RECOMMENDATIONS ON PROPOSALS TO AMEND THE APPENDICES AND WORKING DOCUMENTS FOR CITES COP20

CENTER FOR BIOLOGICAL DIVERSITY

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Introduction

We are in the midst of a spiraling, global extinction crisis. An estimated one million species are headed toward extinction, and millions more are declining.[1] Both beloved and barely-known species around the globe are threatened by habitat destruction, climate change, and critically, burgeoning exploitation including for commercial trade. Each year, millions of animals are plucked from their wild habitats to enter trade as pets, décor, trophies, and trinkets, as Parties to CITES it is your responsibility to protect wildlife from overexploitation. We strongly urge your support for proposals to increase protections for imperiled species around the globe and stand ready to assist you in this endeavor.

Please reach out for any assistance.

Tanya Sanerib
International Legal Director, Senior Attorney
tsanerib@biologicaldiversity.org

Sarah Uhlemann
International Program Director, Senior Attorney
suhlemann@biologicaldiversity.org

Alex Olivera
Mexico Representative, Senior Scientist
aolivera@biologicaldiversity.org

Chris Shepherd
Conservation Advocate
cshepherd@biologicaldiversity.org

The Center for Biological Diversity is a nonprofit conservation organization with more than 1.8 million members and online activists dedicated to the protection of endangered species and wild places. Learn more at www.biologicaldiversity.org/.

[1] https://ipbes.net/global-assessment

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Proposals for Amendment of the Appendices

Proposal 2 **Dorcas gazelle (*Gazella dorcas*)**
By Benin, Burkina Faso, Mali, Mauritania, Niger, Nigeria, Senegal, Sudan, Tunisia
SUPPORT
Inclusion in Appendix II

Dorcas gazelle (*Gazella dorcas*) is Vulnerable according to IUCN. Having undergone a 30% decline over the past three generations while facing threats from hunting (including sport and trophy hunting by foreigners), habitat degradation due to livestock and drought, and illegal trade, the species meets the criteria for Appendix II listing. Found in Algeria, Chad, Djibouti, Egypt (Sinai), Eritrea, Ethiopia, Israel, Jordan, Libya, Mali, Mauritania, Morocco, Niger, Somalia, Sudan, Tunisia, Western Sahara, and possibly in Burkina Faso, Nigeria, and Senegal, the species is traded internationally for its horns, meat, and skins as well as to meet demand for medicine, trophies, and the pet and live animal trade. Additionally, regulating trade in Dorcas gazelle would align CITES and CMS protections for this species, which CMS identified as "highly vulnerable (mean score ≥0.83) and likely to be very highly threatened by use and trade."[2]

Proposal 4 **Giraffe (*Giraffa camelopardalis*)**
By Namibia, South Africa, United Republic of Tanzania, Zimbabwe
OPPOSE
Removal of populations from Angola, Botswana, Eswatini, Malawi, Mozambique, Namibia, South Africa, and Zimbabwe from Appendix II

Giraffes (*Giraffa camelopardalis*) are assessed as Vulnerable by IUCN and should all remain on Appendix II. Proposal 4 seeks to delist certain giraffe populations in southern Africa, which would present substantial taxonomic and enforcement challenges if adopted. As the Parties recognized in 2019 in listing giraffes on Appendix II, the species is facing threats and increasing trade that warrant at least regulating trade through an Appendix-II listing.

While giraffe taxonomy has long been deliberated, CITES currently recognizes only one species of giraffes, as does IUCN and CMS. Proposal 4, however, relies upon literature recognizing four species of giraffe—Masai, northern, southern, and reticulated. Using alternate nomenclature references without going through the process for adopting such references is inconsistent with CITES' nomenclature protocols and Annex 6 to Resolution Conf. 9.24 (Rev. CoP17) and Resolution Conf. 12.11 (Rev. CoP19).

Additionally, Proposal 4 pertains to only a subset of range countries of the "southern giraffe" species. Zambia is not covered by the Proposal. Thus, Proposal 4 concerns only giraffes in Angola, Botswana, Eswatini, Malawi, Mozambique, Namibia, South Africa,

[2] UNEP/CMS/COP14/Doc.21.2 (available at: https://www.cms.int/en/document/assessment-risk-posed-cms-appendix-i-listed-species-direct-use-and-trade).

and Zimbabwe. However, the Proposal fails to specifically address each of these countries and provide the relevant supporting information for delisting giraffes in *each* country. For example, the Proposal focuses primarily on South Africa while often excluding discussion of papers or even data from other countries in discussing habitat trends, utilization, and threats. The lack of support for delisting in each of the eight countries to which the Proposal pertains warrants its denial.

Further, the Proposal fails to address major enforcement problems that would result from delisting some giraffes and maintaining others on Appendix II. Contrary to Proposal 4, giraffe specimens are not readily distinguishable, particularly bones, tails, skin pieces, and skulls. Even experts cannot necessarily discern where skins came from nor differentiate between giraffes from different regions or the different suggested species (and subspecies) that are being recognized (Dagg & Foster, 1982: 54; Seymour, 2001: 95, 106; Hausen, 2017: 26).[3] Certainly, there is no way to distinguish between giraffes in Zambia that are part of the southern "species" and would require CITES permits under Proposal 4 and giraffes in neighboring countries of the same "species" that would not.[4] The Proposal also fails to fully address laundering of giraffe specimens. Instead, it merely asserts cross-border trafficking does not take place because entire giraffes are so large. This is disingenuous when giraffe specimens—including skins, tails, bones, and even heads—can be readily transported. These enforcement concerns are precisely why Resolution Conf. 9.24 (Rev. Cop17) cautions against split-listing proposals. Thus, the Parties should deny Proposal 4 and maintain all giraffes on Appendix II.

Proposal 5 **Okapi (*Okapia johnstoni*)**
By Democratic Republic of the Congo
SUPPORT
Inclusion in Appendix I

IUCN has assessed the okapi (*Okapia johnstoni*), which is endemic to the Democratic Republic of the Congo, as Endangered due to an over 50% population decline in the last 25 years. Severe declines have occurred in the Okapi Wildlife Reserve, and the species has likely been extirpated from portions of its habitat. The okapi's primary threat is local hunting for meat; however, there is a documented international illegal trade in okapi skins, bones, and fat across the border into Uganda. Habitat loss is also a threat. As a highly threatened, endemic species in illegal trade, the okapi warrants inclusion on Appendix I.

