



CITES COP 19

SUMMARY OF WWF'S POSITIONS ON KEY
AGENDA DOCUMENTS AND PROPOSALS
TO AMEND APPENDICES I AND II AT THE
19TH MEETING OF THE CONFERENCE OF
THE PARTIES TO THE CONVENTION ON
INTERNATIONAL TRADE IN ENDANGERED
SPECIES OF WILD FAUNA AND FLORA (CITES)

14 - 25 November 2022



WWF

WWF is an independent conservation organisation, with more than 35 million followers and a global network active through local leadership in over 100 countries. WWF's mission is to stop the degradation of the planet's natural environment and to build a future in which people live in harmony with nature, by conserving the world's biological diversity, ensuring that the use of renewable natural resources is sustainable, and promoting the reduction of pollution and wasteful consumption.

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Green turtle

Chelonia mydas

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1. GENERAL COMMENTS

WWF's Positions on key working documents and proposals for amendment of Appendices I and II at the nineteenth meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES CoP19)

1. This meeting of the Conference of the Parties is taking place at a unique time in the history of the Convention. On the one hand, the COVID-19 pandemic has greatly disrupted the normal working of the Convention. It has led to the untimely deaths of friends and colleagues who had, over the years, made outstanding contributions to the evolution of the Treaty, and who will now be sorely missed. It has also interrupted many important bodies of work, including the review of significant trade in Appendix II species, and the work mandated on tigers by CoP18. On the other hand, it has prompted Parties and others to reflect on the role of the Convention in the prevention of future pandemics, and its contribution to a one-health approach.
2. The meeting also takes place practically on the eve of the fifteenth meeting of the Conference of the Parties on Biological Diversity, where it is envisaged that Parties will adopt a global framework that will, WWF hopes, lead to a nature-positive outcome by 2030. Although CITES CoP19 is taking place first, we believe that it should signal the urgency of commencing implementation of the framework at once, and we are suggesting amendments to the Strategic Vision of the Convention that can already be adopted at CoP19.
3. The Parties must be prepared to make difficult Decisions in terms of the additional demands that they make on the resources and time of the Secretariat and the Committees, as the present trend is unsustainable. WWF also notes the large proportion of tasks that were mandated by CoP18 (and, in some cases, even CoP17) that have not yet received the necessary external funding. We ourselves have contributed to funding some such work in the past and we hope to continue to do so. However, once again, we call on Parties to be realistic in the Decisions they make at this meeting.
4. WWF regrets the lack of progress on the issue of participation in CITES processes by Indigenous Peoples and Local Communities (IPLCs), and we look forward to being more proactive in working with Parties, IPLCs and other stakeholders to find a way forward that has broad support and that maximises the opportunities for meaningful IPLC participation. We believe that this will greatly benefit the Convention in the long run. We believe that it does a disservice to IPLCs to view their participation solely in terms of objecting to amendments to the Appendices and to measures proposed in agenda documents, and that they can contribute much more insight on a wide range of issues. In this regard, the conflation of IPLC participation with livelihood issues has been unhelpful. However, where they do speak on livelihood issues, their voices should be heard. Even if, on occasion, we disagree with them, we believe it is important that their views are heard, and we would rather hear those views coming from them rather than from others who claim to speak on their behalf.

2. WORKING DOCUMENTS

Panama Convention Center
Panama City, Panama, 14-25
November 2022

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| NO.: | WORKING DOCUMENT | SUBMITTED BY | KEY POINTS | WWF POSITION |
|--------------------|---------------------------|-------------------------------|--|--|
| 10 | CITES Strategic Vision | Standing Committee | Includes draft Decisions leading to amendments of the Strategic Vision at CoP20, based on the outcome of the Global Biodiversity Framework of the Convention on Biological Diversity | <p>We appreciate that the level of uncertainty prevailing at present with regard to the Global Biodiversity Framework makes it impossible to be certain about the final adjustments that will require to be made to the Strategic Vision. On the other hand, it is important that CITES recognises the urgency of starting work on implementation of the Framework as soon as possible, and the outcome of CITES CoP19 should reflect this. In this regard, CoP20 will not happen until 2025, which is already well into the lifetime of the 2030 targets, so deferring any consideration of revisions to the Strategic Vision sends a very negative signal to Parties. Instead, CoP19 should already endorse a nature positive mission by: 1. Replacing the word “halting” with “reversing” in the Mission Statement; 2. Add “ including ensuring the recovery of threatened populations” at the end of the text of Goal 1 - this also reflects the intention of Objective 1.5</p> <p>CALL FOR AMENDMENTS AT THIS COP TO REFLECT A NATURE POSITIVE MISSION</p> |
| 11 | Appendix I-listed species | Plants and Animals Committees | Proposes draft Decisions mandating that the Secretariat, produce detailed assessments on the conservation status, threats, relevance of trade, ongoing in situ and ex situ conservation strategies or recovery plans and funding/resources available or required for at least ten Appendix-I listed species for consideration by the Animals and Plants Committee meetings | <p>WWF supports the draft Decisions, in principle, but with the insertion of the phrase “IUCN Specialist Groups and other experts” after “range States” in Decision 19.AA. We stand ready to provide assistance in undertaking the assessments.</p> <p>SUPPORT</p> |

| NO.: | WORKING DOCUMENT | SUBMITTED BY | KEY POINTS | WWF POSITION |
|--------------------|--|--------------------|---|---|
| 12 | World Wildlife Trade Report | South Africa | Proposes draft decisions to develop a procedure and methodology for a report on wildlife trade worldwide, incorporating data on the financial value of such trade. A pilot report has been prepared by a number of partners, including UNEP, WTO, UNCTAD, IUCN, IED, TRAFFIC and the CITES Secretariat, and will be posted as an Information Document | <p>If the methodology is adequate, this report could be extremely useful to WWF as an indicator of progress for the CITES Strategic Vision, and for targets 5 and 9 of the Global Biodiversity Framework.</p> <p>SUPPORT</p> |
| 13 | Engagement of Indigenous Peoples and Local Communities | Standing Committee | CoP18 established an intersessional Working Group of the Standing Committee to examine this issue, but no progress was made, so it is proposed to roll over the CoP18 Decisions and report to CoP20 | <p>WWF regrets the lack of progress on this issue. In principle, we believe that CITES will benefit from greater participation by Indigenous Peoples and Local Communities (IPLCs), that such participation need not weaken the scientific basis of decision-making. We also believe that the criterion for choosing the best means of facilitating such participation should be whatever means maximises the scope for constructive and reactive input by IPLC representatives.</p> <p>SUPPORT RENEWAL OF THE DECISIONS</p> |
| 14 | Livelihoods | Standing Committee | Proposes draft Decisions to conduct further case studies and to hold a workshop | <p>WWF broadly supports the proposals in this document. However, the Decisions should encourage the identification of case studies that were not, or were only partially, successful, in order to have a fuller picture of livelihood issues with regard to CITES listings and to identify obstacles to be overcome in the future.</p> <p>SUPPORT IN PRINCIPLE</p> |

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| 15 | Participatory mechanisms for rural communities in CITES | eSwatini, Namibia, Zimbabwe | 1) Proposes the adoption of a Resolution (no text provided) endorsing the United Nations Declaration on the Rights of Peasants and Other People Working in Rural Areas 2) Proposes Decisions directing the Secretariat to provide costings for the establishment of a Rural Communities Committee, either as a stand-alone Committee or as a sub-committee of the Standing Committee | <p>Regarding the adoption of a Resolution supporting the UN Declaration, we are supportive in principle, if agreement can be found on a draft text. Regarding the establishment of a Rural Communities Committee (WWF prefers to use the term Indigenous Peoples and Local Communities, or IPLCs), at this point we are not yet convinced that a dedicated Committee is the best means to maximise IPLC participation in decision-making, but we look forward to participating in discussions to explore options.</p> <p>OPEN TO FURTHER DISCUSSIONS</p> |
| 20 | CITES Tree species programme | Secretariat | Proposes draft Decisions mandating the Secretariat to develop a renewed capacity building programme towards the implementation of CITES tree species listings, and inviting in-kind and financial contributions from Parties | <p>The tree species programme is essential to the implementation of CITES tree species listing, and can make an important contribution to the development of sustainable livelihoods in range countries</p> <p>SUPPORT</p> |
| 21 | Review of the ETIS Programme | Standing Committee | Proposes changes to the reporting form and the reporting deadline | <p>WWF welcomes the overall findings of the review. However, the proposed changes to the reporting form, although intended to align with annual reporting obligations for other seizures, will diminish the quality of data for ETIS analyses and will result in the analysis at each CoP being based on older data. They may also result in the loss of domestic seizure data, which contribute to the accuracy of the analyses. We encourage the CoP to find a better way of reconciling the differing needs of ETIS and UNODC, taking advice from the MIKE-ETIS Technical Advisory Group and from UNODC.</p> <p>SEEK FURTHER DISCUSSIONS ON THIS ISSUE</p> |

