GGT'S RECOMMENDATIONS ON THE AMENDMENT PROPOSALS FOR CONSIDERATION AT THE TWENTIETH MEETING OF THE CONFERENCE OF THE PARTIES TO CITES (Samarkand, 2025)

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GLOBAL GUARDIAN TRUST

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SUMMARY OF THE RECOMMENDATIONS

Proposal	Species	Amendment	Recommendation
1	*Damaliscus pygargus pygargus* bontebok	II → 0	Yes
2	*Gazella dorcas* dorcas gazelle	0 → II	No
3	*Saiga tatarica* saiga antelope	annotation	Yes
4	*Giraffa camelopardalis* giraffe	II → 0	Yes
5	*Okapia johnstoni* okapi	0 → I	Yes
6	*Hyaena hyaena* striped hyena	III → I	No
7	*Arctocephalus townsendi* Guadalupe fur seal	I → II	Yes
8	*Monachus tropicalis* Caribbean monk seal	I → 0	Yes
9	*Ceratotherium simum simum* southern white rhino	annotation	Yes
10	*Diceros bicornis bicornis* southern black rhinoceros	I → II	Yes
11	*Choloepus hoffmanni, C. didactylus* sloths	0 → II	No
12	*Cercocebus chrysogaster* golden-bellied mangabey	II → I	No
13	*Loxodonta africana* African elephant	annotation	Yes
14	*Loxodonta africana* African elephant	annotation	Yes
15	*Ceratogymna* spp., *Bycanistes* spp. hornbills	0 → II	Yes
16	*Gyps africanus, G. rueppelli* vultures	II → I	No
17	*Falco peregrinus* peregrine falcon	I → II	Yes
18	*Sporophila* spp. seedeaters	0 → I,II	No
19	*Caribicus warren* Haitian giant galliwasp	0 → I	No
20	*Phyllurus amnicola* leaf-tailed gecko	0 → II	Yes
21	*Phyllurus caudiannulatus* ringed thin-tail gecko	0 → II	Yes
22	*Amblyrhunchus* spp. marine iguana	II → I	No
23	*Conolophus* spp. land iguanas	II → I	No
24	*Bitis harenna, B. parviocula* vipers	0 → I	Yes
25	*Crotalus* spp., *Sistrurus* spp. pit vipers	0 → II	No
26	*Kinixys homeana* hinge-back tortoise	II → I	No
27	*Pelophylax* 4 spp. water frogs	0 → II	Yes
28	*Carcharhinus longimanus* whitetip shark	II → I	No
29	*Galeorhinus galeus, Mustelus* spp. smooth-hound	0 → II	No
30	Mobulidae spp. manta rays	II → I	No
31	*Rhincodon typus* whale shark	II → I	No
32	*Glaucostegus* spp. guitar fish	annotation	No
33	Rhinidae spp. wedgefishes	annotation	No
34	Centrophoridae spp. gulper sharks	0 → II	No
35	*Anguilla* spp. eels	0 → II	No
36	*Actinopyga* 6 spp. sea cucumbers	0 → II	No
37	*Holothuria lessoni* golden sandfish	0 → II	No
38	*Acanthoscurria* spp., etc. tarantulas	0 → II	No
39	*Haliotes midae* South African abalone	0 → II	No
40	*Panax quinquefolius* American ginseng	annotation	Yes
41	*Jubaea chilensis* Chilean wine palm	0 → I	No
42	*Beaucarnea hookeri, B. glassiana* ponytail palm	taxonomy	Yes
43	*Commiphora wightii* Indian bdellium	0 → II	Yes
44	*Euphorbia bupleurifolia* cycad spurge	II → I	Yes
45	*Afzelia bipindensis* red doussie	II → 0	No
46	*Paubrasilia echinata* Brazil wood	II → I	No
47	*Pterocarpus soyauxii* African padauk	II → 0	No
48	*Aloe* 4 spp. aloe	0 → II	Yes
49	*Podocarpus parlatorei* pino blanco	I → II	Yes
50	*Avonia quinaria* avonia	II → I	Yes
51	Amendment of annotation #4	annotation	Yes

RECOMMENDATIONS

Prop. 1 Deletion of the bontebok *Damaliscus pygargus pygargus* from Appendix II (South Africa)

The bontebok *Damaliscus pygargus pygargus* is endemic to South Africa. Naturally, it occurs in the Western Cape but its range has been expanded through the translocation outside its natural range. The bontebok was listed in Appendix I at the Plenipotentiary meeting in Washington in 1973. At CoP3 (New Delhi, 1981), the Conference of the Parties transferred from Appendix I to Appendix II at the request of South Africa. Since then, the population has significantly increased. The main threats include, among others, habitat degradation and hybridization. This subspecies does not qualify for an Appendix II listing. Since the removal of the bontebok from Appendix II is considered to be beneficial to the bontebok and land owners, GGT recommends that the proposal be **adopted**. However, the hybridization problem needs to be addressed more carefully by government authorities.

Prop. 2 Inclusion of the Dorcas gazelle *Gazella dorcas* in Appendix II (Benin, Burkina Faso, Mali, Mauritania, Niger, Nigeria, Senegal, Sudan and Tunisia)

The Dorcas gazelle *Gazella dorcas* is distributed mainly in northern Africa. Israel, Jordan and Syria are also range States. It seems that threats differ country by country, ranging from habitat degradation to hunting. The species is listed in Appendix III at the request of Algeria (2008) and Tunisia (1976). For most of the range States, the Dorcas gazelle is protected or partially protected but illegal trade still occurs not only within the range States but with non-range States. It should be pointed out that enforcement activities need to be strengthened. The species is already listed in Appendix III. If an Appendix III listing does not work as expected, an Appendix II listing would not gain much. Under the circumstances, the proposal should be **rejected**.

Prop. 3 Amendment of the annotation of the saiga antelope *Saiga tatarica* (Kazakhstan)

The saiga antelope *Saiga tatarica* is distributed mainly in western Kazakhstan, Russia, and Uzbekistan. Another saiga species, *Saiga borealis* occurs in Mongolia. Their distribution is severely fragmented. Kazakhstan has the most abundant population of *Saiga tatarica*. Its population has recently increased substantially. According to the supporting statement, the saiga population decreased to a level of 21,000 individuals by 2003 and its current population is estimated at 2,833,600. At CoP9 (Fort Lauderdale, 1994), the US submitted two proposals to include the saiga in Appendices. The proposals submitted by the US were intended to include the population of Mongolia in Appendix I and the rest of the species in Appendix II. At that time, the Conference of the Parties decided to include the species as a whole in Appendix II. The inclusion of the saiga population of Mongolia in Appendix I was rejected. As a result, the species was listed in Appendix II. At CoP18 (Geneva, 2019), the US and Mongolia submitted a proposal to transfer the saiga from Appendix II to Appendix I. The US amended the proposal, noting that the proposal did not conform to the CITES standard nomenclature for *Saiga* spp.. The intention was to transfer both *Saiga tatarica* and *Saiga borealis* to Appendix I. The amended proposal was not adopted but instead, CoP18 decided by consensus to include the annotation: "*A zero export quota for wild specimens traded for commercial purposes*." The present proposal for consideration at CoP20 (Samarkand, 2025) was submitted by Kazakhstan. This proposal aims to amend the annotation adding: "*except for specimens from the population* Saiga tatarica *of Kazakhstan*." If adopted, it will enable Kazakhstan to export saiga parts and derivatives for commercial purposes, including stockpiled horns. Considering the successful achievement, Kazakhstan is entitled to be rewarded. The adoption of the proposal will further benefit the species itself and local communities and as such, the proposal should be **adopted**. The Conference of the Parties should note seriously that a zero quota for international trade has negatively impacted on Kazakhstan's plans for the sustainable use of this species.

