transparency in trade governance. The introduction of potential new mechanisms under the draft Resolution and Decisions reflects growing recognition of the urgent challenges facing Eels, including illegal fishing, declining populations, and trade traceability. By bolstering traceability and consolidating best practices, the guidance stands to significantly strengthen CITES regulatory effectiveness. Further, the Resolution's approach aligns with broader efforts as discussed at SC78 to improve enforcement and monitoring of Eel trade, as well as efforts to harmonise mechanisms across *Anguilla* spp.



#### An Overview of Seizures of Cites-Listed Wildlife in The European Union

Report link:  
[tinyurl.com/EU-seizures-report](https://tinyurl.com/EU-seizures-report)



European Eel - *Anguilla anguilla*



## SHARKS AND RAYS

### CoP20 Doc.88.1

TRAFFIC supports, with caveats, the draft amendments to Resolution Conf. 12.6 (Rev. CoP18) and accompanying draft Decisions, which represent an important step forward in strengthening CITES provisions for sharks and rays. By expanding scope, improving data transparency, enhancing enforcement tools, and reinforcing inter-agency and scientific cooperation, the changes address many of the persistent implementation challenges for these species. This comprehensive approach is critical to ensuring the conservation and sustainable management of sharks and rays. The emphasis on capacity building, especially for developing countries and Small Island Developing States, aligns with CITES's broader goal of making wildlife trade both sustainable and legally acquired.

However, persistent weaknesses in data reporting remain a fundamental concern. The document itself highlights the recurring mismatch between reported trade in CITES-listed shark products and what would be expected based on known catches. Without stronger compliance mechanisms, these gaps undermine the credibility and effectiveness of CITES implementation. To address this, Parties may wish to consider adopting stricter reporting standards at the species level, improving traceability systems, and ensuring accurate NDFs and conversion factors. Encouraging wider adoption of traceability tools, standardised guidance, and practical mechanisms for stockpile management and biological sample transport is essential, as is ensuring equitable access to technologies like automated identification tools through open-access platforms and low-tech alternatives. TRAFFIC recommends Parties also focus attention on high-priority cases such as the undocumented trade in Oceanic Whitetip Shark (*Carcharhinus longimanus*), with the Secretariat already tasked to report on this at SC79.

TRAFFIC is concerned that the extensive work programme of the Animals and Standing Committee working groups on sharks that are mandated through the Decisions of the Parties are generally not completed in the intervening periods between CoPs. Therefore specific items critical to resolving ongoing implementation issues get rolled in to the next intervening period. The Parties are recommended to consider how to resolve this issue. One option is to create a permanent intersessional joint shark working group of the Animals and Standing Committees with a mandate of the relevant Resolutions and Decisions that could work to resolve continued delay.

## DEEPWATER SHARKS

### CoP20 Doc.88.2

TRAFFIC supports this document and its intent to address severe population declines in Gulper Sharks and other deep-water elasmobranchs through stronger regulation, trade monitoring, and international cooperation, is both urgent and well justified. These species are biologically predisposed to overexploitation, given their



#### Factsheet: Netted In Illegal Wildlife Trade - Sharks of India

Factsheet link:  
[tinyurl.com/sharks-rays-and-skates](https://tinyurl.com/sharks-rays-and-skates)



#### Deep Diving into Shark Catch and Trade Mismatches

Study link:  
[tinyurl.com/shark-catch-and-trade](https://tinyurl.com/shark-catch-and-trade)





slow growth, late maturity, and low reproductive rates, which make recovery from depletion especially difficult. By linking fisheries management measures with CITES trade regulation, the draft decisions provide a complementary pathway to ensure that trade is legal, sustainable, and traceable.

While the draft Decisions appropriately consider the deep-water Elasmobranchs, they currently exclude Chimaeras who are also Chondrichthyans (Sharks, Rays and Chimaeras). Chimaeras occur in deep-water, are targeted for their liver oil and meat, are caught with deep-water elasmobranchs in fisheries, with their products entering the same supply chains. They exhibit the same biological characteristics as deep-water elasmobranchs which makes them particularly susceptible to overexploitation and some RFMOs (SIOFA & NEAFC) have listed them as species of concern. Some species, such as *Chimaera monstrosta* and *Neoharriotta pinnata*, have been recently assessed by the IUCN Red list of Threatened Species as Threatened or Near Threatened because they are targeted and taken as secondary catch while targeting other species in fisheries. Given their shared vulnerabilities, fishing pressures, and conservation concerns, TRAFFIC recommends the scope of the Decisions be broadened to include all deep-water chondrichthyans.

TRAFFIC would also encourage Parties to embed measures that emphasise traceability, as shark liver oil is often processed into bulk commodities that obscure species-level identification. This could include, developing supply chain traceability tools, potentially using DNA or chemical profiling. Clearer and more binding timelines for follow-up actions by the Animals and Standing Committees, and for subsequent Party implementation, would also help to translate these decisions into tangible conservation outcomes.

## SEA CUCUMBERS

### CoP20 Doc.90

TRAFFIC supports this document, which highlights the urgent need to strengthen the management and regulation of international trade in sea cucumbers, a group of species highly vulnerable to overexploitation due to high demand, ease of harvest, and slow recovery rates. Overfishing and illegal trade continue to threaten populations, with some countries and territories imposing moratoria or export bans to prevent further depletion of already overexploited stocks. While aquaculture has potential to provide a sustainable supply and relieve pressure on wild populations, large-scale production that meets CITES standards for bred-in-captivity specimens remains challenging and inconsistent across species. The proposed draft Decisions offer a valuable framework to build national capacity, improve traceability systems, and close critical knowledge gaps for both CITES-listed and non-listed species. Strengthened monitoring, reporting, and enhanced regional and international cooperation will be key to reversing population declines and securing the ecological and economic value of sea cucumbers for the future. TRAFFIC stands ready to support Parties in implementing these measures and advancing sustainable management of these important fisheries.

## SIDE EVENT:

### Deepwater Sharks, Rays and Chimaeras: the need for Trade, Conservation and Management Attention

This side event, led by TRAFFIC with support from Deakin University & the University of Tasmania, examines the challenges around sustainable, legal and traceable fisheries and trade in deepwater sharks, rays and chimaeras. The Global Deepwater Shark Initiative team and some key Parties will outline what action is needed for developing forensic tools, trade and traceability, fisheries and management, capacity building and social and behaviour change to conserve these species.

#### Side Events link:

[tinyurl.com/TRAFFICcites-cop20-side-events](https://tinyurl.com/TRAFFICcites-cop20-side-events)



### The Online Trade in high-value marine products from South Africa

#### Report link:

[tinyurl.com/high-value-marine-products](https://tinyurl.com/high-value-marine-products)

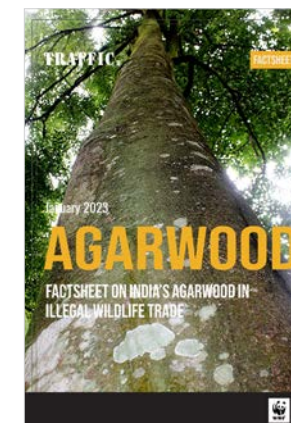


## AGARWOOD

### CoP20 Doc.93

Strengthen management and monitoring of agarwood-producing taxa (*Aquilaria* spp. and *Gyrinops* spp.) is an urgent need given the continuing decline of wild populations caused by overharvesting and selective logging. The proposed guidance is welcome for its clarification of definitions of “artificially propagated” and “assisted production,” recognition that agarwood is produced in diverse systems, including mixed-species plantations, and allowance for the use of cultivated parental stock or non-detrimentally sourced wild material. Importantly, it encourages range States to make use of the Agarwood NDF Guidance when developing NDFs for both wild and plantation-sourced specimens and to register both production systems and exporters to improve traceability. These measures, if implemented, will strengthen transparency, standardise approaches across range States, and improve the ability of Management and Scientific Authorities to ensure that international trade is legal and sustainable.

TRAFFIC supports the emphasis on capacity building and harmonised NDF methodologies, particularly for wild harvests and assisted production systems, as well as the call for improved exporter registration and labeling systems. To close remaining gaps, Parties may wish to invest in developing user-friendly tools, national training programmes, and clear reporting templates, which could help overcome persistent challenges in traceability and compliance. Leveraging the Glossary of Agarwood Products and integrating its use into enforcement training will further aid in preventing laundering of wild-sourced material and ensuring that trade contributes to the long-term sustainability of agarwood resources.



### Factsheet on India's Agarwood in illegal wildlife trade

#### Report link:

[tinyurl.com/agarwood-IWT](https://tinyurl.com/agarwood-IWT)



## ROSEWOOD

### CoP20 Doc.95

The study on the trade of CITES-listed rosewood tree species [*Leguminosae* (*Fabaceae*)], developed by TRAFFIC in partnership with the CITES Secretariat, represents a major step forward in compiling key information on the conservation status, trade patterns, and management challenges of this highly valuable group of timber species, and in identifying practical measures to strengthen the development of NDFs. The study identified 13 high-priority species, 14 medium-priority species, and 50 low-priority species, with priority rankings based on conservation status, trade volumes, and the need for improved data to develop NDFs.

TRAFFIC supports the adoption of the draft Decisions and welcomes their emphasis on directing the Secretariat's capacity-building efforts and technical support toward the 13 high-priority and 14 medium-priority CITES-listed rosewood species identified in the study. We also welcome the invitation to Parties to use the report and its species factsheets as a baseline reference when preparing NDFs for rosewood species, share additional data and feedback to inform



### Report on the conservation and trade of CITES-listed rosewoods

#### Document link:

[tinyurl.com/rosewood-trade-species](https://tinyurl.com/rosewood-trade-species)



future revisions, and collaborate closely with the Plants Committee to ensure continuous improvement of the prioritisation exercise and guidance materials.

Given that no new rosewood tree species were proposed for inclusion in the CITES Appendices at this meeting, TRAFFIC sees particular value in reviewing, updating, and expanding the factsheets and strengthening linkages with the CITES NDF Guidance for tree species as needed. Should Parties determine that further adjustments or updates to the report are required, TRAFFIC stands ready to collaborate with the Secretariat and the Plants Committee to support these updates and maintain the accuracy and usefulness of the information.

## BRAZILWOOD

### CoP20 Doc.97

TRAFFIC welcomes the progress made on the implementation of Decisions 19.249-19.253 and supports the draft Decisions 20.AA-20.DD presented for CoP20. Establishing robust traceability systems for *Paubrasilia echinata* bows and stockpiles is critical to ensuring that trade remains sustainable and legal, while avoiding unnecessary barriers for musicians and manufacturers. The call for voluntary marking or identification systems and the registration of stockpiles represents a practical step toward improving transparency and enforcement. Parties may be encouraged to actively collaborate in developing harmonised, user-friendly traceability mechanisms and to provide timely information to the Secretariat to inform the consolidated report. We further support the role of the Plants and Standing Committees in reviewing these reports and developing targeted recommendations for CoP21 to ensure that progress continues and implementation challenges are addressed promptly.



