



October 14, 2022

CITES Scientific Authority / Canadian Wildlife Service  
Environment and Climate Change Canada / Government of Canada  
Cites-Science@ec.gc.ca

**Re:** Input from Wildlife Conservation Canada to Canada for the 19th Conference of the Parties of the Convention on International Trade in Endangered Species

To whom it may concern:

We at Wildlife Conservation Society and WCS Canada appreciate the opportunity to respond to the notice of Environment and Climate Change Canada (ECCC) regarding species proposals in advance of 19th meeting of the Conference of the Parties (CoP18) to CITES.

WCS Canada's scientists specialize in fish and wildlife ecology, conservation biology, landscape ecology, and species at risk assessment and recovery in Canada. We are affiliated with sister programs of WCS in nearly 60 countries and marine areas with long-term commitments and conservation programs in dozens of landscapes and seascapes across the globe. WCS's 'on-the-ground' and 'in the sea' presence where we work enables us to address multiple aspects of wildlife exploitation and trade, including wildlife crime, at all points along the trade chain in source, transit and consumer countries. WCS is a strong supporter of CITES, has staff who have attended all meetings of the Conference of the Parties since CoP7 in 1989, and will be represented by many international wildlife and policy experts at the Nineteenth meeting of the Conference of the Parties (CoP17) in Panam. One of us (Dr. Lieberman), leads this and other international policy initiatives at WCS along with all matters of international policy, and also serves as the Chair of the Board of WCS Canada.

This letter contains recommendations regarding select working documents and species proposals in three parts:

- 1) WCS overall recommendations (53 pp)
- 2) Letter to Fisheries and Oceans Canada, with Oceans North, on the matter of shark proposals, dated 21 July 2022
- 3) Letter to Fisheries and Oceans Canada, with Oceans North, on the matter of shark proposals, dated 29 July 2022

Thank you for the opportunity to provide these comments and recommendations. We stand ready to provide scientific and technical assistance in your preparations for CoP19.

Sincerely,

A handwritten signature in black ink, reading "Susan Lieberman".

Susan S. Lieberman, Ph.D.  
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A handwritten signature in black ink, reading "Justina Ray".

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## **Recommendations for CITES CoP19**

Select working documents and species proposals

Updated: 9 September 2022



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- **[Detailed Comments: Proposals to amend the Appendices](#)**

*The Wildlife Conservation Society (WCS) is an international non-governmental organization (NGO) that has been working across the globe for more than 125 years to save wildlife and wild places. For more information on anything in this document, please contact Dr. Susan Lieberman at [slieberman@wcs.org](mailto:slieberman@wcs.org).*

## **Introduction to WCS**

The Wildlife Conservation Society (WCS) is an international non-governmental organization (NGO) that has been working across the globe for more than 125 years to save wildlife and wild places. We have conservation programs on the ground in more than 60 countries across Asia, Africa, the Pacific, and the Americas that work in partnership with governments, Indigenous Peoples and local communities, the private sector, and stakeholders on science-based conservation efforts.

WCS applies its biological knowledge, cultural understanding, and partnerships to help ensure that wild places and wildlife thrive alongside local communities. WCS's 'on-the-ground' presence across much of the globe enables us to address multiple aspects of wildlife exploitation and trade, including wildlife crime, at all points along the trade chain. Our field research and related conservation efforts support the design and implementation of science-based conservation and management strategies that not only conserve and protect species, but also enhance sustainability when species are exploited, while improving equitable benefits to local communities and economies from sustainable use regimes, when relevant and appropriate.

WCS is a strong supporter of CITES, has staff who have attended all meetings of the Conference of the Parties since CoP7 in 1989, and will be represented by several national and international wildlife and policy experts at the Nineteenth meeting of the Conference of the Parties (CoP19) in Panama City, Panama. Our views are based on the best available scientific and technical information, and information from our field and country programs around the world.

WCS hereby submits the following recommendations to the Parties on working documents and proposals to amend the Appendices to be considered by CITES CoP19. We also are still analyzing some documents and consulting our field experts, and will have updated recommendations on some issues closer to CoP19, and at the meeting.

Please contact Dr. Susan Lieberman (slieberman@wcs.org) and Alfred DeGemmis (adegemmis@wcs.org) with any questions about the contents of this document.

## Summary Recommendations

*Note: Document number links to a longer position statement/explanation within this document.*

CoP19 Working Documents			
Doc.	Title	Summary	WCS Recommendation
<a href="#">4.1</a>	"Rules of Procedure of the [CoP]: Report of the Standing Committee"	<b>The SC</b> proposes amendments to Rules of Procedure.	<b>ADOPT</b> , <u>except</u> for one amendment to rule 25.
<a href="#">4.2</a>	"Rules of Procedure of the [CoP]: Proposed amendment to Rule 26"	<b>BW</b> and <b>ZW</b> propose amendments to the Rules of Procedure on voting.	<b>REJECT</b> the premise of the document and proposed amendments.
<a href="#">10</a>	"CITES Strategic Vision"	<b>The SC</b> proposes a set of indicators for the CITES Strategic Vision.	Establish an in-session working group to refine indicators.
<a href="#">12</a>	"World Wildlife Trade Report"	<b>ZA</b> proposes new modalities for reporting on economic and price data.	<b>REJECT</b> the proposed draft decisions.
<a href="#">13</a>	"Engagement of Indigenous Peoples and local communities"	<b>The SC</b> proposes to continue work from the previous intersessional period.	<b>AMEND</b> draft decisions to clarify the mandate of future work, and <b>ADOPT</b> .
<a href="#">14</a>	"Livelihoods"	<b>The SC</b> summarizes work and proposes a way forward.	<b>AMEND</b> draft decisions and <b>ADOPT</b> .
<a href="#">15</a>	"Participatory mechanisms for rural communities in CITES"	<b>SZ</b> , <b>NA</b> , and <b>ZW</b> propose a new body to address "rural communities."	<b>REJECT</b> the premise of the document and proposed draft decisions.
<a href="#">19</a>	"CITES and forests"	<b>The SC</b> proposes draft decisions on CITES and forests.	<b>AMEND</b> draft decisions (significantly) and <b>ADOPT</b> .
<a href="#">23.1</a>	"Role of CITES in reducing risk of future zoonotic disease emergence associated with international wildlife trade: Report of the Standing Committee"	<b>The SC</b> proposes a way forward on CITES and zoonotic diseases.	<b>AMEND</b> draft decisions and <b>ADOPT</b> .

<a href="#"><u>23.2</u></a>	“Role of CITES in reducing risk of future zoonotic disease emergence associated with international wildlife trade: One Health and CITES: Human and animal health risks from wildlife trade”	<b>CI, GA, GM, LR, NG, and SN</b> propose a new resolution and draft decisions on health.	<b>ADOPT</b> the draft resolution and decisions.
<a href="#"><u>28</u></a>	“National laws for implementation of the Convention”	<b>The Secretariat</b> proposes draft decisions on national legislation.	<b>AMEND</b> draft decisions and <b>ADOPT</b> .
<a href="#"><u>29.1</u></a>	“Implementation of Article XIII and Resolution Conf. 14.3 (Rev. CoP18) on <i>CITES compliance procedures</i> ”	<b>The Secretariat</b> proposes draft decisions on compliance.	<b>AMEND</b> draft decisions to request a review of all compliance mechanisms.
<a href="#"><u>32</u></a>	“Review of Resolution Conf. 11.3 (Rev. CoP18) on <i>Compliance and enforcement</i> ”	<b>The SC</b> proposes amendments to Reso. Conf. 11.3 and future intersessional work.	<b>ADOPT</b> amendments to the resolution and draft decisions.
<a href="#"><u>36.1</u></a>	“Wildlife crime enforcement support in West and Central Africa: Report of the Standing Committee”	<b>The Secretariat</b> proposes draft decisions.	See below.
<a href="#"><u>36.2</u></a>	“Wildlife crime enforcement support in West and Central Africa”	<b>CI, GM, LR, NE, NG, and SN</b> propose new draft decisions to replace those from SC.	Establish an in-session working group to discuss at CoP19.
<a href="#"><u>37</u></a>	“Wildlife crime linked to the internet”	<b>The Secretariat</b> proposes updated draft decisions.	<b>AMEND</b> draft decisions and <b>ADOPT</b> .
<a href="#"><u>38</u></a>	“Demand reduction to combat illegal trade”	<b>The SC</b> proposes amendments to Reso. Conf. 17.4 and draft decisions.	<b>ADOPT</b> amendments to the resolution and draft decisions.
<a href="#"><u>39</u></a>	“Domestic markets for frequently illegally traded specimens”	<b>The SC</b> proposes amendments to Reso. Conf. 11.3 and draft decisions.	<b>ADOPT</b> amendments to the resolution and draft decisions.
<a href="#"><u>40</u></a>	“Guidance for legal acquisition findings”	<b>The SC</b> proposes draft decisions on legal acquisition findings.	<b>ADOPT</b> the draft decisions.
<a href="#"><u>41</u></a>	“Electronic systems and information technologies and authentication and control of permits”	<b>The SC</b> proposes amendments to existing resolutions.	<b>ADOPT</b> amendments to the resolutions.
<a href="#"><u>42</u></a>	“Purpose codes on CITES	<b>The SC</b> proposes	<b>ADOPT</b> amendments to the

	permits and certificates”	amendments to existing resolutions and draft decisions.	resolutions and draft decisions.
<a href="#"><u>43.1</u></a>	“Non-detriment findings: Reports of the Animals and Plants Committees”	<b>The AC and PC</b> propose draft decisions on non-detriment findings.	<b>ADOPT</b> the draft decisions.
<a href="#"><u>43.2</u></a>	“Making non-detriment findings for specimens of Appendix-II species taken in the marine environment not under the jurisdiction of any State”	<b>UK</b> proposes draft decisions regarding the making of NDFs for Appendix II species taken in areas beyond national jurisdiction.	<b>ADOPT</b> the draft decisions.
<a href="#"><u>47</u></a>	“Specimens produced through biotechnology”	<b>The SC</b> proposes amendments to Reso. Conf. 9.6 and draft decisions.	<b>ADOPT</b> the amendments to the resolution, but <b>AMEND</b> the draft decisions.
<a href="#"><u>48</u></a>	“Definition of the term ‘appropriate and acceptable destinations’”	<b>The SC</b> proposes draft decisions and non-binding guidance	<b>ADOPT</b> the draft decisions and guidance.
<a href="#"><u>49</u></a>	“Introduction from the sea”	<b>The SC</b> proposes draft decisions.	<b>AMEND</b> and <b>ADOPT</b> the draft decisions.
<a href="#"><u>50</u></a>	“Disposal of confiscated specimens”	<b>The SC</b> proposes draft decisions to extend work under the SC.	<b>AMEND</b> and <b>ADOPT</b> the draft decisions.
<a href="#"><u>53</u></a>	“Review of CITES provisions related to trade in specimens of animals and plants not of wild source”	<b>The SC</b> proposes draft decisions to extend work under the SC.	<b>ADOPT</b> the draft decisions.
<a href="#"><u>54</u></a>	“Review of the provisions of Resolution Conf. 17.7...”	<b>The SC</b> proposes amendments to Reso. Conf. 17.7 and draft decisions.	Further <b>AMEND</b> and <b>ADOPT</b> the amendments to the resolution, and <b>ADOPT</b> the draft decisions.
<a href="#"><u>55</u></a>	“Registration of operations that breed Appendix I animal species in captivity for commercial use”	<b>The US</b> proposes amendments to Reso. Conf. 12.10 and draft decisions.	<b>ADOPT</b> amendments to the resolutions and draft decisions.
<a href="#"><u>59</u></a>	“Illegal trade in cheetahs ( <i>Acinonyx jubatus</i> )”	<b>ET</b> proposes draft decisions on cheetahs.	<b>ADOPT</b> the draft decisions.
<a href="#"><u>60</u></a>	“Conservation of amphibians ( <i>Amphibia</i> spp.)”	<b>The AC</b> proposes draft decisions on amphibians.	<b>ADOPT</b> the draft decisions.



<a href="#">65</a>	“Sharks and rays (Elasmobranchii spp.)”	<b>The SC and the AC</b> propose draft decisions on sharks and rays..	<b>AMEND</b> and <b>ADOPT</b> the draft decisions.
<a href="#">66.1</a>	“Elephants (Elephantidae spp.): Implementation of Resolution Conf. 10.10 (Rev. CoP18) on Trade in elephant specimens”	<b>The Secretariat</b> provides an update on various aspects of implementation of Reso. Conf. 10.10, and proposes draft decisions.	<b>AMEND</b> and <b>ADOPT</b> the draft decisions.
<a href="#">66.2.1</a>	“Elephants (Elephantidae spp.): Ivory stockpiles: implementation of Resolution Conf. 10.10 (Rev. CoP18) on <i>Trade in elephant specimens</i> ”	<b>BJ, BF, GQ, ET, GA, KE, LR, NE, SN</b> and <b>TG</b> propose an updated declaration form for reporting on ivory stockpiles, and amendments to renewed decisions.	<b>ADOPT</b> the amended draft decisions.
<a href="#">66.2.2</a>	“Elephants (Elephantidae spp.): Establishing a fund accessible to range States upon non-commercial disposal of ivory stockpiles”	<b>KE</b> proposes draft decisions and an intersessional working group on disposal of ivory stockpiles.	<b>ADOPT</b> the draft decisions.
<a href="#">66.3</a>	“Elephants (Elephantidae spp.): Implementing aspects of Resolution Conf. 10.10 (Rev. CoP18) on the closure of domestic ivory markets”	<b>BJ, BF, GQ, ET, GA, LR, NE, SN</b> , and <b>TG</b> propose draft decisions on domestic ivory markets.	<b>ADOPT</b> the draft decisions.
<a href="#">66.4.1</a>	“Elephants (Elephantidae spp.): International trade in live African elephant specimens: Proposed revision to Resolution Conf. 10.10 (Rev. CoP18) on <i>Trade in elephant specimens</i> ”	<b>BJ, BF, GQ, ET, GA, LR, NE, SN</b> , and <b>TG</b> propose amendments to Reso. Conf. 10.10.	<b>AMEND</b> and <b>ADOPT</b> the proposed revisions to the resolution.
<a href="#">66.4.2</a>	“Elephants (Elephantidae spp.): Clarifying the framework: Proposal of the European Union”	<b>The EU and its MS</b> propose draft decisions regarding live elephant trade and annotations to listings.	<b>ADOPT</b> the draft decisions, <u>except</u> for para c) of draft decision 19.AA.
<a href="#">66.5</a>	“Elephants (Elephantidae spp.): Report on Monitoring the Illegal Killing of Elephants (MIKE)”	<b>The Secretariat</b> provides an updated MIKE analysis to CoP19.	Note the document.
<a href="#">66.6</a>	“Elephants (Elephantidae spp.): Report on the Elephant Trade Information System (ETIS)”	<b>The Secretariat</b> provides an updated ETIS analysis to CoP19.	Note the document.

<a href="#"><u>66.7</u></a>	“Elephants (Elephantidae spp.): Review of the National Ivory Action Plan process”	<b>MW, SN, and the US</b> propose draft decisions regarding the NIAP process.	<b>ADOPT</b> the draft decisions.
<a href="#"><u>67</u></a>	“CITES Big Cats Task Force (Felidae spp.)”	<b>The SC</b> proposes draft decisions, and a <i>Modus operandi</i> for the BCTF.	<b>AMEND</b> and <b>ADOPT</b> the draft decisions and <i>Modus operandi</i> .
<a href="#"><u>68</u></a>	Asian big cats (Felidae spp.)	<b>The SC</b> proposes draft decisions on Asian big cats.	<b>ADOPT</b> the draft decisions.
<a href="#"><u>71.1</u></a>	“Pangolins ( <i>Manis</i> spp.): Report of the Standing Committee and of the Animals Committee”	<b>The SC and the AC</b> propose draft decisions on pangolins.	<b>AMEND</b> , as per document 71.2 below, and <b>ADOPT</b> the draft decisions.
<a href="#"><u>71.2</u></a>	“Pangolins ( <i>Manis</i> spp.): Proposed amendments to Resolution Conf. 17.10”	The <b>UK</b> proposes amendments to draft decisions from SC and amendments to Reso. Conf. 17.10.	<b>ADOPT</b> the draft decisions as amended, and amendments to the resolution.
<a href="#"><u>72</u></a>	African lions ( <i>Panthera leo</i> )	<b>The Secretariat and the SC</b> propose draft decisions on African lions.	<b>ADOPT</b> the draft decisions.
<a href="#"><u>73.1</u></a>	Jaguars ( <i>Panthera onca</i> ): Report of the Standing Committee	<b>The SC</b> proposes draft decisions on jaguars.	<b>AMEND</b> , as per document 73.2 below, and <b>ADOPT</b> the draft decisions.
<a href="#"><u>73.2</u></a>	Jaguars ( <i>Panthera onca</i> ): Proposed amendments to the draft decisions on jaguars agreed at SC74	<b>CR, SV, MX, and PE</b> propose amendments to the SC’s draft decisions on jaguars.	<b>ADOPT</b> the draft decisions.
<a href="#"><u>74</u></a>	Songbird trade and conservation management ( <i>Passeriformes</i> spp.)	<b>The AC</b> proposes renewing decisions on songbirds.	<b>ADOPT</b> the draft decisions.
<a href="#"><u>75</u></a>	Rhinoceroses (Rhinocerotidae spp.)	<b>The Secretariat and the SC</b> propose amendments to Reso. Conf. 9.14 and draft decisions on rhinoceroses.	<b>ADOPT</b> amendments to the resolution and draft decisions.
<a href="#"><u>76</u></a>	Saiga antelope ( <i>Saiga</i> spp.)	<b>The SC</b> proposes draft decisions on saiga antelope.	<b>AMEND</b> 19.AA to refer to specific transit and consumer States, and <b>ADOPT</b> the draft decisions.
<a href="#"><u>78</u></a>	Tortoises and freshwater turtles (Testudines spp.)	<b>The Secretariat</b> proposes draft decisions on tortoises and freshwater turtles	<b>ADOPT</b> the draft decisions, with a small amendment regarding external funding.



<a href="#">80</a>	Marine ornamental fishes	The <b>AC</b> proposes draft decisions on songbirds.	<b>ADOPT</b> the draft decisions.
<a href="#">83</a>	Identifying species at risk of extinction for CITES Parties	<b>GM, LR, NE, NG, and SN</b> propose a new resolution and draft decisions to maintain a database of threatened species.	<b>ADOPT</b> the draft resolution and draft decisions.
<a href="#">87.1</a>	“Amendments to Resolution Conf. 9.24 (Rev. CoP17)”	<b>BW, KH, SZ, NA, and ZW</b> propose amendments to Reso. Conf. 9.24.	<b>REJECT</b> the premise of the document and proposed amendments.
<a href="#">87.2</a>	“Amendments to Resolution Conf. 9.24 (Rev. CoP17): Aquatic species listed in the CITES Appendices: proposals for a new approach to the listing of sharks and rays”	<b>SN</b> proposes amendments to Reso. Conf. 9.24.	<b>ADOPT</b> amendments to the resolution.

