



CITES CoP20 Joint Recommendations of IWMC WCT and SUACO SA (Samarkand, 24.11 to 05.12 2025)

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Executive summary

We recommend proportionate, enforceable CITES decisions that improve conservation outcomes and safeguard community livelihoods. Support status corrections and housekeeping. Support, with tight amendments, measures that rely on marking, audited inventories, independent verification, and review clauses. Oppose or seek withdrawal where proposals are scientifically weak, legally incoherent, or unlikely to change the dominant threat pathway. Default to FAO Expert Advisory Panel advice for aquatic taxa. Apply Resolution Conf. 9.24 consistently, distinguish global from regional signals, and prioritise tools that Parties can implement now.

Introduction

This joint IWMC WCT and SUCo SA briefly applies a simple principle: use trade controls where they work, and only as far as the evidence warrants. We favour legal, well-regulated use that funds management, motivates range-state stewardship, and reduces illegal markets. Our analysis follows Resolution Conf. 9.24 (Rev. CoP19), treats FAO Expert Advisory Panel findings as primary for aquatic species, and applies three global standards to every proposal: fit with the Convention, human-rights impacts on local and rural communities, and conservation impact on species and habitats. We map evidence to Annex criteria, test practicality of Non-Detriment Findings, and specify enforceable safeguards. The positions that follow are proportionate, time-bound where needed, and designed to deliver measurable conservation gains.

Category I Support

Prop.1 Bontebok (ZA) — Delete from II. Status correction for a well-managed, fenced, growing provenance; de-listing aligns with 9.24 and reduces unnecessary burden.

Prop.3 Saiga (KZ) — Amend annotation. Targeted fix to keep legal, traceable products flowing while other populations remain controlled.

Prop.4 Giraffe (AO, BW, SZ, MW, MZ, NA, ZA, ZW) — Delete pops from II. Regional evidence points to secure, managed stocks; corrects an over-broad listing.

Prop.7 Guadalupe fur seal — I → II. Recovery documented; II with controls is proportionate.

Prop.8 Caribbean monk seal (extinct) — Delete from I. House-keeping; no conservation value in retaining EX taxa.

Prop.22 Amblyrhynchus spp. — II → I. Narrow-range island endemics with illegal take risk; I deters trafficking with minimal livelihood impact.

Prop.23 Conolophus spp. — II → I. Same logic as Prop.22; strong prevention value.

Prop.24 Bitis harena & B. parviocula — Include in I. Ultra-restricted Ethiopian vipers; I curbs collector trade pressure.

Prop.26 Kinixys homeana — II → I. High trade-driven decline; I is justified to stop laundering.

Prop.40 Panax quinquefolius — Annotation tweak. Trade-facilitation for finished retail slices from artificially propagated plants; zero conservation downside.

Prop.42 Beaucarnea spp. housekeeping — Add two spp. to II. Closes loopholes within a genus listing; keeps nursery trade workable.

Prop.44 Euphorbia bupleurifolia — II → I. Succulent poaching crisis; I improves deterrence and international cooperation.

Prop.48 Aloe spp. taxonomy update. Necessary taxonomic maintenance; keeps scope accurate.

Category II Support with Amendments

Prop.9 Southern white rhino (NA) — Annotation. Support with tight text on marking (ISO-compliant), stock audits, and a 24-month review clause.

Prop.10 Black rhino (NA pop) — I → II. Support with conservative quotas, individual horn-marking, external verification, and suspension triggers.

Prop.13 African savannah elephant (NA) — one-off ivory stocks under CITES controls. Support contingent on a centralised sale mechanism, pre-sale forensic inventorying, and mandatory end-market domestic controls.

Prop.14 African savannah elephant (BW, CI, CM, NA, ZW) — amend A10. Support to harmonise conditions with precise definitions, forensic marking, and compliance triggers.

Prop.27 Pelophylax spp. — Add to II (18-month delay). Support if scope is limited to wild-sourced meat/leather, with range-State quotas and farmed exemptions clearly annotated.

Prop.43 Commiphora wightii — Add to II. Support if annotation narrowly covers wild-harvested resin and bulk derivatives, with exemptions for certified cultivation and finished pharma products.

Prop.49 Podocarpus parlatorei — I → II. Support if paired with strict quotas, legality verification, and a 3-year review to confirm non-detriment.

Prop.51 Aloe ferox & Euphorbia antisiphilitica — amend #4. Support retail-ready finished-product exemption, provided manufacturing traceability to CITES-compliant raw material is explicit.

Category III Request Withdrawal

Prop.28 Oceanic whitetip — II → I. I won't solve bycatch; prioritise RFMO bycatch limits, retention bans, and monitoring.

Prop.29 Galeorhinus & Mustelus spp. — Add to II. Treat via fisheries management (HCRs, VMS, observer coverage) rather than trade listing; risk of paperwork burden without stock benefit.

Prop.30 Mobulidae — II → I. Elevation to I is disproportionate; strengthen II compliance, ports controls, and DNA tools.

Prop.31 Whale shark — II → I. I adds little beyond existing protections; focus on collision/bycatch mitigation and tourism standards.

Prop.32 Glaucostegus spp. — Zero quota annotation. A de facto ban under II without stock-specific evidence; better to enforce current II with NDF guidance.

Prop.33 Rhinidae spp. — Zero quota annotation. Same concern as Prop.32; prefer strengthened II compliance and RFMO action.

Prop.34 Centrophoridae — Add to II. Default to fisheries measures; II unlikely to change deep-sea bycatch dynamics; high mis-ID risk.

Prop.35 *Anguilla* spp. — **Add to II.** Global eel trade is already heavily regulated domestically; II risks displacement/laundering; prefer INTERPOL/Europol ops + traceability pilots.

Prop.36 *Actinopyga* spp. — **Add to II.** Listing ahead of control readiness risks black-market expansion; build national quota/size-limit systems first.

Prop.37 *Holothuria lessoni* — **Add to II.** As above; emphasise harvest controls, stock assessment, and simple product codes before a CITES layer.

Category IV Oppose

Prop.2 *Dorcas gazelle* — **Add to II.** Listing won't address habitat/poaching drivers; prefer targeted national measures and, if needed, App. III by range States.

Prop.5 *Okapi* — **Add to I.** International trade is not the main driver; recommend App. III by DRC plus habitat/security investments.

Prop.6 *Striped hyena* — **Add to I.** Poor fit for I; advocate stronger national protection and conflict-mitigation first.