Prop. 4 Deletion of the giraffe *Giraffa camelopardalis* populations of Angola, Botswana, Eswatini, Malawi, Mozambique, Namibia, South Africa and Zimbabwe from Appendix II (Namibia, South Africa, Tanzania and Zimbabwe)

Recent taxonomic studies have revealed that there are four giraffe species, one of which being the southern giraffe *Giraffa giraffa*. The southern giraffe is distributed in Angola, Botswana, Eswatini, Malawi, Mozambique, Namibia, South Africa, Zambia and Zimbabwe. The proposal intends to delete these populations from Appendix II. As is the case with other wildlife such as lions, rhinos and elephants, southern African countries have the healthy populations while other sub-regions have experienced a precipitous decline. The giraffe *Giraffa camelopardalis* was listed in Appendix II at CoP18 (Geneva, 2019). At that time, the southern African population belonged to *Giraffa camelopardalis*. Southern African countries were opposed to the inclusion of giraffe in Appendix II and subsequently, reservations were entered by Botswana, DRC, Eswatini, Namibia, South Africa, Tanzania, Zambia and Zimbabwe. They opposed because they considered their giraffe populations were increasing or stable believing that blanket listing would not be beneficial to the species conservation. It is clear that the proposed populations do not qualify for an Appendix II listing. The proposal should be **adopted**. The adoption would result in the withdrawal of the reservations entered by these range States.

Prop. 5 Inclusion of the okapi *Okapia johnstoni* in Appendix I (Democratic Republic of Congo)

The okapi *Okapia johnstoni* is endemic to DRC, known as a tropical forest-dwelling animal. The okapi is designated by DRC as a fully protected species. The population is estimated between 35,000 and 50,000. This figure is far in excess of the threshold 5,000. However, the overall rate of decline is estimated more than 50%. It seems that the species meets the Appendix I listing criteria. Main threats include illegal hunting for meat, illegal trade and habitat loss. GGT recommends that the proposal be **adopted**. Even though the species is included in Appendix I, however, major threats will remain there. DRC needs to strengthen its enforcement activities, in particular border controls in close co-operation with its neighboring countries such as Uganda.

Prop. 6 Transfer of the striped hyena *Hyaena hyaena* from Appendix III to Appendix I (Israel and Tajikstan)

The striped hyaena *Hyaena hyaena* is widely distributed from northern Africa through the Middle East to India. The total population is estimated at 5,000 to 14,000. The species was listed in Appendix III at the request of Pakistan in 2014. This means that not only Pakistan but also other range States must abide by CITES regulations. In that case, there is no difference between Appendix III and Appendix II. Whereas the proponents insist the species meets the Appendix I listing criteria, it does not seem likely. The supporting statement refers to Goal 2 of the CITES Strategic Vision in relation to “cases of uncertainty”, but it does not necessarily mean that an Appendix I option is preferable. Threats to the species include habitat loss, human-wildlife conflict, direct persecution and illegal trade. Most of the threats are not affected by CITES listing. The proposal should be **rejected**. There are many range States and it is unclear if they support the proposal. National legislation in relation to Appendix III may vary among range States and therefore, it would be wiser if listed in Appendix II, not Appendix I.

Prop. 7 Transfer of the Guadalupe fur seal *Arctocephalus townsendi* from Appedix I to Appendix II (Mexico and USA)

The Guadalupe fur seal *Arctocephalus townsendi* is a marine mammal species, occurring along the west coast of Mexico, the US and Canada. Those in the US and Canada are peripheral populations. The species was listed in Appendix II at CoP1 (Berne, 1976). At the request of the US it was transferred from Appendix II to Appendix I at CoP2 (San Jose, 1979). Since then, the population has increased exponentially and now estimated at 34,000 to 44,000 individuals. In Mexico and the US, the species is fully protected. Main threats include pollution, climate change, net entanglement and invasive species. The species may not meet even the Appendix II listing criteria but as precautionary measure, the proponents wish to first transfer to Appendix II. The proposal should be **adopted**. The Guadalupe fur seal was subject to the Periodic Review of species included

in Appendix I and II and the review was conducted by Mexico and the US. The Animals Committee recommended the species be transferred to Appendix II.

Prop. 8 Deletion of the Caribbean monk seal *Monachus tropicalis* from Appendix I (Mexico and USA)

The Caribbean monk seal *Monachus tropicalis* used to occur in the Caribbean Sea and Gulf of Mexico. The genus *Monachus* has been included in Appendix I since the beginning of the CITES history. Despite exhaustive surveys, the species is not recorded and as such, considered extinct. The Animals Committee endorsed the submission of the proposal to delete the Caribbean monk seal from Appendix I. Since the species is extinct, the proposal should be **adopted**.

Prop. 9 Amendment of the annotation of the Namibia’s population of southern white rhino *Ceratotherium simum simum* (Namibia)

The white rhinoceros consists of two subspecies, *Ceratotherium simum simum* and *C. s. cottoni*. The latter, northern white rhinoceros, is functionally extinct with only two females left. The former, southern white rhinoceros had been extirpated from most of the range States including Namibia. However, South African remaining population became subject to protection and has increased rapidly. Rhinos have been reintroduced from South Africa to Namibia, Botswana, Zimbabwe, Mozambique and Eswatini. Sixteen individuals were reintroduced from South Africa to Namibia in 1975 and the population has since then increased up to 1,500. The species as a whole does not meet the Appendix I listing criteria, nor Namibia’s population. The population did increase substantially, not because of CITES but because of Namibia’s effort. Such effort must be rewarded. Illegal trade in rhino horns does occur but it is negligible compared to the total number of animals protected. The proposal aims to export live animals, hunting trophies and Government owned rhino horn stock. The adoption of the proposal will further contribute to the conservation of rhinos through creating incentives to private land owners which hold most of Namibia’s white rhinos. The proposal should be **adopted**.

Prop. 10 Transfer of the population of southern black rhinoceros *Diceros bicornis bicornis* from Appendix I to Appendix II (Namibia)

At CoP1 (Berne, 1976), the black rhino *Diceros bicornis* was transferred from Appendix II to Appendix I and other four rhino species were included in Appendix I as well. As a result, all the rhino species in the family Rhinocerotidae became subject to Appendix I listings. The black rhino used to be widely distributed in sub-Saharan Africa. Due to significant poaching, 98 % of the total population are now restricted only to South Africa, Namibia, Zimbabwe and Kenya. The black rhino population in Namibia is estimated at 2,098 holding more than a third of all the black rhinos. The proposal aims to trade in registered rhino horn. Namibia intends to use the proceeds for rhino conservation and community development

programmes within or adjacent to the rhinoceros range. Transferring the Namibian black rhino population from Appendix I to Appendix II will further advance their conservation activities. GGT shares the view of Namibia that international constraints on the ability to maximize the economic value of black rhino are an opportunity cost to Namibia. GGT recommends that the proposal be **adopted**.