[3] Dagg, A. I., & Foster, J. B. (1982) The Giraffe: Its Biology, Behavior, and Ecology. Krieger Publishing Company, Malabar (FL); Seymour, R. (2001). Patterns of subspecies diversity in the giraffe, Giraffa camelopardalis (L. 1758): Comparison of systematic methods and their implications for conservation policy. PhD thesis, University of Kent at Canterbury; Hausen N. (2017) Computer-aided photographic pelage pattern analysis of Giraffa camelopardalis (Artiodactyla: Giraffidae). M.Sc. Thesis, University of London.
[4] We point out that if multiple species of giraffe are recognized generally Zambia is a range country for two such species.

Proposal 7 **Guadalupe fur seal (*Arctocephalus townsendi*)**
By Mexico, United States of America
OPPOSE
Transfer from Appendix I to II

The Guadalupe fur seal (*Arctocephalus townsendi*) was hunted to near-extinction by the 1920s due to the skin trade. Although the population has shown a gradual increase, the species remains highly vulnerable and should continue to be listed on Appendix I. Breeding remains critically concentrated, with approximately 99% of all births occurring on Guadalupe Island. In contrast, recolonized sites such as San Benito support only minimal breeding activity, just 59 pups were recorded there in 2022. This extreme reliance on a single breeding location leaves the species especially susceptible to both natural and human-induced threats. Haul-outs occur on thin shoreline ledges at the base of coastal cliffs, which are highly exposed to sea-level rise. El Niño events, pollution, and bycatch add further pressure.

Downlisting the Guadalupe fur seal would open international, commercial trade and create enforcement challenges. Non-experts, including inspection officers, struggle to tell *Arctocephalus* skins apart, and the specialist traits used for identification (flipper shape, skull/teeth, palate width) are subtle in traded forms. Trade data shows ~3,000 recorded transactions in the genus—mostly for skins—and *A. townsendi* parts and even an illegal skull export have been traded, creating a realistic laundering pathway. Retaining Appendix-I listing is the precautionary choice.

Proposal 8 **Caribbean monk seal, extinct (*Monachus tropicalis*)**
By Mexico, United States of America
OPPOSE
Delete the extinct species *M. tropicalis* from Appendix I

The Caribbean monk seal (*Monachus tropicalis*) is proposed for removal from Appendix I because the species has gone extinct. Under Resolution Conf. 9.24 (Rev. CoP17) Annex 4(D), taxa that may be extinct should not be deleted when they closely resemble extant listed species such that specimens are liable to be confused. The proponents acknowledge *Monachus tropicalis* closely resembles *M. monachus* and *M. schauinslandi*. Reliable identification rests mainly on osteological characters (e.g., cranial/dental morphometrics), which are not practicable for routine inspection of traded materials (skins, mounts, derivatives).

Removing a listed species encourages future deletions of extinct/possibly-extinct taxa despite those species posing look-alike problems, shifting reliance to uneven national laws and exposing gaps that CITES is supposed to level across Parties. Appendix-I permitting for museum/scientific transfers creates an auditable paper trail. Delisting a species compromises global traceability and oversight.

Proposal 9 **White rhino (*Ceratotherium simum simum*)**
By Namibia
OPPOSE
Amendment to Annotation to allow Namibia to trade in white rhino horn

A mere 1,500 southern square lipped white rhinos (*Ceratotherium simum simum*) are in Namibia (Prop. 9 at 3). IUCN has assessed the species as Near Threatened but has warned this status would quickly change without the conservation efforts in place today. Given the small population and threats it faces, white rhinos in Namibia meet the criteria for listing on Appendix I of CITES. Rhino poaching increased in Namibia in 2024 when 83 rhinos were poached compared to 77 in 2023 (CoP20 Doc. 84 Annex 3 at 54). This rise followed the 94 poached rhinos in 2022, which Namibia has described as "one of its worst years" of poaching (SC78 Inf. 44 at 10). Given the small number of white rhinos in Namibia and the significant threat that poaching for the rhino horn trade poses to these animals, the ban on rhino horn that has been in place since 1977 should remain in effect.

Proposal 9 would risk a significant poaching increase coupled with a spike in illegal rhino horn trade. The Proposal should be rejected because of these risks but also because it lacks adequate safeguards—it neither ensures that only lawfully obtained specimens would be traded (i.e., by accounting for existing such stockpiles and their size) nor proposes to use a certification system (RHODIS) that is designed to function as a traceability tool. The risk such trade would pose to rhinos and the backtracking it would cause to the work done to reduce demand and close markets in consumer countries are far too significant to warrant CITES Parties' support. Moreover, the Proposal does not explain who would buy rhino horns given there are no legal markets.

Additionally, at CoP19, Namibia submitted a proposal to place its white rhino population on Appendix II with an annotation allowing for trade in live animals and hunting trophies, with all other specimens being treated as Appendix I specimens. This proposal was soundly rejected and narrowed to only allow Appendix II trade in live animals for in-situ conservation within the natural and historical range of *Ceratotherium simum simum* in Africa. Narrowing Appendix II white rhino trade in this manner is essential for ensuring the animals are only used for actual conservation purposes within their range and that hunting trophies are only traded with both export and import permits being issued to ensure that the hunting offtake is not detrimental to the species' survival. As the IUCN and TRAFFIC report for CoP19 indicated, high offtakes of white rhinos as hunting trophies in Namibia (ranging from "0.37% to 1.78% harvesting rates of the annual white rhino population") occurred from 2018–2021. Given these rates have extended beyond typical sustainability measures (without even accounting for any other forms of mortality), it appears the existing protections are still critical for this species.

Proposal 10 **Black rhino (*Diceros bicornis bicornis*)**
By Namibia
OPPOSE
Proposal for commercial trade in black rhino horn through Appendix II downlisting

The IUCN has assessed the black rhino (*Diceros bicornis*) as Critically Endangered, and the species continues to meet the criteria for listing on Appendix I: the population is small and highly vulnerable to poaching and illegal trade.

While overall the IUCN and TRAFFIC rhino report indicates an increase in black rhinos, the decline in continental Africa "was mainly driven by losses in Namibia and South Africa" (CoP20 Doc. 84 Annex 3 at 15). The black rhino subspecies to which Proposal 10 pertains has decreased, not increased (id. at 3), with the decline being attributed to Namibia and the fact that "increasing poaching pressures, drought and natural mortality rates exceeding birth rates" (id. at 18). Thus, the black rhino does not qualify for downlisting to Appendix II.