Prop.12 *Golden-bellied mangabey* — **II → I.** Insufficient trade-driven decline evidence for I; strengthen enforcement under II.

Prop.16 *Gyps africanus* & *G. rueppelli* — **II → I.** Mortalities are toxin/disease-driven, not trade-driven; I will not fix principal threats.

Prop.18 *Sporophila* spp. package — **I/II.** Sweeping listing risks enforcement overload and laundering; prefer targeted species + range-State quotas/markings.

Prop.25 *Crotalus* & *Sistrurus* spp. — **Add all to II.** Over-broad “family-wide” style approach; push for split-listing/annotations where trade risk is evidenced.

Prop.38 *Theraphosidae* (15 spp.) — **Add to II.** Low-signal, high-admin; target the few proven high-risk taxa instead.

Prop.39 *Haliotis midae* (ZA) — **Add to II (dried only).** Poaching is domestic/organised-crime-led; a partial-form II risks laundering; fix national chain-of-custody first.

Prop.41 *Jubaea chilensis* — **Add to I.** Main threats are habitat/use at source, not international trade; I is a poor tool here.

Prop.45 *Afzelia bipindensis* — **Delete from II in multiple States.** Premature; no independent verification of legality/sustainability across the basin.

Prop.47 *Pterocarpus soyauxii* — **Delete from II in multiple States.** Same as Prop.45; retain II pending transparent audits.

Prop.11 *Two-toed sloths* (BR, CR, PA) — **Add to II.** Need clear international-trade signal and NDF feasibility; otherwise risks busy-work.

Prop.15 *Bycanistes* & *Ceratogymna* — **Add to II.** Require trade/ID data and annotation limiting to live birds + specified parts to be enforceable.

Prop.19 *Caribicus warreni* — **Add to I.** Likely meritorious but confirm population data/illicit trade scale and enforcement capacity first.

Prop.20 *Phyllurus amnicola* — **Add to II.** Check scale of international demand vs Australia's strong domestic controls; may be redundant.

Prop.21 *Phyllurus caudiannulatus* — **Add to II.** As Prop.20; ensure listing won't duplicate national protections without added value.

Prop.34 Centrophoridae — **Add to II.** Default to fisheries measures; II unlikely to change deep-sea bycatch dynamics; high mis-ID risk.

Prop.35 Anguilla spp. — **Add to II.** Global eel trade is already heavily regulated domestically; II risks displacement/laundering; prefer INTERPOL/Europol ops + traceability pilots.

Prop.36 Actinopyga spp. — **Add to II.** Listing ahead of control readiness risks black-market expansion; build national quota/size-limit systems first.

Prop.37 Holothuria lessoni — **Add to II.** As above; emphasise harvest controls, stock assessment, and simple product codes before a CITES layer.

JUSTIFICATIONS

I. & II. Justifications for Adoption (with or without amendment)

Terrestrial Mammals

CoP20 Prop. 1 Bontebok *Damaliscus pygargus pygargus* — Support (Delete from II)

This is a status correction. Under Conf. 9.24 (Rev. CoP19), Annex 2 a is not met: international trade is not a driver of decline, nor is the subspecies likely to become eligible for Appendix I in the near future due to trade. South Africa's Biodiversity Management Plan and Red List assessment show secure, fenced metapopulations on state and private land with growth constrained mainly by habitat limits and hybridisation risk with Blesbok, both managed domestically through translocation standards, studbooks and molecular testing. Annex 4 precautionary measures permit deletion where effective management and monitoring exist, which is the case here. NDFs have been feasible but add little incremental value relative to national controls. Enforceability and traceability remain strong post-deletion: provincial movement permitting and routine genetic panels reliably distinguish Bontebok from Blesbok and hybrids; SANParks and provincial systems already track founder lineages and avoid introgression. De-listing reduces enforcement noise and allows Parties to focus on taxa where international trade risk is material.

CoP20 Prop. 3 Saiga antelope *Saiga tatarica* (Kazakhstan) — Support (Amend annotation)

This is a targeted annotation fix to keep Appendix II oversight globally while allowing controlled, traceable trade from Kazakhstan's demonstrably recovered population. Under Annex 2 a, Saiga remains in Appendix II because some range populations still face risks; however, Annex 4 precautionary measures allow refined annotations where management and monitoring are demonstrably effective. Kazakhstan's aerial censuses show rapid national recovery to multi-million totals by 2024 under strengthened anti-poaching, protected areas and CMS Saiga MoU actions; the IUCN Red List moved the species to Near Threatened in December 2023. International trade is not now a primary threat relative to habitat conflict and episodic disease. The amended text can require audited national stock inventories, science-based quotas and population-based NDFs. Enforceability is feasible: DNA barcoding protocols

can authenticate Saiga horn and distinguish it from look-alikes; CITES annual reporting can be limited to specimens of Kazakhstan origin with stockpile accountability. The change is proportionate, risk-differentiated and consistent with Annex 4 by maintaining global controls while enabling a well-documented, national legal pathway that supports conservation incentives.

CoP20 Prop. 4 Giraffe *Giraffa camelopardalis* (AO, BW, SZ, MW, MZ, NA, ZA, ZW populations) — Support (Delete these populations from II)

Deletion is justified as a regional status correction. Under Annex 2 a, the specified southern African populations are not “likely to become eligible for Appendix I in the near future” due to international trade. New, country-level data compiled in GCF’s State of Giraffe 2025 show stable to increasing numbers across southern range States driven by protected area management, fenced reserves, community conservancies and translocations. Primary threats elsewhere are habitat loss and conflict; international trade is not a demonstrable driver for the listed States. Annex 4 precaution supports removing populations from Appendix II where effective national controls exist and where maintaining them in II adds little conservation value. Deleting only the eight specified populations keeps Appendix II oversight for other regions where risk persists, preserving proportionality. Enforceability remains adequate through domestic permitting, veterinary movement controls, microchip marking for translocations and photographic pattern ID. The correction reduces enforcement noise and aligns the Appendices with disaggregated evidence.

CoP20 Prop. 9 Southern white rhinoceros *Ceratotherium simum simum* (Namibia) — Support with Amendments (Annotation)

This is an annotation refinement within Appendix II, consistent with Annex 4 precautionary measures. AfRSG/TRAFFIC’s CoP20 report shows white rhino numbers stabilising or increasing since 2021; Namibia manages a small but important metapopulation under high-intensity protection. International trade is not the primary driver of risk; organised poaching is. A tight annotation limiting trade to live animals to in-range destinations and strictly controlled hunting trophies, with all other specimens treated as Appendix I, keeps trade compatible with conservation and aligned with Res. Conf. 9.14. Enforceability is high: compulsory horn micro-marking, RhODIS DNA profiling of all horns and hunting trophies, audited stock registers, and reporting to the Secretariat enable robust NDFs and traceability. A review clause after 24 months allows rapid adjustment if indicators worsen. This proportionate, management-enabling amendment supports metapopulation management and conservation financing without expanding commercial horn trade.