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| 23.1 | Role of CITES in reducing risk of future zoonotic disease emergence associated with international wildlife trade: Report of the Standing Committee | Standing Committee | Proposes draft Decisions mandating the Secretariat to work with Parties and relevant International Organisations on compiling information for consideration by the Animals and Standing Committees with a view to those Committees making recommendations on CITES-relevant aspects of a one-health approach | WWF supports the draft Decisions but also welcomes in principle Document CoP19 Doc. 23.2. SUPPORT |
| 23.2 | Role of CITES in reducing risk of future zoonotic disease emergence associated with international wildlife trade: One health and CITES: Reducing human and animal health risks from wildlife trade | Côte d'Ivoire, Gabon, The Gambia, Liberia, Nigeria and Senegal | Proposes a Resolution on One Health and CITES with elements pertaining to risk analysis, transport and handling of live animals, captive breeding and ranching operations etc. | Although the text will require some editing to achieve the broad support necessary for adoption and effective implementation, it is a good basis for discussions at the CoP. It is recommended that the COP establish an in-session working group, if necessary, to refine the text. SUPPORT IN PRINCIPLE |
| 25 | Action plan on gender-related matters | Panama | Proposes draft Decisions mandating the action plan and a draft Resolution on Gender and Wildlife Trade, which encourages Parties and others to take gender considerations fully into account when implementing the Convention | WWF refers Parties to its report entitled “Gender and illegal wildlife trade: overlooked and underestimated”, which bears out the arguments in this document. We warmly support the proposed Resolution and draft Decisions, and we are ready to engage in dialogue with Parties and other stakeholders to ensure an outcome to this agenda item that has broad support and which is likely to strengthen the work of the Convention. SUPPORT |

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| 29.2.1 | Totoaba (<i>Totoaba macdonaldii</i>): Report of the Secretariat | Secretariat | Indicates that Mexico's implementation of CITES Decision 18.293, calling on Mexico to take steps to combat illegal trade in totoaba and vaquita, is mixed at best, and certainly insufficient to prevent use of illegal fishing gear or illegal catch of totoaba. Proposes the adoption of replacement Decisions with stronger wording. | <p>Reports to the Scientific Council of the International Whaling Commission corroborate other reports indicating that illegal fishing of totoaba is not significantly impeded. WWF welcomes the stronger wording in the draft Decisions but refers to the recommendations in CoP19 Document 29.2.2</p> <p>SUPPORT IN CONJUNCTION WITH DOCUMENT 29.2.2</p> |
| 29.2.2 | Totoaba (<i>Totoaba macdonaldii</i>): Renewed and updated Decisions for CoP19 | USA | Proposes draft Decisions, including one directed to Mexico requiring it to strengthen its enforcement efforts to ensure zero tolerance of illegal fishing gear and of entry of vessels to the zero tolerance zone, and one mandating the Standing Committee to take compliance action against Mexico if it considers that reported progress is inadequate | <p>WWF supports the draft Decisions, given the urgency of the situation.</p> <p>SUPPORT</p> |

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| 29.3 | Malagasy palisanders and rosewoods (<i>Dalbergia</i> spp.) and ebonies (<i>Diospyros</i> spp.) | Secretariat in consultation with the Chair of the Standing Committee | <p>Recommends that in the light of the Standing Committee to approve domestic use of “official” stockpiles, these no longer come within the scope of the CITES process; Proposes draft Decisions requiring: Madagascar to secure the stockpiles (including undeclared and hidden stocks) of timber of <i>Dalbergia</i> spp. and <i>Diospyros</i> spp. in Madagascar, and submit regular updates on audited inventories and independent oversight mechanisms, for consideration and further guidance from the Standing Committee; and reissue a Notification to the Parties reminding potential destination countries of shipments of illegal specimens of <i>Dalbergia</i> spp. and <i>Diospyros</i> spp. from Madagascar to take appropriate measures to ensure that such timber is not illegally transported or traded, including prohibiting entry, seizing such specimens upon arrival and apply appropriate sanctions against traffickers in accordance with the provisions of the Convention.</p> | <p>The Standing Committee’s approval of the domestic use of “official” stockpiles was premature, in a context where there has been no reporting on auditing of stockpiles. WWF supports the proposal that there should be no exports of stocks until audits have taken place. However, even at that stage, independent oversight of the process will be essential, as was done for ivory exports in the past. In the meantime, WWF agrees that transit and consumer countries should continue to intercept shipments, and we call upon those who have intercepted shipments not to release them unless documentation demonstrating legality of the export to the named country is available. WWF also submits that the Decisions should mandate the Standing Committee to have overall oversight of implementation of the Action Plan for Malagasy Ebonies, Rosewoods and Palisanders.</p> <p>SUPPORT MAINTENANCE OF THE MORATORIUM. SUPPORT THE DECISIONS WITH AMENDMENTS</p> |



Silky sifaka
Propithecus candidus.

This lemur lives in the forests in Madagascar
that have been most affected by illegal logging.

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| 32 | Review of Resolution Conf. 11.3 (Rev. CoP18) on Compliance and enforcement | Standing Committee | Sets out editorial cleaning to the Resolution approved by the Standing Committee and includes a draft Decision mandating additional work on areas identified as requiring further attention, including the role of professional bodies in implementing the Convention, and specific provisions relating to marine species and introduction from the sea. | WWF supports the draft revisions to the Resolution and, in particular, the accompanying draft Decision, as we consider that some issues require further attention; in particular, the role of professional bodies, and those relating to marine species, especially those introduced from the sea. SUPPORT |
| 33 | Enforcement matters | Secretariat | Reviews developments since CoP18 and includes, inter alia, draft Decisions to work on money laundering associated with illegal wildlife trade | WWF considers that the long suite of draft Decisions relating essentially to money laundering point to the need for a Resolution on this issue. Accordingly, we support the draft Decisions, with the addition of a Decision to mandate the Standing Committee to develop such a Resolution. SUPPORT WITH AMENDMENTS |
| 35 | Task force on illegal trade in CITES-listed tree species | Standing Committee | Incorporates recommendations from a meeting of the task force in which WWF participated. The recommendations relate to legality and traceability, regional and international cooperation, detection of illegal consignments, and species identification | WWF supports the recommendations, but with the addition of a draft Decision mandating the Secretariat to prepare a revision of Resolution Conf. 10.13 (Rev. CoP18) on CITES-listed tree species. SUPPORT WITH AMENDMENTS |
| 39 | Domestic markets for frequently illegally traded specimens | Standing Committee | Proposes editorial amendments to Resolution Conf. 11.3 (Rev. CoP18) on Compliance and Enforcement. Proposes draft Decisions on possession of species included in Appendix I | Possession of specimens of species that are frequently traded illegally is an issue that needs greater oversight. Accordingly, WWF supports the draft Decisions. SUPPORT |

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| 40 | Guidance for making legal acquisition findings | Standing Committee | Proposes draft Decisions to test the rapid guide for making legal acquisition findings to explore automating certain elements. | WWF thanks the Secretariat and Parties for the opportunity to participate in the ongoing work on legal acquisition findings since CoP17, and supports the draft Decisions. SUPPORT |
| 41 | Electronic systems and information technologies, and authentication and control of permits | Standing Committee | Includes new text on ensuring that professionals involved in wildlife trade and management, such as veterinarians receive training on CITES and their role in implementing the Convention and compliance with relevant national laws as part of their professional practice and ongoing accreditation. | Although less detailed than the amendments that were considered in the discussions leading to Document 32, this proposed amendment is a welcome recognition of the important role that can be played by professional bodies in prevention of wildlife crime. SUPPORT |
| 43.1 | Non-detriment findings: report of the Animals and Plants Committees | Animals and Plants Committees | Proposes the establishment and terms or reference of a technical advisory group to plan a second workshop on non-detriment findings | WW supports the establishment of the group and looks forward to participating in the deliberations. SUPPORT |
| 43.2 | Making non-detriment findings for specimens of Appendix II species taken in the marine environment not under the jurisdiction of any State | UK | Proposes a workshop to address problems around the making of NDFs in international waters and, specifically, what are referred to as “international scientific authorities”, which may include regional fisheries management organisations and regional fisheries bodies | This is an important initiative which does not significantly overlap with that outlined in Document CoP19 Document 30, and WWF supports it. SUPPORT |