Additionally, the Proposal to allow black rhino horn trade would undercut efforts to reduce consumer countries' demand and the provision in Resolution Conf. 9.14 (Rev. CoP19), which calls for implementation of strategies to measurably alter consumer use. Perhaps most alarmingly, Proposal 10 relies upon illegal trade data to estimate rhino horn demand, presenting a flawed analysis that vastly underestimates demand by ignoring latent demand or demand that would result from legalization of the trade. Additionally, the Proposal does not explain who would buy rhino horns given there are no legal markets. Black rhino populations are simply too small and too vulnerable to poaching and illegal trade to support downlisting to Appendix II.

Proposal 11 **Hoffmann's two-toed sloth (*Choloepus hoffmanni*) and Linnaeus's two-toed sloth (*C. didactylus*)**
By Brazil, Costa Rica, Panama
SUPPORT
Inclusion of *C. hoffmanni* in Appendix II and *C. didactylus* as look-alike

Hoffmann's two-toed sloth (*Choloepus hoffmanni*) qualifies for inclusion in CITES Appendix II due to ongoing international trade that contributes to continuing population declines, particularly in Colombia, Central America, and parts of Brazil and Bolivia. While it assessed two-toed sloths as Least Concern, IUCN notes the species is decreasing, with habitat destruction, fragmentation, and wildfires being major threats. However, illegal international trade, particularly for the pet and tourism industries, is an urgent and growing concern, exacerbating pressures on already vulnerable populations.

C. hoffmanni is heavily trafficked within and beyond its range states. In Colombia alone, tens of thousands of sloths were captured and sold prior to 2015, primarily as pets. Most are infants, taken from their mothers, often resulting in extremely high mortality, up to

90%, during capture or transport. Trafficking routes extend from Colombia to Panama, Costa Rica, the United States, Europe, and the Middle East, with recent seizures in Peru, Brazil, and Honduras. Sloths are also sold for photo opportunities; used in crafts and jewelry; and traded locally for food, medicine, or magical-religious purposes.

There is no evidence of commercial captive breeding operations in range states, and sloths are notoriously difficult to breed in captivity. Most sloths in trade should therefore be assumed to be wild caught.

While habitat loss remains the primary long-term threat, illegal international trade is an immediate and growing risk to the survival of both *C. hoffmanni* and *C. didactylus*. The latter, although less well-studied, is frequently traded across borders and is nearly indistinguishable from *C. hoffmanni* without genetic analysis. This makes enforcement extremely difficult. As such, *C. didactylus* meets the CITES look-alike criteria and must be included alongside *C. hoffmanni* to enable effective regulation.

Proposal 13 **African elephant, African savannah elephant (*Loxodonta africana*)**
By Namibia
OPPOSE
For trade in elephant ivory

African savannah elephants (*Loxodonta africana*) are assessed as Endangered by IUCN. Opening trade in ivory would undermine elephant conservation and spark significant illegal ivory trade. Namibia's Proposal to resume a legal ivory trade, even at the scale of one country, would create new demand for ivory, resulting in increased poaching and trafficking. Indeed, MIKE and ETIS data from the 2008 one-off sale of ivory show a significant increase in poaching and illegal ivory seizures both before and after the sale. The Proposal is also counter to international efforts to close domestic ivory markets and curtail global demand. The ivory ban is a central pillar of CITES and allowing it to crumble would be detrimental to African elephant survival as well as efforts to curb illegal wildlife trade—especially because ivory is often trafficked with other wildlife specimens.

Proposal 14 **Four African elephant populations**
By Botswana, Cameroon, Côte d'Ivoire, Namibia, Zimbabwe
SUPPORT WITH AMENDMENTS
Amendments to Annotation A10

We appreciate the time and energy that went into the dialog meeting and effort to reach consensus on amendments to Annotation 10 pertaining to live trade of elephants in Africa. However, the proposed amendments could be more precise in paragraph (b) by adding language defining appropriate and acceptable destinations. Deleting the now-dated provisions in paragraphs (g) and (h) pertaining to the previous and disastrous one-off sales would be a step forward for elephants. We suggest that instead of amending consensus language, the existing language in paragraphs (e) and (f) be retained, especially because the focus of the dialog meeting was on live trade—not

leather or ivory trade. However, if these provisions are to be amended, then the final amended language for paragraph (f) should *not* allow for any commercial trade in ivory—even small specimens such as jewelry, ekipas, and carvings.

Proposal 15 **African hornbills (*Bycanistes* spp. and *Ceratogymna* spp.)**
By Cameroon, Congo, Gabon, Niger, Nigeria, Senegal, Sierra Leone, Togo
SUPPORT
Include both genera (7 spp.) on Appendix II

Hornbill species within the genera *Ceratogymna* and *Bycanistes* warrant inclusion in Appendix II due to unregulated international trade of their heads and in some cases, their elaborate casques, and their biological vulnerability. Several seizures of hornbill heads have taken place in Nigeria, including a significant operation by the Nigeria Customs Service in March 2025 at the Mfun/Ekok border, where 128 hornbill heads were confiscated, underscoring the scale and persistence of the international wildlife trade. These species are highly susceptible to overexploitation because they have slow reproductive rates and specialized breeding behaviors. They also face significant threats from habitat loss, degradation, and fragmentation. The additional pressure of hunting for international trade exacerbates their ongoing population declines.

Currently, there are no international trade controls for these species. There is no evidence of commercial captive breeding facilities within range states, especially to supply demand for heads, suggesting that international trade is sourced from wild populations. Inclusion of the species in Appendix II would provide essential oversight of current trade and aid enforcement efforts.

Identification challenges further complicate enforcement. Parts and derivatives from *Ceratogymna* and *Bycanistes* species are often indistinguishable, both from one another and from Asian hornbill species already listed in Appendix I or II. Adding all species in the genera to Appendix II would help ensure that international trade does not contribute to unsustainable population declines.

Proposal 16 **White-backed vulture (*Gyps africanus*), Ruppell's vulture (*Gyps rueppelli*)**
By Benin, Burkina Faso, Burundi, Cameroon, Chad, Congo, Gambia, Guinea, Niger, Nigeria, Senegal, Sierra Leone, Togo
SUPPORT
Transfer *Gyps africanus* and *Gyps rueppelli* from Appendix II to Appendix I

We urge the transfer of the white-backed vulture (*Gyps africanus*) and Rüppell's vulture (*Gyps rueppelli*) from Appendix II to Appendix I, aligning CITES action with CMS commitments and the African-Eurasian Vulture MsAP.