CoP19 Species Proposals (Agenda Item <a href="#">89</a> )			
#	Proponent(s)	Proposal	Recommendation
<a href="#">1</a>	<b>BJ, BF, CF, GA, GN, LR, ML, NE, SN, TG</b>	Transfer <i>Hippopotamus amphibius</i> from App. II to App. I	<b>ADOPT</b> the proposal.
<a href="#">2</a>	<b>BW, NA</b>	Transfer the NA population of <i>Ceratotherium simum simum</i> to App. II, with annotation.	Position <b>PENDING</b> .
<a href="#">3</a>	<b>SZ</b>	Remove the annotation to the App. II listing of SZ population of <i>Ceratotherium simum simum</i> .	<b>REJECT</b> the proposal.
<a href="#">4</a>	<b>ZW</b>	Amend Annotation 2 pertaining to populations of <i>Loxodonta africana</i> of BW, NA, ZA, and ZW	<b>REJECT</b> the proposal.
<a href="#">5</a>	<b>BF, GQ, ML, SN, SY</b>	Transfer populations of <i>Loxodonta africana</i> in BW, NA, ZA, and ZW to App. I	Position <b>PENDING</b> .
<a href="#">8</a>	<b>MY, SG</b>	Include <i>Kittacincla malabarica</i> on App. II	<b>ADOPT</b> the proposal.
<a href="#">9</a>	<b>MY, SG, US</b>	Include <i>Pycnonotus zeylanicus</i> on App. II	<b>ADOPT</b> the proposal.
<a href="#">13</a>	<b>TH</b>	Transfer Thailand's population of <i>Crocodylus siamensis</i> from Appendix I to II, with a zero quota for wild specimens.	<b>REJECT</b> the proposal.

<a href="#"><u>17</u></a>	US	Include <i>Phrynosoma platyrhinos</i> in App. II.	Position <b>PENDING</b> . [Prefer proposal 18]
<a href="#"><u>18</u></a>	MX	Include all <i>Phrynosoma</i> spp. in App. II.	<b>ADOPT</b> the proposal.
<a href="#"><u>21</u></a>	US	Include <i>Crotalus horridus</i> in App. II.	<b>ADOPT</b> the proposal.
<a href="#"><u>22</u></a>	BR, CO, CR, PE	Include <i>Chelus fimbriata</i> & <i>C. orinocensis</i> in App. II.	<b>ADOPT</b> the proposal.
<a href="#"><u>23</u></a>	US	Include <i>Macrochelys temminckii</i> & <i>Chelydra serpentina</i> in App. II.	<b>ADOPT</b> the proposal.
<a href="#"><u>24</u></a>	US	Include <i>Graptemys barbouri</i> , <i>G. ernsti</i> , <i>G. gibbonsi</i> , <i>G. pearlensis</i> & <i>G. pulchra</i> in App. II.	<b>ADOPT</b> the proposal.
<a href="#"><u>25</u></a>	IN	Transfer <i>Batagur kachuga</i> from App. II to App. I.	<b>ADOPT</b> the proposal.
<a href="#"><u>26</u></a>	EU (27), VN	Transfer <i>Cuora galbinifrons</i> from App. II to App. I.	<b>ADOPT</b> the proposal.
<a href="#"><u>27</u></a>	BR, CO, PA	Include <i>Rhinoclemmys</i> spp. in App. II.	<b>ADOPT</b> the proposal.
<a href="#"><u>28</u></a>	MX	Include <i>Claudius angustatus</i> in App. II.	<b>ADOPT</b> the proposal.
<a href="#"><u>29</u></a>	BR, CO, CR, SV, MX, PA, US	Include <i>Kinosternon cora</i> and <i>K. vogti</i> in Appendix I and all other species of <i>Kinosternon</i> spp. in Appendix II (except the species already in Appendix I).	<b>ADOPT</b> the proposal.
<a href="#"><u>30</u></a>	SV, MX	Include <i>Staurotypus salvinii</i> & <i>S. triporcatus</i> in App. II.	<b>ADOPT</b> the proposal.
<a href="#"><u>31</u></a>	US	Include <i>Sternotherus</i> spp. in App. II.	<b>ADOPT</b> the proposal.
<a href="#"><u>32</u></a>	US	Include all <i>Apalone</i> spp. in Appendix II, except for <i>Apalone spinifera atra</i> , which should remain in Appendix I.	<b>ADOPT</b> the proposal.
<a href="#"><u>33</u></a>	IN	Transfer <i>Nilssonina leithii</i> from App. II to App. I.	<b>ADOPT</b> the proposal.
<a href="#"><u>34</u></a>	AR, BR, CR, CI, DO, EC, SV, GA, GN, NE, PA, PE, TG, US	Include all species in family <i>Centrolenidae</i> in App. II.	<b>ADOPT</b> the proposal.
<a href="#"><u>35</u></a>	CO, CR, EU (27), PA	Include <i>Agalychnis lemur</i> in Appendix II with a zero annual export quota for wild-taken specimens traded for commercial purposes.	<b>ADOPT</b> the proposal.

<a href="#"><u>36</u></a>	EU (27)	Include <b><i>Laotriton laoensis</i></b> in Appendix II with a zero annual export quota for wild-taken specimens traded for commercial purposes	<b>ADOPT</b> the proposal.
<a href="#"><u>37</u></a>	BD, CO, DO, EC, EU (27), SV, GA, IL, MV, PA, SN, SC, LK, SY, UK	Include all species in the family <b><i>Carcharhinidae</i></b> in Appendix II.	<b>ADOPT</b> the proposal.
<a href="#"><u>38</u></a>	BR, CO, EC, EU (27), PA	Include all species in the family <b><i>Sphyrnidae</i></b> in Appendix II	<b>ADOPT</b> the proposal.
<a href="#"><u>39</u></a>	BR	Include <b><i>Potamotrygon albimaculata</i>, <i>P. henlei</i>, <i>P. jabuti</i>, <i>P. leopoldi</i>, <i>P. marquesi</i>, <i>P. signata</i> &amp; <i>P. wallacei</i></b> in App. II.	<b>ADOPT</b> the proposal.
<a href="#"><u>40</u></a>	IL, KE, PA, SN	Include all <b><i>Rhinobatidae spp.</i></b> in App. II.	<b>ADOPT</b> the proposal.
<a href="#"><u>41</u></a>	BR	Include <b><i>Hypancistrus zebra</i></b> in App. I.	<b>ADOPT</b> the proposal.

## **Detailed Comments: CITES CoP19 Working Documents**

Note: Links subject to change based on new versions uploaded to CITES website.

### **4. Rules of Procedure of the Conference of the Parties**

#### **4.1 [Report of the Standing Committee](#)**

#### **4.2. [Proposed amendment to Rule 26](#)**

**Recommendation on 4.1: [ADOPT](#), except for one amendment to rule 25 on choosing an alternate order.**

WCS appreciates the work of the Standing Committee to examine the Rules of Procedure, including Rule 25. We broadly support the proposed amendments to Rule 25 paragraph 6, except the bolded text that was subject to divergent views by Parties at SC74. WCS does not believe that Chairs should be allowed to choose an alternate order at their discretion, unless there is a significant technical issue (a situation for which a case study has not yet been identified). Proposals should be presented in order from the most restrictive to least restrictive, in order to facilitate decision-making and streamline (shorten) CoP deliberations.

**Recommendation on 4.2: [REJECT](#) the premise of the document and proposed amendments.**

WCS strongly opposes the recommendations in Document 4.2, which was submitted by Botswana and Zimbabwe. The Convention is clear that each Party will have one vote with respect to the amendment of the Appendices, and CITES has been functioning under this agreement since CoP1. The proposed rule change contravenes Article XV of the Convention, and would complicate and potentially undermine key elements of the Convention and functions the Conference of the Parties. There would be additional considerations, for example, regarding highly migratory species or populations which are shared by multiple countries. We recommend rejection of these recommendations, and urge the proponents to withdraw the document.

### **10. [CITES Strategic Vision](#)**

**Recommendation: Establish in-session working group to refine indicators.**

WCS appreciates the work of the Standing Committee to review indicators for the updated CITES Strategic Vision for 2021-2030. We were pleased to participate actively in the intersessional working group convened under the SC.

WCS submitted [detailed comments](#) to the Standing Committee ahead of SC74, many of which remain highly relevant for discussion at CoP19. We urge the Chair of Committee II to establish an in-session working group to refine the list of proposed indicators for the Strategic Vision, with participation from intergovernmental and non-governmental Observers that work with Parties on data collection, analysis, and dissemination.

## 12. [World Wildlife Trade Report](#)

**Recommendation:** **REJECT** the proposed draft decisions.

WCS notes the submission by South Africa of this document, which proposes a CITES-led “World Wildlife Trade Report” that would capture pricing of wildlife products in trade. While individual Parties might consider such data valuable, particularly to detect trends in supply and consumer demand for wildlife products, WCS recommends **NOT** adopting the draft decisions in Annex 1. We believe that implementing these decisions would further burden CITES structures (Secretariat, Standing Committee) and Parties on reporting with information that is not required by the treaty or resolutions and indeed would confuse the purpose of CITES. The price of wildlife or wildlife products is not a determinant of whether the wildlife in question was obtained legally and sustainably. We are concerned that this would add extra responsibilities to Parties and the Secretariat, and is moving CITES away from its core function—to ensure that any international wildlife trade is legal and sustainable. We concur that there are economic benefits from trade; otherwise, traders would not engage in commerce in the commodity in question if they couldn’t make money. Where Parties wish to voluntarily collect this data and aggregate it, that is their sovereign right, but we cannot support adding further requirements to those already in the Convention and Resolutions of the CoP. Fundamentally, CITES is a conservation convention that focuses on international cooperation in the “protection of certain species of wild fauna and flora against over-exploitation through international trade” (CITES preamble).

Related to this, the Convention does not mention traceability. While there is tremendous value in transparency along the entire trade chain, it is also critical for Parties to be clear on the objectives of the Convention.

## 13. [Engagement of Indigenous Peoples and local communities](#)

**Recommendation on 13:** **AMEND** draft decisions to clarify the mandate of future work, and **ADOPT**.

WCS fully understands, respects, and supports the vital role that Indigenous Peoples and local communities play in conservation around the world. We fully acknowledge their rights as enshrined by the Universal Declaration of Human Rights and the UN Declaration on the Rights of Indigenous Peoples. WCS believes that robust, meaningful engagement with IPLCs in the implementation and enforcement of CITES should be undertaken by Party governments according to their respective legal frameworks. WCS works with Indigenous Peoples and local communities across the globe, including on issues relevant to the conservation and management of CITES-listed species.

We respect the concerns raised by the Chair of the Working Group that progress could not be made due to the COVID pandemic and other issues. We do not oppose the recommendation of the Standing Committee to extend the mandate of this Working Group until CoP20, although we still maintain that a far clearer mandate/objective is needed if intersessional work on this issue is to be productive.

## 14. Livelihoods

**Recommendation:** **AMEND** draft decisions and **ADOPT**.

WCS looks forward to continued discussions on how to further engage Indigenous Peoples and local communities (IPLCs) in wildlife management and conservation at the national level, including through implementation of CITES and CBD, and to the analysis of information on the impacts of this implementation on the livelihoods of IPLCs. We note that in addition to economic and other livelihood benefits that can accrue from effective implementation of CITES and national legislation, there is a significant risk of harm to local livelihoods if wildlife exploitation and trade are illegal or unsustainable. There is always an economic benefit to trade, by definition, but it rarely actually accrues significantly and equitably to local communities (rather, traders further along the trade chain benefit). WCS was pleased to have been included in the Working Group of the Standing Committee on this issue. We of course regret that there was no progress by the Working Group, and the agreed workshop (as per Decisions 18.35 and 18.37) could not take place, due to the devastating COVID-19 pandemic.

The mandate of the Intersessional Standing Committee Working Group on CITES and Livelihoods was to “Monitor the progress made by Parties in implementing Decision 18.33 to engage indigenous peoples and local communities in CITES decision-making processes to better achieve the objectives of the Convention; and to review the report of the Secretariat on the progress made under Decision 18.35 and on the implementation of Resolution Conf. 16.6 (Rev. CoP18) on CITES and livelihoods.”

Whilst we find the report commissioned by the Secretariat (Annex 1) to be interesting, we were disappointed that this report, the Terms of Reference issued to the Consultants, the selection of case studies, the report’s recommendations, or the recommendations of the Secretariat, were not reviewed by the Working Group or Standing Committee. We are disappointed to see it referenced in this document.

WCS recommends supporting the draft decisions in Annex 1 to this document, with some edits. Draft Decision 18.33 (Rev. CoP19) paragraph a) states, “collate or conduct new case studies, using the standard template, that demonstrate how sustainable use of CITES-listed species contributes to the livelihoods of the indigenous peoples and local communities involved in such use, including trade, and to the conservation of the species”. We suggest that such case studies should demonstrate the impact of use of CITES-listed species on both IPLCs and the conservation of the species; the text as drafted assumes all use is sustainable, that all sustainable use benefits IPLC livelihoods, or that all use creates conservation benefits (which are not necessarily the case). This text may preclude inclusion of case studies where the well-being or livelihoods of IPLCs did not benefit, that benefits were not equitable, or that there were livelihood benefits but species conservation status still declined.

We also recommend that the template for case studies be amended to be more inclusive and unbiased. We recommend amendments that will enable a more balanced assessment of benefits, costs, equity, and market conditions of sustainable trade in CITES-listed species, as well as the benefits of alternative activities. We are also concerned about the financial and human resources required for implementation of these decisions.



Finally, we believe that this and other livelihood-related issues would benefit more from being addressed through the CBD, rather than CITES. CBD CoP15 will finalize its Global Biodiversity Framework, which includes issues and targets around the benefits to local communities, at its meeting in Canada shortly after CITES CoP19 closes; we recommend that these issues be taken up in the CBD forum, as well as through implementation at the national level.

#### 15. [Participatory mechanisms for rural communities in CITES](#)

**Recommendation:** **REJECT** the premise of the document and proposed draft decisions.

This document, submitted by Eswatini, Namibia, and Zimbabwe, proposes that the CoP establish a Rural Communities Advisory sub-Committee, and directs the Secretariat to prepare costed options for: 1) a rural communities committee; and 2) a rural communities subcommittee of the Standing Committee. The document also recommends that the Standing Committee make recommendations on this to CoP20, and that the intersessional working group of the Standing Committee be extended. WCS recommends rejection of these proposals, for several reasons.

WCS fully understands, respects, and supports the vital role that Indigenous Peoples and local communities play in conservation around the world. We fully acknowledge their rights as enshrined by the Universal Declaration of Human Rights and the UN Declaration on the Rights of Indigenous Peoples. WCS works with Indigenous Peoples and local communities across the globe, including on issues relevant to CITES-listed species. But we do not see these proposed actions as benefiting IPLCs or the implementation of CITES.

A similar proposal to establish a rural communities committee or subcommittee was rejected at CoP18, partly because it would be extremely difficult to determine which communities should be represented and who should be authorized to represent them. Moreover, all stakeholders already have the opportunity to participate in CITES meetings and provide input, and as such a specific committee or subcommittee is not needed or appropriate. We also believe that there is duplication, with both a rural communities intersessional working group, and an IPLC working group.

We believe that Eswatini, Namibia, and Zimbabwe raise some important points in their paper. We prefer the globally accepted term “Indigenous Peoples and Local Communities (IPLCs)”, rather than “rural communities”, which has the disadvantage of appearing to exclude Indigenous Peoples, or local coastal communities (as “rural” is terrestrially biased). We cannot agree with the claim in the document that the “participation of indigenous peoples and rural communities in CITES decision-making processes has been neglected”. As a treaty, CITES decisions are taken by Parties. We note that many Parties do indeed engage meaningfully and actively with IPLCs in their country at the national level, in the implementation and enforcement of CITES, as well as in the development of proposals and positions to be taken at CoPs. We concur that more should be done at the national level by some Parties, but we do not see how a committee or subcommittee of rural community representatives at the global level would benefit that national or local engagement.

Finally, other multilateral environmental agreements (MEAs) provide for engagement of IPLCs through official observer status. We support attendance of IPLC organizations at CITES meetings as official observers, and would be supportive of a separate fund being established for their participation (as is the case with the CBD).

## 19. [CITES and forests](#)

**Recommendation:** **AMEND** draft decisions (significantly) and **ADOPT**.

WCS supports the adoption of the draft decisions presented in Annex I of Document 19 with amendments. We recommend amending them to ensure that studies and analyses incorporate feedback from a wide variety of technically qualified organizations and experts. We believe that a step-wise process must be followed to ensure that new resolutions and programs of work on forests add concrete value. Noting that the Secretariat has flagged concern about workloads under existing Decisions, Parties must not overburden the Secretariat, or the Animals, Plants, and Standing Committees, and detract from core duties assisting Parties with the implementation of the convention and monitoring compliance. Therefore, such analyses of resolutions, etc. should also take into consideration capacity and resource requirements for implementation. Furthermore, a high proportion of CITES-listed fauna are also forest species, and this document and draft decisions are disproportionately focused on flora.

Fundamentally, CITES is a species-based treaty; the only mention of the word “ecosystem” in the CITES treaty is in Article IV.3, where Scientific Authorities are required to monitor Appendix II exports to ensure the species is maintained at a level consistent with its role in the ecosystems in which it occurs. That applies to flora and fauna, and work by the Secretariat and Parties to help ensure implementation of this requirement by exporting Parties could significantly benefit species in the wild.

## 23. **Role of CITES in reducing risk of future zoonotic disease emergence associated with international wildlife trade**

### [23.1. Report of the Standing Committee](#)

### [23.2. One Health and CITES: Human and animal health risks from wildlife trade](#)

**Recommendation on 23.1:** **AMEND** draft decisions and **ADOPT**.

WCS is pleased to have been a member of the Standing Committee Working Group on the “Role of CITES in reducing risk of future zoonotic disease emergence associated with international wildlife trade”, and to having been able to share our extensive [One Health work and expertise](#), and [science-based work on pandemic prevention](#) with the working group. We thank the Standing Committee, Chair, and members of the working group for the open and collaborative dialogue. It is vital that prevention at source (particularly of pathogen spillover from wildlife) of the next outbreak, epidemic, or pandemic of zoonotic origin be addressed at the national as well as the multilateral level. We believe that CITES and its implementation have a role to play in this prevention, although there is a great deal that needs to be done that is outside the remit of CITES.