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| 45 | Labelling system for trade in caviar | Standing Committee | Includes draft Decisions proposing that the Secretariat and the Standing Committee examine the feasibility of incorporating QR codes into caviar labels, and review the labelling guidelines for CoP20 | WWF supports the draft Decisions, but calls on the aquaculture and the trade sectors, as well as countries with important sturgeon populations, to contribute to the cost of the study on QR code feasibility. SUPPORT |
| 47 | Specimens produced through biotechnology | Standing Committee and Secretariat | Proposes an amendment to Resolution Conf. 9.6 (Rev. CoP16), on readily recognizable samples, that any specimens produced through biotechnology, which appear from the label or other circumstances to be specimens of CITES- listed species, shall be deemed as such, unless specifically exempted from the provisions of the Convention. Also proposes draft Decisions for further work on specimens produced through biotechnology | WWF welcomes and supports the amendment to the Resolution and the draft Decisions. SUPPORT |
| 49 | Introduction from the sea | Standing Committee | Proposes draft Decisions mandating the Secretariat to monitor the negotiations on biological diversity beyond national jurisdiction, to monitor the implementation of Resolution Conf. 14.6 (Rev. CoP16), on introduction from the Sea, and to work with Parties most involved in trade in species from the high seas, including flag of convenience States. Also proposes a draft Decision mandating the Standing Committee to keep the guidelines on the “ten most frequently asked questions” on Introduction from the sea under review | WWF is concerned at evidence suggesting lack of compliance with Resolution Conf. 14.6 (Rev. CoP16), and supports the draft Decisions. SUPPORT |



Cheetah
Acinonyx jubatus

| NO.: | WORKING DOCUMENT | SUBMITTED BY | KEY POINTS | WWF POSITION |
|--------------------|---|--------------------|--|--|
| 51 | Quotas for leopard (<i>Panthera pardus</i>) hunting trophies | Standing Committee | Proposes amendments to reflect the removal of trophies for Kenya and Malawi, and the reduction of Ethiopia's quota to 20 | <p>WWF considers that virtually all the quotas set under the Resolution remain too high, and it calls for an amendment to the Resolution to provide for a review of the quotas by the Animals Committee during every alternate intersessional period.</p> <p>OPPOSE THE DOCUMENT AS IT STANDS</p> |
| 55 | Registration of operations that breed Appendix I animal species for commercial purposes | USA | Proposes amendments to Resolution Conf. 12.10 (Rev. CoP15), on Registration of operations that breed Appendix I animal species for commercial purposes, together with a supporting Decision, to ensure that the register specifies what products are permitted to be traded under the Resolution | <p>WWF supports the amendments to the Resolution, which close a potential loophole.</p> <p>SUPPORT</p> |
| 59 | Illegal trade in cheetahs (<i>Acinonyx jubatus</i>) | Ethiopia | Proposes a suite of draft Decisions directed at strengthening of legislation, improving cross-border cooperation and combating Internet trade, with a mandate to report to the Standing Committee | <p>The situation regarding illegal trade in cheetah remains dire and is particularly worrying with regard to populations close to the Horn of Africa. WWF warmly supports the draft Decisions.</p> <p>SUPPORT</p> |

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| 61 | Eels (<i>Anguilla</i> spp.) | Standing Committee, in consultation with the Chair of the Animals Committee | Proposes draft Decisions directed at range States for European eel aimed at ensuring sharing of non-detriment findings, development of adaptive management plans, sharing of stock assessments, improving traceability, combating illegal trade in glass eels, and reintroduction of seized eels to the wild. The Decisions also mandate further work by the Animals and Standing Committees. | <p>Any decrease in availability of the European eel, is likely to mean that there will be concurrent increases in exploitation and trade of species such as <i>A. rostrata</i> from the Americas, and <i>A. bicolor</i> from Southeast Asia. At CoP 17 and CoP 18, Decisions were adopted that required engagement of Parties who were range States of non-listed species. However, there are no such Decisions tabled for CoP 19. This implies that the challenges associated with the complex interactions of global eel trade have been addressed, which is contrary to the content of the report in Annex 4 of SC74 Document 64.1. As such, an additional Decision directed to Range States, importing and re-exporting countries of <i>Anguilla</i> spp. in international trade, to encourage continued engagement, strengthened coordination and support of implementation of listings would be very welcome. The last is further relevant due to the Dominican Republic's intent to list <i>A. rostrata</i> in Appendix III of CITES, as raised on the floor at SC74.</p> <p>SUPPORT WITH AMENDMENTS</p> |
| 62.1 | Agarwood-producing taxa (<i>Aquilaria</i> spp. and <i>Gyrinops</i> spp.): Report of the Plants Committee | Plants Committee | Proposes draft Decisions mandating the Plants Committee to consider revision of Resolution Conf. 16.10, on Implementation of the Convention for agarwood-producing taxa, and to make recommendations regarding the Agarwood glossary and the Agarwood NDF guidelines | <p>WWF supports the draft Decision, subject to the insertion of the words “having regard to the content of Document CoP19 Doc. 62.2” after the word “Secretariat” in the chapeau text.</p> <p>SUPPORT IN PRINCIPLE</p> |
| 62.2 | Agarwood-producing taxa (<i>Aquilaria</i> spp. and <i>Gyrinops</i> spp.): the history and challenges of agarwood and CITES | UK | Further clarifies potential areas of work by the Plants Committee, with regard to taxonomy, identification, conservation, and legislation and trade | <p>WWF welcomes this document and calls for it to be taken into account in implementing the draft Decisions set out in Document 62.1, in whatever form these are adopted.</p> <p>SUPPORT</p> |

| NO.: | WORKING DOCUMENT | SUBMITTED BY | KEY POINTS | WWF POSITION |
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| 64.1 | Marine turtles (Cheloniidae spp. and Dermochelyidae spp.): Report of the Standing Committee and the Secretariat | Standing Committee and Secretariat | Proposes draft Decisions relating to sustainable use of marine turtles, documentation of bycatch and mortality, hatcheries, survival probability models, bycatch mitigation and research, and mandating further work by the Animals and Standing Committees, together with increased cooperation with its Indian Ocean and South-East Asia Marine Turtle Memorandum of Understanding (IOSEA), and mandating further work by the Animals and Standing Committees | <p>WWF calls for this item and item 64.2 to be taken together. We support the content of the draft Decisions. However, these represent ongoing areas of work that will continue indefinitely into the future, and so are more amenable to inclusion in a Resolution rather than Decisions, as set out in Document CoP19 Do. 64.2.</p> <p>EXPRESS PREFERENCE FOR A RESOLUTION</p> |
| 64.2 | Marine turtles (Cheloniidae spp. and Dermochelyidae spp.): Conservation of marine turtles | Brazil, Colombia, Costa Rica, Peru and USA | Proposes a draft Resolution on marine turtles with provisions relating to capacity building, combating illegal trade, improving legislation and reporting, collaboration with ICCWC, sharing of forensic samples, addressing bycatch and other drivers of decline, cooperation with relevant international bodies, including regional fisheries bodies, CMS and IOSEA, and mandating ongoing work by the Animals and Standing Committees | <p>WWF welcomes and strongly supports the draft Resolution, which incorporates the operative elements of the draft Decisions proposed in Document 64.1</p> <p>SUPPORT</p> |