CoP20 Prop. 10 Black rhinoceros *Diceros bicornis bicornis* (Namibia population) — Support with Amendments (I → II)

A carefully conditioned split-listing for Namibia’s defined population meets Annex 4: trade remains strictly limited and traceable, and the population no longer meets Appendix I biological thresholds at the national subpopulation level. AfRSG/TRAFFIC CoP20 report records increasing black rhino numbers in Namibia under intensive protection and custodianship. The Appendix II transfer, paired with a narrow annotation, facilitates metapopulation translocations and a small, conservative hunting-trophy quota already recognised under Res. Conf. 13.5. International commercial horn trade remains prohibited. Enforceability is high: individual ID, mandatory horn micro-marking, RhODIS DNA profiling, and audited quotas underpin robust NDFs under Res. Conf. 9.14. A staged implementation and suspension

trigger if poaching or illegal trade indicators rise satisfy precautionary measures. The action is scope-correcting and management-enabling without increasing risk of laundering.

CoP20 Prop. 13 African savannah elephant *Loxodonta africana* (Namibia) — Support with Amendments (controlled one-off ivory stocks under CITES)

This is a tightly conditioned controlled-trade authorisation. Annex 4 allows such measures where strict controls ensure non-detriment. The proposal channels audited, government-owned registered raw ivory from natural mortality and management into a one-off sale under CITES oversight. Compatibility with conservation rests on MIKE/ETIS surveillance to detect adverse trends and on forensic verification of stock origin. Standardised genetic assignment of ivory (microsatellite/SNP reference maps) and radiocarbon “bomb-curve” dating can validate lot provenance and age; ICCWC/Secretariat guidance exists for ivory stock inventories. Enforceability is feasible through sealed, barcoded lots; mandatory DNA assignment; 14C dating on a risk-based sample; and binding end-market domestic controls. International trade is not the proximate driver of current mortality; organised poaching and weak internal markets are. Adoption only with stringent conditions meets 9.24 by ensuring non-detriment, transparency and rapid suspension if indicators worsen.

CoP20 Prop. 14 African savannah elephant (BW, CI, CM, NA, ZW) — Support with Amendments (amend Annotation A10)

Harmonising Annotation A10 across the southern African Appendix II elephant populations is a legal tidy-up that reduces ambiguity and improves enforceability without expanding trade. Annex 4 precaution favours clarity: consistent definitions of eligible specimens, marking and reporting duties enable Parties to implement permits and compliance coherently. The proposal should codify specimen-level marking, lot-level DNA assignment and risk-based radiocarbon checks for any stock movement; MIKE/ETIS provide surveillance to confirm that trade conditions do not elevate poaching risk. International risk arises primarily from weak domestic controls and inconsistent annotations; harmonisation removes loopholes and simplifies NDFs. Adoption aligns with past CoP decisions on conditions attached to split-listed elephant populations and enhances traceability obligations rather than liberalising trade.

Marine mammals & Galápagos reptiles

CoP20 Prop. 7 Guadalupe fur seal *Arctocephalus townsendi* — Support (Appendix I → II)

Downlisting is warranted under Annex 1 and Annex 4: the species no longer meets Appendix-I biological thresholds and effective national protections exist. Long-term trend data show sustained recovery since re-colonisation of Isla Guadalupe; NOAA’s 2021 ESA status review and stock assessment report population increases and a minimum size >31,000 based on pup counts and a 3.5 multiplier, with growth rates near 6 percent in recent decades. IUCN presently classifies the taxon as Least Concern, and AC33’s periodic review concluded that Appendix II is more proportionate; other *Arctocephalus* are already in Appendix II, improving regulatory coherence. International commercial trade is negligible; principal risks are climate anomalies and entanglement, not trade. Under Appendix II, any movement remains permit-controlled with NDFs. Enforceability is practical through national prohibitions, MMPA/ESA protections, tagging and photo-ID; Parties can require documentation of legal acquisition and purpose for scientific exchanges. Reporting via national pinniped monitoring ensures rapid detection of adverse trends, satisfying precautionary measures. This status correction aligns CITES controls with contemporary biology while maintaining oversight.

CoP20 Prop. 8 Caribbean monk seal *Neomonachus (Monachus) tropicalis* — Support (Delete from Appendix I; extinct)

Deletion is a housekeeping correction under Annex 3 and consistent with Annex 4 precaution: multiple independent assessments confirm global extinction, so Appendix I retention has no conservation utility. The last verified sighting dates to 1952; NOAA's 5-year review concluded extinction and recommended delisting under the ESA. IUCN's Red List classifies the taxon as Extinct; AC27 previously considered the case in periodic review, and CoP20 Prop. 8 formalises removal from the Appendices. Deletion does not enable trade in extant specimens, and any historical museum material remains subject to domestic law. Enforceability is immaterial in practice, but identification is supported by long-established museum records and literature. Aligning CITES with IUCN and NOAA avoids regulatory clutter, focuses enforcement on extant taxa, and maintains the integrity of the Appendices.

CoP20 Prop. 22 Marine iguana *Amblyrhynchus cristatus* — Support (Appendix II → I)

Action is a precautionary, range-restricted status correction under Annex 1: a single-country endemic with fragmented, island-specific subpopulations, documented illegal take for the exotic-pet market, and susceptibility to stochastic events meets Appendix-I criteria B and C. The 2020 IUCN assessment lists the species as Vulnerable with declines or fluctuations on some islands; genetic and demographic studies show small, isolated units. Documented seizures and prosecutions demonstrate illegal collection, including the 2015 arrest of a smuggler with nine hatchlings; recent analyses of CITES permitting and trade-route laundering identify ongoing risks and recommend Appendix I for all Galápagos iguanas. Annex 4 is satisfied: Ecuador maintains robust domestic protection, and inclusion of the entire genus avoids look-alike complications among subspecies at enforcement points. Enforceability is feasible through zero commercial trade, strict permitting for scientific exchange, and validated molecular tools for identity and provenance; prior cases used mtDNA to assign confiscated iguanas to species/island for repatriation. Appendix I will deter trafficking with minimal livelihood impacts and aligns CITES with contemporary threat analyses.