We generally support the recommendations in this document as a consensus way forward. However, we stress these critical points and suggested amendments:

- 1) This is a matter of great urgency, and although we hope it will be useful for CITES Parties to discuss the issue and consider further actions at CoP20 (probably in 2025), there are urgent actions that are critical for governments to take far sooner, in order to help prevent another devastating pandemic of zoonotic origin. We therefore recommend that a One Health Resolution be discussed and agreed at CoP19, and not wait until CoP20 as per draft Decisions 19.HH and 19.II (please see discussion of document 23.2, below). There is also a lack of urgency in draft Decision 19.BB.
- 2) The recommendations in the document highlight knowledge gaps and the need for more information and data. As a science-based organization, we always agree with the need for more research and data. However, the extensive scientific information and data now available are clear on what is needed to prevent the next pandemic of zoonotic origin, particularly in terms of commercial trade in live (and freshly slaughtered) wild birds and mammals. We know enough to act, and the precautionary principle necessitates action on a fast track.
- 3) On draft Decision 19.AA, we note that pathogens spill over from live wildlife, and limiting submission by Parties to international trade could preclude important information sharing. Therefore, we recommend the following edits:

*19.AA The Secretariat shall issue a Notification to the Parties, requesting Parties to identify and describe any new or existing domestic measures, or stricter domestic measures on in-transit shipments, imports and/or (re-) exports, on live wildlife trade or markets that are designed to contribute to mitigate the risk of pathogen spillover from ~~international wildlife trade~~;*
- 4) We call attention of the Parties to the [guidance produced by WHO, OIE, and UNEP](#) in April 2021 on “Reducing public health risks associated with the sale of live wild animals of mammalian species in traditional food markets”; the guidance calls on national competent authorities to “Suspend the trade in live caught wild animals of mammalian species for food or breeding purposes and close sections of food markets selling live caught wild animals of mammalian species as an emergency measure unless demonstrable effective regulations and adequate risk assessments are in place.”
- 5) Under the auspices of the World Health Organization, governments are now launching a [negotiating process to develop an international instrument](#) on pandemic prevention, preparedness and response. We encourage CITES Authorities to engage at the national level in these negotiations.

**Recommendation on 23.2: ADOPT the draft resolution and decisions.**

WCS greatly appreciates the document submitted by Côte d'Ivoire, Gabon, Gambia, Liberia, Nigeria and Senegal. In particular, we appreciate the detailed discussion and the recognition of the acute urgency of the situation. It would be unfortunate for the CITES CoP to tell the world that it's acceptable to discuss the issue further and wait another three years; prevention of an epidemic or pandemic of zoonotic origin must be on a much faster track. Although there is much that needs to be done that is outside the remit of CITES, the actions recommended in the draft Resolution in this document are balanced, have excellent potential, and should not wait for CoP20 or beyond. There is a tendency in CITES to push some controversial issues to future CoPs; COVID-19 has taught us that there should be no delays on this issue.

WCS strongly supports adoption of the draft Resolution in Annex 1 of this document, to help CITES Parties initiate measures, as a matter of urgency, to mitigate the risk of future pandemics resulting from zoonotic pathogen spillover related to wildlife trade. The intersessional period following CoP19 could be used to evaluate the implementation and effectiveness of the measures in the Resolution and revise them as needed. We also recommend that Parties support the draft Decisions in Annex 2 to the document, but would prefer that draft Decision 19.AA(a) enable qualified wildlife health experts from NGOs to join the One Health Expert Panel.

## **28. [National laws for implementation of the Convention](#)**

**Recommendation:** **AMEND** draft decisions and **ADOPT**.

WCS appreciates the completeness and importance of this document (submitted by the Secretariat). WCS uses our extensive expertise to assist many Parties in the drafting and adoption of effective CITES implementing legislation, and we have always considered this to be a high priority. It is disturbing to see so many Parties with legislation in categories 2 and 3, particularly those countries that have been CITES Parties for more than 30 years. The CITES Secretariat plays a key role in helping Parties achieve full compliance with the Convention, as well as liaising with Parties and other intergovernmental entities on complex legal issues relevant to CITES implementation.

We recommend that Parties adopt the draft decisions, with the expectation that any legal *guidance* (e.g., those developed in line with 19.EE sub-paragraph e) produced by the Secretariat would be subject to review and approval by the Standing Committee. While we do not anticipate major delays, it will be important for Parties' legal advisors and qualified Observers to have an opportunity to weigh in.

## **29. Compliance matters**

### **29.1. [Implementation of Article XIII and Resolution Conf. 14.3 \(Rev. CoP18\) on CITES compliance procedures](#)**

**Recommendation on 29.1:** **AMEND** draft decisions to request a review of all compliance mechanisms.

WCS welcomes the Secretariat's report on the various compliance issues currently being considered by the Standing Committee. WCS engages actively in these discussions, and works closely with some of the Parties identified to ensure that all trade in CITES-listed species is in accordance with the Convention and CITES policy.

We note a recommendation from the Secretariat for Parties to reflect on "possible approaches to facilitate the handling of compliance cases in an efficient and expeditious manner...given the number of ongoing compliance cases and the length of the agenda of the Standing Committee." WCS concurs that the Standing Committee's agenda has become unwieldy, but we strongly support the progress that is made on each of the issues identified. We believe there may be ways to restructure CITES compliance and enforcement review processes to ensure more timely support to Parties with smaller compliance issues, while providing an appropriate amount of time to discuss more complex problems and the potential solutions to them.

We therefore urge Parties to adopt decisions along the following lines:

***Directed to the Secretariat:***

*19.XX The Secretariat shall, subject to external funding, and in consultation with the Standing Committee, contract a consultant to undertake a review of all CITES compliance processes, to identify potential changes to processes and modalities that could streamline compliance review and decision-making by the Standing Committee and the provision of compliance assistance by the Secretariat and other stakeholders, whilst ensuring that decisions on serious non-compliance issues are taken expeditiously.*

***Directed to the Standing Committee:***

*19.YY The Standing Committee shall consider any report produced in accordance with Decision 19.XX and make recommendations for improvements to existing compliance processes for consideration by the 20th meeting of the Conference of the Parties.*

**32. [Review of Resolution Conf. 11.3 \(Rev. CoP18\) on Compliance and enforcement](#)**

**Recommendation:** **ADOPT** amendments to the resolution and draft decisions.

WCS welcomes the work on Resolution Conf. 11.3 (Rev. CoP18) by the Standing Committee. We support the amendments proposed in Annex 1 and particularly welcome the draft decision in Annex 3 to continue work on gaps identified in the current text of the Resolution.

**36. Wildlife crime enforcement support in West and Central Africa**

**36.1 [Report of the Standing Committee](#)**

**36.2 [Wildlife crime enforcement support in West and Central Africa](#)**

There is a critical need for improved collaboration between source, transit, and demand countries to support CWT efforts in West and Central Africa - current systems, protocols and mechanisms are not working. Therefore, WCS supports the establishment of a working group to consider approaches to enhance the current systems and protocols for this transcontinental cooperation. However, it is important that this working group identifies and assesses the numerous past efforts on this issue and takes a broader view that considers other law enforcement and criminal justice agencies at a national, regional, and global level to ensure recommendations are CITES-relevant but not limited to the mandate of CITES Management Authorities.

**Recommendation on 36.2: Establish an in-session working group to discuss at CoP19**

On 19.AA: We recognise the need for external support to the listed actions in a number of countries, but would recommend alternative options are developed to consider whether a CITES Secretariat administered fund for national activities is worth the additional administrative burdens to an already overloaded Secretariat and if this is the most time efficient model for countries to access.

**37. [Wildlife crime linked to the internet](#)**

**Recommendation:** **AMEND** draft decisions and **ADOPT**.

On 19.AA - WCS can recommend adoption of the proposed study to be commissioned by the Secretariat but notes two points: Firstly, given the global scope of CITES-listed species trade this study would need to be conducted in a number of languages which would affect the budgets; and secondly this study should build on extensive research that has already been done, including reviewing existing published papers and grey-literature reports on wildlife crime linked to the internet produced in recent years. The consultant that is hired should have expertise in such research.

### **38. [Demand reduction to combat illegal trade](#)**

**Recommendation:** **ADOPT** amendments to the resolution and draft decisions.

WCS was pleased to engage with intersessional work on this issue under the Standing Committee, including the development of Guidance on demand reduction strategies to combat illegal trade in CITES-listed species. We believe the version endorsed by the Standing Committee provides a useful resource for Parties in undertaking a wide variety of demand reduction activities. WCS works with government and non-governmental partners on several science-based behavior change/demand reduction strategies around the world, and would be pleased to contribute to capacity building efforts in key countries as part of regional workshops to raise awareness of this guidance.

### **39. [Domestic markets for frequently illegally traded specimens](#)**

**Recommendation:** **ADOPT** amendments to the resolution and draft decisions.

WCS welcomes the work of the Standing Committee on this issue, and recommends adoption of the amendments to Resolution Conf. 11.3 (Rev. CoP18), which may not substantively alter Party obligations and address the illegally traded specimens in domestic markets, *and* the draft decision, which could clarify complex legal situations in the future. We note that the presence of domestic commercial markets for specimens of Appendix I species, particularly those in significant demand globally, run the risk of undermining the effectiveness of the Convention and risk further endangerment of the species concerned.

We note that several species that are illegally traded and which are traded in domestic markets are the subject of discussion elsewhere in the CoP19 agenda (e.g., pangolins, saiga). We urge Parties to recognize those opportunities to adopt specific, time-bound actions that target domestic markets facilitating or contributing to illegal trade, and to request appropriate actions from CITES Parties accordingly.

### **40. [Guidance for making legal acquisition findings](#)**

**Recommendation:** **ADOPT** the draft decisions.

WCS welcomes the work of the Standing Committee on this issue and recommends the adoption of the draft decisions in Annex 1. The issuance of legal acquisition findings (LAFs) is fundamental to implementation of the Convention, for all trade in CITES-listed species. Particular attention needs to be paid to LAFs for specimens taking in areas beyond national jurisdiction, or for species subject to legal requirements under other



treaties or agreements to which the exporting country is a Party or Member (e.g., Convention on the Conservation of Migratory Species of Wild Animals, Regional Fisheries Management Organizations).

**41. [Electronic systems and information technologies and authentication and control of permits](#)**

**Recommendation:** **ADOPT** amendments to the resolutions.

WCS welcomes the work of the Standing Committee on this issue and recommends the adoption of amendments to existing Resolutions (in Annexes 1 and 2) and the draft decisions in Annexes 3 and 4. WCS works with government partners in dozens of countries on CITES permitting and e-permitting, and we agree that this is an important area of work for CITES; modernizing the tools used by Parties to meet their obligations under the Convention can provide important means of increasing transparency and accountability.

**42. [Purpose codes on CITES permits and certificates](#)**

**Recommendation:** **ADOPT** amendments to the resolutions and draft decisions.

WCS appreciates having had the opportunity to contribute towards the definition of seven of the twelve Purpose codes used when CITES permits and certificates are issued. We support the draft recommendations proposed by the working group that are outlined in Annexes 1, 3 and 4. We would further welcome the opportunity to work on the additional Purpose codes that were tabled. If Parties decide to add new codes (e.g., confiscated specimens), WCS would also like to contribute towards that work.

**43. Non-detriment findings**

**43.1. [Report of the Animals and Plants Committees](#)**

**43.2. [Making non-detriment findings for specimens of Appendix-II species taken in the marine environment not under the jurisdiction of any State](#)**

**Recommendation on 43.1:** **ADOPT** the draft decisions.

WCS greatly appreciates the work of the Animals and Plants Committees, and the Technical Advisory Group (TAG) on the important issue of providing guidance to Parties on the development and issuance of non-detriment findings (NDFs). The issuance of science-based NDFs is fundamental to the effective implementation of CITES. WCS works closely with CITES authorities in multiple countries to provide scientific and technical assistance in the issuance of NDFs for marine and terrestrial species. We support the recommendations in this document, including all of the draft decisions. In particular, we look forward to working with Parties and observers in organizing and sharing our scientific and technical expertise at the 2nd international expert workshop on NDFs, and we hope it can take place not long after CoP19.

**Recommendation on 43.2:** **ADOPT** the draft decisions.

WCS greatly appreciates the submission of this document by the United Kingdom. The issuance of science-based non-detriment findings (NDFs) is critical for the effective

implementation of CITES and the conservation of CITES-listed species. The issuance of NDFs for CITES-listed species taken in areas beyond national jurisdiction, pursuant to Resolution Conf. 14.6 (Rev. CoP16), necessitates close cooperation with the scientific entities and committees of Regional Fisheries Bodies (including Regional Fisheries Management Organizations), and other international organizations. WCS strongly supports this document, and the recommendations in Annex 1 (draft Decisions 19.AA-DD). WCS looks forward to the workshop proposed in this document, and to sharing our extensive expertise with Parties and other participants.

#### 47. Specimens produced through biotechnology

**Recommendation:** **ADOPT** the amendments to the resolution, but **AMEND** the draft decisions.

WCS was pleased to have participated in the working group of the Standing Committee on this issue. We strongly recommend that Parties adopt the proposed amendments to Resolution Conf. 9.6 (Rev. CoP16) in Annex 1 to this document. Doing so closes any loopholes which would allow any specimens produced through biotechnology and labeled as, or potentially confused with, species listed under CITES to be traded internationally without CITES oversight, and hence potentially jeopardize the conservation status of those listed wild species.

Recommendation: Support some elements of Annex 2, but amend or delete others

WCS has serious concerns about some of the draft decisions in Annex 2.

First, some of the issues proposed in Paragraph 19.AA a) are highly problematic, and we recommend their deletion:

- (ii): Exemptions and simplified procedures should not be available; the risks to the same or closely related wild species in trade, as well as the potential wider environmental risks, are too high not to exercise caution and appropriate due diligence.
- (v): No exceptions should be made for provably pure synthetic products. They could pose a significant risk to wild species by allowing for laundering of wild-derived products as synthetics.
- (ix): Estimated caseload. The number of applications is likely to be relatively small, at least for now. Most of the multiple applications of biotechnology already being deployed are not related to international wildlife trade. For the few potential applications being explored, the impact on wild species could be highly significant. Hence, the bureaucratic effort is likely to be small, while the conservation benefit of strict permitting potentially very large.
- (x): This contradicts the excellent recommended amendment to Resolution Conf. 9.6 (Rev. CoP16) in Annex 1 to this document.

Other points in Annex 2 do merit consideration. For example, in Para. 19.AA a):

- (iv): Establishing legality is clearly critical. This needs to consider the origin of the source material, and also the legality in the proposed destination country, especially if the specimens might be released into the environment. For exporting countries, applicants for a CITES permit should show that the specimens were derived following national biosafety regulations. Where relevant, verification that

national wildlife laws have been complied with is also important. National laws in the importing country that address risk management for an application should be taken into account before issuing permits.

- (vi): A new source code might be needed for specimens derived using biotechnology. They should not be treated as artificially propagated or captive bred since the risks that they might pose to wild species are not necessarily less, and might be more, than removing the species from the wild. However, they cannot have the source code W since there is no removal from the wild.

WCS looks forward to joining any in-session and intersessional working group on this issue.

#### 48. Definition of the term 'appropriate and acceptable destinations'

**Recommendation:** **ADOPT** the draft decisions and guidance.

WCS was pleased to contribute to this intersessional working group both as a member, and through the Association of Zoos and Aquariums and World Association of Zoos and Aquariums (we are a member of both organizations). We strongly support the non-binding guidance presented in this report submitted by the Standing Committee, which provides a path forward for Parties. We continue to emphasize caution not to impose stricter measures on trade in Appendix II species than already exist for Appendix I species. We stand ready to continue to assist Parties on this issue, building on our more than 120 years of extensive experience with *ex situ* wildlife, and the contributions of many zoos and aquaria around the world to the conservation of CITES-listed species in the wild.

#### 49. Introduction from the sea

**Recommendation:** **AMEND** and **ADOPT** the draft decisions.

WCS appreciates the attention of the Parties to the implementation of their obligations relevant to specimens taken in areas beyond national jurisdiction. We appreciate all the hard work and consensus-building that went into the adoption of Resolution Conf. 14.6 (Rev. CoP16); unfortunately, and as the document discusses, and the Standing Committee discussed, too few Parties are effectively implementing this resolution and associated CITES requirements. We appreciate the document and generally support the draft decisions therein. WCS has provided comments on the draft questions referred to in the document.

- Draft Decision 19.AA: we recommend that the Secretariat report the results of the negotiations on the development of an international legally binding instrument under UNCLOS on the conservation and sustainable use of marine biological diversity in areas beyond national jurisdiction (BBNJ), to all Parties, as well as to the Standing Committee.
- Draft Decision 19.BB: we recommend the following edits to the proposed decision (added text underlined): The Secretariat shall approach and work with the States that are most active in the trade in CITES-listed marine species, particularly from areas beyond national jurisdiction, the sea, including Flag ~~of convenience~~ States and territories, with a view to encouraging and assisting them to fulfill their CITES responsibilities and effectively implement the Convention. [Note: there is no

internationally recognized definition of “Flag of Convenience”; the FAO database of Flag States would be useful here].

- Draft Decision 19.DD: we do not see the need to include “as appropriate”; as “Introduction from the Sea” is core to the CITES treaty, it is always appropriate.

#### **50. Disposal of confiscated specimens**

**Recommendation:** **AMEND** and **ADOPT** the draft decisions.

WCS recommends that Parties adopt the draft decision in Annex 1. However, for Draft Decision 19.AA paragraph b, we believe that the provision of materials to assist Parties in implementing Annex 3 of Resolution Conf. 17.8 should not be exclusively dependent on external funding. Rather, we see this as a priority that should be covered under the Secretariat’s budget.

#### **53. Review of CITES provisions related to trade in specimens of animals and plants not of wild source**

**Recommendation:** **ADOPT** the draft decisions.

WCS was pleased to have participated in the working group of the Standing Committee on this issue. We recommend that Parties adopt the proposed amendments to Resolution Conf. 10.16 (Rev.) in Annex 1 to this document and the draft decisions in Annex 2. We look forward to continuing to work with Parties on this important issue.

#### **54. Review of the provisions of Resolution Conf. 17.7 on Review of trade in animal specimens reported as produced in captivity**

**Recommendation:** Further **AMEND** and **ADOPT** the amendments to the resolution, and **ADOPT** the draft decisions.

WCS appreciates this document, and the work of the Secretariat, Animals, and Standing Committees, and Parties on the critical issues raised by Resolution Conf. 17.7 (Rev. CoP18), on “Review of Trade in Animal Specimens Reported as Produced in Captivity”. We appreciate the report of the workshop held in June 2022, and the recommendations in Annex 1 to the document.

WCS strongly supports all efforts to prevent the laundering of wild-caught animals as captive bred, and we see effective implementation of Reso. Conf. 17.7 (Rev. CoP18) as an important element of such efforts. Any false claims of captive-bred or captive-produced for wild-taken animals undermines the conservation of the species concerned, as well as the effectiveness of CITES itself, and trade in animals intentionally misidentified as captive-bred is a violation of the Convention.