| NO.: | WORKING DOCUMENT | SUBMITTED BY | KEY POINTS | WWF POSITION |
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| 65 | Sharks and rays (Elasmobranchii) | Standing Committee and Animals Committee in consultation with the Secretariat and the Animal Committee's lead on the agenda item | Incorporates draft Decisions as follows: 1) directed to Parties, regarding information sharing (including on non-detriment findings, legal acquisition findings and stockpiles of pre-Convention specimens), conversion factors, shipment inspections, provision of funding, combating illegal trade; 2) directed to the Secretariat, including provisions on capacity building, liaising with Regional Fisheries Management Organisations, carrying out a study on mismatches between reported trade and catch levels, collaboration with FAO in reported management measures, fin imagery, and trade in non-CITES-listed species; 3) directed to the Animals and Standing Committees, mandating further work | <p>WWF supports the draft Decisions in principle but notes that many elements could be incorporated into Resolution Conf. 12.6 (Rev. CoP 18), on Conservation and management of sharks, as ongoing work. Accordingly, we propose adoption of an additional Decision, mandating the Animals and Standing Committees to work on revision of that Resolution for CoP20.</p> <p>SUPPORT WITH AMENDMENTS</p> |
| 66.1 | Elephants (Elephantidae spp.): Implementation of Resolution Conf. 10.10 (Rev. CoP18) on trade in elephant specimens | Secretariat, in consultation with the Standing Committee | Reports on activities in the past 3 years to implement the Resolution, proposes renewal of the CoP18 Decisions as follows: 1) on closure of domestic ivory markets; 2) on trade in mammoth ivory; 3) on trade in Asian elephants; 4) on ivory stocks and stockpiles (including one new decision on gathering and dissemination of information on available tools for stockpile management). | <p>WWF supports the draft Decisions on domestic markets, Asian elephants and stockpiles. However, regarding the proposed Decisions to take forward work on mammoth ivory, WWF considers that a review by the Secretariat would not be sufficient and, as such, nor would it be efficient use of the Secretariat's limited core budget time. Rather, we propose an externally funded study that has the scope to accept submissions from interested stakeholders in a transparent manner, with a view to maximising the information base and narrowing the areas of disagreement for any discussions in the Standing Committee or elsewhere.</p> <p>SUPPORT IN PRINCIPLE</p> |

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| 66.2.1 | Elephants (Elephantidae spp.): Ivory Stockpiles: Implementation of Resolution Conf. 10.10 (Rev. CoP18) on trade in elephant specimens | Benin, Burkina Faso, Equatorial Guinea, Ethiopia, Gabon, Kenya, Liberia, Niger, Senegal and Togo. | Proposes amendments to the draft Decisions agreed at the last Standing Committee to (inter alia): 1) ensure that the obligation to report on stockpiles extends to all Parties in whose jurisdiction there is an ivory carving industry, a legal domestic trade in ivory, an unregulated market for or illegal trade in ivory, or where ivory stockpiles exist, and Parties designated as ivory importing countries, and that such reporting is based on a revised template annexed to the document; and 2) encourage Parties to consider stockpile destruction in order to prevent leakage and reduce management costs. | <p>WWF can support the reporting obligations and the draft template in principle. Regarding stockpile destruction, we strongly support the destruction of stockpiles of illegal or unknown origin, except where specimens are required for forensic analysis, as these stockpiles have no realisable commercial value. Regarding stockpiles of verifiable legal origin, while we don't see a likelihood of resumption of ivory trade in the near future (if at all), we understand that there are national sensitivities around destruction and we would not oppose retention as long as such retention does not contribute to illegal ivory trade.</p> <p>QUALIFIED SUPPORT</p> |



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Confiscated ivory, at HQ of Dzanga-Sangha Special Reserve, Central African Republic



African elephant
Loxodonta africana

© Will Burrard-Lucas / WWF-US

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| 66.2.2 | Elephants (Elephantidae spp.): Ivory Stockpiles: establishing a fund accessible to range States upon non-commercial destruction of ivory stockpiles | Kenya | Proposes the establishment of an intersessional working group of the Standing Committee to consider establishing a fund that elephant range States can access upon the non-commercial disposal of ivory stockpiles, as a way of avoiding resumption of commercial ivory sales or buyouts while also providing funding for elephant range States to support conservation initiatives and support human elephant coexistence | <p>WWF would be concerned at the proliferation of bespoke funds, and their associated administrative costs. Bearing in mind that there is already an African Elephant Fund, we would need to be convinced that the fund proposed here would attract donors who would not otherwise have contributed to elephant conservation. There are also doubts as to how disposal of stockpiles could be adequately verified, how the fund would benefit non-range States with large stockpiles, the risk of perverse incentives. We appreciate that at this point all that is being proposed is that the Standing Committee consider the idea, but that proposal has to take into account the growing agenda of the Committee and the need to prioritise. We recommend, rather, that the proponents first discuss these matters with range States, potential donors and other relevant stakeholders, and develop a more precise proposal before it is taken up for consideration by the Standing Committee.</p> <p>OPPOSE</p> |
| 66.3 | Elephants (Elephantidae spp.): Implementing aspects of Resolution Conf. 10.10 (Rev. CoP18) on closure of domestic ivory markets | Benin, Burkina Faso, Equatorial Guinea, Ethiopia, Gabon, Liberia, Niger, Senegal and Togo | Proposes draft Decisions requiring reporting by countries with open domestic ivory markets, and the presentation of such reports, together with any available additional information, to regular meetings of the Standing Committee | <p>The overlapping proposals presented in the various documents submitted under item 66 will require consolidation. In this case we can support the draft Decisions in principle but we will look to have the compilation work done in the context of the ETIS analysis.</p> <p>SUPPORT IN PRINCIPLE</p> |

| NO.: | WORKING DOCUMENT | SUBMITTED BY | KEY POINTS | WWF POSITION |
|------------------------|---|---|---|--|
| 66.4.1 | Elephants (Elephantidae spp.): International trade in live African elephant specimens: Proposed revision of Resolution Conf. 10.10 (Rev. COP18) | Benin, Burkina Faso, Equatorial Guinea, Ethiopia, Liberia, Niger, Senegal and Togo. | Proposes that trade in live African elephants taken from the wild should be limited to in situ conservation programmes or secure areas in the wild, within the species' natural and historical range in Africa. | <p>WWF supports in principle the proposed restrictions on live elephant trade, with the sole but important caveat that they should not exclude permanent as well as temporary ex situ transfers in emergency situations. This document (CoP19 Document 66.4.1) needs to be considered in conjunction with CoP19 Document 66.4.2. The former proposal has good preambular text, and would be operative 90 days after the close of CoP19. The latter proposal also addresses trade in rhinos, but would not be operative until after CoP20.</p> <p>SUPPORT AMENDMENTS TO: RESOLUTION CONF.10.10 (REV. Cop18) AND TO RESOLUTION CONF. 9.14 (REV. CoP17), ENTERING INTO EFFECT AFTER THIS CoP, INCORPORATING THE PREAMBULAR TEXT IN DOCUMENT 66.4.1 AND THE OPERATIVE AMENDMENTS PROPOSED IN DOCUMENT 66.4.2, BUT WITH THE DELETION OF THE WORD "TEMPORARY" IN THE REFERENCES TO TEMPORARY TRANSFERS</p> |

| NO.: | WORKING DOCUMENT | SUBMITTED BY | KEY POINTS | WWF POSITION |
|------------------------|--|-------------------------|---|---|
| 66.4.2 | Elephants (Elephantidae spp.): Trade in live African elephants: Clarifying the Framework: Proposal of the European Union | EU | Proposes that trade in live African elephants taken from the wild should be limited to in situ conservation programmes or secure areas in the wild, within the species' natural and historical range in Africa. | <p>WWF supports in principle the proposed restrictions on live elephant trade, with the sole but important caveat that they should not exclude permanent as well as temporary ex situ transfers in emergency situations. This document (CoP19 Document 66.4.2) needs to be considered in conjunction with CoP19 Document 66.4.1. The latter proposal has good preambular text, and would be operative 90 days after the close of CoP19. The former proposal also addresses trade in rhinos, but would not be operative until after CoP20. Based on the content of Document CoP19. Doc. 88, WWF sees no reason why annotation 2, in respect of <i>Loxodonta africana</i>, cannot be amended editorially by the Secretariat following this CoP, in order to remove the references to the past one-off ivory sale, without triggering reservations that would allow Parties to exclude themselves from the obligations of that listing.</p> <p>SUPPORT AMENDMENTS TO:</p> <p>RESOLUTION CONF.10.10 (REV. Cop18) AND TO RESOLUTION CONF. 9.14 (REV. CoP17), ENTERING INTO EFFECT AFTER THIS CoP, INCORPORATING THE PREAMBULAR TEXT IN DOCUMENT 66.4.1 AND THE OPERATIVE AMENDMENTS PROPOSED IN DOCUMENT 66.4.2, BUT WITH THE DELETION OF THE WORD "TEMPORARY" IN THE REFERENCES TO TEMPORARY TRANSFERS</p> |
| 66.7 | Elephants (Elephantidae spp.): Review of the National Ivory Action Plan process | Malawi, Senegal and USA | Proposes draft Decisions for the Secretariat, in consultation with the Standing Committee, to undertake a review of the process with a view to improving effectiveness and compliance | <p>WWF welcomes this proposal and congratulates the proponents. We strongly support it.</p> <p>SUPPORT</p> |