*Nardostachys jatamansi*

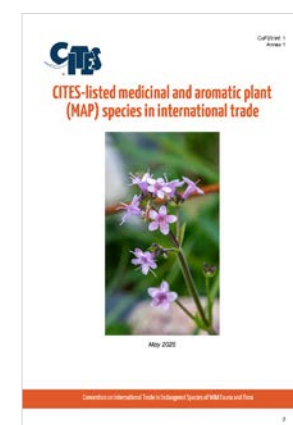
## MEDICINAL AND AROMATIC PLANTS

### CoP20 Doc. 100

TRAFFIC welcomes this document on Trade in Medicinal and Aromatic Plants and supports the adoption of the proposed draft Decisions. In partnership with the CITES Secretariat and the Medicinal Plant Names Services (MPNS) at the Royal Botanic Gardens, Kew (RBG Kew), in 2024, TRAFFIC co-produced a study on CITES-listed medicinal and aromatic plant (MAP) species, providing new analyses of international and online trade, supply chains and nomenclature issues. We appreciate the valuable feedback from the Plants Committee Members, the Nomenclature Specialist and UNEP-WCMC and we hope that the final report which has been published by the CITES Secretariat as an Information document will serve as a key reference for Parties in the ongoing development of a new CITES Resolution on MAPs.

Given the scale and complexity of global MAP trade, ranging from dried plants and extracts to aromatics and cosmetics, robust implementation of CITES is critical to ensure that these species are used legally and sustainably, supporting both species conservation and the livelihoods of Indigenous Peoples, and local communities who depend on them. TRAFFIC therefore welcomes the draft Decisions as amended by the Secretariat, which reflect the publication of the revised report and clarify the scope of work with UNEP-WCMC and the Plants Committee's nomenclature specialist.

TRAFFIC remains ready to continue working with the Secretariat, RBG Kew, Parties and other stakeholders to help translate these findings into effective CITES implementation for MAP species.



**CITES-listed medicinal and aromatic plant (MAP) species in international trade**

**Report link:**

<https://tinyurl.com/E-CoP20-Inf-001-1>



## SIDE EVENT:

**Sustainable Trade in MAPs: Healing Plants, Healthy Trade through Strengthening CITES Implementation for MAPs**

This side event, co-hosted with Nepal and the UK, addresses the challenge of ensuring sustainable and legal trade in the over 1,500 CITES-listed medicinal and aromatic plants (MAPs) vital to global health and livelihoods. The session will share research findings of relevance to CoP20 Doc.100 and the outcomes of the recent workshop on CITES-listed Himalayan MAPs. The event will demonstrate practical approaches to international sustainable trade in MAP species (through the example of Nepal's Jatamansi/Spikenard), and convene an expert panel discussion on practical priorities and approaches for sustainable trade in CITES-listed MAPs, including in the context of the World Wildlife Day 2026.



**Side Events link:**

[tinyurl.com/TRAFFICcites-cop20-side-events](https://tinyurl.com/TRAFFICcites-cop20-side-events)



## ‘LOOK-ALIKE’ CRITERION

### CoP20 Doc. 102

TRAFFIC welcomes this document and supports the adoption of the proposed draft Decisions. The review of how the ‘look-alike’ criterion in Annex 2b A of Resolution Conf. 9.24 (Rev. CoP17) is applied is both timely and important.

In recent years, TRAFFIC has observed an increasing number of proposals to include species in the CITES Appendices based primarily on resemblance (“look-alikes”), even when international trade regulation is not necessary to ensure that trade in the species included -or to be included- in the Appendices for conservation reasons is brought under effective control. In some cases, such look-alike species do not share trade routes, or risk profiles with the species requiring regulation, and the potential for confusion among enforcement officers appears low.

TRAFFIC also agrees that similar challenges arise with higher-taxon listings and “sound-alike” species proposed for inclusion following taxonomic revisions which group them with already-listed taxa, despite there being limited evidence that they require regulation in order to bring the already-listed species under effective control.

We therefore welcome the UK’s proposal to review and clarify the interpretation and implementation of the ‘look-alike’ criterion. TRAFFIC supports the draft decisions aimed at gathering information, undertaking case studies and developing practical guidance to ensure that listings are proportionate and applied in the best interest of the species, so that trade does not threaten their survival.

## PERIODS OF TRANSITION

### CoP20 Doc.105.1, Cop20 Doc.105.2

This guidance for managing “periods of transition” when species are newly listed in, or transferred between, the CITES Appendices, is highly valuable and should be supported. It would reduce burdens on Parties and enforcement officers, minimise inefficiencies for traders, and increase traceability of specimens in trade. By clarifying the rules governing export, re-export, import, or introduction from the sea at different stages of listing, the document seeks to provide greater certainty and consistency, thereby strengthening compliance while also supporting legitimate trade.

The complementary Document from the United States builds upon this foundation by proposing amendments to existing Resolutions to provide consistent, long-term guidance. In particular, the suggested changes to Resolution Conf. 12.3 (Rev. CoP19) on pre-Convention certificates and retrospective permits, and Resolution Conf. 13.6 (Rev. CoP18) on acquisition of Appendix II specimens, are critical steps in ensuring clarity, transparency, and consistency across Parties. These amendments would help prevent misinterpretation and create a stronger, more predictable framework for implementing transitional measures.

Parties may also wish to explore practical tools and capacity building to ease implementation, ensure uniform understanding across Parties, and reduce risks of non-compliance during transitional periods.



Pool Frog - *Pelophylax lessonae*

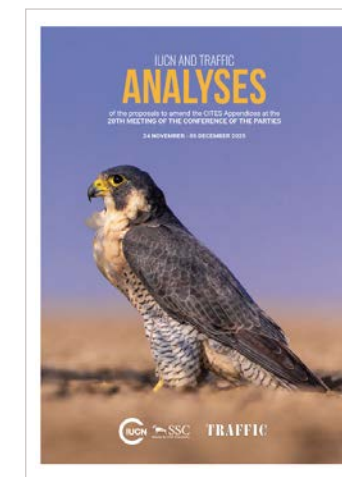


# TRAFFIC RECOMMENDATIONS ON PROPOSALS TO AMEND APPENDICES AT CITES COP20



Peregrine Falcon - *Falco peregrinus*

These recommendations use as their foundation the 'IUCN/TRAFFIC Analyses of the Proposals to Amend the CITES Appendices at the 20th Meeting of the Conference of the Parties', which provide background information underpinning TRAFFIC's advice. As well as the CITES Criteria in Resolution Conf. 9.24 (Rev. CoP17) the IUCN/TRAFFIC Analyses also take into account additional considerations that may be relevant to the decision on whether or not to adopt the proposal (for example, implementation challenges and potential risks/benefits for the conservation of the species concerned). In TRAFFIC's Recommendations to the Parties, in terms of whether to Accept or Reject each proposal, the basic question we try to answer is whether a proposed change to the regulatory treatment of a species under CITES, on balance, would have a positive impact or not: or (in the words of Resolution Conf. 9.24 (Rev. CoP17)) would it "be in the best interest of the conservation of the species concerned, and be a proportionate response to anticipated risks".



The full analyses are available at  
[tinyurl.com/CoP20Analyses](https://tinyurl.com/CoP20Analyses)



A summary of the analyses is available at  
[tinyurl.com/CoP20AnalysesSummary](https://tinyurl.com/CoP20AnalysesSummary)







ACCEPT

CoP20 Prop. 1

## BONTEBOK

*Damaliscus pygargus pygargus*

### Deletion from Appendix II (South Africa)

*Damaliscus pygargus pygargus* numbers in South Africa have risen dramatically, from just a few dozen individuals in the 1930s to an estimated 10,000 by 2021. While its natural range would have supported only about 2,500 individuals, the subspecies has been widely introduced beyond its native range for game ranching, tourism, and trophy hunting. Strong national management measures are in place, and international trade remains limited. The taxon has not been subject to recommendations under the Review of Significant Trade.

Annex 4 of Resolution Conf. 9.24 (Rev. CoP17) provides guidance for removing species from Appendix II. Based on current population trends and management measures, it appears unlikely that continued regulation of trade is necessary to prevent the subspecies from becoming eligible for Appendix I listing or to ensure that harvest levels do not threaten its survival.



REJECT

CoP20 Prop. 2

## DORCAS GAZELLE

*Gazella dorcas*

**Inclusion in Appendix II (Benin, Burkina Faso, Mali, Mauritania, Niger, Nigeria, Senegal, Sudan, Tunisia)**

The population of the dorcas Gazelle (*Gazella Dorcas*) is neither small nor geographically restricted. While some local populations have declined with some evidence of local extirpation, the overall population is thought to have declined by about 30% over three generations to 2016.

Some international trade occurs, primarily in live individuals, but its scale

varies across range States and is not considered a major threat based on recent analyses. Much of the trade takes place in local markets. Current international trade levels do not appear to negatively impact the species enough to warrant international regulation, and it does not meet the criteria for Appendix II listing.



ACCEPT (WITH CAVEATS)

CoP20 Prop. 3

## SAIGA ANTELOPE

*Saiga tatarica*

**Amendment of the existing annotation to the listing in Appendix II (Kazakhstan)**

Kazakhstan collects Saiga (*Saiga tatarica*) population data annually, and the last count showed 3.9 million saiga. Its planned centralised management system has the potential to ensure effective control of harvest limits, assess impacts and adapt management measures. However, the proposal does not provide information on the methods to set annual harvest quotas, including whether an NDF has been conducted for the species. Concerns have been raised that an annual offtake of up to 20% of the total national population referenced by Kazakhstan could be too high, particularly given the risk of disease outbreaks and population fluctuations. TRAFFIC highlights the importance of conducting a robust NDF to establish science-based annual harvest levels.

Current and planned inventory control and marking systems in Kazakhstan provide safeguards to prevent illegal horns from entering legal trade, though some risk of laundering remains if legal trade resumes.

Given that Kazakhstan manages nearly the entire global population of Saiga tatarica, complementary stockpile monitoring in consumer countries and robust traceability systems to distinguish horns from other range States or from Saiga borealis would strengthen these safeguards. Parties may wish to seek clarification on how harvest and export volumes will be set, as well as assurances regarding trade control cooperation with importing countries, but removing this population from the current zero-export quota annotation appears proportionate to the anticipated risks.

Kazakhstan is considering restricting exports to processed horns in the form of finished products. While this may help distinguish legal from illegal horns in consumer markets, it does not address demand for raw horns and if adopted should be supported by a science-based management plan with quantified off-take, export limits, and a robust marking and traceability system.

ACCEPT



CoP20 Prop. 4

## GIRAFFE

*Giraffa camelopardalis*

**Deletion the populations of Angola, Botswana, Eswatini, Malawi, Mozambique, Namibia, South Africa and Zimbabwe from Appendix II (Namibia, South Africa, United Republic of Tanzania, Zimbabwe)**

The Giraffe populations covered in this proposal do not appear to meet the criteria for Appendix II listing. They have neither a restricted range, a small population, nor is harvest for trade reducing their numbers to a level that threatens their survival. Instead, they are currently increasing, and there is no evidence that international trade regulation is necessary to prevent them from qualifying for Appendix I in the near future.

If adopted, the proposal would result in a split-listing of *Giraffa camelopardalis* by geographic population, with some

populations listed in the Appendices and others excluded. Annex 3 of Resolution Conf. 9.24 (Rev. CoP17) generally discourages split-listings because they can create enforcement challenges, though there are precedents. The only adjacent population not included in the proposal is in Zambia, which would remain listed. Reported exports from Zambia are negligible, and there is no evidence of cross-border trade in giraffes or their products between Zambia and the co-proponent range States. As such, the risk of enforcement complications from a split-listing appears low.