CoP20 Prop. 23 Land iguanas *Conolophus* spp. — Support (Appendix II → I)

All three *Conolophus* are single-country island endemics with small, vulnerable subpopulations; *C. marthae* is Critically Endangered with a single known population of a few hundred adults. Annex 1 criteria B/C are met given restricted range, small population size, and observed/likely offtake for the pet trade. Documented smuggling events and prosecutions demonstrate persistent illegal collection; recent peer-reviewed analysis details use of CITES permits and third-country hubs to launder wild-caught Galápagos iguanas, recommending transfer of all Galápagos iguanas to Appendix I. Under Annex 4, transfer is precautionary and enforceable: a genus-level Appendix I listing removes look-alike problems among *Conolophus* species and age classes; scientific exchanges remain possible under non-commercial permits, with NDFs informed by GNPD monitoring. Molecular identification and assignment to species/island have already been used operationally in repatriations, providing a ready enforcement tool. Appendix I will reduce laundering incentives and align international controls with national criminal penalties, while imposing negligible livelihood costs.

Reptiles & Amphibians

CoP20 Prop. 24 *Bitis harena* & *B. parviocula* — Support (Include both in Appendix I)

Annex-1 criteria are met. *B. harensa* is an ultra-restricted Bale Mountains endemic described in 2016, known from very few observations within Harensa Forest, with no population estimate and high susceptibility to collection; *B. parviocula* has a narrow Ethiopian highlands range and is assessed by IUCN as Endangered with a decreasing trend. Both are highly prized in the specialist snake trade; peer-reviewed work documents export of 20 live *B. parviocula* to the United States in 2007, demonstrating demand for rare Ethiopian vipers. Given extremely limited populations, any international commercial take would be detrimental under Annex-2a decision-tree logic; Appendix I is the proportionate precautionary measure under Annex-4. National protection exists via Ethiopia's Wildlife Proclamation and Bale Mountains NP management, but international controls are needed to prevent laundering as captive-bred. Enforceability is practical: Appendix-I zero commercial trade, targeted risk-profiling of consignments declared as "captive-bred *Bitis*," and reference to distinctive morphology supported by the species description. Forensic options include venom proteomics and genetic barcoding for species-level ID, with Ethiopia's authority verifying legality of any scientific exchange. This action removes a clear incentive for collectors and aligns CITES with national conservation priorities for Bale endemics.

CoP20 Prop. 26 *Kinixys homeana* (Home's hinge-back tortoise) — Support (Appendix II → I)

Species meets Annex-1 criteria A–C: steep declines inferred from field data across West Africa, restricted and fragmented forest habitat, and persistent high demand for the pet and bushmeat trades. IUCN's most recent assessment treats *K. homeana* as threatened with continuing decline; TFTSG materials and West Africa reviews highlight severe pressure in Nigeria, Benin, Togo and Ghana. Ongoing exports and seizures of live chelonians in EU markets show enforcement challenges under Appendix II. Transfer to Appendix I is precautionary and proportionate under Annex-4 given the species' biology (slow growth, late maturity), very low recovery potential, and documented laundering among *Kinixys* look-alikes. Enforceability is feasible: Appendix-I zero commercial trade, mandatory permitting for any non-commercial movements, and use of established CITES turtle identification guides to distinguish *K. homeana* from *K. erosa*. Range States can continue community-based conservation and domestic use regulation outside CITES scope, while international demand is curtailed. This upgrade will reduce laundering risk, support NDF feasibility by eliminating commercial exports, and harmonise with EU enforcement priorities on live reptiles.

CoP20 Prop. 27 *Pelophylax epeiroticus*, *P. lessonae*, *P. ridibundus*, *P. shqipericus* — Support with Amendments (Include in Appendix II with 18-month delay)

This is a trade-regulation measure under Annex-2a/2b for look-alike Palearctic water frogs. EU is a major consumer of frog legs, with millions of individuals imported annually; DNA barcoding shows products comprise multiple taxa from several regions and mislabelling is common, hindering species-specific management. While not all included species are globally threatened, regional pressures and international trade in meat and live frogs justify Appendix II to enable NDFs, traceability, and reporting. The 18-month delay is consistent with Annex-4 precaution to develop controls. Enforceability is realistic: customs can require species-level declaration for frog legs, apply DNA barcoding protocols validated on imported products, and align HS codes with "frog legs" commodities. Range-State fisheries/wildlife agencies can set export quotas, size/season limits and certify farmed production. Amendments should specify scope to wild-sourced meat and live frogs, with clear exemptions for demonstrably farmed products to avoid undue

burden. This measured step creates transparency in a high-volume trade and supports regional conservation for *P. shqipericus* and *P. epeiroticus* while accommodating sustainable supply chains.

Plants

CoP20 Prop.40 *Panax quinquefolius* (American ginseng) — Support

The action is a narrowly scoped annotation change to #3 that exempts thin-sliced roots from artificially propagated plants when finished and packaged for retail sale. It does not liberalise trade in wild ginseng. Under Conf. 9.24 Annex 4 (Precautionary), the amendment maintains existing controls on whole and sliced wild roots and all bulk derivatives, while removing unnecessary permit friction for low-risk AP retail items, consistent with current annotation architecture and guidance on finished products. The biological status of *P. quinquefolius* is managed domestically through long-standing State harvest seasons, size limits and export certification; the U.S. CITES Ginseng Programme requires NDFs and case-by-case export clearance, ensuring Appendix-II safeguards remain intact. Enforcement and traceability are straightforward: AP retail packs are label-based and batch-traceable; wild roots continue to require origin documentation and inspection at export. No evidence indicates that exempting AP retail slices will stimulate wild harvest or impair NDFs. The proposal is therefore a status-neutral, enforceable trade-facilitation consistent with Annex 2 and Annex 3 interpretative notes on annotations

CoP20 Prop.42 *Beaucarnea* spp. (housekeeping: add *B. glassiana*, *B. hookeri*) — Support

This is a taxonomic maintenance action aligning the long-standing genus-level Appendix-II listing with current systematics by explicitly bringing former *Calibanus* taxa into *Beaucarnea*. It fits Conf. 9.24 Annex 2(b) and Annex 3 “look-alike” logic by ensuring uniform coverage of morphologically similar taxa in trade, closing an identification gap noted by the Plants Committee. The proposal does not change protection levels or exemptions; it clarifies scope, improving enforceability and legal certainty. Identification and NDF feasibility improve because officers can apply existing *Beaucarnea* ID materials and nursery documentation across the genus without exceptions. The scientific basis rests on peer-reviewed phylogenetic work resolving *Calibanus* within *Beaucarnea* and subsequent PC decisions to update the standard nomenclature and checklist. The net effect is reduced laundering risk and simpler compliance for legitimate nurseries.