IUCN has assessed both species as Critically Endangered, and both show very rapid, multi-decadal declines: *Gyps africanus* has fallen by a median 81% (63–89%) over ~40 years and *G. rueppelli* by ~92.5% (88–98%) over ~43 years, driven by poisoning (including mass events), belief-based trade in body parts, persecution, habitat conversion, and reduced carrion availability. The Proposal also documents substantial domestic and cross-border trade—e.g., 924–1,386 *G. africanus* and 1,128–1,692 *G. rueppelli* traded in West Africa over six years—and CITES-reported direct trade, including live wild-sourced birds (2009–2018), indicating ongoing demand and laundering risk. These facts satisfy Annex 1(A) for Appendix-I listing; an uplisting would tighten international controls, reduce laundering, and complement CMS Appendix I/MsAP and the West African Vulture Conservation Action Plan (2025).

Several range states provide national legal protection for vultures (Section 7.1). However, the enforcement of these national laws is described as inadequate, and much of the trade remains illegal and difficult to control (Sections 6.4 and 7.1).

Proposal 17 **Peregrine Falcon (*Falco peregrinus*)**
By Canada, United States of America
OPPOSE
Transfer *F. peregrinus* from Appendix I to Appendix II

The peregrine falcon (*Falco peregrinus*) should not be downlisted from Appendix I to II, as the downlisting would open opportunities for laundering and create enforcement gaps. The Proposal acknowledges that "some Parties" warned an Appendix II listing could increase demand for wild birds and/or illegal trade; it also notes a transfer "could result in increased legal trade of wild birds." While several range states provide national legal protection for peregrines, the enforcement of these national laws is not always inadequate leaving much of the trade illegal and difficult to control.

The Proposal notes that CITES trade data cannot disaggregate "Falco hybrids," which complicates tracking trade volumes and look-alike control. It also highlights the use of closed leg-ring systems to deter laundering of wild birds, implicitly acknowledging that diversion risk exists. Applying the precautionary approach, peregrine falcons should remain on Appendix I.

Proposal 18 **Great-billed seed-finch (*Sporophila maximiliani*) and 5 other seed-finch species**
By Brazil
SUPPORT
Include *Sporophila maximiliani* in Appendix I and include *S. angolensis*, *S. atrirostris*, *S. crassirostris*, *S. funereal*, and *S. nuttingi* in Appendix II as look-alikes

IUCN classifies the great-billed seed-finch (*Sporophila maximiliani*), a high-value songbird, as Endangered globally and Critically Endangered in Brazil. The global population is estimated at only 1,000–2,499 mature individuals (BirdLife International, 2019). The species' primary threat is illegal capture for trade, driven by the species' high

commercial value and popularity for its song. Despite a national ban on the export of wild-caught native species in Brazil since 1994, wild-caught individuals continue to appear in international markets, confirming ongoing illegal trafficking. Legal trade is also documented. The bird is undergoing a rapid population decline and has become rare across much of its original range. Habitat loss and degradation contribute to this trend.

Given its critical status and ongoing threats, *S. maximiliani* meets the criteria for inclusion in CITES Appendix I. Furthermore, based on the precautionary principle and the resemblance criterion, as these species are difficult to distinguish, especially by non-experts, listing *S. angolensis, S. atrirostris, S. crassirostris, S. funerea*, and *S. nuttingi*, which are also found in international trade in Appendix II, is also warranted.

Proposal 19 **Hispaniolan giant galliwasp (*Caribicus warreni*)**
By Dominican Republic
SUPPORT
Include in Appendix I

The Hispaniolan giant galliwasp (*Caribicus warreni*) warrants inclusion in CITES Appendix I. Hispaniolan giant galliwasps have experienced extensive declines due to habitat loss, predation, including by invasive mongooses, and demand for international trade.[5] The species is now considered rare and declining.[6]

Hispaniolan giant galliwasps are endemic to the Dominican Republic and Haiti. However, they are currently only known to exist in one protected area in the Dominican Republic, Loma Isabel de Torres National Monument. It is estimated that only 66 individuals currently remain there. In Haiti, the species is considered extremely rare,[7] as most records of the species are from the 1970's and more recent search efforts have been unsuccessful.[8]

Hispaniolan giant galliwasps are in demand for the pet trade. The species has been documented in trade in Germany, Czechoslovakia, Canada, and the United States.[9] The Dominican Republic does not allow collection or trade in this species. Therefore, specimens in trade are either sourced from an unknown population in Haiti or are

[5] Landestoy, M., Inchaustegui, S. & Powell, R. 2016. Celestus warreni (errata version published in 2017). The IUCN Red List of Threatened Species 2016: e.T39260A115172613. https://dx.doi.org/10.2305/IUCN.UK.2016-3.RLTS.T39260A71739879.en. Accessed on 12 September 2025.
[6] *Id.*
[7] *Id.*
[8] CITES (2025). Amendments to Appendices I and II of the Convention: Proposal 19 – Celestus warreni (Warren's galliwasp) (CoP20 Prop. 19). Convention on International Trade in Endangered Species of Wild Fauna and Flora, 20th meeting of the Conference of the Parties, Geneva, Switzerland. Retrieved from https://cites.org/sites/default/files/eng/cop/20/prop/E-CoP20-Prop.19.pdf
[9] *Id.*

illegal.[10] Including Hispaniolan giant galliwasps in Appendix I would ensure that international trade does not contribute to further declines in the species' remaining small and fragmented wild populations.

Proposal 22 **Galápagos marine iguana (*Amblyrhynchus* spp.)**
By Ecuador
SUPPORT
Transfer the genus *Amblyrhynchus* spp., represented by the Galápagos marine iguana, (*Amblyrhynchus cristatus*), from Appendix II to Appendix I

Marine iguanas (*Amblyrhynchus* spp.) face numerous, serious threats and continue to appear in the pet trade illegally. Marine iguana populations are vulnerable to environmental variability, experiencing dramatic declines during El Niño events, with mortality rates reaching 10% to 90%. These extreme weather events are expected to increase in frequency and severity due to climate change. Marine iguanas are also increasingly threatened by human activities in and around populated areas.

Illegal capture and international trafficking also pose a growing threat to the species. While Ecuador has never authorized the commercial export of live specimens of marine iguanas, and collection remains strictly prohibited in the Galápagos Islands, they continue to appear in the international exotic pet trade.

IUCN currently classifies the Galápagos marine iguana (*Amblyrhynchus cristatus*) as Vulnerable. Population estimates range broadly from 19,800 to 210,000 individuals, although data remains limited and imprecise. Despite this uncertainty, evidence points to a continuing downward population trend.

Amblyrhynchus cristatus meets the criteria for inclusion in Appendix I. Such a listing would afford the species the highest level of international protection, prohibiting commercial trade globally and reinforcing domestic conservation efforts.