REJECT



CoP20 Prop.5

## OKAPI

*Okapia johnstoni*

**Inclusion in Appendix I (Democratic Republic of the Congo)**

Information on the status of Okapia johnstoni remains limited. Although the species does not appear to have a small population or a restricted distribution, dung count surveys suggest a significant population decline over the past three generations.

The species is protected in the Democratic Republic of the Congo, where all trade is prohibited. A small, legal trade in captive-bred individuals has been authorised to help fund conservation infrastructure. Illegal hunting for meat, skins, and oil is considered a threat, with okapi oil believed to hold medicinal value. Evidence indicates some illegal trade across the border into Uganda, primarily in skins and oil, though its scale remains unclear. Anecdotal reports also suggest possible trade to Southeast Asia and the Middle East, as well as a domestic

market for okapi oil involving processing in South Africa, but these claims have yet to be substantiated.

Although substantiated information on international trade is limited, the species meets the biological criteria for an Appendix I listing. Given that the Okapi is endemic to the Democratic Republic of the Congo, where national legislation prohibits its use, and given the lack of sufficient information to determine whether the species is or may be affected by trade, the DRC could consider including the species in Appendix III with a zero-export quota for wild specimens for commercial purposes, to ensure alignment with its national legislation and as a precautionary measure. This alternative approach would facilitate continued trade in captive-bred Okapis, which has helped fund conservation infrastructure.



REJECT



CoP20 Prop. 6

## STRIPED HYAENA

*Hyaena hyaena*

Inclusion in Appendix I (Israel, Tajikistan)

The Striped Hyaena does not appear to have a small population or a restricted range. While there is evidence that populations are decreasing, the overall extent of the decline cannot be reliably quantified, and it is unlikely that the species would meet the biological criteria for inclusion in Appendix I.

Estimates of the species' population size are limited. In 1998, the global population estimate was between 5,000 and 9,999 mature individuals with a decreasing population trend. A current preliminary estimate based on all available empirical data suggests that the global population is greater than 15,000 individuals.

The Striped Hyaena, one of four extant species in the family Hyaenidae, has a broad but patchy distribution that is confirmed across 37 range States and may occur in as many as ten additional countries. Legal international trade in wild-sourced specimens appears limited, with 38 specimens, mostly hunting trophies, along with a few skins and live animals, reported over the past decade while the species has been listed in Appendix III. There are some reports of opportunistic illegal trade in parts and live animals, but international trade does not appear to be a significant driver of population decline at present.

CoP20 Prop.7

## GUADALUPE FUR SEAL

*Arctocephalus townsendi*

Transfer from Appendix I to Appendix II (Mexico, United States of America)

The Guadalupe Fur Seal was originally listed in CITES Appendix I due to historic overexploitation and its critically low population size. From an estimated 200–500 individuals in the 1950s, the species has made a remarkable recovery, with population numbers rising to approximately 74,000 in 2024.

International trade has been negligible, limited to 40 reported transactions since 1975, primarily for scientific purposes, with no evidence that illegal trade currently poses a threat. National

protection is robust and these domestic measures would remain in place if the species were transferred to Appendix II. Such a transfer is not expected to stimulate demand or create enforcement challenges. Given its population recovery, negligible trade, and continued protection under national law, the species no longer meets the biological or trade criteria for Appendix I, and precautionary safeguards are considered to be sufficient to ensure its continued conservation under Appendix II.



ACCEPT

CoP20 Prop. 8

## CARIBBEAN MONK SEAL

*Monachus tropicalis*

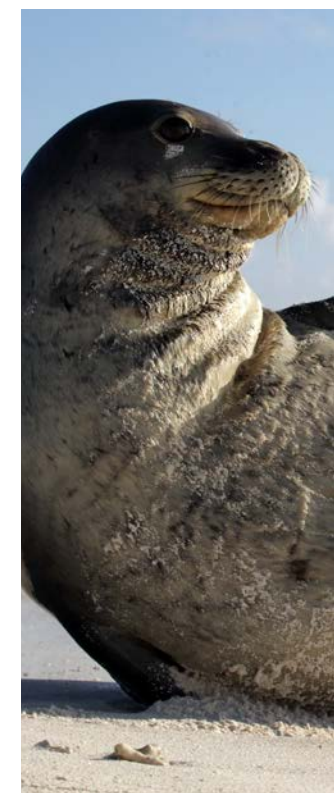
Deletion from Appendix I (Mexico, United States of America)

The Caribbean Monk Seal was last observed before its inclusion in the CITES Appendices under the genus listing for Monk Seals and was formally declared Extinct on the IUCN Red List in 1986.

The precautionary measures in Resolution Conf. 9.24 (Rev. CoP17) allows for the removal of extinct species from Appendix I, though paragraph D specifically addresses species considered possibly extinct rather than confirmed extinct. Nonetheless, there is no plausible risk that this species would be impacted by trade if it were

rediscovered. Trade in the two remaining monk seal species is extremely limited and consists almost entirely of scientific specimens, while the historical threats that drove the Caribbean Monk Seal's extinction, primarily hunting for blubber and skins, are no longer a significant factor for most seal populations.

Although the Caribbean Monk Seal is similar in appearance to the extant monk seal species, clarifying its removal from the Appendices, as proposed, would eliminate any risk of misidentification or confusion in trade and would not hinder implementation of the Convention.



ACCEPT

REJECT C,  
ACCEPT A AND B



CoP20 Prop. 9

## SOUTHERN WHITE RHINOCEROS

*Ceratotherium simum simum*

### Amendment of the Annotation of the Population of Namibia Listed in Appendix II (Namibia)

The Namibia population of the Southern White Rhinoceros (*Ceratotherium simum simum*), were reintroduced in 1975 with just 16 individuals, and has grown to approximately 1,500 today. The population has been on Appendix II since 2023.

The proposed annotation c) specifies that only horns from registered stocks of legally acquired, individually identifiable origin would be eligible for export, and establishes a mechanism for approving future trading partners. However, while the proposal discloses the current size of Namibia's horn stockpiles, it is not disaggregated by species, and there is not an estimate of future accumulation, including from dehorning, nor does it define the timeframe for the initial 200 kg annual cap mentioned in the supporting statement. Because this limit is not part of the proposed annotation, trade would otherwise be governed by the general provisions of Article IV, leaving open the possibility of changes to export volumes without additional CoP approval.

While there is strong evidence of effective national management, anti-poaching measures, and enforcement controls, explicit reference to these safeguards in

the annotation would ensure adequate risk mitigation for *C. simum simum* and other Rhinoceros species. Key uncertainties remain, including how "sufficient national legislation and domestic trade controls" will be defined and verified for importing countries, and how demand-side risks will be managed to prevent stimulating illegal markets. Given that no legal end markets for Rhino horn currently exist and several tonnes of horn enter illegal trade annually, it is unlikely that legal trade of small quantities could reduce poaching pressure. There is also uncertainty about how the CITES Secretariat would verify trading partners and whether it has the resources to fulfill this role.

Regarding hunting trophies b), the number of exports remains low, representing a small fraction of the total population, and Namibia's management is generally considered robust. Therefore, the existing precautionary measures appear sufficient for this element of trade. Regarding point a), which permits trade in live animals exclusively for in-situ conservation, the key difference from the current annotation is that it would allow Namibia to export animals to locations outside the species' natural and historical range within Africa.

REJECT



CoP20 Prop. 10

## SOUTH-WESTERN BLACK RHINOCEROS

*Diceros bicornis bicornis*

### Transfer of the population of Namibia from Appendix I to Appendix II with an annotation (Namibia)

Namibia currently maintains an annual hunting quota for the Southwestern Black Rhinoceros of five adult males, with revenue directed to conservation. Domestic use or trade in Rhino horn and derivatives remains prohibited. Namibia's population, once reduced to fewer than 100 individuals in the 1960s, has steadily recovered, increasing from approximately 1,000 in 2004 to just over 2,000 in 2024, now representing more than 80% of the global population. High anti-poaching costs remain one of the most significant threats to Rhino conservation and proponents suggest that sustainable, legal trade could provide a sustainable alternative to illegal markets, generating funding for continued protection efforts.

Precautionary measures are proposed through an annotation that would limit exports to horns from legally acquired, individually identifiable registered stocks, require approval of trading partners, and stipulate that revenues from trade be directed to Rhino conservation and community development programs. Robust national management and enforcement controls would safeguard

not only its own population but also other Rhino species. However, the annotation does not specify the volume of horn proposed for export or clarify the one-off nature of the sale, effectively leaving future trade levels subject to the general provisions of Article IV. Parties may wish to request greater precision in the annotation to explicitly limit exports to those described in the supporting statement.

Concerns remain regarding the definition of "sufficient national legislation and domestic trade controls" in prospective importing countries, as well as the mechanisms to verify their compliance. The proposal does not explain how future trade would be managed to prevent market stimulation or unintended increases in poaching pressure in other range States with fewer resources. There is also uncertainty about how the CITES Secretariat would verify trading partners and whether it has the resources to fulfill this role. These considerations are critical, as no legal end markets currently exist for Rhino horn and illegal trade continues.





REJECT

CoP20 Prop. 11

## HOFFMAN'S TWO-TOED SLOTH

*Choloepus hoffmanni*

## LINNÉ'S TWO-TOED SLOTH

*Choloepus didactylus*

Inclusion in Appendix II (Brazil, Costa Rica, Panama)

Species of *Choloepus* sloths have wide distributions across the Americas, show adaptability to modified habitats, and can reach moderate population densities in parts of their range (e.g., up to 1.5 individuals per hectare for *C. hoffmanni*). Both species are currently classified as Least Concern on the IUCN Red List, with populations considered large or very large, though declining overall due mainly to extensive habitat loss. While both species have been exported legally and illegally for the exotic pet trade, the numbers involved are relatively small

and unlikely to significantly impact wild populations.

Given the low levels of international trade, there is no evidence that CITES regulation is needed to prevent these species from becoming eligible for Appendix I in the near future, nor to ensure that harvest is not reducing their populations to levels that would threaten their survival. Accordingly, neither species appears to meet the criteria for inclusion in Appendix II under Annex 2a or 2b of Resolution Conf. 9.24 (Rev. CoP17).



REJECT

CoP20 Prop. 12

## GOLDEN-BELLIED MANGABEY

*Cercocebus chrysogaster*

Transfer from Appendix II to Appendix I (Democratic Republic of the Congo)

Recent assessments indicate that the Golden-bellied Mangabey does not have a small population or a restricted range. However, it has been heavily exploited for the bushmeat trade, with reports of declining availability suggesting a decreasing population driven by overharvest and habitat loss. Without strengthened local conservation measures, this decline could soon approach the threshold for what CITES considers a marked recent decline. Although the species appears in

international trade in very small numbers, averaging around 15 live animals per year over the past decade, this trade is unlikely to have a significant impact compared to local hunting for national consumption and habitat degradation. Overall, the species does not appear to meet the biological or trade criteria for inclusion in Appendix I. However, TRAFFIC urges range States to implement local measures to curb domestic demands and resulting species declines.