Prop. 11 Inclusion of the sloths *Choloepus hoffmanni* and *Choloepus didactylus* in Appendix II (Brazil, Costa Rica and Panama)

The two sloth species *Choloepus hoffmanni* and *C. didactylus* are widely distributed in Central and South America. The proponents propose to include the former based on the biological criteria and the latter for a look-alike reason. The populations of these species are not small. The major threats are habitat loss and fragmentation caused by deforestation, wildfire and land use alteration. There exists illegal trade both nationally and internationally. However, international trade is not considered a major threat compared to habitat loss because the trade volume is negligible. Thus, both species do not meet the Appendix II listing criteria. The proposal should be **rejected**.

Prop. 12 Transfer of the golden-bellied mangabey *Cercocebus chrysogaster* from Appendix II to Appendix I (Democratic Republic of Congo)

The golden-bellied mangabey *Cercocebus chrysogaster* is endemic to DRC consisting of two divided populations. It is considered that its population has decreased substantially mainly due to hunting for bushmeat, habitat loss and degradation and trade in wild-caught individuals. There are both legal and illegal trade in live specimens. If DRC is concerned about international trade, DRC should not authorize the export of the specimens under Appendix II requirements. Even if the species is listed in Appendix I, illegal trade would continue. An Appendix I listing would have a negative impact on the species. International trade seems only a fraction of the threats. Most of the threats are of internal nature, which must be solved domestically. Unfortunately, the supporting statement is poorly documented, in particular with regard to species management. Under the circumstances, the proposal should be **rejected**.

Prop. 13 Amendment of the annotation of African elephant *Loxodonta africana* of Namibian population (Namibia)

The African elephant *Loxodonta africana* was transferred from Appendix II to Appendix I at CoP7 (Lausanne, 1989) despite the general recognition that some of the southern African populations did not meet the Appendix I listing criteria. The elephant populations of Botswana, Namibia and Zimbabwe were transferred to Appendix II in 1997 and South African population in 2000. Subsequently, international ivory trade took place twice, but both were ‘one-off trade’. This decision exacerbated the situation because such trade precluded a possibility

of establishing a long-term management strategy. The present proposal aims to trade government-owned ivories of Namibian origin. Revenue obtained from such trade will be used for projects that benefit elephant conservation including community-based conservation. The biggest threat to Namibian elephants is the denial of Namibia’s plea for ivory trade. Continuing to reject their proposal is the punishment for the conservation success of southern African countries. GGT welcomes this proposal because sustainable trade in ivory is in the best interest of the elephant population. The proposal should be **adopted**.

Prop. 14 Amendment of the annotation of the African elephant *Loxodonta africana* populations of Botswana, Namibia, South Africa and Zimbabwe (Botswana, Cameroon, Cote d’Ivoire, Namibia and Zimbabwe)

This proposal is submitted in accordance with the outcome of the African Elephant Dialogue Meeting (AEDM) held in Botswana in September 2024. Attended by 31 African elephant range States, the meeting endorsed by consensus the submission of this proposal. The proposed amendment refers to among others trade in live animals to appropriate and acceptable destinations and outdated description about Resolution Conf. 10.10. It should be reiterated that the proposal is endorsed unanimously by AEDM participants. The proposal should be **adopted**. Without approving this proposal, the integrity of CITES would be questioned.

Prop. 15 Inclusion of African hornbills *Ceratogymna* spp. and *Bycanistes* spp. in Appendix II (Cameroon, Congo, Gabon, Niger, Nigeria, Senegal, Sierra Leone and Togo)

The genus *Ceratogymna* consists of two species and *Bycanistes* seven species. Little is known of the population status of these nine hornbill species. The main threats include habitat loss and degradation, fragmentation and hunting for subsistence. Most of the species in these genera seem to be in decline. Its relative Asian hornbills have been subject to trade. In particular, the helmeted hornbill has been sought for its casque. It seems likely the demand for casque, skull and feather from African hornbills have recently increased. An Appendix II listing will enable to monitor species and parts and derivatives subject to international trade. GGT recommends the proposal be **adopted**.

Prop. 16 Transfer of the vultures *Gyps africanus* and *Gyps rueppelli* from Appendix II to Appendix I (Benin, Burkina Faso, Burundi, Cameroon, Chad, Congo, Gambia, Guinea, Niger, Nigeria, Senegal, Sierra Leone and Togo)

All the species in the order Falconiformes were listed in Appendix II at CoP2 (San Jose, 1979) except those already listed in Appendix I. At that time, vulture species were classified as belonging to this order. As a result, *Gyps*

africanus and *G. rueppelii* were included in Appendix II. These two species are African vultures mainly occurring in Sub-Saharan Africa. Their populations are considered to be in decline. The major threats include habitat alteration, reduced wild ungulates, persecution and poisoning. Hunting for trade is another threat. Most of the threats are not related to CITES and as such, problems must be solved internally. Range States, in particular proponent countries need to improve enforcement activities. Since vulture body parts are used for medicine, juju and other superstition related practice, it seems extremely difficult to control. There is a fear that an Appendix I listing may exacerbate the situation. GGT recommends the proposal be **rejected**. What is needed is to strengthen internal control without transferring the species to Appendix I.

Prop. 17 Transfer of the peregrine falcon *Falco peregrinus* from Appendix I to Appendix II (Canada and USA)

The peregrine falcon *Falco peregrinus* is a cosmopolitan species and its total population is extremely large. It does not meet the Appendix I listing criteria. Most of the birds subject to international trade are from captive breeding facilities. Already, 51 facilities are registered with the CITES Secretariat as a captive breeding operation. A transfer of the species from Appendix I to Appendix II will not have a negative impact on wild populations. Although there are threats such as habitat degradation, pesticide use and Avian flu, the species is secure and increasing. In addition, an Appendix II listing requires a Non-Detriment Finding under article IV of the Convention. At CoP17, Canada submitted a proposal to transfer the species from Appendix I to Appendix II. The proposal was rejected. The EU was concerned that there was insufficient information on precautionary safeguards. GGT believes that a Non-Detriment Findings requirement itself is sufficient as a precautionary measure. The proposal should be **adopted**.

Prop. 18 Inclusion of the seedeaters *Sporophila* spp. in Appendices (Brazil)

The great-billed seed-finch *Sporophila maximiliani* is distributed in Bolivia, Venezuela, Guyana, Suriname, French Guiana and Brazil. The species is a popular cage bird due to its singing ability. The proposal aims to list the great-billed seed-finch *S. maximiliani* in Appendix I and other five species in Appendix II for a look-alike reason. The major threats faced by the great-billed seed-finch include cage-bird trapping and habitat loss and degradation. According to the supporting statement, it seems not difficult for the great-billed seed-finch to breed in captivity. The supporting statement also emphasizes that captive breeding is essential to prevent the extinction of the great-billed seed-finch. An Appendix I listing would hamper bonafide captive breeding programmes. Under the circumstances, we recommend the proposal be **rejected** as it stands and suggest that an Appendix II listing is more appropriate. Brazil may wish to amend the proposal.

Prop. 19 Inclusion of the giant Hispaniolan galliwasp *Caribicus warreni* in Appendix I (Dominican Republic)

The giant Hispaniolan galliwasp *Caribicus warreni* is endemic to Dominican Republic and Haiti. Little is known of the population size and trend. The major threats are habitat loss, habitat fragmentation and invasive species (including cats and dogs). The introduction of mangooses also contributed to the recent decline of the galliwasp. There is demand for pet trade. Another range State, Haiti is not a Party to CITES. The supporting statement does not provide with sufficient information on the situation in Haiti. Nevertheless, the proponent concluded that any specimen is considered illegal. GGT considers that an Appendix II listing is more appropriate this time and therefore, recommends the proposal be **rejected**. The proponent may wish to amend the proposal to this end.