CoP20 Prop.44 *Euphorbia bupleurifolia* — Transfer II → I — Support

The proposal satisfies Conf. 9.24 Annex 1 C and D: very restricted, fragmented populations with observed recent declines and high vulnerability to exploitation. South African enforcement reports and research document sharp increases in succulent poaching since 2020, with *E. bupleurifolia* targeted for horticulture and traditional use, and populations reduced to a fraction of historical range in some areas. Appendix-I will remove commercial trade in wild plants while retaining pathways for registered artificial propagation under Art. VII, supporting legal supply and community growers. Enforceability is strong: Appendix-I permits, nursery registration, and existing succulent ID guides enable border inspection; the look-alike issue is manageable within *Euphorbia* enforcement materials. This status correction is precautionary and consistent with recent national strategies to curb the succulent crisis.

CoP20 Prop.48 *Aloe* spp. — taxonomy update to include former *Chortolirion* spp. — Support

This status-neutral, scope-clarifying update ensures the Appendix-II listing of *Aloe* spp. captures four species formerly treated in Chortolirion, aligning with the current CITES *Aloe* checklist and PC guidance under Conf. 12.11. It advances Conf. 9.24 Annex 2(b) look-alike management by preventing loopholes for visually similar, traded succulents and standardises nomenclature used on permits, making NDFs and enforcement more efficient. The Plants Committee requested Parties to bring such proposals forward, and the checklist has been prepared to support implementation. There is no change to existing exemptions in annotation #4 or to legal artificial propagation pathways. Border control benefits from a single genus scope, unified HS descriptions and updated ID references. Overall, the action improves legal clarity and reduces laundering risk without altering conservation burden.

CoP20 Prop.43 *Commiphora wightii* (guggul) — Support with Amendments

Appendix-II inclusion meets Conf. 9.24 Annex 2(a) due to marked declines from harvest for oleo-gum resin and significant international demand in herbal supply chains. IUCN and pharmacognosy literature report long-term over-exploitation across India and Pakistan, with range contractions and low recruitment. II enables legal, traceable supply from cultivation or non-destructive tapping while curbing unsustainable wild take via NDFs. Enforcement is practicable through permits for bulk resin and primary extracts, manufacturer records, and batch labelling; finished medicines remain regulated by end-market laws.

CoP20 Prop.49 *Podocarpus parlatorei* — Transfer I → II — Support with Amendments

A status correction consistent with Conf. 9.24 Annex 4: the species is Near Threatened, with no recorded international trade since the 1970s Appendix-I listing. Downlisting to Appendix II maintains NDF scrutiny and trade monitoring while aligning with biological criteria and proportionality. It also harmonises with modern timber-ID guidance and supports legal, small-scale, community benefit where management plans exist. Enforceability remains high through timber annotations, species-level customs codes, and available timber ID tools; Parties retain the option to set zero quotas.

CoP20 Prop.51 *Aloe ferox* & *Euphorbia antisiphilitica* — amend annotation #4 — Support with Amendments

The amendment clarifies that finished, retail-ready products remain exempt, while raw and bulk derivatives continue to require CITES documents. It is consistent with Conf. 9.24 Annex 4 precautionary measures and the Standing Committee’s recommendations to streamline annotations without weakening controls. Conservation risk is negligible because wild harvest and primary processing still trigger NDFs and permits; AP supply chains are traceable. Enforcement improves through clear “finished product” wording already used across plant annotations, reducing seizures of bona fide retail goods while focusing controls on upstream materials.

Birds

CoP20 Prop. 17 Peregrine falcon *Falco peregrinus* (Canada) — Support (Appendix I → II)

The downlisting of the Canadian population of *Falco peregrinus* is justified under Conf. 9.24 Annex 1 and Annex 4. The species no longer meets Appendix-I biological thresholds: recovery has been well documented since the banning of DDT, with the North American population exceeding 60,000 individuals by 2020 and stable or increasing across most range States. Canada maintains robust domestic protection

under the Species at Risk Act and migratory bird legislation, ensuring continued habitat safeguards. International commercial trade is negligible; movements are primarily for regulated falconry and captive breeding. Appendix II is proportionate, retaining NDF requirements and trade monitoring without the unnecessary burden of Appendix I. Enforceability remains strong through closed breeding registries, CITES marking requirements for captive-bred raptors, and genetic tools to differentiate wild from captive stock. This is a science-based correction aligning CITES with contemporary conservation status.

I. Justifications for Requesting Withdrawal

CoP20 Prop. 28: Oceanic whitetip shark (*Carcharhinus longimanus*)

International commercial trade is no longer the principal mortality driver for oceanic whitetip; bycatch in tropical tuna fisheries dominates. All four tuna RFMOs already prohibit retention and require prompt safe release, shifting the effective lever to at-sea compliance, observer or EM coverage, and handling protocols rather than additional CITES restrictions. Under Conf. 9.24, Annex 4 requires likelihood of effectiveness: an Appendix-I uplisting would duplicate RFMO bans and add paperwork without reducing bycatch or post-release mortality. NOAA's 2024 recovery materials identify bycatch reduction and survivorship improvements as the core strategy, consistent with RFMO measures. Identification and traceability are tractable via DNA assays, but enforcement capacity is better targeted at RFMO compliance and EM expansion. Annex 5 precaution argues against creating an unenforceable layer that diverts capacity from the dominant threat pathway. The FAO EAP has repeatedly framed pelagic shark risk management around fisheries controls; nothing in the current evidence base shows that an Appendix-I shift would outperform rigorous implementation of existing RFMO rules for this species. On this basis, withdrawal best preserves CITES coherence and focuses Parties on measures with demonstrable mortality benefits.

CoP20 Prop. 29: Tope/School/Flake shark (*Galeorhinus galeus*) and *Mustelus* spp.