CoP20 Prop. 13

## AFRICAN ELEPHANT

*Loxodonta africana*

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. (Namibia)

Since the population's transfer from Appendix I to Appendix II, trade has been permitted only under specific conditions, including limited quantities and timeframes for raw ivory exports. Removing the annotation would allow commercial trade in ivory and ivory products under Appendix II conditions. Resolutions Conf. 10.10 (Rev. CoP19) on Trade in Elephants and Conf. 11.20 (Rev. CoP18) on the definition of "appropriate and acceptable destinations" would continue to apply, with the latter specifically guiding exports of live Elephants.

There are no specific guidelines for assessing proposals to amend annotations of this kind, but Annex 4 of Res. Conf. 9.24 (Rev. CoP17) outlines precautionary measures for such changes. These measures are referenced in the supporting statement but are not incorporated into the proposal itself. Parties would therefore need to consider Namibia's implementation of the Convention, particularly Article IV, and its enforcement controls, as well as the compliance capacity of potential trading partners.

Namibia has described measures for managing legal and unknown ivory stockpiles and has a comprehensive Elephant management plan extending to 2031. The supporting statement outlines the potential contribution of ivory sales to Elephant conservation and related community programmes. Details on how a legal trade would be conducted are limited, including which countries might permit ivory imports, the conditions under which markets might open, licensing arrangements for traders, and monitoring mechanisms for trade and end-use markets. The proposal identifies a role for the CITES Secretariat in oversight but does not specify the mechanisms or resources for this work.

The potential implications of introducing a legal supply of ivory for the global ivory market, including illegal trade, are not specified in the proposal. The supporting statement provides some information on intended controls, but further clarification on implementation and monitoring would provide Parties with a clearer basis for evaluating the proposal against the precautionary measures in Annex 4.



REJECT



CoP20 Prop. 14

## AFRICAN ELEPHANT

*Loxodonta africana*

**Amend the existing annotation for the populations in Botswana, Namibia, South Africa, and Zimbabwe** (Botswana, Cameroon, Côte d'Ivoire, Namibia, Zimbabwe)

The proposal would have two main effects on trade in Elephant products. First, it would harmonise the conditions for trade in live Elephants across the four proponent countries, removing the current restriction that Namibia and South Africa may only export live animals for in-situ conservation purposes. All exports would continue to be regulated under Resolution Conf. 10.10 (Rev. CoP19) on Trade in Elephants and Resolution Conf. 11.20 (Rev. CoP18) on the definition of "acceptable and appropriate" destinations. This change is not expected to significantly affect trade volumes.

Second, the proposal would formally allow Zimbabwe to trade in commercial leather products, a practice that already occurs on a small scale without reported

issues. The deletion of paragraph g), which set conditions for raw ivory sales, would not affect current trade because no raw ivory exports have been permitted since the conditional sales approved at CoP12. Similarly, the removal of paragraph h) would have no practical impact, as it has been inactive for many years.

Overall, the proposed changes are unlikely to negatively affect trade or conservation outcomes for African Elephants in these range States. Should any compliance concerns or detrimental impacts arise, they could be addressed through existing CITES mechanisms, including the compliance procedures outlined in Resolution Conf. 14.3 (Rev. CoP19) or the Review of Significant Trade process.



CoP20 Prop. 15

## HORNBILL GENERA

*Ceratogymna, Bycanistes*

**Inclusion in Appendix II** (Cameroon, Congo, Gabon, Niger, Nigeria, Senegal, Sierra Leone, Togo)

The two African Hornbill genera, *Bycanistes* and *Ceratogymna*, include nine species: six listed as Least Concern, one as Near Threatened, and two as Vulnerable on the IUCN Red List. Population estimates are largely unknown, though both *C. atrata* and *C. elata* are believed to number around or above 10,000 individuals. Most species have wide geographic ranges, yet populations are reported to be declining, primarily due to habitat loss and degradation from deforestation and logging. While some species are involved in national and limited international trade, along with occasional seizures, the overall impact of trade on wild populations remains unclear.

Given the limited information on population status, trends, and trade impacts, there is currently insufficient evidence to conclude that any species

in these genera meet the criteria for inclusion in Appendix II under Resolution Conf. 9.24 (Rev. CoP17). Although their traded forms share similarities with Asian CITES-listed Hornbill species, which are found in high volumes in trade, more data are needed to assess whether these African species enter Asian markets and create enforcement challenges. Specimens of African species closely resemble their Asian counterparts in trade, and the gap in the market from reductions in Asian Hornbill species could potentially be filled with African species. For this reason, and given their vulnerability to exploitation and population decreases reported, a precautionary approach and an Appendix II listing is warranted. Furthermore, listing the species in Appendix II would improve understanding of trade by generating more comprehensive data through annual trade reports.



ACCEPT



CoP20 Prop. 16

## WHITE-BACKED VULTURE

*Gyps africanus*

## RUPPELL'S VULTURE

*Gyps rueppelli*

**Transfer from Appendix II to Appendix I** (Benin, Burkina Faso, Burundi, Cameroon, Chad, Congo, Gambia, Guinea, Niger, Nigeria, Senegal, Sierra Leone, Togo )

Neither *Gyps africanus* nor *G. rueppelli* has a restricted range, and while current population data are limited, available estimates indicate that neither species has a small population. Both, however, have experienced severe population declines and local extirpations in recent years, driven by habitat loss, reduced food availability, and both intentional and unintentional poisoning. As a result, both species were assessed as Critically Endangered on the IUCN Red List in 2021, with significant historical declines that meet Criterion C of Annex 1 in Resolution Conf. 9.24 (Rev. CoP17) for an Appendix I listing.

Reported legal international trade in wild-sourced individuals has been minimal and unlikely to significantly impact wild populations. Nevertheless, substantial illegal cross-border trade has been reported, particularly in West and Central Africa, where vulture parts and derivatives are used for belief-based practices. Although the scale of this trade is not well documented, it likely exacerbates other threats. Given their Critically Endangered status, an Appendix I listing is appropriate, though its effectiveness will depend heavily on strong enforcement efforts to address illegal trade across porous borders.

CoP20 Prop. 17

## PEREGRINE FALCON

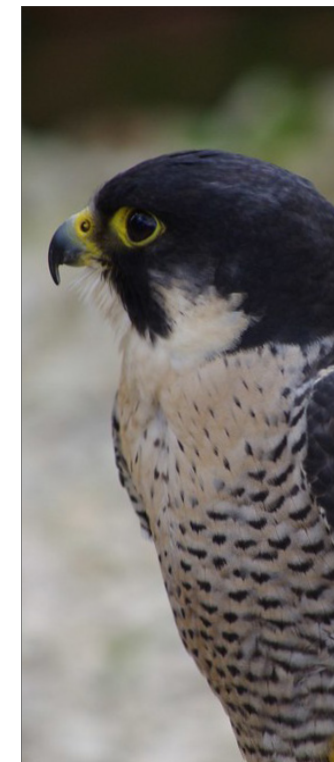
*Falco peregrinus*

**Transfer from Appendix I to Appendix II** (Canada and United States of America)

The Peregrine Falcon (*Falco peregrinus*) has a wide global distribution and its wild population is both large and increasing, having made a strong recovery since the mid-20th century. The species does not meet the biological criteria for Appendix I listing.

Trade in live birds for falconry is growing, but the vast majority of demand is met through captive-bred individuals from registered breeding facilities, with only small numbers of wild birds exported for reintroduction programs. Illegal trade is limited, affecting only certain populations.

Although transferring the species to Appendix II could lead to some applications for wild-sourced trade, the risk to wild populations is likely minimal given the strong captive breeding industry, falconers' preference for captive-bred birds, the species' stable and increasing population, and key trading nations having indicated that their domestic controls would remain unchanged following a transfer to Appendix II. This suggests that the precautionary measures in Annex 4 would be met across most of the species' range.



ACCEPT

CoP20 Prop. 18

## GREAT-BILLED SEED-FINCH

*Sporophila maximiliani*

**Inclusion in Appendix II and *S. angolensis*, *S. atrirostris*, *S. crassirostris*, *S. funerea*, *S. nuttingi* inclusion in Appendix II** (Brazil)

*Sporophila maximiliani* has a very small wild population, likely fewer than 1,000 individuals, with subpopulations that are extremely fragmented. Illegal capture has resulted in the loss of several local populations. In contrast, Brazil's registered captive population exceeds 200,000 individuals. Although most recent trade involves captive-bred birds, evidence indicates that wild capture and illegal trade are still occurring. The species therefore meets both the biological and trade criteria for Appendix I listing. Commercial trade in captive-bred birds could continue under

CITES rules, with breeding operations required to register with the Secretariat in line with Resolution Conf. 12.10 (Rev. CoP15).

For the five additional *Sporophila* species proposed as lookalikes, the similarity of females and juveniles, combined with evidence that they are present in trade, suggests they meet the Annex 2b criteria for Appendix II listing. Other members of the genus *Sporophila* may also warrant future consideration for Appendix II inclusion.



ACCEPT



ACCEPT

CoP20 Prop. 19

## GIANT HISPANIOLAN GALLIWASP

*Caribicus warreni*

### Inclusion in Appendix I (Dominican Republic)

Habitat loss and fragmentation remain the primary threats. While international trade volumes are not well quantified, specimens have been observed for sale in North American and European pet markets, believed to originate from Haiti, though it is unclear whether these are still wild-caught or captive-bred. Given the species' likely small and severely

fragmented population, restricted range, and evidence of ongoing international trade, these factors together suggest that the species meets biological criteria for A and B of Annex 1 of Resolution Conf. 9.24 (Rev. CoP17), and *C. warreni* appears to meet the criteria for inclusion in Appendix I.



ACCEPT

CoP20 Prop. 20

## MOUNT ELLIOT LEAF-TAILED GECKO

*Phyllurus amnicola*

### Inclusion in Appendix II (Australia)

*Phyllurus amnicola* has a highly restricted distribution, occurring in only four known subpopulations in Queensland, Australia. This limited range suggests the species may already meet the biological criterion for an Appendix I listing. Although no legal commercial exports have been authorised, the species has recently appeared in international trade, where individuals command high prices. While overall trade volumes are low and impacts on all subpopulations are unclear, past illegal collection has

caused notable declines in at least one subpopulation. Given the species' susceptibility to overharvest, it appears to meet the criteria for inclusion in Appendix II.

All commercial export of wild specimens from Australia is prohibited. If listed in Appendix II, Australia could also establish and publish a zero quota for wild-sourced commercial exports on the CITES website, signaling that trade in wild-caught specimens is not allowed.

CoP20 Prop. 21

## RINGED THIN-TAIL GECKO

*Phyllurus caudiannulatus*

### Inclusion of in Appendix II (Australia)

*Phyllurus caudiannulatus* is a localised species found in three known subpopulations in Queensland, Australia, with its habitat impacted by recent wildfires. Although no legal commercial exports have been authorised, small numbers of individuals have been recorded in international trade in recent years. There is no clear evidence that this trade significantly affects wild populations, which can be locally abundant, or that a substantial proportion of individuals in trade are wild-sourced. Given the low reported

trade volumes and lack of evidence of ongoing wild collection, the species does not appear to meet the criteria under paragraph 2a of Resolution Conf. 9.24 (Rev. CoP17).