Prop. 20 Transfer of the Mount Elliot leaf-tailed gecko *Phyllurus amnicola* from Appendix III to Appendix II (Australia)

The Mount Elliot leaf-tailed gecko *Phyllurus amnicola* is endemic to Queensland, Australia. The species occurs in only four localities within Bowling Green Bay National Park. The supporting statement identifies several threats including changed fire regimes, invasive grasses, and climate change. In Queensland, the Mount Elliot leaf-tailed gecko is protected. In addition, the export of live reptile species from Australia for commercial purposes has been prohibited. Nevertheless, there seems to be illegal trade. Live specimens are available for sale through online platform advertisement. Australia should as such strengthen its enforcement activities in co-operation with Queensland. The species is already listed in Appendix III. In practice, there is no difference between Appendix III listing and Appendix II listing. Nevertheless, we believe that an Appendix II listing would reinforce border control activities by other countries with vigilance. The proposal should be **adopted**.

Prop. 21 Transfer of the ringed thin-tail gecko *Phyllurus caudiannulatus* from Appendix III to Appendix II (Australia)

The ringed thin-tail gecko *Phyllurus caudiannulatus* is endemic to the south-east region of Queensland, Australia. The species occurs in only three localities. The major threats include climate change, habitat loss and fragmentation and invasive grass infestation. The ringed thin-tail gecko is fully protected. The export of live reptile species from Australia for commercial purposes has been prohibited. Nevertheless, live specimens are available for sale through online platform advertisement. Australia should as such strengthen its enforcement activities in co-operation with Queensland. As is the case with the previous proposal, the species is already listed in Appendix III. In practice, there is no difference between Appendix III listing and Appendix II listing. However, we believe that an Appendix II listing would reinforce border control activities by

other countries with vigilance. The proposal should be **adopted**.

Prop. 22 Transfer of the marine iguana *Amblyrhynchus* spp. from Appendix II to Appendix I (Ecuador)

The marine iguana is a monotypic species in the genus *Amblyrhynchus*. The marine iguana is endemic to Galapagos, Ecuador. The population is estimated to be at 37,000 to 280,000. The species as a whole does not meet the Appendix I listing criteria. However, the species consists of 11 subspecies and some of them are affected negatively. The major threats include El Nino event, invasive predators and other anthropogenic cause resulting from mass tourism. The species is fully protected under Ecuador's law. Illegal trafficking has been found but its volume is negligible. An Appendix I listing would not have a positive impact on the species in particular considering the main threats. GGT sees no reason why the species should be transferred to Appendix I and as such, recommends the proposal be **rejected**.

Prop. 23 Transfer of the land iguanas *Conolophus* spp. from Appendix II to Appendix I (Ecuador)

The genus *Conolophus* consists of three endemic species of land iguanas occurring in Galapagos Islands. The Galapagos pink land iguana *Conolophus marthae* occurs on Isabela Island with a very restricted distribution area found on Wolf Volcano. The Barrington land iguana *C. pallidus* is distributed only on Santa Fe Island. The Galapagos land iguana *C. subcristatus* is distributed on several islands in the Galapagos Archipelago. The population of the rarest species *C. marthae* is estimated in 2010 at a total population of 192 mature individuals. As is the case with the marine iguana, the major threats include El Nino event, invasive predators and other anthropogenic cause resulting from mass tourism. The species is fully protected under Ecuador's law. Illegal trafficking has been found but its volume is negligible. An Appendix I listing would not have a positive impact on the species in particular considering the main threats. We see no reason why the species should be transferred to Appendix I and as such, recommend the proposal be **rejected**. The species are already listed in Appendix II and regulated under CITES requirements. We are more concerned that many invasive species have affected wildlife populations in Galapagos, including dogs, cats, pigs, goats and donkeys. They must be controlled as a matter of priority.

Prop. 24 Inclusion of the Bale Mountains adder *Bitis harenna* and Ethiopian mountain adder *Bitis parviocula* in Appendix I (Ethiopia)

Bitis parviocula and *B. harenna* are both endemic to Ethiopia, with the small population size and restricted area of distribution. These two venomous snakes occur in forests. The main threats are deforestation and alteration. Due to their rarity, the species are vulnerable to any exploitation. Since 1975, Ethiopian law has prohibited the exploitation of wild animals. It is known that the species

are being sold at online markets in Europe and the US. Due to their geometric coloration, they are highly attractive to pet hobbyists. *B. parviocula* and *B. harenna* meet the Appendix I listing criteria and as such, we recommend that the proposal be **adopted**.

Prop. 25 Inclusion of the pit vipers *Crotalus* spp. and *Sistrurus* spp. in Appendix II (Bolivia and Mexico)

The genus *Crotalus* consists of 55 species and the genus *Sistrurus* 3 species. The proposal aims to list two rattle snakes *Crotalus lepidus* and *C. ravus* based on the biological criteria and other species for a look-alike reason. Little is known of population size and population trend. Most species are found in Mexico. Major threats include habitat loss and fragmentation, domestic use and climate change. Domestically, the species are used as food, medicine and esoteric uses. If this proposal is adopted, many countries will be affected, including Argentina, Brazil, Colombia, Guyana, Paraguay, Suriname, Venezuela, Peru, El Salvador, Nicaragua and Canada. Their positions are unknown. GGT recommends that the proposal be **rejected** as it stands and suggests only the two species *Croatus lepidus* and *C. ravus* be subject to the proposal. Even if the species are listed in Appendix II, persecution would continue due to its venomous nature. According to the supporting statement, people tend to kill rattle snakes as soon as they encounter them.

Prop. 26 Transfer of the Home's hinge-back tortoise *Kinixys homeana* from Appendix II to Appendix I (Cameroon, Guinea, Nigeria and Togo)

The Home's hinge-back tortoise is distributed in seven countries including Liberia, Cote d'Ivoire, Ghana, Togo, Benin, Nigeria and Cameroon, of which Cameroon, Nigeria and Togo are the co-proponents. All the species in the genus *Kinixys* were listed in Appendix II at the Plenipotentiary meeting in 1973. According to the supporting statement, the main threats are subsistence hunting, habitat loss due to deforestation and international pet trade. The species is protected in Togo and no export of wild animals for commercial purposes is permitted from Nigeria. It is unknown from the supporting statement if other range States have national laws dealing with this species. The proponents mention under "5. Threats" that exploitation for local consumption of eggs and meat as well as exploitation for trade account for 50% of all threats. We feel that rather than listing in Appendix I, it is more appropriate to solve the problems internally. Under the circumstances, we recommend that the proposal be **rejected**.

Prop. 27 Inclusion of the water frogs *Pelophylax epeiroticus, P. lessonae, P. ridibundus* and *P. shqipericus* in Appendix II (EU, Israel and North Macedonia)

The genus *Pelophylax* comprises 13 species. The proposal aims to include *P. epeiroticus*, *P. ridibundus* and *P. shqipericus* in Appendix II based on the

biological criteria. *P. lessonae* is included for a look-alike reason. *P. ridibundus* is widely distributed in Europe and Middle East. *P. lessonae* occurs in Europe ranging from France to Russia. Distribution of *P. shqipericus* is restricted to Albania and Montenegro. *P. epeiroticus* is found mainly in Greece and part of Albania. The major threat is overexploitation for commercial export of frog legs, destined for the European market. Other threats include habitat loss and water pollution. The biggest threat is consumption of these species for frog legs. It is recommended that the proposal be **adopted**. Since these species are traded in the form of frog legs, it would be difficult to distinguish specimens. While the acceptance of the proposal may lead to the improvement of trade monitoring, it would also create administrative burden to both exporting and importing countries. The EU should assist two range States, in particular Albania and Montenegro in this respect. The exclusion of *P. ridibundus* and *P. lessonae* from the proposal may alleviate burden.