WCS recommends adoption of the majority of recommended amendments to Reso. Conf. 17.7 (Rev. CoP18) in Annex 1 of this document, though some adjustments are needed, which would benefit from further discussion at CoP19. We note that Stage 1, para a.vii should refer to specimens “declared as captive produced” and not “produced as captive produced”.

We strongly concur with paragraph 19 of the document; the current methodology needs to be amended to take into consideration the breeding biology of species (e.g., difficulty to breed or even maintain in captivity, difficulty to breed to F2, low reproductive outputs). In several places, the document refers to cases being referred to the Secretariat or Animals Committee by Parties. We strongly encourage amendments to the text to allow for reporting by and consultation with qualified zoological institutions experienced with *ex situ* captive populations of the species in question. In particular, many accredited zoos and aquaria around the world have extensive experience with captive husbandry methods, care, and breeding of CITES-listed species (including the care and handling of seized/confiscated animals); these are some of the best experts to consult on whether certain species are difficult or easy to maintain and breed in captivity. We recommend amendments accordingly.

**55. Registration of operations that breed Appendix I animal species in captivity for commercial purposes**

**Recommendation:** **ADOPT** amendments to the resolutions and draft decisions.

WCS greatly appreciates the submission of this document by the USA. It raises important issues about the registration of facilities breeding Appendix I animal species in captivity for commercial purposes. WCS strongly supports the recommended edits to Reso. Conf. 12.10 (Rev. CoP15) and the draft decision in the document.

The Parties have agreed that an operation breeding Appendix-I animal species in captivity for commercial purposes should make a continuing meaningful contribution to the conservation of the species concerned, including ensuring that trade from a registered operation will not negatively affect efforts to combat illegal trade in the species. We support the recommended edits in this document that would reinforce the need to ensure that registered operations contribute to the conservation of the species in the wild, and will not undermine efforts to combat illegal trade. We also support the recommended edits to require that the Register of operations that breed Appendix-I animals in captivity for commercial purposes, include for each operation the type of product(s) approved for export (e.g., live animals, skins, hides, meat, etc.). We also greatly support the text requiring updating of information from registered operations every 3 years.

The registration of such operations has expanded over the years. Many such operations do indeed contribute to the conservation of the species in the wild. We are aware however, that some do not, some may risk undermining efforts to combat illegal trade, and there is no clarity for Parties on what products they can authorize for imports or whether individual operations continue to meet the criteria. WCS recommends that Parties adopt the recommended edits and decisions in this document.

**59. Illegal trade in cheetahs (*Acinonyx jubatus*)**

**Recommendation:** **ADOPT** the draft decisions.

WCS greatly appreciates the submission of this document by Ethiopia, which brings much-needed attention to a species that remains threatened by illegal international trade and which experienced undue de-prioritization at CITES CoP18. In particular, the document highlights several peer reviewed studies and other reports, many since CoP18,

with new information highlighting the serious conservation threat of illegal trade to the cheetah subspecies in Horn of Africa (*Acinonyx jubatus soemmeringii*). This subspecies is at high risk of extinction in the very near future, largely due to poaching for trafficking in cubs. The document highlights that the majority of the trafficking is between the Horn of Africa and the Arabian Peninsula, affecting multiple Parties.

WCS appreciates the hard work of destination, transit, and source countries on this issue, including through legislation, enhanced enforcement, and behavior change/demand reduction programs. However, much more needs to be done to prevent the extinction of the cheetah population of the Horn of Africa, as articulated so well in this document. Therefore, WCS recommends that Parties adopt the recommendations and draft decisions in this document.

#### **60. Conservation of amphibians (Amphibia spp.)**

**Recommendation:** **ADOPT** the draft decisions.

WCS works in many countries across the globe, particularly in Latin America, on the conservation of amphibians, including on the threat of exploitation for international trade. We are disappointed that due to limited time and resources, and the COVID19 pandemic, the workshops proposed at CoP18 could not take place. We recommend adoption of these recommendations of the Animals Committee, and the draft decisions in Annex 1 of this document. Along with reptiles, amphibians have received insufficient attention in CITES processes. International trade (for food, pets, and other purposes) continues to threaten many listed and unlisted species, and we look forward to assisting the Parties in making progress on the conservation of amphibians in the wild.

#### **65. Sharks and rays (Elasmobranchii spp.)**

**Recommendation:** **AMEND** and **ADOPT** the draft decisions.

WCS appreciates all of the hard work reflected in this document, on the implementation of CITES for species of Elasmobranchii. There has been tremendous progress, although of course much more needs to be done. We recommend adoption of the consolidated draft decisions in Annex 4 of Document 65, with some small revisions. We believe that basic assistance of the Secretariat to Parties on capacity building and implementation should not always be subject to external funding, but should be core business.

Furthermore, WCS believes that the delivery of the full study described in draft decision 19.BB(c) in Annex 4, which was not completed during the past triennium on the mismatch between catch and trade levels of CITES listed sharks and rays, should remain a top priority. Trade data continue to indicate underreporting by CITES Parties, when compared to country level catch data, and studies of the shark fin and meat trade at its hubs. This is especially important given the continued trade in significant quantities of species now assessed on the IUCN Red List of Threatened Species as Critically Endangered, such as the scalloped hammerhead (*Sphyrna lewini*), great hammerhead (*S. mokarran*) and oceanic whitetip (*Carcharhinus longimanus*) sharks, as noted in document SC 67.2 Annexes 2 and 3.



## **66. Elephants (Elephantidae spp.)**

### **66.1. [Implementation of Resolution Conf. 10.10 \(Rev. CoP18\) on Trade in elephant specimens](#)**

### **66.2. Ivory stockpiles**

#### **66.2.1. [Ivory stockpiles: implementation of Resolution Conf. 10.10 \(Rev. CoP18\) on Trade in elephant specimens](#)**

#### **66.2.2. [Establishing a fund accessible to range States upon non-commercial disposal of ivory stockpiles](#)**

### **66.3. [Implementing aspects of Resolution Conf. 10.10 \(Rev. CoP18\) on the closure of domestic ivory markets](#)**

### **66.4. Trade in live African elephants**

#### **66.4.1. [International trade in live African elephant specimens: Proposed revision to Resolution Conf. 10.10 \(Rev. CoP18\) on Trade in elephant specimens](#)**

#### **66.4.2. [Clarifying the framework: Proposal of the European Union](#)**

### **66.5. [Report on Monitoring the Illegal Killing of Elephants \(MIKE\)](#)**

### **66.6. [Report on the Elephant Trade Information System \(ETIS\)](#)**

### **66.7. [Review of the National Ivory Action Plan process](#)**

#### ***Summary recommendations for agenda item 66:***

- Amend and adopt the draft decisions in Annexes 1-4 of Document 66.1 (see below).
- Adopt the recommendations in Documents 66.2.1, 66.2.2, and the recommended Decisions in Documents 66.2.2 and 66.3.
- Amend the proposed revisions to Reso. Conf. 10.10 (Rev. CoP18) in Document 66.4.1, particularly in paragraph 15.
- Adopt paragraphs a) and b) in Draft Decision 19.AA of Document 66.4.2, but reject paragraph c).
- Adopt the draft decisions contained in Annex 1 of Document 66.7.

#### ***Closure of domestic ivory markets:***

WCS appreciates and supports the efforts of CITES Parties around the world to take legal, regulatory, and enforcement measures to effectively close their domestic markets for elephant ivory. We welcome the work of the CITES Secretariat since CoP18 to collect information from Parties on their domestic efforts, and the discussions that took place in the Standing Committee. We strongly support the renewal of Decisions 18.117 to 18.119 as presented in Document 66.1. The closure of domestic markets for elephant ivory is a key factor in reducing poaching of elephants for their ivory, and combating ivory trafficking.

There are very few legal domestic markets for commercial trade in ivory, with Japan as the remaining non-range State with a significant domestic commercial ivory market. Resolution Conf. 10.10 (Rev. CoP18) is clear that markets contributing to the illegal trade should be closed; we believe it is vital to link sources of information on illegal trade in ivory, such as those data collected by the CITES Elephant Trade Information System (ETIS), with analyses of progress towards implementation of the Resolution. WCS therefore *also* supports the draft decisions in Document 66.3, submitted by Benin, Burkina Faso, Equatorial Guinea, Ethiopia, Gabon, Liberia, Niger, Senegal, and Togo, which include an additional draft decision (19.DD) to integrate a consideration of legal markets into the ETIS report produced for future meetings of the Standing Committee and CoP.

Finally, even where legislative or regulatory action has been taken to close domestic markets, there remains illegal trade in elephant ivory that is closely linked to illegal international trade. We therefore urge Parties to redouble efforts to strengthen enforcement of existing legal prohibitions to ensure that laws are effective in protecting elephant populations in the wild. We also believe this should be considered in future reports from ETIS to the Standing Committee and CoP.

***Trade in mammoth ivory:***

WCS strongly supports efforts to study the trade in mammoth ivory, which is increasingly available, and its impact and contribution to the illegal trade in elephant ivory and the poaching of elephants. We welcome the contributions from Parties and other experts as outlined in paragraphs 19 and 20 of Document 66.1, and look forward to reviewing this study prior to CITES CoP20.

***Trade in Asian elephants:***

We welcome the support from CITES Parties to expand the number of MIKE (Monitoring the Illegal Killing of Elephants) sites across the Asian elephant's range, and the development of a regional system of registration that could increase transparency. However, WCS notes with concern the relatively low response rate from Asian elephant range States to Notification 2020/017. When considering the draft decisions in Annex 3 of Doc. 66.1, we recommend that transit or consumer States also be invited to provide any relevant information, particularly with respect to trade in live Asian elephants, as well as any elephant products or derivatives. This was an integral part of the CoP18 decisions that may be lost in the draft decisions for consideration by CoP19.

***Stocks and stockpiles:***

WCS was pleased to participate in the intersessional working group on elephant ivory stockpiles, and we welcome the endorsement by the Standing Committee of the "Practical guidance on ivory stockpile management." We welcome that the draft decisions for consideration by CoP19 direct the Secretariat to issue a Notification requesting Parties to "submit information about available management tools, and new techniques and technologies related to any of the elements mentioned" in the guidance. Regular reporting of government and significant privately-held stockpiles of elephant ivory is essential to strengthen international cooperation on securing ivory stockpiles and preventing leakage back into international trade.

We urge Parties with such stockpiles to continue reporting, and to consider disposal/destruction methods that would reduce opportunities for leakage and reduce reporting burdens.

WCS therefore welcomes Document 66.2.1, submitted by Benin, Burkina Faso, Equatorial Guinea, Ethiopia, Gabon, Kenya, Liberia, Niger, Senegal, and Togo. The proposed inventory form could collect useful information from Parties that would facilitate capacity building and increase transparency. It also provides a standardized form to collect data on resource needs for securing elephant ivory stockpiles, which could provide actionable data for other CITES Parties and non-governmental organizations providing technical support and funding for these efforts. We recommend adopting the draft inventory forms and Decisions in this document.

WCS welcomes the proposal from Kenya in Document 66.2.2 to establish an intersessional working group to explore the idea of establishing a fund that elephant range States could access upon the non-commercial disposal of ivory stockpiles. We agree with the caveat in the document that it will be critical to examine the intended and unintended consequences of such a fund (including de-linking compensation from such a fund to quantities, which could present a variety of perverse incentives or outcomes). The issue is complicated, but we support the effort herein to facilitate a dialogue on this issue. At this stage, an intersessional working group to discuss options is a good way forward, and we recommend that Parties adopt the draft decisions in Doc. 66.2.2.

***MIKE and ETIS reports:***

WCS welcomes the reports from the MIKE and ETIS programmes, which provide invaluable, locally sourced information from Parties and enforcement officials on trends in illegal killing and trade in elephants. We welcome the high response rates from MIKE sites from across Africa and South Asia, and WCS was pleased to facilitate training for officials at MIKE sites in Central and East Africa.

With regards to the PIKE scores (Proportion of Illegally Killed Elephants) outlined in the MIKE report, we note that there was a small increase at the African continental scale in 2021 from the score in 2020. While this is still lower than the 2011 peak, there remains cause for concern with the increase in illegally killed elephants (apparently driven by increases in West and Central Africa). Poaching of African forest elephants requires continued attention and resourcing, particularly in light of their recent reclassification as Critically Endangered on the IUCN Red List of Threatened Species.

WCS appreciates the ETIS report submitted to CoP18 (Document 66.6). Our experience working to gather actionable intelligence on wildlife trafficking aligns with data provided to ETIS that Nigeria remains a critical node in illegal trade in elephant ivory.

***National Ivory Action Plan process:***

WCS appreciates the ETIS report submitted to CoP18 (Document 66.6). ETIS provides hugely valuable information to guide Parties in the implementation of the National Ivory Action Plan (NIAP) process. The NIAP process has resulted in the enhancement of counter wildlife trafficking efforts in several countries, and helped close key routes for illegal trade in elephant ivory. However, as demonstrated by the MIKE and ETIS reports (see below) illegal killing of elephants and trade in their ivory continues. CITES Parties must stay vigilant.

WCS recognizes that despite good efforts, some countries currently included in the NIAP process remain significantly affected by the illegal trade in ivory. There is some correlation between those countries that continue to be affected and concerns regarding participation in the NIAP process. This demonstrates a correlation between the process and realities on the ground. However, the NIAP process, as currently outlined in Annex 3 to Resolution Conf. 10.10 (Rev. CoP18) could benefit from a review of effectiveness.

WCS therefore recommends that Parties adopt the draft decisions in Document 66.7, which was submitted by Malawi, Senegal, and the United States of America. In particular, we strongly support the points in paragraph 7 of the document, outlining the rationale for a review of the NIAP process. Such a review would provide an overview of the NIAP processes successes and failures, and offer Parties opportunities to strengthen

international cooperation in this area. We strongly encourage Parties to ensure that the Standing Committee is able to provide input into the Terms of Reference of the envisaged consultancy, and that Parties, IGOs, and NGOs are fully consulted in this process.

*Trade in live elephants:*

WCS has active field programmes focused on African elephants in 12 Range States of the species, covering both forest and savannah populations. WCS appreciates the document (66.4.1) submitted by Benin, Burkina Faso, Equatorial Guinea, Ethiopia, Liberia, Niger, Senegal, and Togo. The document raises very important issues.

We agree that if the Parties wish to adopt Resolution text that provides guidance on the international trade in live wild-caught elephants, the best option would be to include such requirements through amendments to Resolution Conf. 10.10 (Rev. CoP18), rather than through decisions that are relevant only to Appendix II populations.

We support adoption of the non-binding guidance for determining whether a proposed recipient of a live African elephant is suitably equipped to house and care for it, as submitted by the Standing Committee for the consideration of CoP19. We also support the non-binding best practice guidance on how to determine whether “the trade would promote *in situ* conservation”, also submitted by the Standing Committee for the consideration of CoP19.

WCS has more than 120 years of extensive experience with *ex situ* captive wildlife through our zoos and aquarium. Many accredited zoos and aquaria have made significant contributions to the conservation of CITES-listed species in the wild, particularly through breeding for reintroduction programmes. Indeed, there could be situations where the conservation of the species would be enhanced through non-commercial exports of wild African elephants, for *in situ* conservation reintroduction programs. There also might be cases of an emergency situation that could necessitate removing an individual from the wild and exporting it for veterinary or other purposes. Therefore, although there are some good suggested amendments to Reso. Conf. 10.10 (Rev. CoP18) in Annex 1 of the document, we recommend that paragraph 15 be amended to allow for emergency or exceptional circumstances.

*Reservations taken to the annotation to the listing of *Loxodonta africana*:*

In advance of the 74th meeting of the Standing Committee, WCS was clear that “reservations” taken by Parties to an editorial correction updating the references to the resolutions in the annotation to the listing of the African elephant (*Loxodonta africana*) was not a legal reservation, either as defined by the CITES treaty or by international law. We respect and acknowledge the concerns of the eight Parties that took these reservations, but the objections in question are not to the amendment of Appendix I or II, or the transfer of a species between the Appendices, and as such we stress they are not reservations.

We appreciate the multiple issues raised by the European Union in Document 66.4.2, although we believe the document mixes issues relevant to annotations themselves, with issues relevant specifically to reservations, and that separating the issues could facilitate negotiations.

We recognize that some legal questions have been raised, and Parties would benefit from clarity on this matter. WCS therefore supports the adoption of draft decision 19.AA paragraphs a) and b) in Document 66.4.2. However, we recommend that Parties not adopt paragraph c) of the proposed draft decision, which deals with convening a dialogue meeting as per Resolution Conf. 14.5. We do not see such a dialogue meeting as appropriate for these legal questions, or legal issues around reservations. As regards issues around trade in live elephants, we see the CoP as the appropriate structure for decision-making on the issue, rather than a dialogue meeting (and its associated significant expense).

#### 67. [CITES Big Cats Task Force \(Felidae spp.\)](#)

**Recommendation:** **AMEND** and **ADOPT** the draft decisions and *Modus operandi*.

WCS applauds the efforts to establish a CITES Big Cats Task Force, in spite of the delays to the process due to COVID-19 restrictions. We support the establishment of such a Task Force, given the ongoing and, in some cases, increasing trade in big cats, big cat specimens, parts and derivatives, the expansion of the trade to impact more species, and the complexities of distinguishing parts from different species and sources, thereby providing significant challenges for law enforcement agencies.

WCS supports the Draft Decision 19.XX in Annex 1 of this document. We also support the Terms of Reference and *Modus operandi* of the CITES Big Cats Task Force as in Annex 2 of the document, with the following proposed amendments: (i) Add to Task Force Activities 1 g), following “including trade originating from captive-bred sources”, the phrase “and trade originating from wild sources purporting to be from captive-bred sources”; (ii) Add to Task Force Outcomes 2 i), following “laundering of illegal specimens from and through such facilities” the phrase “and associated trade chains”.

WCS has conservation programmes focused on big cats in 32 countries across Asia, Africa and Latin America, and we further welcome the opportunity to participate in the Task Force. We are grateful to DEFRA UK for convening the first online meeting of the group. We also recognize that progress on implementing the Task Force has otherwise been slow and encourage a reinvigoration of the group.

#### 68. [Asian big cats \(Felidae spp.\)](#)

**Recommendation:** **ADOPT** the draft decisions.

WCS works on addressing trade in Asian big cats, especially of tigers and their parts, in 12 countries and we welcome the continued attention and efforts to eliminate trade in these species. We note that illegal trade in big cats and their parts remains a significant factor in the decline of all species of Asian big cats with the exception of the Asiatic population of the lion *Panthera leo*. We also note that the reduced agenda of the 73rd meeting of the Standing Committee did not include illegal trade in Asian big cats, and urge its prominence at CoP19. We urge Parties and others to prioritize action and implementation of relevant resolutions (including Reso. 12.5 (Rev. CoP18) and decisions. We note that 14.69 is not fully implemented, and we recommend Parties prioritize its implementation.