However, as the species is endemic to Australia, which prohibits the commercial export of wild specimens, Australia could consider an Appendix III listing with a zero-export quota for wild specimens traded for commercial purposes, in line with its national legislation.



REJECT

CoP20 Prop. 22

## GALÁPAGOS MARINE IGUANA

Genus *Amblyrhynchus* spp. *Amblyrhynchus cristatus*

### Transfer from Appendix II to Appendix I (Ecuador)

The Marine Iguana, the sole species in the genus *Amblyrhynchus*, is endemic to the Galápagos Islands, Ecuador, where it inhabits both major and satellite islands. The Marine Iguana has been included in CITES Appendix II since 1975, the same year Ecuador joined the Convention. No live, wild-collected specimens have been reported as legally exported since its listing, and Ecuador has prohibited exports of this species since 1998. Limited trade recorded in the CITES database consists entirely of captive-bred individuals, although as the Marine Iguana is poorly suited to captivity, no successful long-term breeding is recorded. As no legal exports of this species have been authorised by Ecuador, it is questionable whether the "captive-bred" individuals in trade were legally acquired. The species has a somewhat restricted range and is vulnerable to population fluctuations

and multiple ongoing threats, including climatic events, however, evidence of illegal international trade appears limited, and the impact on wild populations is unlikely to be significant.

However, while the Marine Iguana may not fully meet biological or trade criteria for Appendix I, its high vulnerability to climatic events and other environmental disturbances justify a precautionary approach. An Appendix I listing would require trade from alleged captive bred individuals to come from captive breeding facilities registered with the Secretariat. This would be impossible if they were unable to prove the legal acquisition of the breeding stock. Thus, it would reduce smuggling incentives for laundering through captive breeding. With this in mind, an Appendix I listing is justified.



ACCEPT





ACCEPT

CoP20 Prop. 23

## **GALÁPAGOS LAND IGUANAS** *Conolophus* spp.

**Transfer from Appendix II to Appendix I (Ecuador)**

Galápagos Land iguanas (*Conolophus* spp.) are endemic to the Galápagos Islands, Ecuador, and face a range of threats that vary in severity across the archipelago. These threats are increased by the species low reproduction, small isolated populations, and low genetic diversity. The Galápagos Pink Land Iguana and Barrington Land Iguana have highly restricted distributions, are confined to a single location, and are acutely vulnerable to extrinsic threats, including climate-driven population fluctuations and habitat degradation. The Galápagos Land Iguana, has a somewhat larger population, but remains at risk from invasive species and climate

events causing periodic declines and habitat loss.

Ecuador does not permit legal exports of these species, though trade in live specimens of uncertain origin has been recorded and some illegal harvesting is reported. In light of their conservation status, Appendix I listing appears justified for all three species.

Should Parties determine that certain species do not meet the Appendix I criteria, Ecuador could alternatively establish a zero-export quota for wild-sourced commercial exports, in line with national legislation, to signal that trade in wild specimens is prohibited.



REJECT

CoP20 Prop. 24

## **BALE MOUNTAIN ADDER** *Bitis harenni*

## **ETHIOPIAN MOUNTAIN ADDER** *Bitis parviocula*

**Inclusion in Appendix I (Ethiopia)**

The Bale Mountain Adder and Ethiopian Mountain Adder are large, visually striking vipers endemic to Ethiopia, found in montane forests and grasslands. *Bitis harenni* has a particularly restricted range, and population sizes and trends remain unknown. Trade in both species has been prohibited under Ethiopian law since 2004. The last record of wild-sourced *B. parviocula* in trade dates back to 2009, though small numbers have occasionally appeared in pet markets, and the species has been successfully bred in captivity. There is

no evidence that *B. harenni* is involved in trade, and it is unclear whether current demand for *B. parviocula* is being met through captive breeding rather than wild harvest.

While *B. harenni* may meet the biological criteria for Appendix I listing due to its restricted range, it does not meet the trade criterion, as there is no evidence of trade pressure. *B. parviocula*, which has a wider range and very limited, mostly from captive-bred specimens, also does not appear to meet the biological or trade criteria for inclusion in Appendix I.

CoP20 Prop. 25

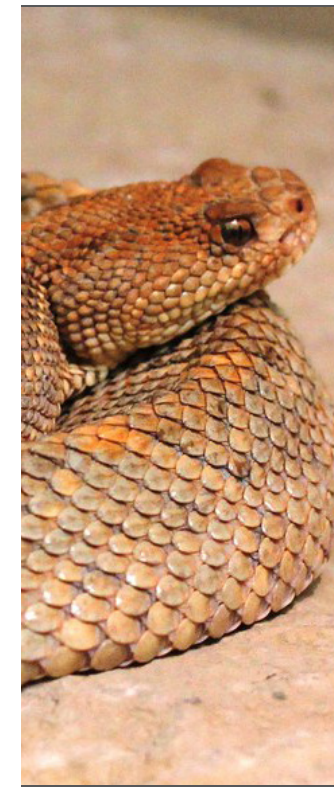
## **ROCK RATTLESNAKE** *Crotalus lepidus*

## **CENTRAL PLATEAU PYGMY RATTLESNAKE** *Crotalus ravus*

**Inclusion of in Appendix II and the genera *Crotalus* and *Sistrurus* in Appendix II as lookalikes (Mexico and Plurinational State of Bolivia)**

Both genera *Crotalus* and *Sistrurus* face threats from habitat loss, climate change, persecution, road mortality, and some illegal collection, with narrow-range or habitat-specialist species most at risk. However, reported international trade, mainly in captive-bred specimens and small amounts of parts, is minimal and unlikely to impact wild populations. *C. lepidus* and *C. ravus* are both assessed as Least Concern on the IUCN

Red List (2007), with stable populations and no major threats identified. Given the very limited trade and lack of evidence of significant impact on wild populations, neither species appears to meet the biological or trade criteria for Appendix II listing under Annex 2a. Similarly, other species in these genera do not appear to meet the criteria for inclusion under Annex 2a or 2b for “lookalike” concerns.



REJECT

CoP20 Prop. 26

## **HOME'S HINGE-BACK TORTOISE** *Kinixys homeana*

**Transfer from Appendix II to Appendix I (Cameroon, Guinea, Nigeria, Togo)**

Home's Hinge-back Tortoise does not have a restricted range or, based on current information, a small population. However, its distribution is fragmented, and its population is believed to have declined by over 80% in the past three generations (approximately 45 years), with further declines projected. This trend is driven by extensive habitat loss and high levels of exploitation for domestic use across its range, with international and regional trade contributing to a lesser extent. Although the species can adapt to secondary or modified habitats, its low reproductive

rate and delayed maturity limit its ability to recover from overharvesting.

International trade, mostly involving wild-sourced specimens, has added pressure to already vulnerable populations. Recent declines in reported trade likely reflect export restrictions introduced under the Review of Significant Trade process, but there is potential for trade to resume, and some unreported regional trade may still occur. Given these factors, *Kinixys homeana* appears to meet both the biological and trade criteria for inclusion in Appendix I.



ACCEPT



CoP20 Prop. 27

## WATER FROGS

*Pelophylax epeiroticus*, *P. lessonae*, *P. ridibundus*, *P. shqipericus*

Inclusion in Appendix II (European Union, Israel, North Macedonia)

Among the four *Pelophylax* species assessed, *P. epeiroticus* and *P. shqipericus* have relatively restricted ranges and are classified as Near Threatened and Vulnerable on the IUCN Red List, respectively, reflecting concerns over harvesting for international trade. *P. ridibundus* is widely distributed and listed as Least Concern, though some populations face significant harvest pressure. *P. lessonae* is also Least Concern, but concerns focus on trade involving hybrids with *P. ridibundus*, which can also hybridise with *P. epeiroticus* and *P. shqipericus*.

All four species are thought to contribute to the high-volume frogs' legs trade. However, trade data are not species-specific and are often affected by misidentification, making it difficult to determine the exact impact on individual

species. *P. ridibundus* is believed to be the most heavily traded, but this remains unconfirmed. Given the uncertainty over species-specific trade volumes and impacts, it is challenging to determine whether any of the species clearly meets the Appendix II listing criteria under Res. Conf. 9.24 (Rev. CoP17). Furthermore, other *Pelophylax* species in addition to those proposed for inclusion in Appendix II, are found in the main exporting countries and contribute to the trade in frogs' legs. Together with the lack of species-specific data, this would make the implementation of the listing of these species even more challenging.

If *P. ridibundus* were listed, trade in its hybrids with *P. lessonae* and other Eastern European populations would also be regulated under Res. Conf. 10.17 (Rev. CoP14) on *Animal Hybrids*.



CoP20 Prop.28

## OCEANIC WHITETIP SHARK

*Carcharhinus longimanus*

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)

The primary threat to the Oceanic Whitetip Shark (*Carcharhinus longimanus*) is overexploitation, largely as incidental bycatch in commercial fisheries. Although it is rarely targeted directly, its tendency to remain near the surface in tropical waters, where fishing pressure is intense, makes it particularly vulnerable.

The Oceanic Whitetip was reviewed under the CITES Review of Significant Trade (RST) process in 2023, which led

Senegal to establish zero export quotas in 2024. Despite retention bans, there is ongoing evidence of incidental catches being landed and sold, and Parties have reported substantial trade levels in recent years. Illegal and unreported fin trade is also likely continuing, undermining the species' recovery. Given its severe historical decline, wide distribution, and ongoing exploitation, the Oceanic Whitetip meets the biological criteria for inclusion in Appendix I.





CoP20 Prop. 29

## TOPE AND SMOOTHHOUNDS

*Galeorhinus galeus*

Smoothhounds genus *Mustelus*

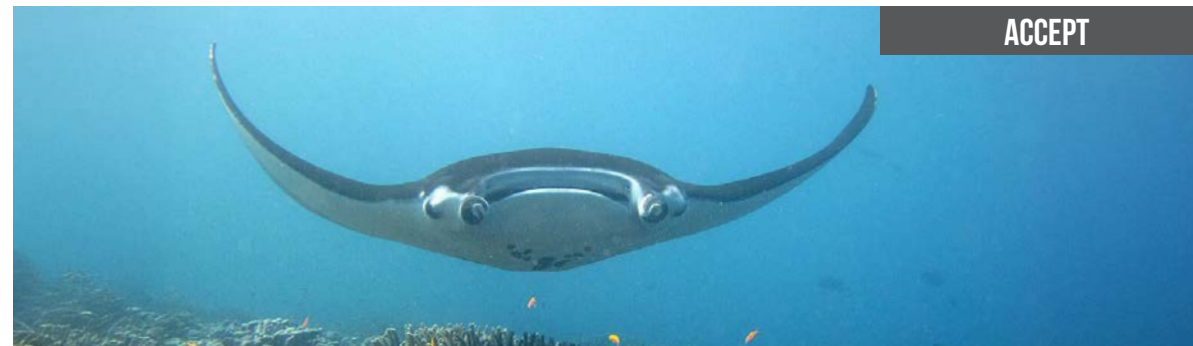
**Inclusion in Appendix II** (Brazil, Ecuador, European Union, Panama, Senegal)

Where fishing regulations for Tope and Narnownose Smoothhound have been enacted and effectively enforced, some population recovery has been observed. Nonetheless, population declines in other regions suggest that Tope meets the criteria for inclusion in Appendix II under Annex 2aA of Res. Conf. 9.24 (Rev. CoP17), with reductions consistent with the guidelines for commercially exploited, low-productivity aquatic species provided in the footnote to Annex 5. Similarly, despite recent signs of stabilizing catches in Argentina and Uruguay, historic declines in Narnownose Smoothhound populations also appear consistent with Appendix-II listing guidelines.