Proposal 25 **Rattlesnakes (*Crotalus lepidus, C. ravus*) and *Crotalus* spp. and *Sistrurus* spp.**
By Bolivia and Mexico
SUPPORT
Include *Crotalus lepidus*, *C. ravus* on Appendix II and *Crotalus* spp. and *Sistrurus* spp. as look-alikes

The rattlesnakes (*Crotalus lepidus* and *Crotalus ravus*) both have narrow ranges, are naturally scarce, and face persecution and habitat alteration. Both species are protected domestically in Mexico as imperiled. Illegal offtake is substantial—*C. ravus* accounts for ~10% of rattlesnake seizures—and *C. lepidus* is widely harvested for dried-meat "medicinal" capsules (~720 snakes/year; 727 snakes used for ~68,000 specimens in 2022–2024), indicating trade-driven pressure on small, fragmented populations.

[10] *Id.*

For enforceability, genus-level inclusion under Annex 2b(A) is essential: ~85% of rattlesnake items in trade are identifiable only to genus; ~80% of seizures are parts/derivatives; and many records are logged simply as *Crotalus/Sistrurus*, making species-only listings impractical. A genus listing also reduces the need for officers to handle live venomous snakes for identification.

There is documented laundering and concentrated cross-border trade: Mexican endemics appear in commerce without Mexican permits; the U.S. recorded *C. ravus* imports years before Mexico authorized any commercial exports; and online EU sales plus bite-case reports signal a persistent illicit market. With legal flows dominated by the Mexico–U.S. corridor (~98.5% of exports; 96% of imports), Appendix-II controls—NDFs, permits, and traceability—applied at the genus level are proportionate and precisely targeted.

Proposal 26 **Home's hinge-back tortoise (*Kinixys homeana*)**
By Cameroon, Guinea, Nigeria, Togo
SUPPORT
Transfer *K. homeana* from Appendix II to Appendix I

Home's hinge-back tortoise (*Kinixys homeana*) warrants inclusion in Appendix I due to ongoing, unregulated international trade to supply demand for pets. IUCN classifies *K. homeana* as Critically Endangered, citing severe population declines across its range. This decline is driven by habitat loss, subsistence harvesting, use in traditional medicine, and intensive collection for both local markets and the international pet trade. The species is especially heavily exploited in Togo, Ghana, and Benin. There is strong evidence of local extirpations, including within protected areas, particularly where turtles are easily captured.

The species has been listed under CITES Appendix II since 1977 alongside all Testudinidae but declines have continued. Domestic collection and use often remain unregulated. Without effective regulation and sufficient habitat protection, the species faces continued collapse. Including *K. homeana* in Appendix I would help ensure that international trade does not contribute to unsustainable population declines.

Proposals 28-34 **Elasmobranchii**
SUPPORT
Numerous proponents

All seven shark Proposals warrant support. Elasmobranchii typically have life history characteristics that make them susceptible to overharvest, including long lives, late maturation, and low fecundity. Many species are threatened by an ongoing, international market for their fins, meat, and other parts.

These Proposals include transferring oceanic whitetip sharks, the family of rays and devil rays (Mobulidae spp.), and whale sharks from Appendix II to Appendix I:

- **Proposal 28: Oceanic whitetip sharks (*C. longimanus*)**: IUCN has assessed oceanic whitetip sharks as Critically Endangered, and the species has suffered a global population decline of greater than 80% in the last three generations. Despite growing international and domestic protections, overfishing and trade in Asia continues to threaten the species with extinction.

- **Proposal 30: Rays and devil rays (*Mobulidae* spp.):** The nine highly-migratory ray species in the Mobulidae family have all been assessed as threatened by IUCN, either as Vulnerable or Endangered. Rays are highly vulnerable to overharvest, as they are slow growing, late to mature, and are among the least fecund of all elasmobranchs. Threatened by direct catch for their gill plates, in demand in some traditional medicines, and bycatch, population declines have continued despite their current protections under Appendix II.

- **Proposal 31: Whale sharks (*Rhincodon typus*):** IUCN assessed whale sharks as Endangered due to an estimated global decline of 40-92% over three generations. Whale sharks are the largest and one of the least fecund shark species, reaching sexual maturity at 25 years of age. While very little legal trade occurs in the species, due in part to current CITES Appendix II-listing, bycatch and illegal trade continue to occur.

The Proposals also include adding tope and smoothhound sharks and gulper sharks to Appendix II:

- **Proposal 29: Tope (or School) and Smoothhound Sharks (*Galeorhinus galeus*, *Mustelus schmitti*, *M. mustelus*) and all other *Mustelus* spp. as look-alike:** IUCN has assessed both tope sharks (*G. galeus*) and the Patagonian narrownose smoothhound shark (*M. schmitti*) as Critically Endangered due to an >80% global population reduction over three generations and has assessed the common smoothhound shark (*M. mustelus*) as Endangered due to a 50-79% decline over three generations. All three species are targeted for their high-value meat; *Mustelus* species have been increasingly targeted as tope shark (*G. galeus*) populations have declined.

  The other species in the genus *Mustelus* (houndsharks) warrant listing for as look-alike species. The houndsharks closely resemble both *G. galeus* and other Mustelus species. The various species are commonly recorded together in catch data as houndsharks or smoothhounds. Meat and dried fin products are difficult to identify to the species level.

- **Proposal 34: Dwarf gulper shark and gulper shark (*Centrophorus atromarginatus*, *C. granulosus*), and 14 other species in the family Centrophoridae as look-alike:** IUCN has assessed *C. atromarginatus* and *C. granulosus* as Critically Endangered due to population declines of over 80% in portions of their ranges. With long lives and few pups per litter, the species' life histories make them vulnerable to overfishing. These deepwater sharks are

gravely threatened by the high value, international liver oil trade, and few management measures exist on the domestic level.

It is difficult to distinguish between the shark species in the family *Centrophorus*, and it is difficult to identify the source-species from traded products, primarily liver oil but also meat and fins.

The Proposals also include retaining giant guitarfish and wedgefish on Appendix II with a zero annual export quota:

- **Proposal 32: Giant guitarfish (*Glaucostegus* spp.):** Since these species' listing on Appendix II at CoP19, IUCN re-assessed all seven species of guitarfish as Critically Endangered due to global declines of 80-99%. As some of the highest value sharks in the fin trade, legal and illegal trade continue to threaten the species, in addition to significant bycatch and coastal development. These species clearly warrant an Appendix-I commercial trade ban, but a zero-export quota for commercial trade from the wild will at least pause trade.