Prop. 28

Transfer of the oceanic whitetip shark *Carcharhinus longimanus* from Appendix II to Appendix I (Argentina, Bahamas, Brazil, Comoros, Dominican Republic, Ecuador, EU, Fiji, Gabon, Honduras, Lebanon, Oman, Panama, Samoa, Senegal, Seychelles, Sri Lanka, Sudan, Togo and UK)

The oceanic whitetip shark *Carcharhinus longimanus* is a wide-ranging, oceanic shark species. The species occurs in tropical and temperate waters worldwide. A proposal to include the oceanic whitetip shark in Appendix II was first submitted at CoP15 (Doha, 2010) by Palau and the US but was rejected. At CoP16 (Bangkok, 2013), Brazil, Colombia and the US co-submitted a proposal, which was then adopted. The oceanic whitetip shark experienced a substantial decline in Eastern Pacific Ocean, Western Central Pacific Ocean, Indian Ocean and Atlantic Ocean. The major threat to the species is overfishing by industrial and artisanal fisheries. According to the supporting statement, the species is no longer a target of industrial fisheries and is required to be released if taken as bycatch. Actually, most regional fisheries management organizations (RFMO) prohibit, among others, shark finning at sea, including International Commission for the Conservation of Atlantic Tunas (ICCAT), Inter-American Tropical Tuna Commission (IATTC), Western and Central Pacific Fisheries Commission (WCPFC), Indian Ocean Tuna Commission (IOTC) and Commission for the Conservation of Southern Bluefin Tuna (CCSBT). At a national level, many countries prohibited shark finning and trade in fins. More than 10 years have passed since the inclusion of the oceanic whitetip shark in Appendix II. If an Appendix II listing does not work as expected, there is no reason to believe an Appendix I listing will work. We are concerned that an Appendix I listing may stimulate illegal trade, thus going underground. Instead, Parties should make every effort to strengthen enforcement activities. The FAO Expert Panel concludes that the proposal does not meet the criteria for listing in Appendix I globally. Under the circumstances, we recommend the proposal be **rejected**.

Prop. 29

Inclusion of the smooth-hound *Galeorhinus galeus* and *Mustelus* spp. in Appendix II (Brazil, Ecuador, Panama and Senegal)

The species subject to this proposal belong to the family Triakidae. While *Galeorhinus galeus* is a monotypic species, the genus *Mustelus* comprises 28 species. The proposal aims to include three species, *Galeorhinus galeus*, *Mustelus mustelus* and *M. schmitti*, in Appendix II in accordance with the biological criteria and other 26 species for a look-alike reason. *Galeorhinus galeus* is widely distributed in warm temperate waters, including waters off North America, South America, Europe, Africa and Australia. *Mustelus mustelus* occurs in the east Atlantic Ocean, including the Mediterranean Sea. *Mustelus schmitti* is found in the Southwest Atlantic. The threats include overfishing, habitat loss and degradation and climate change. According to the supporting statement, the two main products of these species currently in international trade are meat and fins. Fins are a valuable byproduct of meat fisheries. The FAO Expert Panel concludes that the two species do not meet the Appendix II listing criteria and one species is unable to be assessed due to insufficient information. In addition, GGT believes that CITES is not an appropriate forum to deal with commercially exploited marine species. The listing of many commercial fish species for a look-alike reason would create unnecessary administrative burden on CITES authorities. FAO, RFMOs and any other sub-regional agreement are better suited for dealing with fisheries issues. There should be many other species of higher priority. Under the circumstances, the proposal should be **rejected**.

Prop. 30

Transfer of the manta and devil rays Mobulidae spp. from Appendix II to Appendix I (Bahamas, Belize, Brazil, Comoros, Dominican Republic, Ecuador, Fiji, Gabon, Jamaica, Maldives, Panama, Samoa, Senegal, Seychelles, Sudan and Togo)

The genus *Mobula* comprises nine species, i.e., *Mobula mobular*, *M. thurstoni*, *M. tarapacana*, *M. eregoodoo*, *M. luhlii*, *M. hypostoma*, *M. munkiana*, *M. birostris* and *M. alfredi*. Manta and devil rays are found in tropical and subtropical waters. Two manta species, *Manta birostris* and *Manta alfredi*, were included in Appendix II at CoP16 (Bangkok, 2013). At CoP17 (Johannesburg, 2016), the genus *Mobula* was included in Appendix II, thus covering all the *Mobula* species. The present proposal aims to transfer the family Mobulidae from Appendix II to Appendix I. Since the family Mobulidae is not included in Appendix II, the proponents' intention is to list all these species and any putative species in the genus *Mobula* in Appendix II. The genus was included in Appendix II at CoP17 (Johannesburg, 2016). Nevertheless, the populations of manta and devil rays had declined. The present proposal aims to transfer the genus *Mobula* from Appendix II to Appendix I. The main threats are target and bycatch fishing operated by industrial and artisanal fleets. According to the supporting statement, despite the listings in Appendix II, the international gill plate trade and the fisheries that supply trade demand have not reduced to sustainable levels. This means that an Appendix II listing has not worked as expected. The meat and gill plates are consumed

locally and internationally. Even though listed in Appendix I, target and bycatch fishing would continue. As mentioned under Prop. 29, GGT reiterates that CITES is not an appropriate forum to deal with commercially exploited marine species. FAO, RFMOs and any other sub-regional agreement are better suited for dealing with fisheries issues. The FAO Expert Panel was not possible to determine if the extent of decline would meet the criteria for listing in Appendix I because insufficient evidence of declines is available. Under the circumstances, GGT recommends that the proposal be **rejected**. Efforts should be focused on enforcement activities under the current Appendix II listing.

Prop. 31 Transfer of the whale shark *Rhincodon typus* from Appendix II to Appendix I (Argentina, Bahamas, Bangladesh, Belize, Comoros, Dominican Republic, Ecuador, Fiji, Gabon, Maldives, Panama, Philippines, Samoa, Senegal, Seychelles, Sri Lanka and Togo)

The whale shark is a cosmopolitan tropical, subtropical and warm temperate shark species. The species was listed in Appendix II at CoP12 (Santiago, 2002). The proponents enumerate many threats to the whale shark, including fisheries catch, bycatch in nets, vessel strikes, habitat decline, inappropriate tourism and climate change. Fishery catch and bycatch may occur domestically. The illegal component of these catch represents a small fraction of threats. The supporting statement is highly speculative. Most of the threats are of internal nature or nothing related to international trade. Under the section '6.4 Illegal trade', the supporting statement mentions "*In many nations whale sharks have little value for food and there is no incentive to catch them or keep incidentally caught whale sharks for local consumption*". The whale shark is already listed in Appendix II. A transfer of the species to Appendix I is a reflection of CITES' failure. Before transferring to Appendix I, the Non-Detriment Findings process need to be pursued properly. Otherwise, illegal activities would continue even after transferring to Appendix I. The FAO Expert Panel considered that the proposal did not meet the Appendix I listing criteria. Under the circumstances, GGT recommends that the proposal be **rejected**.