## **71. Pangolins (*Manis* spp.)**

### **71.1. [Report of the Standing Committee and of the Animals Committee](#)**

### **71.2. [Proposed amendments to Resolution Conf. 17.10](#)**

**Recommendation on 71.1:** **AMEND**, as per document 71.2 below, and **ADOPT** the draft decisions.

WCS appreciates the deliberations of the Animals and Standing Committees on the implementation of the existing CITES Resolution and Decisions on pangolins (*Manis* spp.). We generally support the adoption of the draft decisions in Annex 1 of Document 71.1 -- particularly 19.CC, which would encourage Parties in whose territories stocks of parts and derivatives of pangolins exist to establish and apply strict control measures and report on such measures to the Secretariat.

**Recommendation on 71.2:** **ADOPT** the draft decisions as amended, and amendments to the resolution.

However, we believe the full scope of the draft decisions in Document 71.1 are inadequate to deal with structural problems enabling the illegal trade in pangolin species. We therefore welcome the submission of Doc. 71.2 by the United Kingdom, which would strengthen Reso. Conf. 17.10 (Rev. CoP18) and the draft decisions in Document 71.1. Robust reporting on stocks and stockpiles of pangolin products would enable international cooperation, national capacity building, and other efforts to ensure that stockpiles do not leak into the illegal trade or facilitate illegal trade through other means. These critically important amendments would strengthen collaborative actions by CITES Parties, much like resolutions regarding elephants and rhinoceroses have previously. We urge Parties to amend the proposed decisions to seek input from relevant Parties prior to SC77 and SC78, so that action is not deferred until CoP20.

## **72. [African lions \(\*Panthera leo\*\)](#)**

**Recommendation:** **ADOPT** the draft decisions.

WCS welcomes the attention on the trade in African lions, which continues to be a complex and challenging issue impacting the species in the wild across its range. We also recognize the challenges of moving the various CoP18 Decisions forward due in large part to the COVID-19 pandemic. WCS supports the Draft Decisions on African Lions (*Panthera leo*) in Annex 1 of the document.

## **73. Jaguars (*Panthera onca*)**

### **73.1. [Report of the Standing Committee](#)**

### **73.2. [Proposed amendments to the draft decisions on jaguars agreed at SC74](#)**

The jaguar is an emblematic species of the Americas, due to both its importance in maintaining natural landscapes and ecosystem functionality, and as an important element of indigenous cultures for centuries. The jaguar is the largest native feline in the Americas and a transboundary species. We encourage Parties to support all necessary actions to benefit the conservation of this emblematic and ecologically important species.



WCS works with governments and other partners on the conservation of jaguars and their habitats in nine countries (Guatemala, Honduras, Nicaragua, Colombia, Ecuador, Peru, Bolivia, Paraguay and Brazil). WCS is very concerned about the emerging threat of national and international trade in jaguar parts, and that trafficking of such parts between jaguar range countries and Asia appears to be increasing. We welcome the documents addressing the issue, and the recommendations therein.

**Recommendation on 73.1:** **AMEND**, as per document 73.2 below, and **ADOPT** the draft decisions.

WCS appreciates the work of the Secretariat on the execution of Decision 18.251 and completion of the study on illegal trade in jaguars, which is comprehensive and very useful. WCS supports the draft decisions arising from the report, detailed in Annex 1..

**Recommendation on 73.2:** **ADOPT** the draft decisions.

WCS welcomes the submission of Document 73.2 by the jaguar Range States of Costa Rica, El Salvador, Mexico and Peru. We recommend that Parties adopt the draft decisions in Annex 1 of the document, which complement those in Doc. 73.1, and potentially will lead to action for the conservation of jaguars. Based on our extensive conservation program on jaguars, WCS would be pleased to join the proposed intersessional working group.

#### **74. [Songbird trade and conservation management \(Passeriformes spp.\)](#)**

**Recommendation:** **ADOPT** the draft decisions.

WCS welcomes the attention of the Animals Committee to the trade in songbirds, which takes place across multiple continents and regions. We recommend renewal of the draft decisions as presented in Annex 1, although we also recommend that the study envisaged in draft Decision 18.256 (Rev. CoP19) avoid duplication and take into full consideration new studies and reports on this issue, including those noted in the document. We urge Parties and other stakeholders to provide funding to fully implement the draft decisions.

#### **75. [Rhinoceroses \(Rhinocerotidae spp.\)](#)**

**Recommendation:** **ADOPT** amendments to the resolution and draft decisions.

WCS welcomes Document 75, which addresses the implementation of Resolution Conf. 9.14 (Rev. CoP17), Decisions 18.110 to 18.116, and contains the report of the IUCN Species Survival Commission (IUCN SSC) African and Asian Rhino Specialist Groups and TRAFFIC to CoP19 (Annex 4). This document, and particularly the report, provides important insight into the conservation status and trends of African and Asian rhinoceroses, as well as data on legal and illegal trade in rhinoceros horn and other products.

We welcome the continental increases in the overall African population of black rhinoceroses, and lament the decline in overall population of white rhinoceroses. We recognize the leadership of Namibia, South Africa, Kenya, and Zimbabwe in conserving the largest populations of rhinoceroses in their natural habitat, despite continued threats posed by poaching. We note that a relatively small proportion of the Indian/Nepalese population of greater one-horned rhinoceroses was illegally killed from 2018 to 2022. We



also note that it remains challenging to recover smaller, isolated populations of Javan and Sumatran rhinoceroses in Indonesia. Noting that the majority of rhino horn seizures originated from illegally killed animals, it is logical that southern white rhinos continue to remain at threat from poaching across their range and particularly in South Africa and that these activities continue to fuel the illegal trade in rhinoceros horn.

We support the confirmation by Parties of their relevant enforcement focal points for rhino horn, and the potential convening of another CITES Rhinoceros Enforcement Task Force meeting. The relatively low rate of convictions to arrests in Africa is problematic, and we suggest increased attention to achieving successful convictions of poachers; without successful prosecution, arrests and seizures are just a minor irritant for traffickers. We also note the low rate of convictions in Asia. We urge Asian rhinoceros range States to provide all relevant data on illegal killing of and trade in rhinoceros species to ensure that datasets are complete. We encourage Parties to require the Secretariat to work with NGOs with extensive in-country experience with these issues

The IUCN Specialist Group identifies South Africa, China/Hong Kong SAR, Viet Nam, Malaysia, Mozambique, the UAE, and Qatar as the CITES Parties most implicated in the illegal trade in rhinoceros horn (by volume), with the Secretariat also recommending that attention be paid to declines of both black and white rhinoceros populations in Botswana. We therefore recommend the adoption of time-bound decisions that request action from all of these Parties, in line with the findings of the IUCN Specialist Group and other experts.

We urge Parties, including transit States, to enhance all enforcement activities and efforts to further constrict the illegal trade in rhinoceroses -- including by engaging with other CITES enforcement focal points. WCS supports the renewal of Decision 18.116 on illegal domestic markets for rhinoceros horn, and we urge integration of this Decision with country-specific decisions addressing Parties where there is known to be consumer demand for rhinoceros horn (including China and Viet Nam).

#### 76. [Saiga antelope \(\*Saiga spp.\*\)](#)

**Recommendation:** **AMEND** 19.AA to refer to specific transit and consumer States, and **ADOPT** the draft decisions.

WCS works on the conservation of saiga in the wild in Mongolia, and other countries, and we welcome the discussion within CITES of legal and illegal trade in saiga antelope. We generally support the draft decisions in the document. However, we recommend that draft decision 19.AA be amended to refer to *specific transit and consumer States*, alongside range States, to avoid situations in which key Parties do not provide the requested information. Significant non-Range transit and consumer States and territories for saiga antelope products (from both species recognized under CITES-approved taxonomy, and according to reported CITES trade data) include China, Hong Kong SAR, Japan, Malaysia, Singapore, and Thailand -- all of which have significant saiga stockpiles and legal domestic trade -- with re-exports being reported to additional countries such as Indonesia, New Zealand, and the United States. While all Parties should be invited to provide information and responses on stockpiles, we believe it is appropriate to name China/Hong Kong SAR, Japan, Singapore, Malaysia and [Thailand](#) as key transit and consumer States.

We welcome the offers of support from Parties during SC74 to support Parties with significant domestic stockpiles of saiga products to secure and monitor their stockpiles, as well as to support cross-border training to improve implementation of CITES and counter illegal trade. This collaborative approach to capacity building can strengthen understanding and enforcement among CITES Parties. We note that the Medium-Term International Work Programme for the Saiga Antelope for 2016-2020 does not encourage the development of commercial trade in saiga products and derivatives; and the annotation to Appendix II is clear that there should be no exports from the wild of saiga parts or products. We are also not aware of any successful commercial-scale captive production of saiga. We therefore urge non-Range States with significant stockpiles to consider plans for eliminating stockpiles and prohibiting domestic commerce in saiga products.

**78. [Tortoises and freshwater turtles \(Testudines spp.\)](#)**

**Recommendation:** **ADOPT** the draft decisions, with a small amendment.

We appreciate the tremendous work that went into finalizing the *Identification Guide to Tortoises and Freshwater Turtles and their Parts, Products, and Derivatives in Trade*. This was a major undertaking, and we urge all Parties to share it with their enforcement and Customs officials. We also appreciate the increased support by many Parties, as reported in the document, to enforcement efforts to combat trafficking in tortoises and freshwater turtles, and their products. We encourage Parties to continue and increase those efforts. However, the report focuses primarily on seizures, which are only part of what is needed to combat trafficking. The report commends many seizures, but we urge Parties, the Secretariat, and ICCWC Partners, to focus as well on successful prosecutions, particularly as a deterrent (and the judicial outcomes of the seizures), as well as crime prevention efforts. In our experience, all too often seizures are not accompanied by successful prosecution, and just end up being “the cost of doing business” for traffickers. We also urge more work on science-based behavior change in consumer countries, as well as more crime prevention efforts. We support draft Decisions 19.AA and 19.BB, with the exception that we do not see that 19.BB (a) and (c) should only take place if external funding is available. We believe that the request to the Secretariat to report to CoP20 (Decision 19.BB.c) or to engage with ICCWC (Decision 19.BB.a) should not require external funding; they are core work.

**80. [Marine ornamental fishes](#)**

**Recommendation:** **ADOPT** the draft decisions.

WCS welcomes this document, submitted by the Animals Committee, with the proposal to renew decisions on marine ornamental fishes that have not yet been implemented. We look forward to providing insights during technical workshops, and urge UNEP-WCMC, IUCN and other consultants identified to solicit feedback from a wide variety of technically qualified stakeholders.

**83. [Identifying species at risk of extinction for CITES Parties](#)**

**Recommendation:** **ADOPT** the draft resolution and draft decisions.

WCS thanks The Gambia, Liberia, Niger, Nigeria and Senegal for this proposal to establish, maintain and regularly update a database noting the CITES status of all species identified as CE, EN, or VU in the IUCN Red List so that Parties may assess whether such species are, or may be, affected by international trade. We appreciate that this could be useful in flagging potential major gaps in CITES listings, especially for countries with limited capacity to monitor their native species potentially threatened by such trade. While many species remain to be assessed under the Red List, those most likely to be threatened by trade are the better known species, often vertebrates, most of which have been assessed and their status known. Hence, the principle behind this recommendation is good, and we look forward to further discussions at CoP19 with the proponents and other Parties.

**87. [Proposed amendments to Resolution Conf. 9.24 \(Rev. CoP17\)](#)**

**87.1. [Proposed amendments to Resolution Conf. 9.24 \(Rev. CoP17\)](#)**

**87.2 [Aquatic species listed in the CITES Appendices: proposals for a new approach to the listing of sharks and rays](#)**

**Recommendation on 87.1: REJECT the premise of the document and proposed amendments.**

We strongly urge Parties to reject the proposed amendments and draft Decision in this document submitted by Botswana, Cambodia, Eswatini, Namibia, and Zimbabwe. The proposal aims to amend Resolution Conf. 9.24 (Rev. CoP17)—“Criteria for Amendment of Appendices I and II” by proposing livelihood and food security criteria be added in addition to the current biological and trade criteria. They also propose a requirement that international trade must be the key driver of population decline for a species to be included in the Appendices. We oppose these proposed amendments, as they are in contravention of the Convention, in contravention of long-standing precedent and interpretation by the Parties, and they potentially undermine the effectiveness and very nature of CITES.

This proposal is in contravention of the text of the CITES treaty (Article 2 para. 1) which states, “Appendix I shall include all species threatened with extinction which are or may be affected by trade”; and Article 2 para. 2 states, “Appendix II shall include: (a) all species which although not necessarily now threatened with extinction may become so unless trade in specimens of such species is subject to strict regulation in order to avoid utilization incompatible with their survival...” Article 2 is thus clear that the conservation status of the species is the paramount determinant of whether a species should be included in Appendix I or II.

The proposal is inconsistent with the language and objectives of the Convention and would undermine all efforts to include species in Appendix I or II. Livelihood considerations should be included by national governments when implementing CITES and Parties have repeatedly decided that these issues, albeit important, should not be considered in the listing process.

WCS works closely with governments, Indigenous Peoples and local communities (IPLCs), and other stakeholders at the national and local level across the globe, to help ensure that conservation is integrated with the accrual of equitable livelihood benefits (including

social and cultural benefits) to IPLCs. That includes the conservation and management of wildlife, as well as areas important for biodiversity. WCS looks forward to continued discussions on how to further engage IPLCs in wildlife management and conservation at the national level, including through implementation of CITES, and to the analysis of information on the impacts of CITES implementation on the livelihoods of IPLCs. We note that in addition to economic and other livelihood benefits that can accrue from effective implementation of CITES and national legislation, there is a significant risk of harm to local livelihoods and sustainable development when wildlife exploitation and trade are illegal and/or unsustainable. There is always an economic benefit to trade, by definition, but it rarely accrues significantly and equitably to local communities. WCS believes that critical livelihood discussions, interventions, and the full implementation and recognition of the U.N. Declaration on the Rights of Indigenous Peoples (UNDRIP) should be carried out at the national and local levels; such issues should not be part of the scientific evaluation of whether or not a species is threatened or potentially threatened with extinction, including by international trade.

WCS recognizes that there will always be political and economic considerations and pressures when Parties decide whether to submit or support a proposal to amend the Appendices. However, such considerations must not be part of the determination of whether a species is threatened or potentially threatened with extinction; mixing political and economic considerations into scientific considerations risks the integrity and impact of the Convention.

Furthermore, the proposal unfortunately makes a number of false or misleading statements about the effects of CITES listings:

- It is not true that “Appendix I-listings... mak[e] utilisation continue yet without the ability of users to generate income” (para. 18). International trade is only one of the options for deriving income or other benefits from wild species; uses not affected by CITES listings include for example ecotourism. Sustainable, legal trade that is not for primarily commercial purposes but still offers economic benefits, such as sport hunting, is not prevented by Appendix I. Unsustainable international trade may destroy a beneficial local use by eliminating populations of the species concerned, especially if the species is already threatened and qualifies for listing under Appendix I based on biological criteria. We note that benefits of species to IPLCs include not only cash, but also cultural and social benefits. Protecting the economic benefit of someone profiting from trade in wildlife commodities should not be part of determining whether or not a species is threatened in the wild.
- It is erroneous that “For species that have a long-standing history of livelihood use, an Appendix I-listing takes away income sources, especially for resource-scarce regions” (para. 19). An Appendix I listing may preserve income sources such as tourism revenue by protecting the species involved. Further, the main beneficiaries of unregulated, unsustainable trade are usually traders and traffickers further along the trade chain, rather than local communities.
- It is misleading and a misinterpretation of the very essence of CITES to claim that “an Appendix I-listing does not benefit the species since utilisation continues against other threats” (Para. 20). CITES was never intended to address all threats facing a species, and removal of one threat does not cease to be a benefit simply because other threats continue to exist. For a species that is threatened in the wild, eliminating the threat posed by commercial exploitation and trade can

enable managers and others to more effectively address other compounding threats, or at a minimum can help prevent a species from becoming further endangered or even extinct in the wild.

- We agree that “An Appendix I-listing may affect management options, government funding and public attention to species conservation...” (para. 21), but oftentimes it increases funding and public attention to that species. Such considerations should not, however, be factored into the listing criteria.
- The erroneous statement that “Illegal use may continue due to the long-standing history of livelihoods” (para. 23) falsely implies that failure of a listing to eliminate all illegal trade is a reason for not listing a species. That is a misunderstanding of basic criminology and legal practices; failure of legislation to prevent all thefts or murders does not mean that those should no longer be crimes. We agree that more needs to be done to combat wildlife trafficking, including at the consumer end.
- We note that failure to list a species that qualifies for Appendix I or II does not in any way guarantee that profits from trade will benefit local communities; quite the opposite is more likely.
- We stress that the proposed amendment to Reso. Conf. 9.24 (Rev. CoP17) Annexes 1 and 2 is more restrictive than the text of the Convention, and should not be adopted. The treaty does not state that threats posed by trade must be the key driver of population decline.

We agree that it is highly relevant for Parties to consider food security issues in any species conservation and management programs. However, we strongly oppose inclusion of food security as part of the listing criteria. It is risky and unclear how this factor could be assessed or implemented. Many species are traded internationally as luxury food items, but rarely for basic sustenance or food security; rather, the international trade in some species can threaten the food sources of wildlife-dependent communities. Further, if a species is threatened in the wild, we cannot see how it can be part of food security for local communities without restricting exploitation for international trade. We also wish to reinforce that inclusion of a species on CITES Appendix I or II does not preclude its domestic use or customary use by IPLCs.

Finally, we believe that this and other livelihood-related issues would benefit more from being addressed through the CBD, rather than CITES. CBD CoP15 will finalize its Global Biodiversity Framework, which includes issues and targets around the benefits to local communities, at its meeting in Canada shortly after CITES CoP19 closes; we recommend that these issues be taken up in the CBD forum, as well as through implementation at the national level.

In conclusion, WCS strongly urges Parties to reject all proposed resolution amendments and decisions in this document, and not convene an in-session or intersessional working group.

**Recommendation on 87.2: ADOPT amendments to the resolution.**

We greatly appreciate this document submitted by Senegal. It presents case studies to demonstrate that CITES Appendix II listings for shark and ray species have been lagging behind the adoption of stronger fisheries prohibitions by some tuna RFMOs and domestic protections for the same species. This indicates a misalignment between the intent of

CITES Appendix II, to ensure that trade is legal, sustainable, and documented, and the timing at which those listings are adopted, i.e., when species already meet criteria for prohibitions in regional and domestic fisheries management frameworks, corresponding closer to CITES Appendix I.