Similarly, increasing fishing pressure across much of Common Smoothhound

range, ongoing declines and range contractions in some regions, and demand in international trade indicate that regulation may be needed to ensure harvest does not reduce populations to levels that threaten survival. This suggests the species meets the criteria for Appendix II listing under Annex 2aB.

Most remaining *Mustelus* species are harvested for meat, with fins from some species entering international trade. Because meat and fins of smoothhound species are difficult to distinguish, listing Tope, Narnownose Smoothhound, or Common Smoothhound in Appendix II would likely require that other *Mustelus* species entering trade also be listed under Annex 2bA, to facilitate enforcement and avoid confusion.



CoP20 Prop. 30

## MANTA AND DEVIL RAYS FAMILY

*Mobulidae* (Mobulids)

**Transfer from Appendix II to Appendix I** (Bahamas, Belize, Brazil, Comoros, Dominican Republic, Ecuador, Fiji, Gabon, Jamaica, Maldives, Panama, Samoa, Senegal, Seychelles, Sudan, Togo)

Mobulid Rays are characterised by very low reproductive rates and fecundity, making them particularly vulnerable to overexploitation. They are impacted by a variety of fisheries and face significant pressure due to the high international demand for their gill plates. While global population sizes for all *Mobula* species remain unknown, available estimates for Manta Rays suggest that their populations are not small and their distribution is not restricted.

Current data indicate that Bentfin Devil Ray, Oceanic Manta Ray, Sicklefins Devil Ray, and Spinetail Devil Ray have experienced declines consistent with the guidelines for Appendix I listing for low-productivity, commercially exploited aquatic species as outlined in Annex 5 of Res. Conf. 9.24 (Rev. CoP17). Atlantic Pygmy Devil Ray, Longhorned Pygmy

Devil Ray, and Shorthorned Pygmy Devil Ray may also meet these criteria if genus-level data are used to assess population trends. All of these species are known to be affected by trade.

For Munk's Pygmy Devil Ray and Reef Manta Ray, available data do not indicate declines consistent with Appendix I criteria, although both are also impacted by trade. A split listing of the family Mobulidae, with some species in Appendix I and others in Appendix II, could create regulatory and enforcement challenges because products in trade are difficult to distinguish by species. If such challenges arise, Parties could consider annotating Appendix II listings with a zero-export quota for commercial trade in wild-caught specimens to help address enforcement concerns.



REJECT

CoP20 Prop. 31

**WHALE SHARK**  
*Rhincodon typus*

**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)

Whale Shark populations are widely distributed. However, data indicate significant population declines in certain areas, with projections suggesting continued decreases driven by fishing, vessel strikes, and climate change. According to the footnote in Annex 5 of Res. Conf. 9.24 (Rev. CoP17) concerning commercially exploited aquatic species, a decline of approximately 50% over 120 years for a low-productivity species does not constitute a marked historic decline under the guidelines for Appendix I

listing, which suggest a reduction to 15–20% of baseline levels. Considering this and the range of conservation measures implemented in recent years, the species does not appear to meet the biological criteria for inclusion in Appendix I.

Reported levels of legal trade are very low, likely reflecting existing national and international protection measures. Available evidence indicates that illegal trade is limited.



ACCEPT

CoP20 Prop. 32

**GIANT GUITARFISHES**  
*Glaucostegus spp.*

**Retain in Appendix II with a zero-export quota for wild 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)

*Glaucostegus spp.* are predominantly associated with shallow, soft-bottom coastal habitats, generally in waters less than 50 m deep, making them highly vulnerable to coastal fishing pressure and habitat degradation. They are frequently caught both as targeted catch and retained bycatch in coastal and artisanal fisheries, with their fins commanding a premium price internationally. Despite significant exploitation, no stock assessments exist, and catch data are often reported only at the family or genus level, resulting in limited species-specific population information. Nevertheless, analyses of historical landings and modelled

population trends indicate declines exceeding 80% since the mid-20th century, consistent with the IUCN Red List assessments.

In this context, the proposed zero-export quota represents an appropriate and precautionary measure under the provisions of Annex 4 of Resolution Conf. 9.24 (Rev. CoP17). By halting commercial trade in wild specimens, this annotation would provide much-needed relief for populations while allowing time for data collection, improved management, and potential recovery, ensuring that any future trade can be demonstrably sustainable and traceable.



ACCEPT

CoP20 Prop. 33

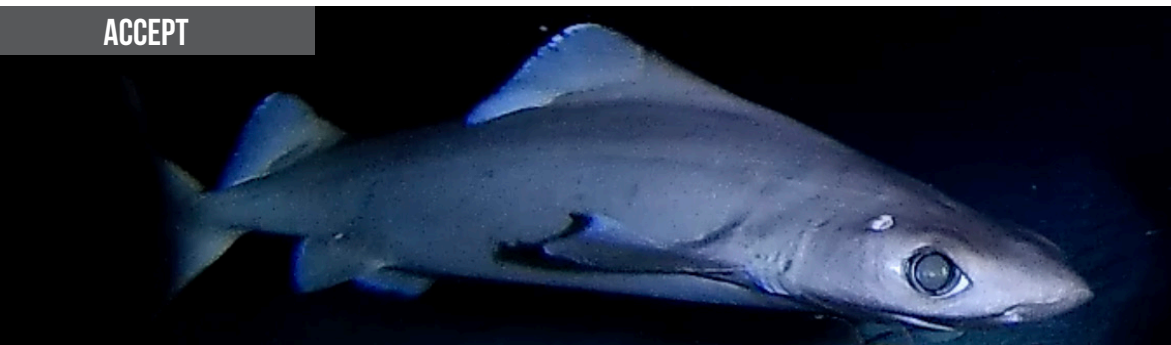
**WEDGEFISHES**  
*Family Rhinidae*

**Retain in Appendix II with a zero-export quota for wild 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, Senegal, Sierra Leone, Sudan, Togo Samoa, Senegal, Seychelles, Sri Lanka, Togo)

Wedgefishes are bottom-dwelling species typically found in shallow coastal habitats, generally at depths of up to 400 m. Their use of nearshore habitats makes them highly susceptible to exploitation from demersal trawl, net, and line fisheries, both as targeted catch and as retained bycatch. While their meat is primarily consumed locally, Wedgefish fins are among the most valuable in international trade, and additional products such as snouts and

skins also enter markets. Confusion in reporting, driven by morphological similarities and overlapping ranges between species, has likely led to misidentification and underestimation of true catch levels. Population sizes remain poorly quantified, and species-specific data to determine precise trends are lacking. In this context, the proposed zero-export quota is a proportionate and precautionary measure.





CoP20 Prop. 34

## GULPER SHARKS

### Family Centrophoridae

**Inclusion 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)

The principal threat to Gulper Sharks is fishing pressure, from both commercial and artisanal fisheries. They are directly targeted and retained as bycatch due to the exceptionally high value of their liver oil, which can make up 30% of body weight and contains squalene, a product traded internationally for use in cosmetics, pharmaceuticals, and dietary supplements. Gulper Sharks are also exploited for meat and fins. Their extremely low biological productivity due to slow growth, long gestation, late maturity, and very small litters, make them highly vulnerable to overexploitation, with recovery estimated to take decades (60-80+ years). Most Gulper Shark fisheries remain unmanaged, except in parts of the Northeast Atlantic and Southwest

Pacific, where concerns over dramatic population declines have prompted some regulatory measures. Where regulation is absent, Gulper Shark fisheries often follow boom-and-bust cycles.

Taxonomic complexity and morphological similarity among *Centrophorus* species make species-specific identification difficult, with landings frequently reported only at the genus level. The main product in international trade, squalene, cannot be visually differentiated by species. For these reasons, the inclusion of all *Centrophoridae* species in Appendix II is necessary to ensure that trade in *C. atromarginatus* and *C. granulosus* can be effectively monitored and controlled.



CoP20 Prop. 35

## EELS

### *Anguilla* species

**Inclusion in Appendix II** (European Union, Honduras)

Eels (*Anguilla* spp.) are a highly valuable fisheries resource. Temperate species, including the CITES-listed *A. anguilla* and the non-listed *A. japonica* and *A. rostrata*, are harvested in large quantities, particularly as seedstock for aquaculture in China and Japan. The resulting products are primarily consumed domestically but are also re-exported to markets in Southeast Asia, Europe, and the United States.

Populations of several Eel species have declined in a number of range States. Recruitment levels of *A. anguilla* have stabilised but remain very low relative to historical baselines. In some jurisdictions, harvests are managed through quotas, closed seasons, licensing, and Total Allowable Catches (TACs). Despite these measures, stocks in some range States appear to be in decline, although the unique biology of Eels makes it difficult to attribute decreases to a single cause.

Consequently, it cannot be stated with certainty whether *A. rostrata* or *A. japonica* meet the biological criteria for Appendix-II listing under Annex 2a of Res. Conf. 9.24 (Rev. CoP17). The use of wild seedstock to support aquaculture further complicates management and population assessment.

Trade in Anguillid eels is dominated by *A. japonica*, *A. rostrata*, and *A. anguilla*, with products of other species also known to enter international markets. Processed Eel products, Glass Eels, and elvers are difficult to distinguish by species, particularly in mixed shipments, and accurate identification often requires genetic testing, which is impractical for routine enforcement. As a result, all currently unlisted *Anguilla* species meet the criteria for inclusion in Appendix II under Annex 2b as lookalikes of *A. anguilla*.



CoP20 Prop. 36

## SEA CUCUMBERS

*Actinopyga echinites*, *A. Lecanora*, *A. mauritiana*,  
*A. miliaris*, *A. palauensis*, *A. varians*

### Inclusion in Appendix II (European Union)

The six *Actinopyga* Sea Cucumber species proposed for Appendix II listing are shallow-water Indo-Pacific species widely harvested for international trade, where they are sold as trepang or bêche-de-mer. Their biological traits make them highly susceptible to overexploitation, and there is evidence of significant depletion for some species, such as *A. echinites* and *A. miliaris*, in parts of their range. While species-specific trade volumes are not well quantified, available shipment records suggest that *Actinopyga* species contribute substantially to the global bêche-de-mer trade. Identification of species in processed form is challenging because consignments are often mixed.

There is limited recent information on global population status or trends for

these species, and the overall impact of wild harvest is poorly understood. Where data are available, they generally point to population declines with potential or actual overharvesting for trade. Although current information is insufficient to determine whether the proposed species meet the Appendix II criteria in Annex 2a of Res. Conf. 9.24 (Rev. CoP17), where information is available, it generally indicates population decreases. Therefore, a precautionary approach would be appropriate and would support an Appendix II listing. Regulation of trade in *A. lecanora* and *A. palauensis* would also be necessary for the effective control of trade in other *Actinopyga* species, and these species should be included in Appendix II as lookalikes.