Prop. 32 Inclusion of the annotation to the guitar fishes *Glaucostegus* spp. (Bangladesh, Benin, Brazil, Burkina Faso, Burundi, Cabo Verde, CAR, Comoros, Congo, Gabon, Guinea, Guinea-Bissau, Maldives, Mali, Niger, Nigeria, Panama, Sierra Leone, Sudan and Togo)

The genus *Glaucostegus* comprises seven species. *Glaucostegus* spp. are found in tropical to warm temperate seas ranging from Africa through Indian Ocean to Oceania. The genus was included in Appendix II at CoP18 (Geneva, 2019). The proposal aims to maintain the Appendix II listing status but include the annotation of "*a zero annual export quota from wild-taken specimens traded for commercial purposes*". According to the supporting statement, a zero-export quota would prevent an Appendix I listing in the future. In practice, there is no difference between an Appendix I listing and Appendix II with this annotation.

In either case, commercial trade is prohibited. In order to reopen commercial trade, the Conference of the Parties must accept by a two-thirds majority. The main threats to all the species in the genus *Glaucostegus* are unmanaged and unregulated fisheries and trade. This must be addressed through conservation and management measures by RMFOs and range States. The secondary threat is habitat loss and degradation. Due to the complexity of CITES procedures concerning commercially exploited marine species, CITES is not an appropriate mechanism to deal with these species. The FAO Expert Panel was not possible to determine if the extent of decline would meet the criteria for listing in Appendix II with the proposed annotation because insufficient evidence of declines is available. GGT recommends that the proposal be **rejected**.

Prop. 33 Amendment of the annotation of the wedgefishes *Rhinidae* spp. (Bangladesh, Benin, Brazil, Burkina Faso, Burundi, CAR, Comoros, Congo, Gabon, Gambia, Guinea, Guinea-Bissau, Maldives, Mali, Niger, Nigeria, Panama, Senegal, Sierra Leone, Sudan and Togo)

The family Rhinidae consists of 11 species. This family was included in Appendix II at CoP18 (Geneva, 2019). They are widely distributed in warm temperate to tropical inshore continental seas, occurring in the eastern Atlantic, Western Indian Ocean, South Asia, South-East Asia and Oceania. Most of the wedgefishes have experienced significant population decline. Normally, wedgefishes are sought after for their fins. According to the supporting statement, the main threat is unsustainable and unregulated fisheries mortality throughout their range. It is imperative that range States improve fisheries management and enforcement activities. The proposal aims to maintain the family in Appendix II but include "*a zero annual export quota for wild-taken specimens traded for commercial purposes*". In practice, there is no difference between an Appendix I listing and Appendix II with this annotation. In either case, commercial trade is prohibited. In order to reopen commercial trade, the Conference of the Parties must accept by a two-thirds majority. The supporting statement mentions that "*a zero quota is appropriate to give the species the opportunity to recover to a point where sustainable trade will not threaten them with extinction*". We have witnessed at the previous CoPs that it is extremely difficult to loosen the trade restriction even if downlisting proposals are based on scientific evidence. In particular, this is a concern because the wedgefishes are subject to artisanal fisheries. The FAO Expert Panel was not possible to determine if the extent of decline would meet the criteria for listing in Appendix II with the proposed annotation because insufficient evidence of declines was available. GGT considers that Non-Detriment Findings and Significant Trade Review process are more relevant and as such, recommends the proposal be **rejected**.

Prop. 34 Inclusion of the gulper sharks Centrophoridae spp. in Appendix II (Brazil, Comoros, Dominican Republic, Ecuador, EU, Lebanon, Nigeria, Panama, Senegal, Syria and UK)

Gulper sharks are deepwater species and are patchily distributed in the Atlantic and Indo-Pacific Oceans. The proposal aims to list the dwarf gulper shark *Centrophorus atromarginatus* and the gulper shark *Centrophorus granulosus* in Appendix II based on the biological criteria. In addition, 11 species in the genus *Centrophorus*, 3 species in the genus *Deania* and any other putative species in the family Centrophoridae are to be included in Appendix II for a look-alike reason. By doing so, all the Centrophoridae species can be listed in Appendix II. The major threat to gulper sharks is industrial and artisanal target and bycatch fisheries. These sharks are sought after for their liver oil, from which squalene can be produced. Additional threats include use of meat and fins, mining, pollution and climate change. Listing in Appendix II of marine species has faced many difficulties including introduction from the sea and Non-Detriment Findings. The listing of many commercial fish species, including non-endangered species for a look-alike reason, would create unnecessary administrative burden on CITES authorities. GGT is concerned that the effectiveness of listing commercially exploited marine species has yet to be reviewed. It is regrettable that a large number of countries became co-sponsors without waiting for the outcome of the FAO Expert Panel. Actually, the FAO Expert Panel concludes that the best available scientific data and technical information in the proposal does not meet the criteria for listing in Appendix II. Under the circumstances, the proposal should be **rejected**.

Prop. 35 Inclusion of the eels *Anguilla* spp. in Appendix II (EU, Honduras and Panama)

The genus *Anguilla* comprises 17 species. They are catadromous species, occurring globally. The proposal aims to include *Anguilla japonica* and *Anguilla rostrata* in Appendix II based on the biological criteria and other 14 eel species in Appendix II for a look-alike reason. *Anguilla japonica* occurs in East Asia. *Anguilla rostrata* occurs mainly in North America. *Anguilla anguilla* was included in Appendix II at CoP14 (The Hague, 2007). Threats to anguillid eels include overexploitation, climate change, dams as migration barriers and habitat degradation. There are many types of threats caused both naturally and anthropogenically. GGT is aware that some anguillid eels have seen precipitous decline in the population sizes. Our concern is that listing all the eel species in Appendix II may have a negative impact on some of eel species. No or little information is provided in the supporting statement on trade status of those proposed for a look-alike reason. It is difficult to grab potential impacts on artisanal fisheries. Consultations were made by EU with range States. While five countries support the proposal, five countries oppose it. Those opposing the proposal include China, Indonesia, Japan, New Zealand and Korea. Many range States do not clarify their positions. The supporting statement identifies 16 non-

EU countries/region as main exporting countries of live eels and their products, of which China, Hong Kong and Indonesia are opposed to the proposal. In addition, GGT agrees to the conclusion of Stein *et al*. (2025) article entitled "Eels: uncertain impacts of proposed CITES listings" that "*Before any changes to the CITES listings, a comprehensive assessment is needed to evaluate the expected impacts on stocks, eel aquaculture, legal trade and smuggling relative to conservation targets and risk analyses*". The FAO Expert Panel concludes that the proposal does not meet the CITES listing criteria. It should also be pointed out that the FAO Expert Panel is concerned about the risks of unintended negative consequences such as increased illegal trade, market distortions and the disruption of successful management cooperation. Under the circumstances, GGT recommends that the proposal be **rejected**. Our position does not necessarily mean that CITES Parties do not need to take remedial actions. Among others, for example, eel managements should be improved in the wild. It is also suggested that an eel product should contain the species scientific name in its label at the retail level. Furthermore, a draft Resolution (CoP20 Doc.87 Annex 2) was submitted by the Animals Committee and the Standing Committee. If adopted, Parties are requested to make every effort to abide by the Resolution.