The analysis of the case studies reveals that the inflexible interpretation of the CITES listing criteria (CITES Res. Conf. 9.24 (Rev. CoP17)) and, particularly, its Annex V footnote for aquatic species, is the root cause of this misalignment. The document suggests that Parties reconsider the way in which they have approached the listing of aquatic species on CITES and consider the intent of the Convention and the CITES listing criteria (CITES Res. Conf. 9.24 (Rev. CoP17)), as well as the life history of sharks and rays, when considering the listing of vulnerable marine species such as sharks.

Applying the footnote to sharks has, in practice, meant listing Endangered or Critically Endangered species with several decade long population recovery times in Appendix II (i.e., porbeagle, oceanic whitetip, wedgefish, manta rays, great hammerheads), when Appendix I would have been more appropriate from a biological perspective. The listings in Appendix II of depleted, Endangered species makes any sustainable trade or positive NDFs near impossible given that they have already suffered such severe declines due to unregulated exploitation and other threats.

There is a clear need to explore the aquatic species footnote in Resolution Conf. 9.24 (Rev. CoP17) and add specific references to applying it differently for sharks and rays to account for their biology and life history characteristics. Such a step can help ensure that CITES listing actions are based on scientific knowledge and are more complementary to that of RFMOs and CMS, with rapidly declining species listed on Appendix I, and those not yet threatened but likely to become so as a result of trade pressure listed on Appendix II, to allow for ongoing, sustainable trade in a timely manner. This document proposes those changes be made to Resolution Conf. 9.24 (Rev. CoP17) and WCS strongly recommends its adoption at CoP19.

Such changes can help solve the ongoing controversy around shark and ray listing proposals, conflicting opinions between Parties, and streamline expert advice on listing proposals, which appropriately consider the biology of aquatic species such as sharks.

## **CoP19 Species Proposals**

*Note: Links subject to change based on new versions uploaded to CITES website.*

### **89. Proposals to amend Appendices I and II**

#### **1. *Hippopotamus amphibius* -- ADOPT**

*Proponents: Benin, Burkina Faso, Central African Republic, Gabon, Guinea, Liberia, Mali, Niger, Senegal, Togo*

*Proposal: Transfer from Appendix II to I*

WCS appreciates the submission of this proposal by Benin, Burkina Faso, Central African Republic, Gabon, Guinea, Liberia, Mali, Niger, Senegal, and Togo to transfer *Hippopotamus amphibius* from Appendix II to Appendix I. The hippopotamus has a patchy and scattered distribution across Sub-Saharan Africa. It is listed by the IUCN Red List of Threatened Species as Vulnerable, changed in 2006 from Least Concern, and last updated in 2017. The primary threats to the species are habitat loss and degradation, often leading to conflict with humans around the freshwater habitats relied upon by the species, and unregulated hunting for meat and for ivory from their canine teeth.

International trade in hippo ivory increased markedly following the ban on international commercial trade in African elephant ivory, agreed at CoP7 in 1989, and levels of illegal and unregulated/unsustainable trade remain high. Hippo populations are especially vulnerable to overexploitation because of their naturally low reproductive rate (generally only one offspring every two years). Populations across much of the range have declined very significantly and the species in many countries clearly qualifies for an Appendix I listing, although a few Range States retain healthier populations. It is not possible to readily determine the origin of hippo ivory in trade, and the Precautionary Principle necessitates listing the species based on the many parts of its range where it is threatened by international trade. Hence, we recommend listing the entire species on Appendix I, both to ensure greater protection for the many vulnerable populations, and also recognizing that CITES Reso. Conf. 9.24 (Rev. CoP17), Annex 3, is clear that split listings are to be avoided in view of the enforcement problems it creates.

#### **2. *Ceratotherium simum simum* -- PENDING**

*Proponents: Namibia and Botswana*

*Proposal: Transfer the Namibia population from Appendix I to II, with an annotation limiting trade to live animals for in situ conservation and hunting trophies.*

Namibia and Botswana propose to transfer the Namibia population of southern white rhinoceros from Appendix I to Appendix II, with an annotation in the listing itself that would only allow export of live animals for *in situ* conservation, and of hunting trophies. We note that under the current Appendix I listing, Namibia can already export hunting trophies and live Southern white rhinos as long as they meet the requirements of Article III of the Convention.



In the proposal, Namibia cites the ability to obtain greater revenues from exports of live animals and hunting trophies if the species is on Appendix II. We note that even if that is the case, such economic considerations are not part of the criteria for amending the CITES Appendices (as per Reso. Conf. 9.24 (Rev. CoP17)).

The proposal cites increasing population numbers for this species within Namibia (currently the largest population outside of South Africa). It also notes that private landowners currently providing habitat for southern white rhinos may not be able to keep this habitat against other pressures. WCS appreciates conservation successes in Namibia as detailed in this proposal, and commends the efforts of Namibia to increase enforcement efforts against the illegal killing of southern white rhinoceroses.

As noted in Document 75, and in the annexed report from the IUCN African and Asian Rhinoceros Specialist Group, continental declines are continuing in Southern white rhinoceroses. Namibia contains the second largest population of *C. simum simum*, but it remains significantly smaller than the population in South Africa (which is regularly targeted by poachers). We welcome the report of population increases within Namibia, but stress that any transfer of this population from Appendix I to Appendix II would be accompanied by complicated implementation and potential cascading effects across the populations of southern Africa and beyond. Pending assurances from Namibia about safeguards for CITES implementation, feedback from other rhinoceros range States on the potential effects on their populations, and as long as we are assured that there would be no reservations taken to this amendment of the Appendices, we might be able to recommend adoption of this proposal, with the annotation as proposed. Absent those assurances and feedback from range States, we recommend rejection of the proposal.

### **3. *Ceratotherium simum simum* -- REJECT**

*Proponent: Eswatini (formerly Swaziland)*

*Proposal: Remove the annotation to the Appendix II listing of the Eswatini population*

Eswatini proposes to remove the annotation to the Appendix II listing for its Southern white rhino population. This would permit international trade pursuant to CITES Article IV, including trade for primarily commercial purposes, of Southern white rhinos from Eswatini—both live animals as well as parts and derivatives, such as horns. The supporting statement says that this would be to enable export from Eswatini of 330 kg of rhino horn currently held in stockpiles. However, removal of the annotation would not restrict trade for commercial purposes to this stockpile.

The proposal claims that potential revenues from sale of horns should be considered in removing the Annotation and allowing commercial trade, but that is not a factor in the CITES listing criteria (Reso. Conf. 9.24 (Rev. CoP17)).

Africa's and Asia's rhinoceroses are facing a poaching crisis, and all efforts must be made to counter the trafficking in rhino horn that is driving the poaching, and to disrupt the organized criminal networks benefiting from it. WCS believes that legalizing rhino horn trade from Eswatini will exacerbate rather than solve the problem, by stimulating demand, undermining enforcement efforts in other rhinoceros range States, facilitating laundering of illegal horn through "legal" sales, and undermining enforcement and market control measures in consumer States.

Additionally, use of rhino horn is both evolving and poorly understood and now includes not only treatments for cancer and associated illnesses [e.g. fever] but also non-traditional preparations. If these preparations grow in popularity, demand could escalate if the stigma associated with illegality is removed. Furthermore, many Asian consumer States have made significant progress in reducing demand and altering consumer behavior, and in enforcement and prosecutions—those efforts would be undermined by opening up any legal international rhino horn trade. We note as well that import and sale for commercial use of rhino horn and products is illegal in all consumer States.

Even a conservative application of the Precautionary Principle suggests that legalizing the trade is dangerous. Demand-reduction and market control initiatives have been successful in curtailing markets for rhino horn. Such initiatives together with more effective law enforcement throughout the trade chain, efforts to disrupt the criminal networks involved, and efforts to combat the corruption driving this trade, present the best hope for ending the poaching crisis, not opening a legal trade in rhino horns.

WCS recognizes the conservation efforts of Eswatini, but we recommend that the Parties reject this proposal. However, we also recommend that the international community work to help support rhino conservation in countries such as Eswatini.

#### **4. *Loxodonta africana* -- REJECT**

*Proponent: Zimbabwe*

*Proposal: Amend Annotation 2 pertaining to the populations of Botswana, Namibia, South Africa and Zimbabwe*

Zimbabwe has submitted a proposal to amend the Appendix II listing of African elephant populations in Botswana, Namibia, South Africa, and Zimbabwe.

The proposed amendments would (a) open commercial trade in elephant leather from Zimbabwe; (b) delete a reference to the conditional sale of ivory from all populations in Appendix II that took place following CoP12; and (c) remove language prohibiting further proposals for commercial sales of ivory. Even though this does not immediately propose a structured commercial sale of ivory from Appendix II populations, it is a serious cause for concern, as it would open the possibility of future commercial sale of ivory.

The annotation would leave in place requirements that any commercial trade be sourced from stockpiles verified by the Secretariat, that trading partners be approved by the Standing Committee, and that any revenue derived from sales be channeled towards elephant conservation efforts in these proponent range States.

This proposal is not dissimilar to a proposal submitted by Botswana, Namibia, and Zimbabwe at CITES CoP18. WCS opposed those proposals at CoP18, and similar proposals at CoP17, because population data provided within the proposal were insufficient to justify movement towards *any* commercial sale of ivory.

While there have been several years of a downward trend in sub-regional PIKE scores for southern Africa, we do note a small uptick for 2021, and continued reports, for example in

Document 75, suggest that poachers are still operating within these countries for other wildlife products (e.g., rhinoceros horn).

WCS recommends that Parties reject this proposal. Although this proposal would leave certain restrictions in place, WCS does not support any reopening or legalization of international commercial trade in elephant ivory because: a) it cannot be sufficiently regulated, monitored, or enforced to prevent laundering of illegal ivory, and b) it continues to stimulate demand. Furthermore, important steps have been taken to close domestic ivory markets in multiple countries, including China (including Hong Kong SAR), the EU, the United Kingdom, Singapore, and the United States. All of these are in accordance with Resolution Conf. 10.10 (Rev. CoP17), and it is clear that the international community is not seeking to further support domestic and/or international ivory trade.

## **5. *Loxodonta africana* -- PENDING**

*Proponents: Burkina Faso, Equatorial Guinea, Mali, Senegal, Syria*

*Proposal: Transfer populations of Botswana, Namibia, South Africa and Zimbabwe from Appendix II to Appendix I*

Burkina Faso, Equatorial Guinea, Mali, Senegal, and Syria have submitted a proposal to transfer the elephant populations of Botswana, Namibia, South Africa and Zimbabwe from Appendix II to I, thereby including all populations of this species on Appendix I.

WCS notes that a similar proposal was put forward at CITES CoP18 by Burkina Faso, Côte d'Ivoire, Gabon, Kenya, Liberia, Niger, Nigeria, Sudan, Syria, and Togo. WCS recommended then that the proposal should be rejected by Parties until such time as new data on population trends were available to justify the transfer to Appendix I of elephants in these four countries. We were very concerned at that time as well about the potential for Parties to enter a reservation to this transfer between the Appendices, which would stimulate poaching and illegal trade, and undermine years of work to protect elephant populations and close domestic ivory markets.

In considering the proposal under consideration by CoP19, WCS looked to whether any *new* population data were available that demonstrate that the four populations of *L. africana* in this proposal meet the criteria in Resolution Conf. 9.24 (Rev. CoP17). For population trends, the proposal cites the African Elephant Specialist Group report from 2016 (Thouless et al.). Population data presented in the proposal show a decline at the species level. We note that this includes both forest and savannah elephants under CITES-approved nomenclature.

While there have been several years of a downward trend in sub-regional PIKE scores for southern Africa, we note a small uptick for 2021, and continued reports in, for example, Document 75, suggest that poachers are still operating within these countries for other wildlife parts (e.g., rhinoceros horn).

The proposal correctly notes that split listings are discouraged within CITES in accordance with Reso. Conf. 9.24 (Rev. CoP17) Annex 4, as it creates significant enforcement challenges for range States working to address illegal killing and trade in this species. WCS agrees with this view.

We note with concern that in 2021, the IUCN Red List of Threatened Species [reclassified the African forest elephant](#) (*Loxodonta cyclotis*, recognized by CITES as *L. africana*) as [Critically Endangered](#), and the [African savanna elephant](#) (*L. africana*) as [Endangered](#). Considering the precarious conservation status of the species (particularly the forest elephant) and the scientific information in the IUCN assessment, we find that the populations currently in Appendix II now qualify for Appendix I.

WCS therefore recommends that the Parties support the intent of this proposal to transfer the populations of *Loxodonta africana* of Botswana, Namibia, South Africa and Zimbabwe from Appendix II to I, based on currently available population data.

However, we are very concerned that, perversely, agreeing to greater protection for the African elephant could threaten populations further (of both savanna and forest elephants), if both a range State and consumer State were to enter reservations to the Appendix I listing of the populations in Botswana, Namibia, South Africa and Zimbabwe. Therefore, although we support the intent of the proposal to create a level playing field across Africa, we encourage interested Parties (range and consumer States and others) to find common ground on these issues at CoP19. Until all domestic ivory markets are closed, or consumer States declare they will enter a reservation, we cannot recommend adoption of this proposal at this time.

We urge Parties whose elephant populations are the subject of this proposal, and indeed all African elephant range States, to continue to increase enforcement action and exercise vigilance against any efforts to traffic elephant ivory or other products, and to increase regional and global cooperation to dismantle ivory trafficking networks that continue to endanger African elephants across the continent.

#### **8. *Kittacincla malabarica* -- [ADOPT](#)**

*Proponents: Malaysia, Singapore*

*Proposal: Include in Appendix II*

Despite stable or increasing trends in parts of the species overall range, the local extirpations in parts of Indonesia such as Java, Sumatra, and West Kalimantan - close to centers of demand in the caged songbird trade - and the vulnerability of specific sub-species present significant cause for conservation concern. Declining availability and increased demand demonstrated by market surveys in Indonesia suggest potential sourcing from other parts of the species range. There is an urgent need to proactively put in place measures to ensure any further trade is legal and sustainable, and to prevent a change in trade patterns that could decimate local populations in other parts of the species' range.

A high number of seizures across Southeast Asia, particularly in countries such as Malaysia where it is a protected species, as well as historical trade data collected by the EU suggest that international trade in this species has been and will continue to be a factor in its conservation. CITES regulations will help ensure any trade is legal and sustainable. The species clearly qualifies for inclusion in Appendix II.

Noting feedback from the range State consultation, we strongly support listing all populations of this species, as not including certain countries' populations on Appendix II

would undermine implementation and enforcement. It also contradicts Reso. Conf. 9.24 (Rev. CoP17) Annex 3, “Split-listings that place some populations of a species in the Appendices, and the rest outside the Appendices, should normally not be permitted”.

#### **9. *Pycnonotus zeylanicus* -- ADOPT**

*Proponents: Malaysia, Singapore, USA*

*Proposal: Transfer from Appendix II to I*

The straw-headed bulbul, *Pycnonotus zeylanicus*, is one of Southeast Asia’s most threatened bird species. It is declining extremely rapidly across its range primarily as a result of trapping of wild birds for the cage-bird trade, compounded by habitat loss within its rather specific habitat type. 50 years ago, the species was widespread in lowland riparian forests across much of Southeast Asia, but trapping for the songbird trade (both domestic and international) has caused its extirpation across most of its former range, including from inside protected areas. It is believed to be extinct in all of Thailand and Myanmar, as well as Java in Indonesia; it is believed to be almost extinct in Sumatra, and of 19 sites where the species was recorded in Borneo pre-2000, recent records indicate it was observed in less than half (Chiok et al. 2019). With only an estimated 600-1,700 mature individuals remaining in the wild, the species is listed on the IUCN Red List of Threatened Species as Critically Endangered (BirdLife International 2022). The only population not known to be declining is that in Singapore, with an estimated 200-500 mature individuals. Prices for the birds in Indonesia continue to increase, so even as supply declines, demand evidently continues to rise. There is no evidence that captive breeding is alleviating the demand for wild-caught birds whose singing is deemed to be superior.

WCS recommends that the only way to conserve the species is to prevent all further international commercial trade. Thus, WCS strongly recommends adoption of this proposal, and looks forward to working with Indonesia, Malaysia, and Singapore in conserving the species.

#### **13. *Crocodylus siamensis* – REJECT**

*Proponent: Thailand*

*Proposal: Transfer Thailand’s population of *Crocodylus siamensis* from Appendix I to II, with a zero quota for wild specimens.*

Thailand proposes to transfer its population of *Crocodylus siamensis* from Appendix I to II, with a zero quota for wild specimens. *C. siamensis* is categorized as Critically Endangered on the [IUCN Red List of Threatened Species](#) (most recently in 2012) and is among the most endangered of all crocodilians, with very few (perhaps about 100 or fewer) individuals remaining in the wild in Thailand, in very small isolated populations. The species clearly does not meet the biological criteria for transfer to Appendix II, regardless of any annotation. We recommend that Parties reject this proposal.

We concur with the proposal that the species is well established in captivity, with tens of thousands of individuals in farms in Thailand, Cambodia, and Vietnam (though not necessarily pure *C. siamensis*). Successful captive breeding has led to the [registration of 29 commercial breeding farms in Thailand](#), pursuant to Reso. Conf. 12.10 (Rev. CoP15). The

captive production in Thailand however is no substitute for conservation of the species in the wild. The goal of CITES is the conservation of species in the wild, and much more needs to be done to prevent the extinction in the wild of this species. If a species such as this is traded successfully and profitably, but the species continues to be Critically Endangered or becomes Extinct in the wild, then CITES implementation has failed. We encourage the Government of Thailand to establish and implement programs to reintroduce *C. siamensis* into the wild, and monitor populations, with the goal of recovery of the species.

**17. *Phrynosoma platyrhinos* -- PENDING** (prefer 18, below)

*Proponents: United States*

*Proposal: Include in Appendix II.*

[No written comment]

**18. *Phrynosoma* spp. -- ADOPT**

*Proponents: Mexico*

*Proposal: Include in Appendix II.*

[No written comment]

**21. *Crotalus horridus* -- ADOPT**

*Proponents: United States*

*Proposal: Include in Appendix II.*

[No written comment]

**A note on proposals 22-33 (Testudines)**

**Recommendation: ADOPT proposals 22-33**

Turtles, including tortoises, freshwater turtles, and sea turtles, are one of the two most threatened large groups of vertebrates (along with primates), with 63% of the 270 species currently assessed on the IUCN Red List of Threatened Species listed as Critically Endangered, Endangered, or Vulnerable. Additionally, provisional assessments by the IUCN Tortoise and Freshwater Turtle Specialist Group of previously unevaluated species and updated re-evaluations of previously listed species indicates that more than half (ca. 55%) of all 357 global species of turtles and tortoises are threatened with extinction (Rhodin et al. 2018, in *Chelonian Conservation and Biology*; Turtle Taxonomy Working Group 2021, in *Chelonian Research Monographs*).