- **Proposal 33: Wedgefish (family Rhinidae):** Since these species' listing on Appendix II at CoP18, all but one of the 11 species in this family is now assessed as Critically Endangered by IUCN; the last species is Near-Threatened. The gravely species are threatened by fishing for international fin, meat, and skin markets, with their fins valued especially high. These species clearly warrant an Appendix-I listing, but a zero-export quota for commercial trade from the wild will at least pause trade.

Proposal 35 **Anguillid Eels (*Anguilla* spp.)**
By European Union, Honduras, and Panama
SUPPORT
Include *Anguilla japonica* and *A. rostrata* on Appendix II and all other species not already protected by CITES in the genus *Anguilla* as look alikes

International trade has caused significant declines in the three main eel species targeted for consumption. *Anguilla japonica* and *Anguilla rostrata* are Endangered (IUCN 2018 and 2020, respectively) due to 50% population declines over three generations. The third species, *Anguilla anguilla*, is Critically Endangered and was included on CITES Appendix II in 2009 and banned from EU import, after which demand for other eel species skyrocketed.

Eels are removed from the wild at all stages of life, both as adults and as juveniles to stock eel aquaculture, which remains entirely dependent on wild stocks as commercial-scale captive breeding is not yet viable. Demand and illegal, unreported, and unregulated fishing for eels is high.

Appendix II listing of the American eel (*A. rostrata*) particularly warrants U.S. support. According to IUCN, demand for the species in Asia is "now at record-high levels," with a

20-fold increase in juvenile imports between 2004 and 2020. In 2023, the Atlantic States Marine Fisheries Commission found the species "depleted."

Anguillid eel species are almost indistinguishable in their early life stages and as processed products. Accordingly, all species in the genus *Anguilla* warrant Appendix II listing as look-alike species.

Proposal 36 **Actinopyga sea cucumbers (six species in *Actinopyga* spp.)**
By European Union
SUPPORT
Include *A. echinites*, *A. mauritiana*, *A. miliaris*, and *A. varians* in Appendix II and *A. lecanora* and *A. palauensis* as look-alikes

Actinopyga sea cucumbers are declining due to overexploitation for the beche-de-mer trade. IUCN has assessed the four species as Vulnerable with current population declines of 30-40%. Dramatic declines have occurred in multiple regions, including extirpation in some areas. The species are vulnerable to overexploitation due to their long lifespans, density-dependent reproduction, and shallow, easily-accessible habitats. Global demand for bêche-de-mer remains high, and aquaculture is minimal, with wild stocks supplying demand without stronger controls.

Processed products and overlapping morphology make species identification difficult—some Actinopyga species are even grouped as "spork"—so adding look-alikes is essential to prevent laundering. Ongoing coral-reef and seagrass loss further erode resilience, reinforcing the need for Appendix-II safeguards now.

Proposal 37 **Golden sandfish (*Holothuria lessoni*)**
By European Union
SUPPORT
Include *Holothuria lessoni* in Appendix II

The golden sandfish (*Holothuria lessoni*) clearly warrants inclusion on Appendix II. IUCN assessed the species as Endangered due to an estimated >50% global decline in its population driven by overfishing. The species recovers slowly due to shallow, easily accessible habitats, and density-dependent reproduction, and the species has suffered local extirpations, including in parts of Fiji, Vanuatu, and Tonga. *H. lessoni* has a very high-value with retail prices up to ~US$849/kg, and recent export data and UN Comtrade patterns indicate strong demand in Saudi Arabia, Hong Kong SAR, and China.

Listing in Appendix II would allow but regulate international trade, ensuring harvest is sustainable, legal, and traceable, and the FAO Expert Panel's recommendation supports the Proposal.

Proposal 38 **Rose tarantula (*Grammastola rosea*) and 14 other tarantula species**
By Argentina, Bolivia, Panama
SUPPORT
Include on Appendix II (14 other species as look-alikes)

The rose tarantula (*Grammastola rosea*), with its often pink-hued hairs, has been one of the most commonly traded tarantulas in the world. Between 2021-2024, at least 9,500 *G. rosea* were recorded in the LEMIS data as imported into the United States for the pet trade. However, actual U.S. trade was likely significantly higher, as another 8,700 tarantulas from the genus *Grammastola* were imported without the species identified and taxonomic synonyms are used, and significant demand also occurs in the European Union.

Like the vast majority of tarantula species, *G. rosea* has not been assessed by IUCN. However, many tarantula species are highly susceptible to overharvest due to their life history, including slow growth, late sexual maturity, and high female longevity, likely living for decades. Tarantulas are also highly susceptible to habitat destruction due to their limited dispersal capacity. Due to its vulnerability to its significant international trade, the rose tarantula warrants inclusion in Appendix II.

Tarantula identification is challenging for adult specimen and even more challenging for juveniles. Accordingly, the other 14 South American tarantulas proposed qualify for Appendix II as look-alike species. However, each of the 14 look-alike species has been documented in trade and likely share vulnerability to overexploitation due to life history characteristics and qualify for Appendix II listing due to these trade threats.

Working Documents

Doc. 4 **Rules of Procedure**
By the Standing Committee
SUPPORT with Amendment

Rule 25.6 of the Rules of Procedure addresses the process for how multiple proposals that pertain to the same taxon but differ in substance should be considered at the CoP. The Working Group and Standing Committee discussions clarified that, under the Rule, all proposals should be introduced and decided upon at CoP. If the first two sentences of Rule 25.6 with the amendments proposed in Document 4 are adopted, then the third sentence is not needed because all proposals will be introduced and decided upon so any proposals pertaining to multiple taxon will not require further consideration. Thus, we suggest deleting the third sentence, and this suggested amendment is indicated below in Yellow and ~~Strikeout~~. We further suggest a sentence clarifying that the last proposal adopted will serve as the decision of the CoP this is in Green.

> 6. If two or more proposals including proposals amended in accordance with Rule 24, paragraph 2 or in accordance with paragraph 5 of this Rule,

relate to the same taxon, but are different in substance, the Chair shall so advise the Conference, clearly indicating the implications of the adoption of one proposal for the other(s), and allow each of the proposals to be introduced prior to submitting any of them for discussion and decision. ~~t~~The Conference shall first decide on the proposal that will have the least restrictive effect on the trade and then on the proposal with the next least restrictive effect on the trade, and so on until all proposals have been submitted to decision. ~~When however, If, in relation to the same taxon, the adoption of one proposal necessarily implies the rejection of another proposal, the latter proposal shall nevertheless not be submitted to decision in relation to any other taxon remaining in the latter proposal~~. If more than one proposal is adopted, in the event of any conflict or inconsistency between the proposals, the last proposal adopted by the CoP will prevail. Nothing in the procedure stipulated in this paragraph is intended to affect the procedure in the other paragraphs of Rule 25.