CoP20 Prop. 37

## GOLDEN SANDFISH

*Holothuria lessoni*

### Inclusion in Appendix II (European Union)

Sea Cucumbers (*Holothuroidea*) comprise around 1,800 species globally, with the Golden Sandfish (*Holothuria lessoni*) among the most valuable tropical species. It is highly sought after for the production of bêche-de-mer, a luxury food product, and for use in traditional medicine, where it commands among the highest market price. *H. lessoni* occurs in shallow waters up to 30 metres deep, and has undergone significant declines due to heavy exploitation, with local extirpations reported in areas.

Biological traits make *H. lessoni* intrinsically vulnerable to overharvest, including its sedentary behaviour, late

maturity (2–5 years), density-dependent reproduction, low recruitment rates, and dependence on close proximity for successful external fertilisation. Sea Cucumber fisheries worldwide are known to follow boom-and-bust cycles, and this includes the *H. lessoni*, with evidence of increasing fishing pressure and accelerated population declines in recent years. While aquaculture efforts have been explored, production remains small-scale and is unlikely to offset exploitation pressures across its range. Given its high market value, biological vulnerability, and evidence of severe and ongoing depletion, an Appendix II listing is warranted.





CoP20 Prop. 38

## TARANTULA SPECIES

*Grammostola rosea*, *Acanthoscurria chacoana*,  
*Acanthoscurria insubtilis*, *Acanthoscurria musculosa*,  
*Acanthoscurria theraphosoides*, *Avicularia hirschii*,  
*Avicularia rufa*, *Avicularia avicularia*, *Catumiri argentinense*,  
*Cyriocosmus berate*, *Cyriocosmus perezmilesi*,  
*Haplotremus albipes*, *Holothele longipes*, *Pamphobeteus*  
*antinous*, and *Umbyquyra acuminatum*

**Inclusion in Appendix II** (Argentina, Plurinational State of Bolivia, Panama )

Reliable data on historical and current population sizes of the fifteen tarantula species proposed for Appendix II listing are limited, and overall population trends are unknown. Several species, including *Grammostola rosea*, one of the most widely traded tarantulas globally, are present in international trade.

Most trade in *G. rosea* was historically reported from Chile, which banned all tarantula exports in 2015. Trade in other species is relatively low and is primarily reported as captive-bred. Challenges with misidentification and misreporting, including the use of synonyms and trade routed through non-range States, complicate monitoring and regulation. The impact of trade on wild populations remains unclear. With Chile's export ban and very limited trade reported since 2017, there is no evidence to

suggest that trade regulation is currently needed to prevent wild populations from declining to a threatened level. None of the fifteen species appears to meet the biological or trade criteria for Appendix II listing under Annex 2a or 2b of Res. Conf. 9.24 (Rev. CoP17).

If any of the species were considered to meet the criteria in Annex 2a, it is not evident that the others would meet Annex 2b "lookalike" criteria. Adult specimens are reportedly distinguishable, while juveniles and hatchlings, commonly traded but largely sourced from captive breeding operations, are more challenging to identify. No significant implementation or enforcement issues have been reported for currently listed tarantula species.



CoP20 Prop.39

## SOUTH AFRICAN ABALONE

*Haliotis midae*

**Printed Inclusion in Appendix II** with an annotation "dried form only"  
 (South Africa)

South African Abalone (*Haliotis midae*) is subject to both legal and illegal trade. Legal exports, in live, frozen, canned, and dried forms, come primarily from regulated farming and ranching operations, with a relatively small total allowable catch from wild populations. Illegal trade, mostly in dried form and to a lesser extent frozen, is placing significant pressure on wild stocks. Available data show substantial reductions in population densities and declines in catch per unit effort over time. In some key conservation areas, spawning biomass has fallen below 20% of pre-fishing levels, suggesting a marked historical decline that may meet the biological criteria for Appendix I listing. Given the species' biological vulnerability, regulation of trade appears necessary to prevent further depletion, and the species appears to meet the criteria for Appendix II listing.

However, the proposal as currently drafted may face implementation challenges. The suggested annotation could be inconsistent with the text of the Convention, as Article I(b)(2) defines a specimen of an Appendix-I or Appendix-II animal as "any animal, whether alive or dead, and any readily recognizable part or derivative thereof," meaning all parts and derivatives are automatically covered. This is reaffirmed in Res. Conf. 11.21 (Rev. CoP19), which clarifies that an annotated animal listing includes the entire animal, live or dead, and any specified parts or derivatives.

While *Haliotis midae* meets the criteria for inclusion, the proposal is not consistent with the Convention text. South Africa could choose to list *Haliotis midae* in Appendix III, which could include dried form only and could amend the proposal for Appendix II for CoP21 to include the whole specimen.





ACCEPT

CoP20 Prop. 40

## AMERICAN GINSENG

*Panax quinquefolius*

**Amend annotation #3 to exempt finished products packaged and ready for retail trade of thin-sliced roots derived from artificially propagated plants (United States of America)**

This proposal aims to expand the current exemption under annotation #3 for American Ginseng to include retail-ready products consisting of roots sliced 1-3 mm thick, provided they are derived from artificially propagated plants. Currently, annotation #3 exempts powders, pills, extracts, tonics, teas, and confectionery but does not cover whole or sliced roots, meaning that even small, legally purchased retail quantities, often bought by tourists, require CITES Appendix II export documents. These requirements can be costly and time-consuming, potentially discouraging lawful trade. The proposed exemption would streamline

legal trade, reduce administrative burdens, and allow enforcement agencies to focus resources on higher-risk products.

To qualify, sliced roots would need to be packaged with clear visual identification, such as transparent windows or panels, to ensure effective enforcement-packaging already commonly used in the USA. As wild-sourced roots are highly valued in whole form, there is little economic incentive to slice and launder them as artificially propagated products, suggesting a low conservation risk.



REJECT, BUT SUPPORT A  
POTENTIAL AMENDMENT  
FOR AN APPENDIX II  
LISTING

CoP20 Prop. 41

## CHILEAN PALM

*Jubaea chilensis*

**Inclusion in Appendix I (Chile)**

*Jubaea chilensis* is a slow-growing, long-lived palm with a relatively restricted range in central Chile. Its seeds and sap have been widely harvested for food, and its habitat has been impacted by land-use change, deforestation, and fire, leading to significant historical population declines. The current wild population is estimated at over 100,000 mature individuals, most of which occur in protected areas, and appears to be stable, though recruitment remains low and fire continues to pose a threat. Seeds are traditionally collected by local communities, sometimes illegally, with an unknown proportion entering international trade. While seed prices in overseas markets have risen, the economic benefits for local communities remain unclear.

The species is also widely cultivated as an ornamental plant in Chile and abroad. Although past declines are thought to have been substantial, existing protection measures, including harvest regulation and the concentration of wild populations within protected areas, appear to have stabilised the species. It is uncertain whether *Jubaea chilensis* meets the criteria for Appendix I listing. Inclusion in Appendix II would enable monitoring and regulation of international trade to ensure it remains non-detrimental and could include a zero export quota for wild-sourced seeds. If the species were to be included in Appendix II, nurseries exporting plants would not require registration under Res. Conf. 9.19 (Rev. CoP15).

CoP20 Prop.42

## PONYTAIL PALMS

*Beaucarnea hookeri*  
*Beaucarnea glassiana*

**Inclusion in Appendix II, as part of the listing of the *Beaucarnea* spp. (Depository Government (Switzerland) and Mexico)**

Recent evidence shows limited international trade in *Beaucarnea hookeri* seeds and seedlings, which are difficult to distinguish from those of other species in the genus, but no evidence of trade in *B. glassiana*. Available data indicate that trade in *B. hookeri* likely originates from cultivated plants, with small quantities exported from Mexico in recent years, all reportedly artificially propagated. There is no indication that illegal harvest remains a significant threat to wild populations. Since its 2017 Appendix II listing, nearly all reported

global trade in *Beaucarnea* species has involved artificially propagated specimens, suggesting that regulation is no longer necessary to bring trade under control. These species therefore do not appear to meet the criteria for Appendix II. Nonetheless, their inclusion under the genus listing, rather than using an annotation to explicitly exclude them, may offer a more coherent and streamlined approach, consistent with the guidance of Resolution Conf. 12.11 (Rev. CoP19) on Standard Nomenclature.



ACCEPT

CoP20 Prop. 43

## INDIAN BDELLIUM - TREE

*Commiphora wightii*

**Inclusion in Appendix II (European Union)**

*Commiphora wightii* is a relatively widespread shrub found at moderate densities in the arid regions of western India, Pakistan, and Oman. It has been extensively harvested for its gum, leading to significant population declines that are expected to continue due to ongoing habitat loss, intensive exploitation, and the species' biological vulnerability. High levels of wild harvesting for international trade, with little to no cultivation-based production, contributed to its 2014 IUCN Red List assessment as Critically Endangered. While recent global population data are limited, healthy and locally abundant populations are reported in some areas, including the Kachchh region of Gujarat

and in Oman. As accessible resources in India have been depleted, most resin processed there is now imported from Pakistan, with some domestic wild-harvested resin still contributing to exports of processed products. On this basis, *C. wightii* may meet the criteria for inclusion in Appendix II.

Extracts (resin), powders, and finished products are the primary forms first seen in trade as exported from the range States. If an annotation were considered necessary, Annotation #1 would cover these commodities in trade in line with Res. Conf. 11.21 (Rev. CoP19) on *Use of annotations in Appendices I and II*.



ACCEPT



ACCEPT



CoP20 Prop. 44

## CYCAD SPURGE

*Euphorbia bupleurifolia*

Transfer from Appendix II to Appendix I (South Africa)

The Cycad Spurge (*Euphorbia bupleurifolia*) is a very slow-growing succulent endemic to South Africa, valued internationally as an ornamental plant. The overall wild population is small, with some subpopulations extremely limited in size, and it occupies a restricted area of occupancy within a broader extent of occurrence. The species is known from very few locations, with evidence of a 70% reduction in the number of known subpopulations.

Evidence indicates that wild specimens falsely declared as artificially propagated

have contributed to recent population declines, likely representing the main driver of this trend. While recent enforcement efforts appear to have curtailed or at least reduced illegal collection and trade, there remains ongoing demand, with small numbers of live plants still exported from South Africa over the past five years. Given the species' restricted range, declining subpopulations, slow growth rate, and continued pressure from illegal trade, *Euphorbia bupleurifolia* appears to meet the biological and trade criteria for inclusion in Appendix I.

REJECT



CoP20 Prop. 45

## RED DOUSSIÉ

*Afzelia bipindensis*

Deletion from Appendix II of populations located in Central Africa: Cameroon, Central Africa Republic, Congo, Democratic Republic of the Congo, Equatorial Guinea and Gabon (Burundi, Cameroon, Central African Republic, Congo, Democratic Republic of Congo, Equatorial Guinea, Gabon)

Available data, primarily from forest inventories in Central African forest management units (FMUs), indicate that *Afzelia bipindensis* remains a widespread species, occurring at moderate densities with a large population of mature trees. Sustainable management measures are reported to be in place in much of its range, with regeneration observed to be good within managed concessions. NDFs have been published for Cameroon and the Democratic Republic of the Congo, and export quotas are published for Congo and Equatorial Guinea, although it is not confirmed whether these quotas are based on NDFs. On this basis, the species in these range States may not meet the biological or trade criteria for inclusion in Appendix II.