The proposal aggregates species and stocks with divergent statuses and drivers; Annex 2(a) requires evidence that regulating international trade is needed to prevent qualification for Appendix I. For tope, regional overfishing histories are managed through domestic rebuilding plans and TACs in Australia and New Zealand; ICES provides region-specific advice in the Northeast Atlantic. For *Mustelus* spp., trade is largely domestic and low-value; fins are not a major global commodity compared to requiem/hammerhead complexes. Annex 4 feasibility is weak for a broad Appendix-II listing: HS codes are not species-specific, many stocks are data-poor, and routine NDFs across dozens of look-alike triakids would be impracticable without lab tools and new reporting systems. Identification of processed products needs DNA assays, but those are not yet scaled for frontline customs screening. The evidentiary link between international trade and population decline is inconsistent across the package; fisheries mortality remains the leverage point. Withdrawal avoids an over-broad, hard-to-enforce measure and aligns with targeted fisheries management that directly caps mortality.

CoP20 Prop. 30: Manta and devil rays (*Mobulidae* spp.)

Uplisting mobulids to Appendix I fails Annex 4's likely-effectiveness test: retention and sale are already prohibited across all tuna RFMOs, with mandated safe-handling and release, so the binding control point is at-sea compliance, not CITES trade documentation. Mortality remains dominated by incidental capture in purse-seine and longline fisheries; Appendix I would not reduce bycatch or improve survivorship

beyond what robust RFMO implementation can achieve. IUCN assessments show high threat levels, but CITES must use the right tool for the job. Current Appendix-II regulation plus RFMO bans allow Parties to trace limited scientific/management movements while focusing capacity on EM/observers, FAD rules and handling. Enforcement practicality also argues against Appendix I: look-alikes among *Mobula* species complicate field ID, while DNA and standardised NDF guidance already exist for Appendix-II compliance. FAO/EAP advice in previous cycles stressed fisheries measures for bycatch-dominated taxa; those conditions persist. Withdrawal keeps CITES aligned with RFMO science and avoids stretching enforcement on a pathway that does not address the main threat.

CoP20 Prop. 31: Whale shark (*Rhincodon typus*)

The primary threats are vessel strikes and bycatch; international trade plays a minor contemporary role. All tuna RFMOs now ban sets on whale sharks and require safe release, so Annex 4's test of likely effectiveness is not met by an Appendix-I shift that adds little to at-sea controls. IUCN lists the species as Endangered, but mortality reduction hinges on compliance with avoidance and release protocols, EM/observers, and spatial-temporal mitigation in hotspots. ICCAT's 2023 measure, WCPFC 2012-04 and IOTC 13/05 provide the operative framework; IATTC has parallel provisions. Traceability for rare parts is feasible via DNA, yet the limiting step is fleet behaviour and monitoring, not CITES permitting. Maintaining Appendix II and focusing capacity on RFMO compliance and maritime traffic mitigation better satisfies Annex 4 and Annex 5 precaution. Withdrawal would keep CITES aligned with fisheries science and avoid diverting scarce enforcement resources from the dominant threat pathway.

CoP20 Prop. 32: Guitarfishes (*Glaucostegus* spp.) — zero-quota annotation

These taxa were listed in Appendix II at CoP18 to regulate trade; imposing a blanket zero export quota would functionally convert II into I without demonstrating Annex-1 thresholds range-wide. Annex 4 requires Parties to first show that existing Appendix-II controls, NDFs, and new ID tools are insufficient; implementation remains in early phases as countries scale shark/ray permitting since 2022–2023. Mortality is still driven largely by coastal multispecies gillnet/trawl fisheries within range States; a zero-quota trade annotation risks displacement to informal channels and reduces incentives for verifiable bycatch retention aligned with recovery plans. Enforcement practicality is constrained by look-alikes among rhino rays; CITES/FAO have produced improved fin and dried-product ID guidance and e-NDF tools that should be operationalised under the current II listing before escalating controls. Withdrawal maintains CITES proportionality and focuses resources on national effort controls, port inspections and NDF capacity building that address the principal threat pathway.

CoP20 Prop. 33: Wedgefishes (*Rhinidae* spp.) — zero-quota annotation

As with guitarfishes, a family-wide zero export quota under Appendix II would be a de facto Appendix-I outcome without demonstrating Annex-1 criteria across all species. Current Appendix-II listings are still being operationalised; Parties are building capacity for species-level ID, e-NDFs and reporting. Annex 4 requires practicality and likely effectiveness: look-alike issues among rhino rays and requiem sharks remain challenging for frontline officers, though new CITES guides exist. The principal driver of mortality is domestic coastal fisheries effort; a categorical trade zero-quota risks enforcement overload and displacement rather than measured reduction. FAO/EAP advice for similar taxa has emphasised implementing existing II listings with capacity support before escalation. Withdrawal maintains coherence

and allows investment in NDF templates, lab-supported ID, and targeted national measures that directly address fishing mortality.

CoP20 Prop. 34: Gulper sharks (Centrophoridae spp.; 14 spp.)

Annex 2(a) requires showing that regulating international trade is needed to prevent Appendix-I qualification. Here, predominant mortality for gulper sharks is from deep-sea bycatch in longline and trawl fisheries; major jurisdictions and RFMOs have already adopted non-retention rules or deep-sea closures. In the Northeast Atlantic, ICES advice documents sustained restrictions and data limitations; EU has closed 87 areas to bottom gears below 400 m to protect VMEs, indirectly reducing deep-sea shark bycatch. Reported trade is low and poorly resolved by HS codes; an across-family Appendix-II listing would be difficult to enforce because processed products are look-alikes with other squaliforms and many species are data-poor, undermining NDF feasibility under Annex 4. FAO DSF guidelines and recent regional assessments emphasise bycatch monitoring and spatial measures. Withdrawal avoids an administratively heavy, low-impact listing and focuses Parties on proven tools: effort/spatial controls, observer or EM coverage, and port-state enforcement of landing bans.

II. Justifications for Rejection

Note: *Should Proposals 28 to 37 remain on the Agenda, they shall be rejected by the Parties for the same justifications used to recommend their withdrawal.*

Aquatic species

CoP20 Prop. 39 *Haliotis midae* (South African abalone)

The crisis in *H. midae* is overwhelmingly domestic and regional, driven by organised crime and corruption, not licit international trade in CITES-regulated forms. Decades of large-scale illegal harvest for East Asian markets have outstripped TACs and undermined management. A partial Appendix II listing limited to “dried specimens” would create a laundering pathway for wet/frozen forms and mixtures, complicate verification, and strain NDF capacity. This fails Annex 4 (effectiveness) and Annex 5 (precaution) because control systems are not yet robust across all product forms and supply chains. South Africa’s own 2025 stock status reporting still flags heavy illegal offtake; UNODC’s 2024 and 2020 crime reports document entrenched trafficking networks linking abalone and synthetic drugs. TRAFFIC and national analyses estimate multi-thousand-tonne annual illegal flows over the 2000s–2010s. Sustainable solutions are national: whole-of-chain traceability from diver to export, strong port-of-exit controls, targeted criminal justice operations, verified ranching with tight source codes, and calibrated domestic market measures. Enforceability/traceability: dried meats are hard to prove visually; only laboratory methods such as stable isotopes and genetics offer origin assignment, and these are not yet deployed at scale at borders. A partial listing risks displacing illegal trade rather than reducing it. The appropriate sequence is to fix national chain-of-custody and compliance, then consider a comprehensive Appendix III or calibrated Appendix II that covers all significant product forms with tested traceability.