Prop. 36 Inclusion of the sea cucumbers *Actinopyga echinites, A. lecanora, A. mauritiana, A. miliaris, A. palauensis* and *A. varians* in Appendix II (EU)

The genus *Actinopyga* comprises 18 species. They are widely distributed in the Indo-Pacific except the Caribbean species *A. agassizi*. The proposal aims to include *A. echinites*, *A. mauritiana*, *A. miliaris* and *A. varians* in Appendix II based on the biological criteria and *A. lecanora* and *A. palauensis* for a look-alike reason. The major threat is over fishing. Climate change and ocean pollution are considered additional threats. Sea cucumbers are sought after for international trade. There are also subsistence use and domestic trade. Little information is provided in the supporting statement on the listing impact on artisanal fisheries and livelihood. Consultations were conducted with range States but only 11 range States responded. Indonesia and Japan opposed the proposal and Israel and Mauritius supported. The positions of the remaining 7 range States are not clear. The FAO Expert Panel concludes that the proposal does not meet the criteria for listing in Appendix II. GGT recommends the proposal be **rejected**.

Prop. 37 Inclusion of the golden sandfish *Holothuria lessoni* in Appendix II (EU)

Sea cucumbers were first included in Appendices at CoP18 (Geneva, 2019). Three species in the genus *Holothuria* are already included in Appendix II. *Holothuria lessoni* is widely distributed in the Indo-Pacific. Major threats to *Holothuria lessoni* is overfishing. According to the supporting statement, *Holothuria lessoni* is collected throughout its range and is one of the highest commercially valued species due to its taste. In most of range States, *H. lessoni* is exploited in industrial, artisanal or subsistence fisheries. Consultations

were made with range States. Most of the respondents did not indicate any position. China is opposed to the proposal. China considers that a review of the effectiveness of existing listings for *Holothuria* should take place before including other species in Appendices. GGT associates itself with China's comment. This position could be applicable to other commercially exploited aquatic species as well. Although the FAO Expert Panel concludes the proposal meets the criteria, GGT's position remains unchanged. GGT recommends that the proposal be **rejected**.

Prop. 38

Inclusion of the tarantulas *Grammostola rosea, Acanthoscurria chacoana, Acanthoscurria insubtilis, Acanthoscurria musculosa, Acanthoscurria theraphosoides, Avicularia hirschii, Avicularia rufa, Avicularia avicularia, Catumiri argentinense, Cyriocosmus berate, Cyriocosmus perezmilesi, Hapalotremus albipes, Holothele longipes, Pamphobeteus antinous,* and *Umbyquyra acuminatum* in Appendix II (Argentina, Bolivia and Panama)

Tarantulas are large venomous spiders in the family Theraphosidae consisting of 1,100 species. Thirteen species are already included in Appendix II. The proposal aims to list *Grammostola rosea* in Appendix II based on the biological criteria and 14 species for a look-alike reason. *G. rosea* is distributed in Chile, Argentina and Bolivia. Other 14 species are found in various countries including Brazil, Paraguay, Ecuador, Peru, Venezuela, Guyana, Trinidad and Tobago and Suriname. Little is known of the population size and trends. The major threats are habitat loss, fragmentation and degradation. According to the supporting statement, a vast volume of tarantulas have been traded internationally. Since insufficient information on the population size and trend is available, it is difficult to determine if international trade have negative impacts on these species. From the supporting statement it is unclear if the proponents consulted other range States. Their positions are unknown. As such, the proposal should be **rejected**.

Prop. 39

Inclusion of the South African abalone *Haliotis midae* in Appendix II (South Africa)

The South African abalone *Haliotes midae* is endemic to South Africa. The species was included in Appendix III in May 2007 but withdrawn in May 2010 for administrative and capacity reasons. Now that the problem has been solved, South Africa decided to submit a proposal to include the species in Appendix II. According to the proposal, the listing is limited to specimens in the dried form only. With this annotation, exempted from CITES provisions are fresh, frozen or canned form and any specimens other than dried abalone. This is because most of the illegal trade is in the form of dried abalone. South Africa has identified three main threats, i.e., the illegal fishing of wild abalone populations, Allee effects and ocean acidification. Whereas abalone farming and ranching are operated very successfully, illegal trade in wild-sourced abalone is rampant. By including the species in Appendix II, South Africa hopes that in the future, *H. midas* stocks can

provide sustainable socio-economic benefits, particularly to coastal communities. Illegally acquired specimens are traded through other SADC countries and as such, international co-operation is imperative. However, these concerns can be accommodated by listing the species in Appendix III. GGT recommends that the proposal be **rejected**. South Africa may wish to list the species in Appendix III again before CoP20, which is more flexible in administration and beneficial to local communities than listing in Appendix II. Meanwhile, main importing countries should assist South Africa.

Prop. 40

Amendment of the annotation of the American ginseng *Panax quinquefolius* (USA)

The American ginseng *Panax quinquefolius* is distributed in the US and Canada. It is found in the deciduous forests in eastern North America. The species was listed in Appendix II at the Plenipotentiary meeting in 1973. The proposal aims to amend the current annotation by adding the wording "*finished products packaged and ready for retail trade of roots sliced 1-3 mm thick derived from artificially propagated plants of* Panax quinquefolius." If adopted, finished products from artificially propagated American ginseng will be exempted from CITES provisions. The threats include habitat loss and fragmentation, overharvesting, illegal trade and deer browse. Trade involves both wild-harvested and artificially propagated roots. Consultations were conducted with Canada, 22 States and one Tribe. According to the supporting statement, Canada has expressed concern over the impact on their wild populations. As long as Canada is concerned, only cultivated American ginseng can be legally traded. The US should accommodate Canada's concern. A majority of States indicated qualified support. We recognize the merit of the proposed exemption and as such, recommend that the proposal be **adopted**.

Prop. 41

Inclusion of the Chilean wine palm *Jubaea chilensis* in Appendix I (Chile)

The Chilean wine palm *Jubaea chilensis* is endemic to Chile. The main threats to the species are habitat loss, land-use alteration, cattle grazing, water extraction, invasive species and deforestation. In particular, climate change, wildfire, urbanization, invasive species and extraction of seeds are problematic. The specimens are traded both domestically and internationally. Thus, most of the threats are of internal nature. In the past, the palm trees were cut to extract sap. It seems likely that this threat is now controlled. An Appendix I listing would preclude the possibility of future international trade, which may not be in the interest of Chile. The proposal should be **rejected**. It is recommended that Chile amends the proposal to the effect that the species in question is listed in Appendix II.

Prop. 42 Inclusion of the ponytail palm *Beaucarnea hookeri* and *Beaucarnea glassiana* in Appendix II (Mexico and Switzerland)

The genus *Beaucarnea* was listed in Appendix II at CoP17 (Johannesburg, 2016). These species are distributed in Mexico, Honduras and probably in Nicaragua. They are planted as ornament plants mainly in Europe and North America. *Beaucarnea hookeri* and *B. glassiana* were not part of *Beaucarnea* at that time and were not subject to the proposal at CoP17. These two species now belong to the genus *Beaucarnea*. At its 27th meeting, the Plants Committee invited Depositary Government (Switzerland) to submit proposals for inclusion in Appendix II. The present proposal is in line with this recommendation and as such, the proposal be **adopted**.