In addition to other threats, turtle populations have declined significantly, and continue to decline, due to targeted exploitation for unsustainable domestic and international trade. Over-exploitation of wild populations of turtles is the single most powerful factor that is

driving species and populations towards extinction. Abating such a threat is the very reason that CITES exists.

Over CITES' history, many turtle species have been added to Appendices I and II. We appreciate the significant conservation and management actions taken by CITES Parties for the conservation of tortoises and freshwater turtles. However, many non-CITES and CITES-listed freshwater turtle species continue to be affected negatively by unregulated, poorly regulated, and/or illegal trade. Traders and collectors seeking new sources and species often shift to new species and populations as others are depleted. Furthermore, CITES-listed species are sometimes intentionally misidentified as unlisted species, hampering enforcement efforts.

We believe that a piecemeal species-by-species approach to listing turtles in the Appendices is not the most effective strategy, and will continue to drive unsustainable trade towards additional non-listed species. Waiting for complete data for all populations would mean the certain depletion or complete loss of many species, and would not be consistent with the Precautionary Principle. Failure to add these species to Appendix II would be a repudiation of CITES' mission to manage international trade in at-risk taxa.

Turtles pose significant identification challenges even for experts, and they certainly do so for Customs officials. We strongly recommend adoption of all of the proposals submitted to CoP19 that relate to turtles, including in particular proposals at the higher taxonomic level (genus or family). This is fully consistent with CITES Article II.2.b. and Resolution Conf. 9.24 (Rev. CoP17), Annex 2b. The Parties have more than 45 years of experience with higher taxonomic listings, and we applaud the Parties that have submitted these proposals to CoP19. We provide brief comments on these proposals, below. WCS has extensive field conservation experience in the conservation of tortoises and freshwater turtles; please contact us if you have questions on any of these proposals.

## **22. *Chelus fimbriata* & *C. orinocensis* -- ADOPT**

*Proponents: Brazil, Colombia, Costa Rica, Peru*

*Proposal: Include in Appendix II*

We welcome the proposal from these four Range States to include the only two species in the genus *Chelus* on Appendix II. The proposal clearly demonstrates the significantly increasing international trade in this species (including illegal trade), mostly for the pet and hobbyist markets. The species qualify for Appendix II. We know all too little about this species' biology, particularly age to maturity in the wild and juvenile survivorship. Unlike many tropical turtles, the age to maturity appears to be protracted (evidence of limited captive breeding in zoos and private collections around the world). This lengthy time to maturity makes the species particularly vulnerable to exploitation. Inclusion in Appendix II will help ensure exports are legal and sustainable, and will stimulate improved management.

## **23. *Macrochelys temminckii* & *Chelydra serpentina* -- ADOPT**



*Proponent: USA*

*Proposal: Include in Appendix II*

We strongly recommend adoption of the proposal submitted by the USA to include the Alligator snapping turtle and Common snapping turtle in Appendix II (the species are currently in Appendix III). The U.S. is experiencing a resurgence of unsustainable turtle trade and Appendix II is the principal CITES mechanism to address this. We note that pursuant to CITES Article IV, the inclusion in Appendix II requires a non-detriment finding, which is not required pursuant to Article V. Therefore, adoption of this proposal would help ensure the sustainability of exploitation and trade in these species. The proposal clearly demonstrates that the species are increasing in international trade; that *M. temminckii* clearly meets the biological criteria for inclusion in Appendix II; and that *C. serpentina* clearly meets the criteria for inclusion due to its similarity of appearance to *M. temminckii* (they are difficult to differentiate as immatures, and the majority of international trade is in immatures). Hatchlings of *Macrochelys* are often mixed into large shipments of common snapping turtles to hide their presence. Both species have slow life history traits, including late sexual maturity, long adult lifespan, and extended reproductive lives, and are particularly vulnerable to over-exploitation. Appendix II listing for these species is the logical, precautionary, and conservation-minded approach.

**24. *Graptemys barbouri*, *G. ernsti*, *G. gibbonsi*, *G. pearlensis* & *G. pulchra* -- ADOPT**

*Proponent: USA*

*Proposal: Include in Appendix II*

We recommend adoption of the proposal submitted by the USA to include the 5 species of Broad-headed map turtles in Appendix II (the species are currently in Appendix III). We note that pursuant to CITES Article IV, the inclusion in Appendix II requires a non-detriment finding, which is not required pursuant to Article V. Therefore, adoption of this proposal would help ensure the sustainability of exploitation and trade in these species. The proposal clearly demonstrates that these 5 species satisfy the criteria for inclusion in Appendix II.

The broad-headed group of *Graptemys* is a distinct arm of the clade *Graptemys* (which may warrant greater taxonomic studies with Next Gen DNA sequencing). The species are perceived to be in decline based on the long history of researchers doing surveys in the southeastern United States. More research is needed to understand the impact on these species of compounding threats, including invasive alien Asian clams and zebra mussels in their habitat, and river impoundment and channelization. However, trade appears to be increasing and high amongst high-end hobbyists and collectors, with prices increasing annually. Limited numbers are captive bred and exports are dependent on wild-caught animals. The limited captive breeding is an opening for laundering of wild caught hatchlings/juveniles into the trade.

**25. *Batagur kachuga* -- ADOPT**

*Proponent: India*

*Proposal: Transfer from Appendix II to I*

We recommend adoption of this proposal from India, to transfer the Red-crowned roof turtle to Appendix I. The species is listed as Critically Endangered on the IUCN Red List of Threatened Species, and continues to decline; the Red List notes there are likely to only be 500 mature individuals remaining in the wild. There is no legal trade of the species originating from India as it is a Class I wildlife species. Although Bangladesh was a range State, the species is believed to be extirpated from the country. After more than 15 years of hatch and release programs on the Chambal River in India, this species is still in marked decline. Juveniles and adults are targets of poaching and trafficking, for the pet and hobbyist trades. Headstarting facilities have been the target of theft for the Asian turtle market.

**26. *Cuora galbinifrons* -- ADOPT**

*Proponents: Vietnam and the European Union*

*Proposal: Transfer from Appendix II to I*

We recommend adoption of this proposal from Vietnam, one of the three Range States of the species (along with China and Lao PDR), and the EU. Collection for the pet, hobbyist, and food trades is believed to be the greatest threat to the species, which has been assessed as Critically Endangered on the IUCN Red List since 2000. *C. galbinifrons* is legally protected from exploitation in all range countries, but illegal exploitation and trade continue and enforcement will be enhanced through an Appendix I listing. Furthermore, recent surveys in northern Vietnam have found previously unknown populations. There is valid concern that these populations will be quickly exploited for the international hobbyist trade. Transfer to Appendix I may be the best means of protecting perhaps the only remaining functioning populations.

**27. *Rhinoclemmys* spp. -- ADOPT**

*Proponents: Brazil, Colombia, Costa Rica, Panama*

*Proposal: Include all species in the genus in Appendix II*

We recommend adoption of this proposal from four of the Range States of this taxon, to include all species in the genus *Rhinoclemmys* in Appendix II. As one of the few remaining genera of brightly colored turtles not on Appendix II, there is great concern of their exploitation now increasing dramatically, particularly for the pet trade. Recent illegal exports from Mexico have been increasing, and trade from some countries (e.g. Honduras) is at a level that is clearly unsustainable. We find that the proponents have clearly demonstrated that the species qualify for inclusion in Appendix II, and a genus level listing is the most appropriate, due to difficulties in identification by non-experts. [Note: as of 3 September, this proposal was only available in Spanish.]

**28. *Claudius angustatus* -- ADOPT**

*Proponent: Mexico*

*Proposal: Include in Appendix II*

We recommend adoption of this proposal by Mexico, one of the three Range States of the species. Due to its specific habitat restrictions (seasonally flooded wetlands) the species

is very vulnerable to habitat loss, the second greatest threat after exploitation for domestic and international trade. The seasonal exploitation of the species is particularly worrisome, as it is extremely easy to collect the species during the first few rains of the year. The species is in international trade, both for use as pets and for human consumption. Captive breeding is unsuccessful. The species clearly qualifies for Appendix II.

### **29. *Kinosternon* spp. -- ADOPT**

*Proponents: Brazil, Colombia, Costa Rica, El Salvador, Mexico, Panama, USA*

*Proposal: Include *Kinosternon cora* and *K. vogti* in Appendix I and all other species of *Kinosternon* spp. in Appendix II (except the species already included in Appendix I)*

We recommend adoption of this proposal by 7 of the Range States of this genus (mud turtles). Trade in the species in this genus has skyrocketed in the last few years. We find that the proposal clearly demonstrates that *K. cora* and *K. vogti* qualify for inclusion in Appendix I, and that all other *Kinosternon* species qualify for inclusion in Appendix II, pursuant to Reso. Conf. 9.24 (Rev. CoP17), either Annex 2a or 2b (depending on the species). The species are often very difficult to tell apart by known experts (and even more difficult for Customs officials), leading to great potential for laundering protected species within shipments of non-protected species. The species are exported in very high numbers for the pet and hobbyist markets, largely to the US and EU, and there is also significant illegal trade.

### **30. *Staurotypus salvinii* & *Staurotypus triporcatus* -- ADOPT**

*Proponents: El Salvador and Mexico*

*Proposal: Include in Appendix II*

We recommend adoption of this proposal from El Salvador and Mexico (two of the four Range States of these species), to list *Staurotypus salvinii* in Appendix II pursuant to Reso. Conf. 9.24 (Rev. CoP17) Annex 2a, and to list *Staurotypus triporcatus* in Appendix II pursuant to Reso. Conf. 9.24 (Rev. CoP17) Annex 2b. Both of these species of Giant musk turtles are highly valued in the pet trade. The smaller species, *S. salvinii*, appears to have a much smaller distribution along coastal Mexico and Guatemala. It is likely Critically Endangered but there has not been a range wide survey since the mid-90's. There has been limited success in farming these species, and any exports are dependent on removing wild specimens. As a species that is already heavily exploited for food and is facing a great deal of wetland habitat loss, there is a need to limit/reduce global trade to sustainable, legal levels, as clearly recognized by the co-sponsors. [Note: as of 3 September, this proposal was only available in Spanish.]

### **31. *Sternotherus* spp. -- ADOPT**

*Proponent: USA*

*Proposal: Include in Appendix II*

We recommend adoption of this proposal from the USA to include all species of musk turtles in the genus *Sternotherus* in Appendix II. The proposal clearly shows that the species qualify for inclusion in Appendix II pursuant to Reso. Conf. 9.24 (Rev. CoP17)

Annex 2a. Their life history (late maturity, long lifespan, low recruitment, small clutch size, and reliance on low adult mortality), like other turtle species, makes them highly susceptible to anthropogenic threats including exploitation for international trade. These turtles are very popular internationally, with the pet and collectors trades. There have been significant recent increases in international trade, particularly the striped musk turtles from Florida, and the Florida endemic species, *S. steindacheri*. The flattened musk turtle, *S. depressus*, is of great concern and is on the US Endangered Species Act as threatened. There is very high collectors' demand for *S. depressus*, which is often the focus of smuggling operations. There are known cases of *S. depressus* being intentionally mixed into shipments of unprotected musk turtles; inclusion in Appendix II will help ensure that any trade in these species is both sustainable and legal, and will help facilitate enforcement along the trade chain.

### **32. *Apalone* spp. -- ADOPT**

*Proponent: USA*

*Proposal: Include all species in the genus in Appendix II, except for *Apalone spinifera atra*, which should remain in Appendix I*

We recommend adoption of this proposal from the USA to list all species in the genus *Apalone* (softshell turtles) in Appendix II, other than the subspecies that is currently in Appendix I (to remain in App I). We note that *A. ferox*, *A. mutica*, and *A. spinifera* (other than *A. s. atra*) are currently in Appendix III. These species, native to Canada, the USA, and Mexico, clearly qualify for inclusion in Appendix II pursuant to Reso. Conf. 9.24 (Rev. CoP17), Annex 2aA and 2aB. Trade in these species continues to increase annually as demand in Asia increases. Softshell turtles are also a prized food item and with an increasing number of turtle farms each year, more founder stock is needed and older farms need replacement breeding stock as there is limited adequate animal husbandry in the farming industries. It is cheaper to buy new breeders than it is to provide veterinary care to sick or injured turtles. While these species can be bred in captivity, they are easily caught and trapped in the wild, and it remains unknown if the supply can meet the current commercial demand, thereby making wild populations vulnerable to over-exploitation. Furthermore, Appendix II listing will greatly benefit efforts by the US states and Federal government to monitor farms, and ensure animals are truly bred in captivity and that exports do not harm wild populations. Additionally, as the species are difficult to tell apart, even by experts, Appendix II will reduce the opportunities to launder the more threatened species as unlisted species.

### **33. *Nilssonina leithii* -- ADOPT**

*Proponent: India*

*Proposal: Transfer from Appendix II to I*

We recommend that Parties adopt this proposal to transfer Leith's softshell turtle, a Critically Endangered Indian endemic, to Appendix I. *Nilssonina leithii* has been subject to intensive exploitation and is believed to have suffered a decline averaging over 90% in the last 30 years (and declines are ongoing). The species clearly meets the criteria for Appendix I pursuant to Reso. Conf., 9.24 (Rev. CoP17) Annex I. It is prohibited under Indian law to hunt, collect, or trade the species, but illegal capture and illegal trade for both domestic and international food markets, live animals, and its calipee is a significant

threat. Clearly, any commercial trade in the species will further endanger the species, and it should be included on Appendix I, which will help stimulate enhanced enforcement efforts. We also recommend that the Government of India increase efforts in the *in situ* conservation and management of this species.

#### **34. *Centrolenidae* spp. -- ADOPT**

*Proponents: Argentina, Brazil, Costa Rica, Côte d'Ivoire, Dominican Republic, Ecuador, El Salvador, Gabon, Guinea, Niger, Panamá, Perú, Togo, and the USA.*

*Proposal: Include all species in the family in Appendix II*

We recommend adoption of this proposal to include 12 species of glass frogs in the family Centrolenidae in Appendix II pursuant to Reso. Conf. 9.24 (Rev. CoP17) Annex 2a, and all remaining species in the family in Appendix II pursuant to Annex 2b of the Resolution. The proposal clearly demonstrates that the species qualify biologically for inclusion in Appendix II. The species are increasingly exploited, often illegally, for the pet and collectors' trades (mostly to Europe and the USA). The great difficulty in distinguishing between different species and genera of the family Centrolenidae provides an opportunity for exploitation (and laundering) by those who desire to trade in rare or endangered species if only some, but not all, species of glass frogs were to be included in Appendix II. It is vital therefore to list all species in this family. That is in addition to the benefits of Appendix II, in helping to ensure that trade is legal and biologically sustainable, which will help reduce pressure on wild populations that are already threatened by habitat fragmentation, climate change, and disease.

#### **35. *Agalychnis lemur* -- ADOPT**

*Proponents: Colombia, Costa Rica, European Union, Panama*

*Proposal: Include in Appendix II with a zero annual export quota for wild-taken specimens traded for commercial purposes*

We recommend that Parties adopt this proposal, submitted by the three Range States of the species and the EU. The species clearly qualifies for inclusion in Appendix I. However, the proposal is for a zero quota for wild-taken animals traded for commercial purposes, and cannot be made stronger. We recommend its adoption, but encourage the Range States to evaluate the effectiveness of the zero quota and consider Appendix I if necessary in the future.

#### **36. *Laotriton laoensis* -- ADOPT**

*Proponent: European Union*

*Proposal: Include in Appendix II with a zero annual export quota for wild-taken specimens traded for commercial purposes*

We recommend that Parties adopt this proposal. The Lao warty newt is in high demand in the pet and collectors trades, is Endangered on the IUCN Red List of Threatened Species, and it clearly qualifies for inclusion in Appendix I. However, the proposal is for a zero quota for wild-taken animals traded for commercial purposes, and cannot be made stronger. We recommend its adoption, but encourage Lao PDR to evaluate the effectiveness of the zero quota and consider Appendix I if necessary in the future.

### 37. *Carcharhinidae* spp. -- **ADOPT**

*Proponents: Panama, Bangladesh, Colombia, Dominican Republic, Ecuador, El Salvador, European Union and its 27 Member States, Gabon, Israel, Maldives, Senegal, Seychelles, Sri Lanka, Syria, and the United Kingdom.*

*Proposal: Include all species in the family Carcharhinidae in Appendix II*

We greatly appreciate this proposal from more than 40 Parties to include 19 species of Carcharhinid or Requiem sharks on Appendix II, pursuant to Reso. Conf. 9.24 (Rev. CoP17) Annex 2a, and all remaining species in the family by similarity of appearance, pursuant to Reso. Conf. 9.24 (Rev. CoP17) Annex 2b. All of the 19 species proposed pursuant to Annex 2a (and thus Article II.2.b of the Convention) are assessed as Endangered or Critically Endangered on the IUCN Red List of Threatened Species, with most populations facing rapid recent declines of 70% or more, and some populations suffering near 100% depletion.

This Appendix II proposal would bring the majority of the shark fin trade under CITES Appendix II regulation (i.e., ensure sustainable, legal trade). Noting that Requiem sharks constitute at least 70% of the fin trade (Cardenosa et al 2022) and over 68% of the family is threatened with extinction (Dulvy et al 2021), such action is clearly critical given that the intent of CITES Appendix II is to regulate the trade in species not necessarily threatened with extinction but in which trade must be controlled in order to avoid utilization incompatible with their survival (CITES Article II.2).

International trade is the major threat to this family of sharks. At least 39 species in the Requiem shark family have been documented in the fin markets of Hong Kong and Guangzhou, representing 46% of all species recorded in these markets (Fields et al. 2018). The proportional contribution (volume) of Requiem shark species in the global fin trade could be as high as 85.5% (Clarke et al. 2006, Fields et al. 2018, Cardenosa et al. 2018a, Cardenosa et al. 2020 and 2022).

There is a close visual resemblance between the most commonly traded forms of the 19 Critically Endangered and Endangered species proposed here for listing (primarily their fins but also dressed carcasses and meat), and the same products from many currently unlisted species in the family Carcharhinidae, along with already Appendix II listed members of the family, such as the silky shark (*C. falciformis*).

For sharks currently listed on the CITES Appendices, visual fin identification (ID) has been used as the primary technique to identify species at the point of trade, which facilitates implementation and enforcement by Customs officials. Some species, such as the oceanic whitetip shark, could be listed at the species level due to clear markings on their fins, enabling relatively easy identification. Other taxa such as wedgefish were listed on Appendix I at the family level due to the similarity of dorsal fins between wedgefish species. Parties made these decisions based on the ease of visual identification of the unprocessed fins.

It is crucial to maintain the ease of visual ID we have seen to date, and as for the wedgefish and mobulid proposals adopted at CoP17 and CoP18, any species within the Requiem shark family will need a family level listing due to similarity of fins.