| NO.: | WORKING DOCUMENT | SUBMITTED BY | KEY POINTS | WWF POSITION |
|--------------------|---|---|--|---|
| 67 | CITES Big Cats Task Force (Felidae spp) | Standing Committee | Proposes renewal of the CoP Decisions to establish and convene the Task Force with amendments to reflect the fact that the terms of reference are now agreed and are annexed to the Document | <p>WWF accepts the terms of reference as agreed by the Standing Committee and can support the amended draft Decisions, with one amendment to 19.AA(b) that the Secretariat “ provide support to the Task Force allowing it, inter alia, to fulfil the activities as stated in the terms of reference” as the full list of activities is more comprehensive than those listed in the draft Decision paragraph.</p> <p>SUPPORT WITH AMENDMENTS</p> |
| 68 | Asian big cats (Felidae) | Secretariat, in consultation with the Chair of the Standing Committee | Proposes amendments to Resolution Conf. 12.5 (Rev. CoP18) on conservation of and trade in tigers and other Asian big cats, of which the key operative parts are: Prevention of specimens from captive bred facilities entering illegal trade; and Undertaking targeted initiatives to change consumer behaviour using relevant experts. Proposes a new draft Decision on the sharing of genetic samples and info on genetic research projects. Proposes retention of Decision 14.69 on captive tigers Proposes renewal of CoP18 Decisions as follows: Mandating Secretariat missions to countries with captive facilities of concern; Encouraging sharing of photos of seized skins for identification purposes; and Mandating the Standing Committee to make country-specific, time-bound recommendations to strengthen the implementation of the Convention, of Decision 14.69 and of paragraph 1 h) of the Resolution | <p>WWF is deeply concerned about the lack of implementation of the Resolution and associated Decisions, and lack of reporting on the same. Only five of 31 range states responded to Notification No. 2020/039. Decisions 18.100, 18.101 and 18.105 (recommended for deletion) give specifics, drawn from the review in Annex 4 of CoP18 Doc 71.1, that are not captured in the Resolution. Such specificity is clearly needed to help address the lack of implementation. We recommend instead that an in-session working group identifies where time-bound, country specific measures could strengthen implementation across the Resolution, learning from previous CITES reviews and Parties’ reports. Para. 1h) in the Resolution should specifically refer to record keeping ‘centrally by the government’, otherwise it will be uncoordinated, and Para. 5d) should end with the addition ‘to end demand for illegal tiger and other big cat parts and derivatives’ as per language in Decision 18.106 as to the expected goal. Decision 18.108 (Rev. CoP19) b) and Decision 18.109 (Rev. CoP19) should refer specifically to reporting to SC77 as these crucial activities have been long awaited and tiger numbers in farms have only increased. We otherwise support the recommendations in paragraph 28.</p> <p>CALL FOR AN IN-SESSION WORKING GROUP</p> |

| NO.: | WORKING DOCUMENT | SUBMITTED BY | KEY POINTS | WWF POSITION |
|----------------------|---|--|--|---|
| 70 | Rosewood timber species [Leguminosae (Fabaceae)] | Plants Committee | Renews CoP18 Decisions calling for a study on Rosewood trade (which could not be funded during the last two intersessional periods) but scaled back, to take account of recommendations from recent Plants Committee meetings. Also proposes convening a workshop on rosewood trade | WWF supports the renewal of the Decisions as modified and calls on Parties to support this important work. SUPPORT |
| 71.1 | Pangolins (<i>Manis</i> spp.) | Standing Committee, in consultation with the Animals Committee | Proposes renewal of the CoP18 Decisions, including calling for range States to implement in situ conservation programmes, calling for Parties to report seizures at species level and to secure stocks, and mandating further work by the Animals and Standing Committees | WWF notes the poor level of reporting compliance by range States, and calls for the draft Decisions to be amended to mandate the Standing committee to recommend trade suspensions in respect of both range countries and consumer countries that fail to comply with reporting requirements. SUPPORT WITH AMENDMENTS |
| 71.2 | Pangolins (<i>Manis</i> spp.): Proposed amendments to Resolution Conf. 17.10 | UK | Supports our position on Document 71.1 by advocating for timebound, specific recommendations by the Standing Committee. Proposes amendments to Resolution Conf. 17.10 on conservation of and trade in pangolins to improve enforcement effort, including through international cooperation, and the application of tools such as forensics, anti-money laundering, and online monitoring, and to close domestic markets that are contributing to poaching and illegal trade. | WWF welcomes and supports the proposed amendments, especially the call for closure of domestic markets that are contributing to poaching and illegal trade. We note that the call for the use of anti-money laundering techniques supports the case for a Resolution on money laundering. SUPPORT |
| 73.1 | Jaguar (<i>Panthera onca</i>) | Standing Committee | Proposes draft Decisions on enforcement, range State cooperation and implementation of the Roadmap for jaguar conservation | WWF Supports the draft Decisions, subject to our comments on Document 73.2 SUPPORT IN PRINCIPLE |



| NO.: | WORKING DOCUMENT | SUBMITTED BY | KEY POINTS | WWF POSITION |
|----------------------|--|--|---|--|
| 73.2 | Proposed amendments to the draft Decisions on jaguars agreed at SC74 | Costa Rica, El Salvador, Mexico and Peru | The amendments propose that the Standing Committee establish an intersessional working group to: establish a workplan for the implementation of the first two Decisions as proposed in Document CoP19 Document 73.1; and Consider the need for a Resolution on jaguars | <p>WWF welcomes the suggestion of the establishment of a working group to draw up a work programme for implementation of the first two Decisions, and for consideration of a Resolution. With regard to the latter, however, we do note that jaguars are not the only big cats affected by trade that are not the subject of a Resolution, and this would need to be taken into account.</p> <p>SUPPORT IN PRINCIPLE</p> |
| 75 | Rhinoceroses (Rhinocerotidae spp.) | Standing Committee and Secretariat | The seven Parties most affected by illegal trade in rhinoceros' horn during the period 2018 to 2020, in terms of illegal trade volumes (ordered from high to low in terms of illegal trade volume) are: South Africa, China [including Hong Kong SAR], Viet Nam, Malaysia, Mozambique, the United Arab Emirates and Qatar. Botswana is also noted as a country that has seen noticeable population decline. Draft Decisions are directed to these Parties, but without any associated obligation to report to meetings of the Standing Committee. A further suite of draft Decisions mandates reconvening of the rhinoceros task force. Minor amendments are also proposed to Resolution Conf. 9.14 (Rev. CoP17) on Conservation of and trade in African and Asian Rhinoceroses | <p>WWF welcomes the document, including the IUCN-TRAFFIC report in Annex4, and we support reconvening the rhino task force. However, we are deeply concerned that the draft country-specific Decisions do not require relevant countries to report to the Standing Committee. While there have been encouraging signs of good practice in some of these countries, most of them have been implicated in the ongoing crisis of poaching and illegal trade in rhinos for over a decade and/ or are associated with illegal trade in other species of concern. In this context, WWF considers that such a reporting obligation is essential, and that a Decision should also be adopted mandating the Committee to make specific, timebound recommendations. We call for an in-session working group to undertake further work on the draft Decisions.</p> <p>CALL FOR AN IN-SESSION WORKING GROUP</p> |