Prop. 43 Inclusion of the Indian bdellium *Commiphora wightii* in Appendix II (EU)

The Indian bdellium *Commiphora wightii* is distributed in India, Pakistan and Oman. The major threats are extraction of oleo-resin gum, habitat loss and fragmentation, caused by road building, urban growth and agricultural expansion. Consultations were made with the three range States. Whereas Pakistan supports the proposal, India opposes listing in Appendices. Oman has not taken any position at the time of the deadline for submission. India insists it has strict enforcement in place. Also, the right to preserve traditional medicinal and cultural practices is stressed. A significant volume of oleo-resin is exported from India mainly to other countries in Europe, America and Asia. According to the supporting statement, Pakistan is the primary source of wild-sourced specimens due to the over-exploitation and depletion of population in India. The adoption of the proposal will facilitate India's goal to utilize this important resources on a sustainable basis. We recommend that the proposal be **adopted**.

Prop. 44 Transfer of the cycad spurge *Euphorbia bupleurifolia* from Appendix II to Appendix I (South Africa)

The cycad spurge *Euphorbia bupleurifolia* is endemic to South Africa. The species was included in Appendix II at the Plenipotentiary meeting in 1973. *Euphorbia bupleurifolia* is popular among succulent plant collectors and is traded internationally. The major threats are habitat loss and degradation, traditional medicine use and illegal trade of wild plants. In the supporting statement, South Africa mentions that an Appendix I listing would assist by ensuring trade is limited to bona fide artificially propagated plants. In order to do so, South Africa needs to register nurseries with the CITES Secretariat as artificially propagated facilities. South Africa should assist such bona fide nurseries. GGT recommends the proposal be **adopted**.

Prop. 45 Deletion of some populations of the apa *Afzelia bipindensis* from Appendix II (Burundi, Cameroon, CAR, Congo, DRC, Equatorial Guinea and Gabon)

African population of *Afzelia bipindensis* was listed in Appendix II at the request of Benin, Cote d'Ivoire, EU, Liberia and Senegal at CoP19 (Panama City, 2022). The proponents need to clarify their intention. It is not clear if the proposal covers the species as a whole or applies to some specific African populations. If the latter is the case, the populations of Angola, Nigeria and Uganda remain in Appendix II. This situation will create confusion with some populations being listed in Appendix and others not listed. GGT suggests that the proposal be **rejected** or withdrawn and resubmitted at the next CoP covering all African populations and introduced populations anywhere else. It seems that the management plan of the species is well established. It is hoped this should be strengthened further.

Prop. 46 Transfer of the Brazilwood *Paubrasilia echinata* from Appendix II to Appendix I (Brazil)

The Brazilwood *Paubrasilia echinata* is endemic to Brazil. The species was first listed in Appendix II with annotation at CoP14 (The Hague, 2007). At CoP19 (Panama City, 2022), Brazil submitted a proposal to transfer the species from Appendix II to Appendix I. The Conference of the Parties did not adopt the proposal but instead, chose to amend the annotation. At the same time, it adopted Decisions directed to the Secretariat, Parties, Plants Committee, Standing Committee and governmental, inter-governmental and non-governmental organizations and other entities. Some Decisions are still going on. As such, it is premature to transfer the species to Appendix I. Under the circumstances, the proposal should be **rejected**. The major threats are deforestation and illegal logging. These activities will occur even after listing the species in Appendix I. Brazil should strengthen its management and enforcement activities. Brazil's laws prohibit the exploitation of this species from the wild but illegal trade is still rampant.

Prop. 47 Deletion of some populations of the African padauk *Pterocarpus soyauxii* from Appendix II (Burundi, Cameroon, CAR, Congo, DRC, Equatorial Guinea and Gabon)

At CoP19 (Panama City, 2022), all the *Pterocarpus* species became included in Appendix II at the request of Cote d'Ivoire, EU, Liberia, Malawi, Senegal and Togo. The species is distributed in Central and tropical West Africa from Nigeria to Angola. The proposal aims to delete several populations of *Pterocarpus soyauxii* from Appendix II. This proposal is similar to Prop. 45 by its nature. If the proposal is adopted, *Pterocarpus soyauxii* populations of Cameroon, Congo, DRC, CAR, Gabon, Equatorial Guinea and Angola are deleted from Appendix. The populations of Gabon and Nigeria will remain in Appendix. GGT suggests

that the proposal be **rejected** or withdrawn and resubmitted at the next CoP covering all the African populations and introduced populations anywhere else. In the supporting statement, the proponents emphasize "*maintaining them in this Appendix, alongside other species of the genus* Pterocarpus, *without scientific or commercial justification risks sending a negative message of systematic undifferentiated classification. Such an approach could weaken the credibility of the Convention's regulatory mechanisms, by neglecting sustainable management efforts, ecological realities and traceability systems implemented in Central Africa*". We fully concur with this statement and believe that the same principle is applicable to other species as well.

Prop. 48 Amendment to the annotation of the aloe *Chortolirion* spp. (South Africa, Switzerland and Zimbabwe)

As is the case with Prop. 42, this proposal was submitted in accordance with the recommendations at the 27th meeting of the Plants Committee. *Aloe bergeriana, A. jeppeae*, *A. subspicata* and *A. welwitschii* were at the time of listing in CITES Appendices were taxonomically classified as belonging to the genus *Chortolirion* and therefore, are not included in Appendices. The Plants Committee invited Switzerland to submit a proposal to include these four species. The proposal should be **adopted**.

Prop. 49 Transfer of the pino blanco *Podocarpus parlatorei* from Appendix I to Appendix II (Argentina)

Podocarpus parlatorei is a conifer species distributed in Argentina and Bolivia. Historically, the species was subject to heavy logging for its timber and it was listed in Appendix I at the Plenipotentiary meeting in 1973. However, the species is now well managed. In the past, the Plants Committee reviewed the appropriateness of listing the species in Appendix I (PC16, 17, 18). The Plants Committee endorsed the maintenance of the Appendix I status. At the 27th meeting of the Plants Committee in July 2024, this was again discussed. Argentina conducted a review leading to the submission of this proposal. Bolivia's position is unknown. Conditional upon Bolivia's acceptance, we recommend the proposal be **adopted**.

Prop. 50 Transfer of the avonia *Avonia quinaria* from Appendix II to Appendix I (South Africa)

The avonia *Avonia quinaria* is distributed in the Northern Cape Province of South Africa and southern tip of Namibia. The species was included in Appendix II at the Plenipotentiary meeting in 1973. *Avonia quinaria* is popular among succulent plant hobby collectors due to its peculiar morphological structure. According to the supporting statement, the key importer is Germany, followed by Hong Kong, Korea and Belgium. The major threat is the illegal harvest of wild plants. Illegal trade does occur. South Africa is seeking assistance from other countries to

close down illegal trade. A consultation was made with Namibia but its position is unclear. Conditional upon Namibia's support, the proposal should be **adopted**. In the supporting statement, South Africa mentions that an Appendix I listing would assist by ensuring trade is limited to bona fide artificially propagated plants. In order to do so, South Africa needs to register nurseries with the CITES Secretariat as artificially propagated facilities. South Africa should assist such bona fide nurseries.

Prop. 51 Amendment of the annotation #4 (UK)

The proposal was submitted by the UK as Chair of the Working Group on Annotations. The proposal aims to make a minor amendment to the annotation #4 in line with the consensus recommendation made by the Standing Committee at its 78th meeting in 2025. It is proposed to simplify and align wording in the annotation #4 without any substantial change. The proposal should be **adopted.**

For the benefit of species and people
(GGT's motto)

A publication of the Global Guardian Trust, 2025.

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