Nevertheless, *A. bipindensis* appears to meet the "lookalike" criteria for Appendix-II listing under Criterion A of Annex 2b of Res. Conf. 9.24 (Rev. CoP17). While efforts have been made to standardise

trade names for African *Afzelia* species and identification techniques are available, these names are not always applied consistently. In practice, enforcement officers lacking access to appropriate identification tools may find it difficult to distinguish *A. bipindensis* timber from that of other Appendix-II-listed species such as *A. africana*, *A. bella*, and *A. pachyloba*, as well as other species in the genus. Timber consignments often contain material consolidated from multiple countries, which can include illegally harvested timber, increasing the risk of laundering if populations are excluded from CITES controls. Adoption of the proposal would create a split-listing for *A. bipindensis* by geographical population, a situation that Annex 3 of Res. Conf. 9.24 (Rev. CoP17) notes should generally be avoided due to potential enforcement challenges, although some precedents exist.

ACCEPT



CoP20 Prop. 46

## BRAZILWOOD

### *Paubrasilia echinata*

#### Transfer from Appendix II to Appendix I (Brazil)

*Paubrasilia echinata* has experienced extensive historical exploitation for international trade. Its natural populations are small, fragmented, and some subpopulations have been extirpated. Based on deforestation rates within its Atlantic Coastal Forest range, the wild population is estimated to have declined by more than 80% over the past three generations. Evidence of ongoing international demand combined with reports of illegal trade suggest that illicit felling for export timber continues to affect wild populations. As such, *P. echinata* appears to meet the biological and trade criteria for Appendix I listing.

While Musical Instrument Certificates (MICs) could facilitate cross-border

movement of instruments and parts, these certificates would not apply to instruments made with *P. echinata* acquired after its initial listing in 2007. If there are concerns about the practical implications of an Appendix I listing, an alternative approach would be to retain the species in Appendix II with an amended Annotation #10 that removes exemptions for finished musical instruments, accessories, and parts, paired with a zero-export quota for wild-sourced commercial specimens. This would enhance trade controls while preserving the ability to use MICs for non-commercial movement.

REJECT



CoP20 Prop. 47

## *Pterocarpus soyauxii*

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

Available information suggests that *P. soyauxii* populations in Angola, Cameroon, Congo, the Democratic Republic of the Congo, Central African Republic, Equatorial Guinea, and Gabon may not meet Appendix II criteria. These countries report measures to ensure sustainable and legal harvesting and trade of the species, with regeneration appearing adequate within managed concessions. However, illegal logging remains a key threat, though its scale and impact are difficult to quantify. Uncertainty also persists regarding the sustainability of current harvest levels and the status of NDFs for the species in some exporting range States.

Although there are scientific techniques that can differentiate *P. soyauxii* from other *Pterocarpus* species, enforcement officers may lack access to such tools. This presents challenges, particularly in distinguishing *P. soyauxii* from *P. erinaceus*, an Endangered species

subject to multiple CITES trade suspensions. Timber from populations proposed for delisting would be differentiated from those remaining in Appendix II solely by their stated origin. Given that timber consignments are frequently consolidated in Central Africa, often in Cameroon, from several countries, including those with weaker enforcement capacity, there is a risk that timber of uncertain or illegal origin could enter trade under the guise of legally sourced material. For this reason, *P. soyauxii* appears to continue meeting the 'lookalike' criteria.

If adopted, this proposal would result in a split-listing of *P. soyauxii* populations, with Nigerian populations remaining in the Appendices and others excluded. Annex 3 of Res. Conf. 9.24 (Rev. CoP17) advises against such split-listings due to potential enforcement challenges, though there are limited precedents where they have been applied.





ACCEPT

CoP20 Prop. 48

***Aloe bergeriana, Aloe jeppeae, Aloe subspicata, Aloe welwitschii***

**Inclusion in Appendix II, as part of the listing of the *Aloe* spp.** (Depository Government (Switzerland), South Africa and Zimbabwe)

The genus *Aloe* comprises over 600 species, mostly native to Africa, and has been listed in CITES Appendix II since 1975, with 21 species now in Appendix I. *Aloe bergeriana* is native to Namibia, South Africa, and Zimbabwe; *A. subspicata* occurs in Botswana, Eswatini, Lesotho, Namibia, and South Africa; *A. jeppeae* is endemic to South Africa; and *A. welwitschii* is endemic to Angola. There is no evidence of international trade in any of the four species, nor is there likely to be significant demand for wild-collected specimens.

While the flowers of these species are distinct from other *Aloe* species, their bulbous bases and thin, grass-like leaves closely resemble other small bulbous

grass aloes already listed under the genus, making it difficult to visually distinguish them in trade. Still, since none of these species is known to be threatened or traded internationally, they do not meet the biological criteria for inclusion in Appendix II. Although their similarity to other listed grass aloes could meet “lookalike” criterion, there is currently no known trade in wild-collected specimens of these similar species. Nonetheless, including these four species under the genus listing, rather than excluding them via annotation, may provide a clearer and more streamlined approach consistent with the guidance in Resolution Conf. 12.11 (Rev. CoP19) on Standard Nomenclature.



ACCEPT

CoP20 Prop. 49

**PARLATORE’S PODOCARP**  
***Podocarpus parlatorei***

**Transfer of from Appendix I to Appendix II (Argentina)**

Available information indicates that *Podocarpus parlatorei* does not have a small wild population and can be locally abundant. Although its area of occupancy is relatively restricted and affected by development, deforestation of its habitat has been limited. While the species faces climate-related risks, projected population declines do not appear sufficient to justify its retention in Appendix I.

Significant international trade in this species has not been recorded for nearly five decades, and there is no evidence that future demand would pose a threat to wild populations. There is some potential interest in its use as an ornamental tree in temperate horticulture.

CoP20 Prop.50

***Avonia quinaria***

**Transfer from Appendix II to Appendix I (South Africa)**

*Avonia quinaria* is a slow-growing species with a restricted and fragmented distribution, occurring primarily in South Africa and only marginally in Namibia, where little information is available. The species is intrinsically vulnerable due to its biology and has been heavily impacted by collection for the ornamental plant trade, reportedly leaving many populations largely or entirely depleted of mature individuals.

These factors indicate that the species meets the biological and trade criteria for inclusion in Appendix I.

It should also be noted that the transfer of the genus *Avonia* to *Anacampseros* has been proposed in the revision of CITES standard nomenclature at CoP20 (document CoP20 Doc. 110). If adopted, the species would henceforth be referred to as *Anacampseros quinaria*.



ACCEPT

CoP20 Prop. 51

***Aloe ferox***  
***Euphorbia antisyphilitica***

**Amend annotation #4 (United Kingdom of Great Britain and Northern Ireland (as Chair of the Working Group on Annotations))**

The proposal seeks to amend Annotation #4, paragraph f), so that it reads: “f) finished products packaged and ready for retail trade of *Aloe ferox* and *Euphorbia antisyphilitica*” rather than the current wording “f) finished products of *Aloe ferox* and *Euphorbia antisyphilitica* packaged and ready for retail trade”. This change addresses a minor ambiguity in the current wording, which does not clearly specify whether it applies to all finished products of *Aloe ferox* or only those packaged and ready for retail sale. The amendment aligns the language with that used in paragraph g) of Annotation #4 and harmonises it with the definition of “finished

products packaged and ready for retail trade” provided in paragraph 8 of the interpretation section of the Appendices:

“Products, shipped singly or in bulk, requiring no further processing, packaged, labelled for final use or the retail trade in a state fit for being sold to or used by the general public.”

Adoption of this amendment would not substantively affect trade in *Aloe ferox* or *Euphorbia antisyphilitica* but would ensure clarity and consistency with similar language used in Annotations #2 and #13.



ACCEPT



## PHOTO CREDITS

- p.4 Bernard Dupont / Wikimedia  
p.7 Adam Azim / Unsplash  
p.8 Harshil Gudka / Unsplash  
p.15 Red Charlie / Unsplash  
p.22 Colin Watts / Unsplash  
p.25 Christian Gloor / Wikimedia  
p.34 Dmitry Konstantinov / Wikimedia  
p.38 ANSAB  
p.41 Frank Vincentz / Animalia.bio  
p.42 iStock  
p.44 Aurthur Chapman/ Flickr  
Jbooba/ Pixabay  
p.45 Biodiversity Challenge Fund / Flickr  
p.46 Byrdyak / Wikimedia  
p.47 Joybot / Wikimedia  
p.48 Rushikesh Deshmukh / Wikimedia  
p.49 Chris Earley / Flickr  
NOAA Photo Library / Wikimedia  
p.50 Ikiwaner / Wikimedia  
p.51 Spitzmaulnashorn / Wikimedia  
p.52 Gail Hampshire / Wikimedia  
Atamari / Wikimedia  
p.53 Leif Blessing / Pexels  
p.54 xiSerge / Pixabay  
p.55 Tommy Andriollo / Wikimedia  
p.56 Becky Matsubara / Flickr  
p.57 David Merrett / Flickr  
Félix Uribe / Flickr  
p.58 Ramespin / Wikimedia  
Smithsonian's National Zo / Flickr  
p.59 Rhett Dodd / iNaturalist  
Scott Ableman / Flickr  
p.60 Vince Smith / Flickr  
Guppiecat / Flickr
- p.61 OZinOH / Flickr  
Bernard Dupont / Flickr  
p.62 Sergey Yeliseev / Flickr  
p.63 Cvf-ps / Wikimedia  
p.64 Alex Burton / iNaturalist  
p.65 NOAA Photo Library / Wikimedia  
p.66 Matthew T Rader / Wikipedia  
Matt Kieffer / Wikipedia  
p.67 Mononoke / Wikimedia  
p.68 J. Grimshaw / iNaturalist  
p.69 Wild Wind / Wikimedia  
p.70 Philippe Bourjon / Wikimedia  
p.71 Mon Galloway / iNaturalist  
p.72 Micha L. Rieser / Wikimedia  
p.73 Markus Burgener / TRAFFIC  
p.74 Tom Potterfield / Flickr  
Paola Mosig Reidl / TRAFFIC  
p.75 Frank Vincentz / Wikimedia  
Geethaka99 / Wikimedia  
p.76 Martin Heigan\_flickr  
p.77 Sylvain Piry / PlantNet  
p.78 Brandizzi / Wikimedia  
p.79 Daniel262 / PlantNet  
p.80 Graham G. / iNaturalist  
Agnieszka Kwiecien / Wikimedia  
p.81 Yakovlev Alexey / Wikimedia  
Kousvet / Wikimedia  
p.83 Nick Athanas / Flickr

Black-billed seed finch - *Sporophila atrirostris*





WORKING TO ENSURE THAT TRADE  
IN WILD SPECIES IS LEGAL AND  
SUSTAINABLE, FOR THE BENEFIT OF  
THE PLANET AND PEOPLE.

**TRAFFIC**

Funding provided by



TRAFFIC  
+44(0)1223 331 997  
[traffic@traffic.org](mailto:traffic@traffic.org)  
[traffic.org](https://traffic.org)