| NO.: | WORKING DOCUMENT | SUBMITTED BY | KEY POINTS | WWF POSITION |
|----------------------|---|--------------|--|---|
| 78 | Tortoises and freshwater turtles (Testudines) | Secretariat | Proposes draft Decisions aimed at improved enforcement | <p>WWF supports the intention of the draft Decisions but considers that much of the content would be better reflected in amendments to Resolution Conf. 11.9 (Rev. CoP18) on conservation of and trade in tortoises and freshwater turtles.</p> <p>SUPPORT IN PRINCIPLE</p> |
| 87.1 | Proposed amendments to Resolution Conf. 9.24 (Rev. CoP17) | eSwatini | Proposes amendments to the listing criteria Resolution requiring that: i) livelihoods and food security; and ii) the likelihood of continued illegal trade; are considered when listing proposals are being prepared and evaluated. Also proposes a draft Decision which, inter alia, would require components to establish that trade is the main threat to a species | <p>While the document does not require explicitly that livelihood and food security considerations should override scientific aspects when proposals are being considered, the wording is ambiguous and open to misinterpretation, especially after a lapse of time. Any reference to livelihoods in Resolution Conf. 9.24 (Rev. CoP17), and in Annexes I and II of that Resolution in particular, faces the same risk, whatever the intention. WWF agrees that it is important to address livelihood considerations as early as possible, including reflecting on them in preparing listing proposals, but this can be addressed through Resolution Conf. 16.6 (Rev. CoP17) on CITES and livelihoods. Ultimately, decisions as to adoption of such proposals should be based solely on science. WWF agrees with the proponents that the likelihood of illegal trade continuing or increasing following an Appendix I listing is a valid practical concern when considering listing proposals. However, this and other such considerations are implicitly addressed in the opening paragraph of Annex 4 of Resolution Conf. 9.24 (Rev. CoP17). Regarding any requirement to establish that trade is the main threat to a species when proposing a species, even for Appendix I, this goes further than Article II of the Convention and, indeed, it is often the case that trade acts in concert with other threats.</p> <p>OPPOSE</p> |

| NO.: | WORKING DOCUMENT | SUBMITTED BY | KEY POINTS | WWF POSITION |
|----------------------|--|--------------|--|---|
| 87.2 | Aquatic species listed in the CITES Appendices: Proposal for a new approach to the listings of sharks and rays | Senegal | Proposes that the aquatic species footnote in Resolution Conf. 9.24 (Rev. CoP17) to exclude long-lived species with low fecundity, sharks and rays, in particular, from the numeric guidelines set out in that footnote for commercially-exploited aquatic species | <p>The document makes a comprehensive case as to why sharks and rays do not fit with the demographic parameters in the footnote. It is anomalous that sharks and rays should be assessed according to the same demographic criteria as, for example, pelagic bony fish</p> <p>SUPPORT</p> |
| 88 | Communications concerning amendments to the Appendices received by the Depositary Government after the 18th meeting of the Conference of the Parties | Secretariat | <p>Recommends that in future references to Resolutions should not be included in substantive annotations but rather, where necessary, should be reflected in the interpretation section thereof. Also advises that, where an annotation to an animal species listed in Appendix I or II is amended, a Party may enter a reservation in accordance with Article XV paragraph 3; however, the effect of such reservation is limited to excluding the amendment from applying to the reserving Party until the reservation is withdrawn, and the reserving Party remains bound by the version of the annotation in effect prior to the amendment. Accordingly, amendments are proposed to Resolution Conf. 11.21 on use of annotations in Appendices I and II, on Resolution Conf. 4.6 (Rev. CoP18) on submission of draft Resolutions, draft Decisions and other documents to the Conference of the Parties, and to Resolution Conf. 4.25 (Rev. CoP18) on Reservations</p> | <p>WWF is persuaded by the logic of this document and supports the proposed amendments to the relevant Resolutions. It is our understanding, based on this document, that editorial amendments to Annotation 2 on <i>Loxodonta africana</i>, in order to exclude references to the past one-off ivory sale, would not confer a right to Parties to exclude themselves from the substantive obligations of that listing via a reservation.</p> |



3. PROPOSALS FOR AMENDMENT OF APPENDICES I AND II

Great green macaw (*Ara ambiguus*), also known as Buffon's macaw or the great military macaw eating the almendro tree (*Dipteryx panamensis*) fruits. Tortuguero, Costa Rica

© Shutterstock

| NO.: | TAXON | SPECIES COMMON NAME | PROPONENT(S) | PROPOSAL | WWF POSITION |
|------|-------------------------------|---------------------|---|---|--|
| 1 | <i>Hippopotamus amphibius</i> | Hippopotamus | Benin, Burkina Faso, Central African Republic, Gabon, Guinea, Liberia, Mali, Niger, Senegal, Togo | Transfer from Appendix II to Appendix I | WWF acknowledges the critical state of hippopotamus populations in West and Central Africa. However, we do not consider that species meets the decline guidelines for Appendix I listing. While the proposal correctly points out that the numeric thresholds in Resolution Conf. 9.24 (Rev. CoP17) are only guidelines, it does not make a sufficient case as to why they should be departed from in this case. In this regard, although the productivity of the species is low, it is not exceptionally so. Furthermore, while there might be a case for departing from the guidelines if international trade was the main driver of hunting and decline, this is not the case. Although there are parts of the range where the species is targeted for its ivory, when looking at patterns across the entire range, the primary drivers of hunting are for the meat, or in response to human-wildlife conflict. Habitat degradation is an additional cause of decline. A range-wide Appendix I listing, therefore, would not address the main threats to the species, and would unjustifiably preclude those countries with large populations from deriving benefits from sustainable international trade. With all these considerations in mind, WWF is anxious to explore ways to address the situation in Central and West Africa but is not in a position to support a range-wide Appendix I listing. |



Hippopotamus amphibius

OPPOSE

| NO.: | TAXON | SPECIES COMMON NAME | PROPONENT(S) | PROPOSAL | WWF POSITION |
|------|----------------------------------|----------------------|----------------------|---|---|
| 2 | <i>Ceratotherium simum simum</i> | Southern white rhino | Botswana and Namibia | Transfer of the population of <i>Ceratotherium simum simum</i> of Namibia from Appendix I to Appendix II with the following annotation: For the exclusive purpose of allowing international trade in: a) live animals for in-situ conservation only; and b) hunting trophies. | We recognise the successful white rhino conservation efforts in Namibia to date and the importance of in situ range expansion for species recovery. We support the opportunity for Namibia to participate in this endeavour as a measure of its conservation success, and as has successfully occurred formerly with white rhino from South Africa. Furthermore, the proactive Inter-agency co-operation in addressing wildlife trafficking has been largely successful in controlling the threat from transnational organised crime involvement in illegal rhino horn trade in Namibia to date. The Namibian approach utilising appropriate management actions, improved legislation and sentences, cooperative wildlife crime-related intelligence, detection, effective investigation and prosecution, law enforcement and community support is admirable and should be recognised and adopted elsewhere. We note that the majority of the population is on private land and the statement that no captive breeding operations have been registered in Namibia and that, at least for now, the Government is not intending to apply for any registration. In addition, it is stated that the revenue derived from rhino sales would go directly back into conservation and anti-poaching programmes as well as equipment, law enforcement, education, community initiatives, infrastructure and habitat management. However, WWF would welcome clarification from Namibia that this is not an assumption but is based on legislation covering the private sector |



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SUPPORT

Southern white rhino
(*Ceratotherium simum simum*)

| NO.: | TAXON | SPECIES COMMON NAME | PROPONENT(S) | PROPOSAL | WWF POSITION |
|------|----------------------------------|----------------------|--------------|---|--|
| 3 | <i>Ceratotherium simum simum</i> | Southern white rhino | eSwatini | Remove the existing annotation to the Appendix II Listing of eSwatini's population, in order to allow international trade in rhino horn from that country | While respecting the views and the intentions of the proponents, WWF does not propose to enter into debate on this proposal, which has been unsuccessful at the last two CoPs, and which does not, in our view, address the primary issues on which CITES needs to focus with respect to rhinos. |