Terrestrial mammals

CoP20 Prop. 2 *Gazella dorcas* (Dorcas gazelle)

Dorcas gazelle shows widespread Sahel–Sahara fragmentation with local declines driven chiefly by habitat degradation from pastoral expansion, water-point development and local hunting for meat, not by international trade. Recent field work in Chad’s Ouadi Rimé–Ouadi Achim recorded 7,700–18,000 dorcas using extensive seasonal movements, with livestock pressure the dominant issue, indicating regionally variable trends and management drivers (2011–2019 surveys). International trade signals are small and mostly regulated live movements; historic WCMC extracts and Secretariat summaries characterise trade as “very small,” with limited trophies and parts. On Conf. 9.24 Annex 2 a, evidence that international trade is a driver of decline is insufficient; Annex 2 b look-alike concerns are weak given workable live-animal marking and existing national protections. Priority fits are Annex 5 (precaution) and the Convention’s Preamble: targeted domestic enforcement and CMS Sahelo-Saharan antelope actions outperform an Appendix-wide listing at addressing grazing, water development and opportunistic local hunting. NDF feasibility under Annex 4 is challenging across dispersed Sahel range States; an Appendix III by willing range States plus national quotas and microchipping of any live exports would be more proportionate and enforceable. In short, a new Appendix II listing risks paperwork without conservation leverage on the actual threats.

CoP20 Prop. 5 *Okapia johnstoni* (Okapi)

Okapi is Endangered and endemic to DRC, but principal threats are insecurity, habitat encroachment and illegal mining in and around the Okapi Wildlife Reserve, not international trade. UNESCO State of Conservation notes persistent governance and planning gaps at OWR and pressures from gold mining and associated deforestation, while WCS–ICCN co-management since 2019 targets ranger effectiveness and community engagement. The 2015 IUCN assessment emphasises population reduction due to habitat loss, poaching linked to armed groups and weak rule of law; reported international trade is negligible. Under Conf. 9.24 Annex 1, an Appendix I transfer should be justified by biological status in combination with trade posing a marked risk; here, trade is not the driver. Annex 4 (NDF) and Annex 5 suggest more effective instruments are national law enforcement, mining governance, land-use control and targeted demand reduction for bushmeat domestically. Appendix III by DRC could assist any residual control needs without creating a global prohibition of limited relevance. Enforceability: any live movements can be microchipped; parts are virtually absent from recorded trade. Therefore, Appendix I would add little conservation effect relative to strengthening site security, clarifying zoning and resourcing OWR management.

CoP20 Prop. 6 *Hyaena hyaena* (Striped hyena)

Globally listed as Near Threatened with a decreasing trend, striped hyena remains widespread from North and East Africa through the Middle East to India. Declines are mostly due to persecution, poisoning, road mortality and prey depletion in human-dominated landscapes, not international trade. Recent regional work finds variable status (e.g., some Middle Eastern populations considered Vulnerable), while population modelling and collision studies highlight anthropogenic mortality as principal drivers. Conf. 9.24 Annex 1 thresholds for Appendix I are not met at global scale; Annex 2 a is also unmet because evidence that international trade is a primary driver is thin. Tactical measures better aligned with Annex 5 include national protection, conflict-mitigation, toxicant controls and carcass disposal protocols. Enforceability: Appendix I would create limited additional leverage because identifiable trade is sparse; where parts occur, distinguishing Hyaenidae products to species often requires expert morphology or DNA barcoding, which is not yet routinely available to frontline officers across the range. Practical identification aids exist but capacity is uneven, making a prohibition difficult to operationalise for negligible trade benefit. Strengthened national measures and awareness campaigns therefore offer better returns than an Appendix I uplisting.

CoP20 Prop. 12 *Cercocebus chrysogaster* (Golden-bellied mangabey)

The species is Endangered and restricted to DRC, with declines primarily driven by bushmeat hunting and habitat loss in the central Congo Basin. Evidence that international trade is a major driver is weak; recorded CITES trade is minimal and largely historical. Under Conf. 9.24 Annex 1, Appendix I should be reserved for taxa where the biological status plus trade create a marked extinction risk; here, trade is not the main pressure. Annex 2 a and Annex 5 point to strengthening national enforcement on bushmeat, land-use and site management, alongside better market surveillance and demand-side work in Kinshasa and regional hubs. Enforceability: identification of mangabey meat is difficult visually; when needed, DNA tools can resolve species of bushmeat, but these are lab-dependent and not a routine frontline capability, arguing for focused national chains-of-custody and periodic ops rather than a higher Appendix. Maintain Appendix II, reinforce domestic controls, and if new evidence of trade emerges, consider targeted zero-export quotas or Appendix III at DRC's request, coupled with microchipping for any live in-country transfers. This pathway better matches Annex 4 operational feasibility and directs resources to the principal threats.

Birds

CoP20 Prop. 16 *Gyps africanus* & *Gyps rueppelli* (African White-backed and Rüppell's Vultures)

Population declines are severe and well-documented, but the dominant drivers are poisoning linked to carnivore conflict and poaching, belief-based use for traditional medicine, electrocution and collisions, and habitat change. International commercial trade is a minor contributor relative to these pressures. Annex 1 biological concern is met regionally, yet Resolution Conf. 9.24 requires that a listing change be likely to be effective (Annex 4). Appendix I would not measurably reduce poisoning incidents or domestic belief-based demand that operates largely outside CITES channels. CITES Decisions 19.192–19.196 and the CMS Vulture MsAP already prioritise anti-poisoning frameworks, toxicant controls, sentinel-poisoning response, and power-infrastructure mitigation, which are the interventions with highest expected impact. Trade data summaries to the Animals Committee show low volumes of legal international trade for West African vultures relative to mortality from poisoning. Enforceability and traceability are also problematic: parts in belief-based markets are hard to identify to species; while DNA barcoding can resolve identity, it is lab-dependent and rarely feasible at frontline inspection points across range States. Look-alike issues among *Gyps* spp. exacerbate this. Maintaining Appendix II while directing resources to anti-poisoning, toxicant regulation, carcass-disposal protocols, grid retrofits, and targeted market enforcement is more consistent with Annex 4 and Annex 5 than a symbolic Appendix I shift that diverts scarce compliance capacity from the true drivers.