For Requiem sharks, with nearly 70% of the family already Threatened as per IUCN Red List, and all 19 'lead' species in this proposal already Endangered or Critically Endangered, CITES action is needed now. WCS strongly urges CITES Parties to adopt this proposal.

Further information on the proposal and tools to aid its implementation can be found at <https://citessharks.org/cop19proposals>

### **38. *Sphyrnidae* spp. -- ADOPT**

*Proponents: Brazil, Colombia, Ecuador, European Union, Panama*

*Proposal: Include all species in the family Sphyrnidae in Appendix II*

We recommend that the Parties adopt this proposal to include the bonnethead shark (*Sphyrna tiburo*), a smaller coastal species of hammerhead shark, in Appendix II; and to include the five other smaller bodied hammerhead sharks in Appendix II by similarity of appearance, pursuant to Reso. Conf. 9.24 (Rev. CoP17) Annex 2b.

At CITES CoP16 in 2013, three large-bodied hammerhead sharks, including the Scalloped hammerhead (*Sphyrna lewini*), Smooth hammerhead (*Sphyrna zygaena*) and Great hammerhead (*Sphyrna mokarran*) sharks were included on Appendix II by the Parties. At the time, they were thought to be the only hammerhead species in international trade. Since then, updated research into the species composition of the international fin trade (Cardenosa 2020) has detected an increasing presence of smaller, less expensive shark fins and fins from coastal and smaller-bodied shark species, including the small-bodied hammerheads.

It has been highlighted by many CITES Parties and the Animals Committee (<https://cites.org/sites/default/files/eng/com/ac/30/Inf/E-AC30-Inf-14.pdf>) that this now presents an illegal trade loophole, with documented occurrences of listed hammerhead species being traded as unlisted ones. To close this loophole, the EU is proposing that all remaining hammerheads (family Sphyrnidae) are listed on CITES Appendix II alongside the bonnethead as "lookalike species", putting all nine described species of hammerheads on CITES Appendix II. This proposal should be adopted to aid in the implementation of existing Appendix II hammerhead shark listings.

### **39. *Potamotrygon albimaculata*, *P. henlei*, *P. jabuti*, *P. leopoldi*, *P. marquesi*, *P. signata* and *P. wallacei* -- ADOPT**

*Proponent: Brazil*

*Proposal: Include in Appendix II*

We recommend that Parties adopt this proposal to Include *Potamotrygon wallacei* and *Potamotrygon leopoldi* in Appendix II in accordance with Article II.2.a of the Convention and Resolution Conf. 9.24 (Rev. Cop 17), Annex 2a; and include *P. henlei*, *P. albimaculata*,



*P. jabuti*, *P. marquesi*, and *P. signata* on Appendix II in accordance with Article II.2.b of the Convention and Resolution Conf. 9.24 (Rev. Cop 17), Annex 2a.

**40. *Rhinobatidae* spp. -- ADOPT**

*Proponents:* Israel, Kenya, Panama, and Senegal

*Proposal:* Include in Appendix II

We recommend that Parties adopt this proposal to include all species of guitarfish (family: *Rhinobatidae*) on CITES Appendix II. Six guitarfish species that are assessed on the IUCN Red List of Species as Critically Endangered are proposed for inclusion on Appendix II. Due to similarities in appearance of traded products and the IUCN Red List classification of many other species as Threatened, all remaining species in the family *Rhinobatidae* are included in the proposal as “lookalikes”, pursuant to Reso. Conf. 9.24 (Rev. CoP17) Annex 2b and CITES Article II.2.b.

In recent years, Parties have included many shark-like rays on CITES Appendix II, such as wedgefish (*Rhinidae*) and giant guitarfishes (*Glaucostegidae*) due to the very high value of their fins, and their precarious conservation status in the wild. With potential lookalike issues between Family *Rhinobatidae* species and CITES Appendix II listed wedgefish and giant guitarfish fins, including all species in the Family *Rhinobatidae* can help prevent laundering of wedgefish or giant guitarfish via mislabeling as non-listed *Rhinobatidae* fins (while also helping to ensure that trade in all guitarfish is legal and sustainable).

Although there are limited reports and publications on the presence of these species in the shark fin trade, anecdotal information indicates that their fins are exported in significant quantities and enter the global shark fin trade. As such, precautionary Appendix II listing of this family is justified, especially given the lookalike issues noted above with already listed wedgefish and giant guitarfish.

**41. *Hypancistrus zebra* -- ADOPT**

*Proponent:* Brazil

*Proposal:* Include in Appendix I

We recommend that Parties adopt this proposal to include the Zebra pleco, a Brazilian endemic species included as Critically Endangered on the IUCN Red List of Threatened Species. The species is subject to significant illegal trade; all trade is for the ornamental fish trade. Although there is no legal commercial captive breeding of the species in Brazil, it is bred in captivity commercially in several countries. Appendix I listing, to protect this Critically Endangered species in the wild, will not prevent the registration of legitimate captive breeding facilities (with legally and sustainably obtained founder stock); the primary focus on CITES of course is and should be on the status of the species in the wild.



21 July, 2022

To: Adam Burns  
Acting Assistant Deputy Minister  
Fisheries and Oceans Canada  
By email: adam.burns@dfo-mpo.gc.ca

Dear Adam,

We are writing to urge Canada to support strong, science-based proposals to include additional shark species on Appendix II at this year's 19<sup>th</sup> meeting of the Conference of the Parties (CoP19) of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). Species listing proposals for consideration at CoP19 this November can be found on the CITES website [here](#).

The Government of Panama is leading a proposal to list the entire family of **requiem sharks** (Family Carcharhinidae) on CITES Appendix II. The EU Commission is leading a proposal to list all species of **hammerhead sharks** (Sphyrinidae spp.) that are not already listed, in Appendix II. Finally, Israel is leading a proposal to list all species of **guitarfishes** (Rhinobatidae spp.) on Appendix II. The fact that all three of these proposals are family-level listings speaks to the urgency of protecting sharks and rays from unsustainable international trade as well as the reduction in the enforcement burden that family-level listings offer. **We urge Canada to support these proposals.**

Canada has already emerged as a global shark leader in recent years. In 2019, Canada adopted world-leading [measures](#) that prohibit the trade in detached shark fins. In 2021 at ICCAT, Canada helped lead the charge to ban the retention of North Atlantic shortfin mako shark (*Isurus oxyrinchus*) (which is on CITES Appendix II). Further, at the 2021 NAFO meeting, Canada also supported a proposal to ban the retention of the Greenland shark (*Somniosus microcephalus*).

The mandate letter for the Minister of Fisheries and Oceans and the Canadian Coast Guard directs DFO to work together with Environment and Climate Change Canada to “halt and reverse nature loss by 2030 in Canada, achieve a full recovery for nature by 2050 and champion this goal internationally.”

Supporting the aforementioned science-based proposals to include shark species on Appendix II can help achieve this objective by elevating Canada's leadership on shark conservation and slowing the decline of vulnerable shark and ray populations through CITES listing.

### Rationale

Countries and experts around the world, including in Canada, are intensifying calls for taking action to maintain healthy ocean biodiversity and ocean ecosystems considering the multitude of threats including overfishing and climate change via the Convention on Biological Diversity (CBD) and the United Nations Framework Convention on Climate Change (UNFCCC), as well as via CITES. Sharks and rays play a key role in maintaining thriving ocean ecosystems. In new research released since CITES CoP18, an estimated 37% of chondrichthyan species (sharks, rays and chimaeras) are already threatened with extinction – the second highest rate among all vertebrate groups<sup>1</sup>.

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<sup>1</sup> Dulvy et al., Overfishing drives over one-third of all sharks and rays toward a global extinction crisis, Current Biology (2021),

The key threat to these species is overexploitation<sup>1</sup>; population declines are driven by the international trade for shark and ray products including in particular fins<sup>2</sup>. CITES has a critical role to play in slowing these declines by regulating the international shark and ray trade, but to date only 25% of the fin trade is regulated through CITES Appendix II listings. **CITES Parties must do more to control this global trade that is driving these ancient predators to extinction.**

Populations of many unlisted shark and ray species continue to plummet, and much of the trade driving these declines remains unmanaged in many countries and ocean regions. It is time to shift from a more reactive species-by-species approach to a more comprehensive and proactive approach focusing on listing at the family level, for example as has already been done for thresher sharks (family Alopiidae) and giant guitarfishes (family Glaucostegidae). There is strong precedent for listing species on CITES Appendices at the family or order level.

The need for listing all the hammerhead sharks is clear. In the eight years since the three large hammerhead shark species were listed in CITES Appendix II, improved research on the species composition and volume supplying the international fin trade demonstrates that the smaller-bodied hammerhead species are also being internationally traded for their fins.<sup>3</sup> There is also a risk that traded fins of the listed hammerhead shark species may be falsely claimed to be the unlisted species of small hammerhead sharks. This has already been raised as an issue of concern at the CITES Animals Committee in documents [AC30 Inf.14](#) and [AC Com.8](#). The species of concern are the remainder of the family not currently included on the CITES Appendices, mainly the smaller bodied species: *Sphyrna media*, *Sphyrna tudes*, *Sphyrna corona*, *Sphyrna gilberti*, *Eusphyrna blochii* and *Sphyrna tiburo*. These species' fins are either lookalikes for each other, or for already listed hammerhead species in their most commonly traded form (dried, unprocessed shark fins), thus necessitating a family-level listing approach.

In addition, the government of Panama, the host of CoP19, has submitted a proposal to list the entire family of requiem sharks on CITES Appendix II (Family Carcharhinidae), almost 70% of which have been assessed as threatened on the IUCN Red List of Threatened Species<sup>4</sup>. The inclusion of 19 lead species in the proposal is based on: 1) scientific evidence of population declines driven by unregulated international trade, 2) their status as Endangered or Critically Endangered on the IUCN Red List of Threatened Species, and 3) high volumes in the fin trade. The other species are included because their parts (i.e., dorsal, pectoral, caudal fins and meat) and products are difficult to distinguish (particularly by Customs and border control officers) from the other species within the family. Panama obtained the support of 40 co-sponsors from around the world (Bangladesh, Colombia, the Dominican Republic, Ecuador, El Salvador, the European Union (27 countries), Gabon, Israel, the Maldives, Senegal, the Seychelles, Sri Lanka, Syria and the UK), all of which recognize the urgent need to bring the majority of the shark fin trade under CITES control before more of these species become Endangered. This will be a priority issue for the CoP hosts at CoP19 in Panama City this November.

Listing the entire requiem shark family would facilitate efficient implementation and enforcement at the customs and border control level, helping to combat and prevent trafficking. It would bring the vast majority of the fin trade under CITES regulation, increasing the likelihood that every shipment of fins

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<https://doi.org/10.1016/j.cub.2021.08.062>

<sup>2</sup> Fields, A. T. *et al.* Species composition of the international shark fin trade assessed through a retail-market survey in Hong Kong. *Conserv. Biol.* **32**, 376–389 (2018).

<sup>3</sup> Cardeñosa *et al.* 2020. “[Species composition of the largest shark fin retail-market in mainland China](#).” *Scientific Reports*.

<sup>4</sup> Pacoureau, N., Rigby, C.L., Kyne, P.M. *et al.* Half a century of global decline in oceanic sharks and rays. *Nature* **589**, 567–571 (2021). <https://doi.org/10.1038/s41586-020-03173-9>

would contain CITES Appendix II species. Customs officials could then reasonably require that every such shipment be accompanied by CITES documents. This will reduce the burden and guess work for customs and border control. Furthermore, the additional permitting required would greatly improve data collection and help promote the sustainability and legality of the shark fin trade.

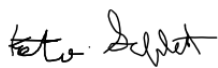
Together, the requiem and hammerhead shark and guitarfish ray family-level listing proposals would, when combined with the Appendix II shark and ray listings adopted at the past three CoPs, help ensure that only legal, sustainable trade in sharks and rays can continue. This safety net of full fin trade regulation will make it difficult for trade demands to shift from listed to unlisted species. For many of the species in trade, it is already too late – **action must be taken at CITES CoP19 to regulate the entire shark fin trade on CITES Appendix II, before widescale Appendix I listings and shark and ray trade bans are needed.**

## Conclusions

With Canada's adoption in 2019 of world-leading [measures](#) that prohibit the trade in detached shark fins and leadership at RFMOs, this focus on shark conservation at CITES CoP19 presents an opportunity to further showcase that leadership. Canada's support for sustainability checks pursuant to Appendix II regulation of any continued trade via these listing proposals would fit well with the domestic ban on the trade in detached shark fins, while acknowledging that other countries will continue to trade in shark fins, but that this trade should only go forward if it is sustainable and legal.

We ask Canada to join this effort to properly regulate the trade in shark fins, and work with Panama, the EU, the UK, and the other governments sponsoring shark and ray proposals at CITES to push for this essential action at CITES CoP19 by supporting these proposals, and helping them meet this ambitious agenda for sharks, and the world's oceans, this November at CITES CoP19.

Sincerely,



Katie Schleit  
Senior Fisheries Advisor  
Oceans North



Susan Lieberman, Ph.D.  
Vice President, International Policy  
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29 September, 2022

To: Jennifer Shaw  
Science Advisor, Ecosystems and Oceans Science  
Fisheries and Oceans Canada  
By email: [jennifer.shaw@dfo-mpo.gc.ca](mailto:jennifer.shaw@dfo-mpo.gc.ca)

Dear Jenn,

Thank you very much for the excellent discussion we had on August 17th, regarding the shark proposals being tabled and discussed at the upcoming 19th meeting of the Conference of the Parties (CoP19) to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). We appreciate your openness, and of course your consideration of these proposals.

We are writing in follow up to that meeting and our letter of the 21st of July, to provide you with additional information that has since become available.

We call your attention to the recent assessments of these proposals by the CITES Secretariat, IUCN/TRAFFIC and the UN Food and Agriculture Organization (FAO), which we know Canada will consider carefully in developing its positions for CITES CoP19.

In addition to the clear justification for the adoption of these listings detailed in our previous letter and the proposals themselves, we were pleased to see that both the CITES Secretariat and the IUCN/TRAFFIC assessments of the proposals for the requiem sharks (Family Carcharhinidae), hammerhead sharks (Sphyrnidae spp.), and guitarfishes (Rhinobatidae spp.) concluded that they meet the CITES listing criteria for inclusion in Appendix II.

Even the FAO panel, which uses a very narrow and non-precautionary interpretation of the CITES listing criteria, noted in their assessment that three of the lead requiem shark species, and the bonnethead shark qualified for Appendix II. Importantly, this FAO panel noted that analyzing lookalike species (CITES Article II.2.b) was beyond its capacity.

We welcome and call your attention to the recent submission from Panama of a new identification guide that supports these three proposals, providing the additional information the FAO panel was lacking. This guide was developed by the leading experts in visual fin identification and confirms that all remaining members of all three families meet the CITES criteria as lookalike species, with point of landing identification possible to the species level. Although this will facilitate traceability, point of trade identification remains only possible to the family level. Therefore, requiring the listing of the entire family will facilitate enforcement at the point of trade, in line with the CITES listing criteria.

Panama's additional Information documents for CoP19, including this new identification guide for the proposed shark species can be found at: <https://cites.org/sites/default/files/documents/E-CoP19-Inf-02.pdf>

As noted in that guide itself:

*At the point of landing, all species included in Proposals 37, 38, and 40 are identifiable to the species level. Identification guides to support implementation of the proposed listings are often*

*available at the national and regional levels and in multiple languages. This allows for species specific management and monitoring, and the issuance of CITES permits before products enter the international trade (if supported with appropriate documentation such as non-detriment and legal acquisition findings). This in turn is likely to increase traceability and reporting at the species-level.*

*At the point of trade, the ability to visually identify first dorsal fins and pectoral fins (for some species) has been key to ensure effective implementation of species listings. With multiple species of requiem, hammerhead, and guitarfish species being proposed, visual identification to the species-level will become increasingly difficult and customs officials will need to rely on genetic approaches to determine the species entering the trade. As highlighted in this document, look-alike issues for the majority of these species will occur within each of the families proposed.*

*The information provided in this guide demonstrates the difficulty in identifying fins to the species level for all three proposals. Combined with the current status of species, family level listings of sharks and rays are likely going to be more effective from both a conservation and implementation/enforcement perspective. This family level approach has also been adopted for other species such as seahorses and orchids and has encouraged the development of traceability mechanisms. Since the majority of fins of the newly proposed species cannot be distinguished from each other without genetic tools, a family listing would allow customs officials to implement new listings and support with regulating international trade.*

This reinforces the summary in the IUCN/TRAFFIC analysis that states:

*'Some 16 of these species (Carcharhinus altimus, C. albimarginatus, C. amboinensis, C. brevipinna, C. leucas, C. limbatus C. sorrah, Negaprion brevirostris, Prionace glauca, Rhizoprionodon acutus, R. lalandii, R. longurio, R. oligolinx, R. porosus, R. taylori, and Triaenodon obesus) and two additional species (C. galapagensis and Rhizoprionodon terraenovae) also have fins that are difficult to distinguish from some of the lead species above as well as species already included in the Appendices (Sphyrna mokarran and Carcharhinus falciformis). These appear to meet the (lookalike) criteria for listing in Annex 2bA.*

*In summary, the great majority of species in the family Carcharhinidae appear to meet the criteria for inclusion in Appendix II, either because regulation is needed to ensure that the harvest is not reducing the wild populations to a level at which their survival may be threatened by continued harvesting or other influences (Annex 2a of the Resolution) or as lookalikes (Annex 2b of the Resolution). Inclusion of the remaining seven species in the Appendices would facilitate compliance.'* <https://www.traffic.org/site/assets/files/19065/iucn-traffic-cop19-full-analyses.pdf>

And is further strengthened in the finding of the CITES Secretariat's analysis that:

*All species (in the requiem shark family) are likely to be look alike species for trade in meat.* <https://cites.org/sites/default/files/notifications/E-Notif-2022-066.pdf>

Finally, Panama has submitted an additional information document that summarizes a newly released peer reviewed paper on the global trade in shark fins. The paper was released after these independent analyses of the listing proposal were conducted, and again raises concerns about the methodology used in the FAO panel's analysis. It shows that some 70% of the global trade in shark fins are IUCN threatened, that requiem sharks make up the core of that trade, and in conclusion recommends that

CITES Parties consider listing the family on CITES Appendix II as a means of regulating this unsustainable trade: <https://cites.org/sites/default/files/documents/E-CoP19-Inf-01.pdf>

There is also helpful information now available at [www.citessharks.org](http://www.citessharks.org).

Based on the huge body of evidence in the listing proposal itself and presented here, along with the crisis facing the world's sharks, and the additional support these listings have been offered via these independent assessments, we reiterate our request that Canada support these important proposals.

Sincerely,



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