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Southern white rhino
(*Ceratotherium simum simum*)

| NO.: | TAXON | SPECIES COMMON NAME | PROponent(S) | PROPOSAL | WWF POSITION |
|------|---------------------------|---------------------|--------------|--|--|
| 4 | <i>Loxodonta africana</i> | African elephant | Zimbabwe | <p>For the exclusive purpose of allowing: a) trade in hunting trophies for non-commercial purposes; b) trade in live animals to appropriate and acceptable destinations, as defined in Resolution Conf. 11.20 (Rev. CoP17), for Botswana and Zimbabwe and for in situ conservation programmes for Namibia and South Africa; c) trade in hides; d) trade in hair; e) trade in leather goods for commercial or non-commercial purposes for Botswana, Namibia, South Africa and Zimbabwe f) trade in individually marked and certified ekipas incorporated in finished jewellery for non-commercial purposes for Namibia and ivory carvings for non-commercial purposes for Zimbabwe; g) trade in registered raw ivory (for Botswana, Namibia, South Africa and Zimbabwe, whole tusks and pieces) subject to the following: i) only registered government-owned stocks, originating in the State (excluding seized ivory and ivory of unknown origin); ii) only to trading partners that have been verified by the Secretariat, in consultation with the Standing Committee, to have sufficient national legislation and domestic trade controls to ensure that the imported ivory will not be re-exported and will be managed in accordance with all requirements of Resolution Conf. 10.10 (Rev. CoP17) concerning domestic manufacturing and trade; iii) not before the Secretariat has verified the prospective importing countries and the registered government-owned stocks; iv) above, in a single sale per destination under strict supervision of the Secretariat; vi) the proceeds of the trade are used exclusively for elephant conservation and community conservation and development programmes within or adjacent to the elephant range; On a proposal from the Secretariat, the Standing Committee can decide to cause this trade to cease partially or completely in the event of non-compliance by exporting or importing countries, or in the case of proven detrimental impacts of the trade on other elephant populations. All other specimens shall be deemed to be specimens of species included in Appendix I and the trade in them shall be regulated accordingly.</p> | <p>While respecting the views and the intentions of the proponents, WWF does not propose to enter into debate on this proposal, which has been unsuccessful at the last two CoPs, and which does not, in our view, address the primary issues on which CITES needs to focus with respect to elephants.</p> |

| NO.: | TAXON | SPECIES COMMON NAME | PROPONENT(S) | PROPOSAL | WWF POSITION |
|------|---|---|--|--|--|
| 5 | <i>Loxodonta africana</i> | African elephant | Burkina Faso, Equatorial Guinea, Mali, Senegal, Syrian Arab Republic | Transfer of the populations of Botswana, Namibia, South Africa and Zimbabwe from Appendix II to Appendix I | While respecting the views and the intentions of the proponents, WWF does not propose to enter into debate on this proposal, which has been unsuccessful at the last two CoPs, and which does not, in our view, address the primary issues on which CITES needs to focus with respect to elephants. |
| 8 | <i>Copsichus malabaricus</i> | White-rumped shama | Malaysia and Singapore | Include in Appendix II | This songbird is in high demand in the caged bird trade, and there is evidence of decline and local extinctions. Appendix II listing is justified and proportionate. SUPPORT |
| 9 | <i>Pycnonotus zeylanicus</i> | Straw-headed bulbul | Malaysia, Singapore and USA | Transfer from Appendix II to Appendix I | There are between 600 and 1700 mature individuals remaining in the wild of this species, which was once common in Southeast Asia, and demand in the caged bird trade is demonstrably one of the drivers of this decline. Consequently, it meets both the population size and decline criteria for Appendix I listing. SUPPORT |
| 22 | <i>Chelus fimbriata</i> and <i>C. orinocensis</i> | Matamata turtle and Orinoco matamata turtle | Brazil, Colombia, Costa Rica and Peru | Include in Appendix II | Despite the absence of population data and the presence of other threats to the species, the restricted area of distribution and the compelling evidence of international trade justify an Appendix II listing. Although there is some local use, available information suggests that this is insignificant when compared to take for international trade. SUPPORT |

| NO.: | TAXON | SPECIES COMMON NAME | PROONENT(S) | PROPOSAL | WWF POSITION |
|--------------------|--------------------------|--------------------------|--------------|---|--|
| 26 | <i>Cuora galbifrons</i> | Indochinese box turtle | EU, Viet Nam | Transfer from Appendix II to Appendix I | Population data are scarce, but, with a decline of up to 90%, and with low productivity, the decline criterion is met. SUPPORT |
| 33 | <i>Nilssonia leithii</i> | Leith's softshell turtle | India | Transfer from Appendix II to Appendix I | Based on the shrinkage of range, the distribution and decline criteria for the species appear to be met. SUPPORT |



CONCERNING ALL MARINE SHARK AND RAY PROPOSALS:

WWF supports all the marine shark and ray proposals tabled at this CoP, but we emphasise that further listings will not be successful in achieving legal and sustainable fisheries and trade unless they are coupled with concrete measures to address implementation challenges at both national and regional level, including through enhanced engagement of Regional Fisheries Management Organisations and Regional Fisheries Bodies (RFMOs/RFBs).

The three proposals, if adopted, will further increase the number and volume of commercially traded shark and ray species listed on CITES, while implementation challenges persist with existing listings. Therefore, Parties must put much greater effort into coordinating with each other and through RFMOs/RFBs towards reducing unsustainable fishing and supporting robust NDF processes, particularly on migratory species and fisheries on high seas. It is also essential that Parties work together to improve traceability which underpins successful trade controls for the increasingly large number of species listed.

Blue sharks
Prionace glauca

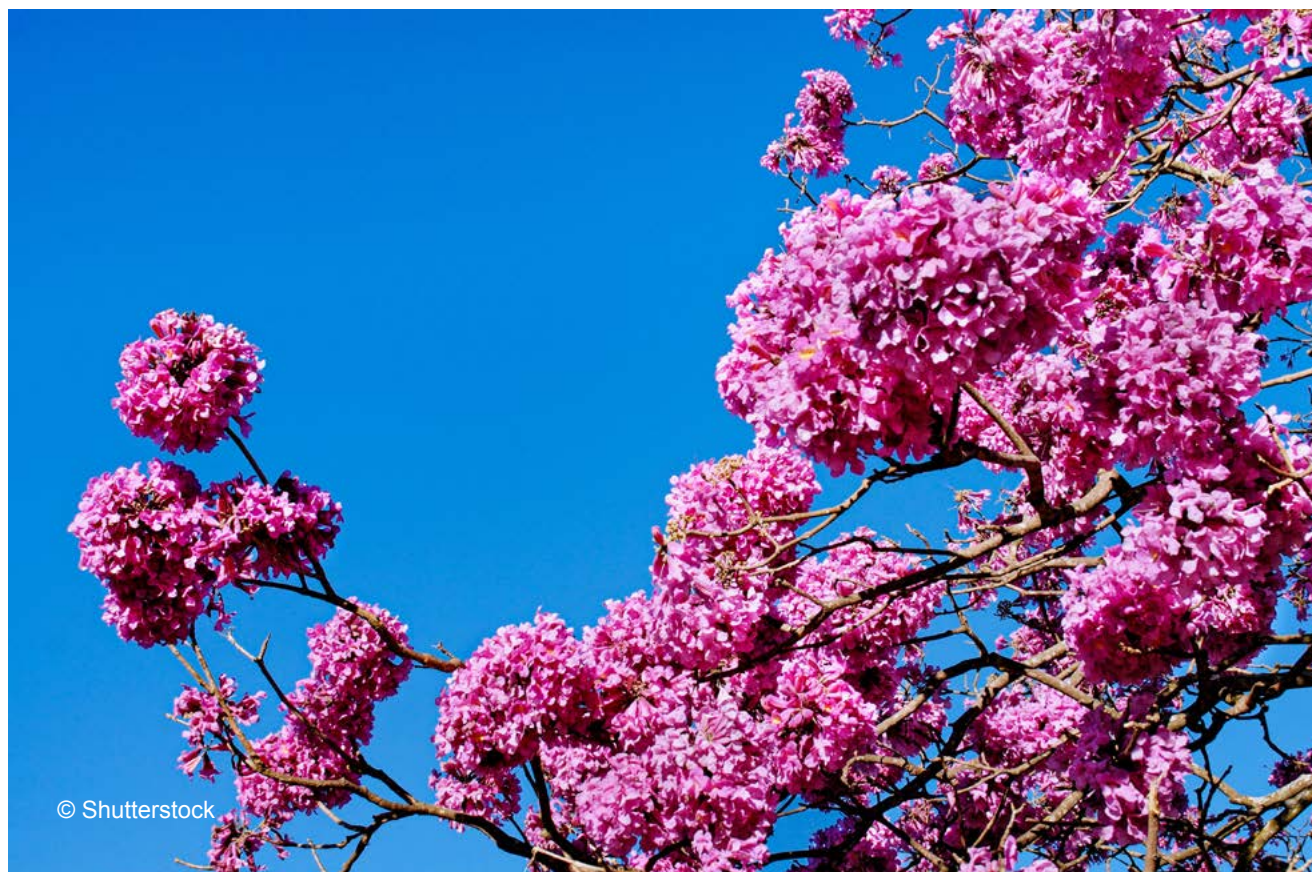
| NO.: | TAXON | SPECIES COMMON NAME | PROPONENT(S) | PROPOSAL | WWF POSITION |
|--------------------|-------------------|---------------------|---|------------------------|--|
| 37 | Carcharhinidae | Requiem sharks | Bangladesh, Colombia, Dominican Republic, Ecuador, El Salvador, EU, Gabon, Israel, Maldives, Panama, Senegal, Seychelles, Sri Lanka, Syrian Arab Republic, UK | Include in Appendix II | <p>The proposal makes a good case for the 19 species it proposes based on Annex 2a of Resolution Conf. 9.24 (Rev. CoP17). This in turn creates a need for listing the remainder of the family in accordance with Annex 2b of the Resolution. In the case of trade of shark meat, in particular, but also in the case of trade in fins in many instances, especially within this family, it is very difficult, especially for enforcement officers, to distinguish one species from another.</p> <p>WWF acknowledges that the listing of the <i>Prionace glauca</i> (Blue shark), in particular, if adopted, will have wide-ranging impact on the fishing nations and industries. However, we recognize this species is not threatened with extinction at this time and catch data is often available through the RFMOs, presenting an opportunity for successful CITES implementation. We therefore urge Parties to engage through RFMOs to accelerate the management of this and other shark species.</p> <p>SUPPORT</p> |
| 38 | Sphyrnidae spp. | Hammerhead sharks | Brazil, Colombia, Ecuador, EU Panama | Include in Appendix II | <p><i>Sphyrna tiburo</i> is proposed on substantive grounds, and the remainder of the species are proposed on lookalike grounds. In fact, prior to CoP18, WWF had already identified the need to list the family on lookalike grounds.</p> <p>SUPPORT</p> |
| 40 | Rhinobatidae spp. | Guitarfishes | Israel, Kenya, Senegal and Panama | Include in Appendix II | <p>The case for lookalike listing for the entire family has merit, due to the taxonomic complexity, and the fact that the fins are widely traded.</p> <p>SUPPORT</p> |