CoP20 Prop. 18 *Sporophila* spp. package (incl. *S. maximiliani*)

Sporophila maximiliani is heavily impacted by trapping for the domestic and regional cage-bird market, with some cross-border flows in the Guiana Shield. For many proposed congeners, pressure is heterogeneous and chiefly domestic. Under Annex 1, some taxa are threatened, but Annex 4 emphasises likely effectiveness: a sweeping Appendix I/II package across multiple *Sporophila* will not address the principal market, which is internal to Brazil and neighbouring countries, where enforcement hinges on local surveillance, licensing, and demand reduction. Annex 2 b look-alikes are acute: females and juveniles of several *Sporophila* are near-indistinguishable in the field; delayed plumage maturation and seasonal variation complicate ID, elevating misidentification risk and enforcement error. Traceability is weak for small passerines; closed-ring systems and DNA parentage testing exist but are costly and not

widely deployed. CITES trade records under-capture domestic trafficking, so an expansive listing risks large administrative load with limited marginal conservation benefit. A tighter alternative consistent with Annex 4/5 is targeted national controls on priority species and routes, calibrated Appendix III by range States if needed, and a verified-breeding scheme with tamper-proof rings and periodic audits. Maintain resources on hotspot market enforcement, online trade suppression, and confiscation-to-release protocols, which evidence indicates are the leverage points for these songbirds.

Reptiles

CoP20 Prop. 25 *Crotalus* spp. & *Sistrurus* spp. (rattlesnakes)

The proposal applies Annex 2 a and 2 b across two whole genera, yet evidence that international trade is a primary driver of decline is weak and heterogeneous. Many widespread *Crotalus* and *Sistrurus* taxa are Least Concern on the IUCN Red List, while the few threatened taxa show pressures led by habitat loss, persecution, road mortality and localised harvest for domestic use or “roundups,” not international commerce. Eastern Massasauga declines, for example, are driven by habitat fragmentation and hydrology; the species is already addressed by strong national instruments (ESA listing, provincial/state laws). Mexico’s long-standing export controls and the UMA management system regulate native reptile use domestically, limiting licit exports. Global CITES snake-trade analyses indicate pythons dominate international flows; rattlesnakes are marginal in the CITES dataset. Under Res. Conf. 9.24, Annex 4’s “likely to be effective” test is not met for a blanket Appendix II listing: it would add large administrative cost without targeting dominant threats. Annex 5 cautions against listings that outstrip identification and NDF capacity; dozens of look-alike species, mixed-form products (meat, skins, curios) and long supply chains would require lab tools (DNA barcoding, isotopes) that are not yet routine in frontline enforcement. A proportionate alternative is targeted national measures, split or Appendix III listings for demonstrably at-risk species/populations, and verifiable ranching/captive-breeding where appropriate, supported by ring/markings and audit protocols.

Spiders

CoP20 Prop. 38 Theraphosidae (15 spp., tarantulas)

Evidence: The proposal does not show that international trade is a primary driver of global or range-wide declines meeting Annex 2a thresholds. Recent analyses of LEMIS and CITES data show declining pet-trade imports and a marked shift to captive-bred supply in listed tarantulas (e.g. *Brachypelma*), indicating manageable trade under Appendix II where applied; impacts are heterogeneous and evidence for trade-driven population reduction is sparse or local. Main pressures are mixed, including habitat loss and opportunistic collection, failing Annex 2a. A broad, multi-taxon listing would strain enforcement, with high look-alike risk across Theraphosidae and limited validated ID tools beyond a few genera; NDFs would be unreliable for many newly listed species. Targeted national controls, App. III where needed, and improved monitoring of online trade are the proportionate response, consistent with Annex 4 precaution.

Plants

CoP20 Prop. 41 *Jubaea chilensis* (Chilean palm)

Evidence: Annex 1 criteria for Appendix I is not met. The IUCN Red List uplisted *Jubaea* from Vulnerable to Endangered in 2021, but principal threats are domestic: habitat loss, fragmentation, recurrent wildfires, and heavy local seed harvest leading to seed-dispersal collapse and poor recruitment. International trade is not evidenced as a primary driver of decline. Genetic studies show low diversity and high inbreeding, pointing to habitat and demography issues rather than cross-border demand. An Appendix I listing would add paperwork for nursery-propagated plants and seeds while doing little to address in-country drivers; traceability of seeds to wild vs. cultivated origin is challenging, limiting NDF feasibility. Prefer national protection, habitat restoration, and, if export control is needed, Appendix III by Chile.

CoP20 Prop. 45 *Azela bipindensis* (Red doussié) deletion from Appendix II

Evidence: Removal fails Annex 2b (look-alike) and Annex 4 precaution. Regional trade remains substantial and legality risks persist; independent, basin-wide verification systems, NDF practice, and chain-of-custody audits are uneven. De-listing selected range States would create laundering routes for similar *Azela* and other high-value timbers. While some assessments list *A. bipindensis* as Least Concern, this does not demonstrate that exports are non-detrimental or that similarity-of-appearance issues are resolved. Scientific ID tools such as DART-TOFMS can separate *Azela* spp., but capacity and reference coverage are still growing, limiting enforceability at scale. Retain Appendix II with annotation #17 and accelerate verified legality, quotas, and lab capacity.

CoP20 Prop. 47 *Pterocarpus soyauxii* (African padauk) deletion from Appendix II

Evidence: African *Pterocarpus* populations were newly placed in Appendix II at CoP19 with annotation #17. Implementation time has been short; deleting selected range States now would undercut ongoing establishment of NDFs, legality verification, and ID capacity, contrary to Annex 4 precaution. Market demand and well-documented look-alike issues within *Pterocarpus* argue for maintaining uniform coverage under Annex 2b. Laboratory tools can distinguish *Pterocarpus* species, but routine use depends on specialist labs and reference spectra, which are still scaling; inconsistent coverage would open laundering pathways. IUCN assessments for *P. soyauxii* are not a substitute for demonstrating low risk from trade and similarity in commerce. Retain Appendix II; focus on marked consignments, portal controls, and lab-supported checks.