If these amendments are adopted, then there is no need for the proposed Decision. If none of the amendments are agreed upon, then a Decision should be adopted to carry forward the discussions on Rule 25.6. We suggest amendments to ensure formation of an intersessional working group and a clearer mandate.

The Standing Committee shall, with the support of the Secretariat and an intersessional working group, and building on the work conducted in previous intersessional periods, continue to consider ~~whether to include a stepwise~~ the approach for considering and adopting amendment proposals with overlapping taxa in Rule 25.6 of the Rules of Procedure of the Conference of the Parties and propose amendments, as appropriate, to the 21st meeting of the Conference of the Parties.

Doc. 17 World Wildlife Trade Report
By the Standing Committee
REJECT

Widespread concerns have been raised with this Report, including its utility for aiding CITES Parties in meeting the Convention's aims and the burden continued production of the Report would place on CITES Parties by including the monetary value of specimens traded in their CITES annual reports. Given the need to focus CITES' resources on its core objectives, we urge Parties to discontinue this agenda item.

Doc. 35.3 Compliance Matters: Totoaba
By the Secretariat
SUPPORT with Amendment

Totoaba remains a critical issue on the CITES agenda, as fewer than 10 vaquita likely remain, and—after nearly a decade of CITES directives—Mexico continues to fail to meet the Parties' urgent recommendations to stop its illegal totoaba fishing and trade, which is the primary threat to the vaquita. While Mexico has made progress in implementing

its Compliance Action Plan (CAP), critical deficiencies remain, such as inadequate enforcement, including land-based inspection, and failure to install monitoring systems on all vessels. Illegal fishing continues to occur outside of the Zero Tolerance Area (Zo), in areas where vaquita are known to inhabit.

While we support many of the Secretariat's recommendations, we urge Parties to amend and strengthen the draft Decision text contained in Annex I to Doc. 35.3. These include recommendations to: expand the boundaries of the Zo to cover areas of documented vaquita distribution; reactivate the Expert Committee on Fishing Technologies (ECOFT) to advise on transition to alternate gear; urgently conclude and maintain all milestones in the CAP; and fully implement and maintain Mexico's domestic 2020 Agreement regulating gear, systems, methods, techniques and schedules for fishing, including landing-site and vessel-monitoring provisions. This serious compliance matter has been under the Parties' review for nearly a decade, and the Parties should urgently press Mexico to finally, fully halt illegal totoaba fishing and trade to save the vaquita.

Detailed proposed amendments can be consulted here.

Doc. 48 Proposed Amendments to Resolution Conf. 12.3
By Burundi, Cameroon, the Central African Republic, Congo, the Democratic Republic of the Congo, Equatorial Guinea, and Gabon
OPPOSE

This document suggests amendments to Resolution Conf. 12.3 on permits and certificates with the objective of attempting to address delays in the issuance of import permits. The proposed amendments are in tension with the language and concepts in existing Resolutions such as Resolution Conf. 2.11 paragraph (c), Resolution Conf. 18.7 (Rev. CoP19), and Resolution Conf. 17.9.

The proposed amendments would undermine the work CITES is doing to ensure adequate legal acquisition findings are made by suggesting that any specimen listed on an export permit is presumed to have been legally acquired. Instead, legal acquisition findings must be made separately from the export permit and should follow the guidance in the Annexes to Resolution Conf. 18.7 (Rev. CoP19).

Additionally, the suggested procedures for dispute resolution are costly and impracticable particularly as they may require members of the Animals or Plants Committee to interpret importing Parties' domestic laws. Given these concerns, we recommend opposing this proposal.

Doc. 59 Stocks and Stockpiles
By the Standing Committee
SUPPORT with Amendment

This document details the intersessional work to clarify the terms stocks and stockpiles. It proposes to use the term stockpile, to amend several Resolutions to change stocks to stockpiles, and to include a definition of stockpiles to be added to the CITES glossary.

We urge support for this definition with the following amendment. Specimens held for enforcement purposes must be included in the definition of stockpiles; exempting those specimens would create a loophole undermining CITES' Parties ability to review and understand the quantity of stockpiles held.

> 'Stockpiles' refer to any quantity of legally stored dead specimens, including parts and derivatives, of CITES-listed species held by public or private entities. Specimens included in permanent collections held by scientific institutions for non-commercial purposes or by individuals as personal or household effects~~, as well as seized or confiscated specimens still under an enforcement procedure,~~ are excluded from the definition. In general, provisions related to stockpiles in CITES Resolutions and Decisions are intended to ensure that these are secured, managed and disposed of in such a way that the specimens would not enter or re-enter illegal trade and for specimens of species listed in Appendix I not to be used commercially.

Doc. 73 Trade in Endemic Species
By Brazil and Ecuador
SUPPORT with Amendment

Doc. 73 it is important for aiding Parties in the conservation of their native and endemic species. We urge support for this effort and recommend strengthening the Decision directed to the Standing Committee to call upon it to make appropriate recommendation to CoP21.

Doc. 82 Guidance on Non-Detriment Findings for Trade in Leopard (*Panthera pardus*) Hunting Trophies
By the Animals Committee
AMEND

Assessed as Vulnerable by IUCN, leopards (*Panthera pardus*) are suspected to be declining although the species is little studied. Unsustainable offtake, including from trophy hunting, is thought to play a role in leopard decline. As documented at AC30, when South Africa studied its leopard population, then the only robust population trend data available, it found an 8% annual decline (AC30 Inf. 23 at 2). Due to suspected leopard declines and quotas for leopard hunting trophies that have long come under scrutiny due to the faulty rainfall model upon which they are based, leopards require conservation attention.

Nevertheless, the current Decisions as amended would cut importing countries, scientific experts, and other CITES stakeholders out of the process for developing Non-detriment Findings for leopards. Given the dire need for data on leopard population trends both for assessing the species' status in Africa as well as for ensuring that the trophy trade is not detrimental, we recommend rejection of the amendments to Decision 18.169 (Rev. CoP20) paragraph b so the Decision reverts to the previous version adopted

at last CoP. Additionally, we suggest that the CITES Parties consider whether a review of the leopard quotas is warranted during the next intersessional process.