| NO.: | TAXON | SPECIES COMMON NAME | PROPONENT(S) | PROPOSAL | WWF POSITION |
|--------------------|---|---------------------|---------------------------------|--|---|
| 42 | <i>Thelenota</i> spp. | Sea cucumbers | European Union, Seychelles, USA | Include in Appendix II | <p>T. ananas is listed as endangered, while T. anax and T. rubralineata are data-deficient. However, in all cases, IUCN has identified overfishing as the main threat. While the population data contain gaps, there are signs of sharp decline where fishing is prevalent, and the slow maturation of the species compounds the risk.</p> <p>SUPPORT</p> |
| 44 | <i>Handroanthus</i> spp, <i>Roseodendron</i> spp. and <i>Tabebuia</i> spp. | Trumpet trees | Colombia, EU, Panama | Include in Appendix II with annotation #17 (Logs, sawn wood, veneer sheets, plywood and transformed wood. | <p>H. impetiginosus and H. serratifolius are proposed on substantive grounds. Decline data, based on assessment of trees per ha, are presented, and IUCN notes international trade as the main threat to the species, which are listed as endangered and near threatened, respectively. The remainder of the species are proposed on lookalike grounds. They were once in one genus, and taxonomic and identification uncertainties are documented.</p> <p>SUPPORT</p> |
| 45 | <i>Rhodiola</i> spp. | Stonecrops | China, EU, Ukraine, UK, USA | Include in Appendix II with annotation #2 (All parts and derivatives except: a) seeds and pollen; and b) finished products packaged and ready for retail trade.) | <p><i>Rhodiola rosea</i> and <i>Rhodiola crenulata</i> are proposed on substantive grounds. The decline data are very scant. However, the available decline information, and a projected growth in what is already a high volume trade justify Appendix II listing. Taxonomic uncertainties in the genus as a whole warrant a genus-wide listing on lookalike grounds.</p> <p>SUPPORT</p> |

| NO.: | TAXON | SPECIES COMMON NAME | PROPONENT(S) | PROPOSAL | WWF POSITION |
|------|--|-----------------------|---|--|---|
| 46 | <i>Afzelia</i> spp. (African populations) | Pod mahoganies | Benin, Côte d'Ivoire, EU, Liberia and Senegal | Include in Appendix II with annotation #17 (Logs, sawn wood, veneer sheets, plywood and transformed wood.) | <p>A. africana, A. bipindensis and A. pachyloba are categorised as globally Vulnerable in the IUCN Red List due to overexploitation for timber, while A. quanzensis was considered locally threatened in some areas due to selective logging, and this is supported by trade data. The remainder of the genus warrants listing on lookalike grounds; indeed it is becoming clear that generic listings should be the default approach for Appendix II timber species.</p> <p>SUPPORT</p> |
| 47 | <i>Dalbergia sissoo</i> | North Indian Rosewood | India, Nepal | Delete from Appendix II | <p>It is acknowledged that D. sissoo would not meet the Annex 2a criteria in Resolution Conf. 9.24 (Rev. CoP17). The proposal contends that D. sissoo is easy to identify in its living condition, and that its wood can also be distinguished from other species of Dalbergia by its wood anatomical features, gene sequences and also by using technologies like DART TOFMS, Near-Infrared and Raman Spectroscopy. However, if identification of wood in trade is dependent on such specialised techniques then the species still meets Criterion A in Annex 2(b) Resolution Conf. 9.24 (rev. CoP17), that the specimens of the species in the form in which they are traded resemble specimens of a species included in Appendix II under the provisions of Article II, paragraph 2 (a), or in Appendix I, so that enforcement officers who encounter specimens of CITES-listed species are unlikely to be able to distinguish between them. Moreover, adoption of this proposal could lead to a cascade of future exclusion proposals that would undermine the genus-wide listing.</p> <p>OPPOSE</p> |

| NO.: | TAXON | SPECIES COMMON NAME | PROPONENT(S) | PROPOSAL | WWF POSITION |
|--------------------|---|---------------------|---|---|---|
| 48 | <i>Dipteryx</i> spp. | Cumaru | Colombia, EU, Panama | Include in Appendix II with annotation "Logs, sawn wood, veneer sheets, plywood, transformed wood and seeds" | <p>Population decline due to intensive timber harvest, as well as biological vulnerability due to intrinsic slow growth and late maturation, are sufficient to justify listing of <i>D. alata</i>, <i>D. micrantha</i>, <i>D. odorata</i> and <i>D. oleifera</i> on substantive grounds, while the taxonomic complexities of the genus require the listing of the remaining species. WWF also supports the proposed annotation, which would control both the timber commodities and seeds, as a precautionary measure, due to the risk that seed harvest and subsequent trade has the potential to act as an additional or even synergistic stressor on the regeneration and long-term viability of <i>Dipteryx</i> spp. populations.</p> <p>SUPPORT</p> |
| 50 | <i>Pterocarpus</i> spp. (African populations) and <i>Pterocarpus erinaceus</i> and <i>P. tinctorius</i> | Padauk | Côte d'Ivoire, EU, Liberia, Senegal, Togo | Include in Appendix II with annotation #17 (Logs, sawn wood, veneer sheers, plywood and transformed wood) and amend annotations of <i>Pterocarpus erinaceus</i> and <i>P. tinctorius</i> , already listed in Appendix II, to annotation #17 | <p>For wide ranging and highly exploited species such as <i>P. erinaceus</i> (Appendix II), <i>P. angolensis</i> and <i>P. lucens</i> (non-CITES), a significant number of range countries have conducted size class distribution and other growth rate qualifying studies, particularly over the past 15 years. Almost all of these surveys have shown a size class distribution typical of an unstable population, which is a key indicator of unsustainable harvesting practices. This is consistent with studies across both the rosewood genera of <i>Pterocarpus</i> and <i>Dalbergia</i>, which show (where data exist), declining or unstable population dynamics. It is reinforced by indications of growing trade in non-listed species to China, justifying listing of all African species on substantive and lookalike grounds.</p> <p>SUPPORT</p> |

| NO.: | TAXON | SPECIES COMMON NAME | PROponent(S) | PROPOSAL | WWF POSITION |
|------|--|---------------------|--|--|---|
| 51 | <i>Khaya</i> spp. (African populations) | African mahoganies | Benin, Côte d'Ivoire, EU, Liberia, Senegal | Include in Appendix II with annotation #17 (Logs, sawn wood, veneer sheets, plywood and transformed wood.) | All species except <i>K. comorensis</i> (which has not been assessed), are assessed as vulnerable due to overharvesting for timber, with loss of mature trees leading to poor regeneration. The species are indistinguishable from one another, requiring a genus-wide listing both on lookalike and substantive grounds. SUPPORT |



Pink Ipe,
Handroanthus impetiginosus



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