Doc. 84 Rhinoceroses
By the Standing Committee and Secretariat
SUPPORT with Amendment

This document carries forward critical work to address illegal trade and poaching of rhinos. As evidenced by the IUCN and TRAFFIC report in Annex 3, rhino conservation needs to remain a priority at CITES.[11] While black rhino populations have generally increased minimally since 2023, although that is not the case for the southwestern sub-species, and white rhinos declined by 11.2% since 2023. Poaching and the illegal horn trade remain grave threats to both black and white rhinos. For this reason, we recommend strengthening the Decisions in Annex 1 and adding an additional Decision directed to the Standing Committee:

> Directed to the Standing Committee
>
> 20.DD The Standing Committee shall consider the report and recommendations of the Secretariat and the recommendations of the intersessional working group in accordance with Decisions 20.CC and 20.EE and make recommendations to the Parties or the Secretariat, as appropriate.
>
> 20.EE The Standing Committee shall:
> a) establish an intersessional working group to:
> i) consider the information provided by Parties to the Secretariat on their implementation of Decisions 18.116, 20.AA, and 20.BB;
> ii) consider the information contained in the report prepared by the IUCN/SSC African and Asian Rhino Specialist Groups and TRAFFIC contained in CoP20 Doc. 84 Annex 3;
> iii) consider other relevant published literature, peer-reviewed papers, and CITES reports; and
> iv) make appropriate recommendations to SC81 and SC82.

Doc. 90 Conservation of and trade in sea cucumbers (Holothuridae and Stichopodidae)
By United States
SUPPORT

This document describes sea cucumbers' vulnerability to exploitation and increasing trade, through increased number of species traded, increased harvest, and increased prices, as well as significant illegal and unreported trade. The document also summarizes two decades of CITES work, including a 2006 workshop held and the recent inclusion of six sea cucumber species in Appendix II.

[11] Funding to ensure implementation of Resolution Conf. 9.14 (Rev. CoP19) is key and we urge Parties to ensure that a full rhino report is prepared as detailed in the Resolution.

The Draft Decision text proposes a practical, time-bound plan to address gaps in sea cucumber conservation. It directs the Secretariat to collect standardized data including NDFs/LAFs, seizures, quotas, and unreported legal trade and to convene a technical workshop, which the Animals and Standing Committees will use a basis for recommendations for CoP21.

This decision addresses core gaps in sea cucumber conservation, including identification issues, biological information to make NDFs, identifying additional research needs, and capacity building. The approach mobilizes Parties and donors, focuses efficiently on Stichopodidae/Holothuriidae, and builds on prior CITES work, strengthening current Appendix-II implementation rather than creating new mandates.

Doc. 92 Marine Ornamental Fish
By the Secretariat
SUPPORT

This document reports on the marine ornamental fish (MOF) workshop held in Brisbane, Australia in 2024 and invites Parties to implement workshop recommendations, including: recording trade in MOF with consistency and at the species level and reviewing the catalogue of MOF in international trade identified at the workshops and identify species that may warrant further research or "other considerations."

According to the workshop report, over 2,000 MOF species are traded internationally, yet very few—including seahorses, clarion angelfish, and humphead wrasse—are included in the CITES Appendices. The various analyses reviewed during the MOF workshop identified over 100 species that were considered high or at least moderate risk from trade. Yet no MOF species were proposed for inclusion in CITES at CoP20. We strongly urge Parties to review the lists and propose species for CITES protection at CoP21 to address this burgeoning trade.

Doc. 102 Considering the 'Look-Alike' Criterion Annex 2B A of Resolution Conf. 9.24 (Rev. CoP17) on Criteria for Amendment of Appendices I and II
By the United Kingdom of Great Britain and Northern Ireland
OPPOSE

This document proposes to establish an intersessional process to review the use of criterion A of Annex 2b of Resolution Conf. 9.24 (Rev. CoP17) for listing species under Appendix II of CITES. Species are listed under criterion A when they are traded in a form that makes them difficult or impossible to distinguish from an Appendix I or II listed species. Regulating the trade in such species eases enforcement burdens on CITES Parties by relieving border officials from the time-consuming process of distinguishing species that "look-alike," while simultaneously ensuring needed trade restrictions are implemented for imperiled species. The proposal focuses heavily on the permitting and administrative burdens associated with such listings but fails to account for the

enforcement benefits (including documenting such benefits in the proposed intersessional process).

The proposal questions the conservation benefits of look-alike listings, but such listings are critical for avoiding boom and bust trade cycles in which traders shift from one species to another to avoid regulatory burdens or meet demand when the initial species in trade is depleted. Scientific literature documents this phenomenon[12] and illustrates how rapidly traders shift from one species to another supporting the need for listing of look-alikes to avoid their depletion before they can be protected. Maintaining flexibility in how criterion A is interpreted is important both for CITES enforcement as well as for regulating trade in species that might otherwise be depleted by serial overexploitation. For these reasons, we urge opposition to this proposal.

Doc. 112 Higher Taxon Listings
By the Standing Committee
SUPPORT

This document proposes the adoption of changes to Resolution Conf. 12.11 (Rev. CoP19) on Standard Nomenclature. Adoption of the suggested changes will help address and clarify the process for making nomenclature changes and when such changes require proposals to amend the appendices. We urge support for these amendments.

Doc. 113 Taxonomy and Nomenclature of African Elephants (*Loxodonta* spp.)
By the Secretariat
SUPPORT Option B

This document offers three options for updating the nomenclature of Africa elephants to reflect the best available science recognizing two species of elephants in Africa: savannah and forest elephants. We urge the adoption of Option B listing the genus on the appendices: *Loxodonta spp*. Including the genus will have the least disruptive effects on permitting, MIKE analyses, and existing Resolutions and Decisions. It also comports with Annex 3 of Resolution Conf. 9.24 (Rev. CoP17), which indicates that if all species of a higher taxon are listed on an appendix, the higher taxon should be used. While the Secretariat raises concerns about Parties using the genus on permits and certificates, any issues that arise can be resolved by the Parties through amendments to Resolution Conf. 10.10 or other guidance, and the CITES website can indicate that the Convention recognizes the two species of elephants.

[12] https://conbio.onlinelibrary.wiley.com/doi/pdfdirect/10.1111/csp2.13092 ("Following the boom-and-bust logic of other turtle species (CITES, 2011), the increased difficulty of obtaining some species following CITES listings (due to price increases or decline in exports now requiring permits) may have influenced the rise of others. Indeed, Graptemys, Clemmys, and Terrapene turtles have long been attractive pet species, but interviewees suggested that Kinosternon and Sternotherus just recently gained popularity in the pet trade."); https://www.ecomarres.com/downloads/seacuc.pdf ("many individual sea cucumber fisheries followed a typical trajectory with a rapid increase, short peak, and in most cases a substantial downward trend, thereby suggesting a boom-and-bust pattern"); AC25 Doc. 19 at p. 11.