



For the CITES Scientific Authority, Environment and Climate Change Canada

Subject: Technical briefing based on the *CITES CoP20 Joint Recommendations of IWMC WCT & SUCo SA (Update)* — suggested positions for Canada’s CoP20 preparations

Purpose. To share concise, evidence-based positions that Canada may consider when shaping interventions at CoP20 (Samarkand, 24 Nov–5 Dec 2025). These positions summarise the joint recommendations of IWMC WCT & SUCo SA (hereafter “the joint recommendations”) and indicate convergence with **Resolution Conf. 9.24 (Rev. CoP19)** and, for aquatic taxa, the **FAO Expert Advisory Panel (FAO EAP)** assessments.

Key messages. The joint recommendations favour proportionate, enforceable measures that demonstrably improve conservation outcomes, are feasible for **Non-Detriment Findings (NDFs)**, and respect national/Indigenous governance systems. For aquatic species, they place primary weight on FAO EAP advice; for all species, they map evidence explicitly to Conf. 9.24 criteria and Annex 4 precautionary measures.

Why this matters to Canada. Canada is (i) a **co-proponent** for **Prop. 17 Peregrine Falcon** (Appendix I → II), (ii) affected by **Panax quinquefolius (Prop. 40)** trade rules, and (iii) a major fisheries nation with a strong interest in ensuring that **aquatic listings** align with FAO science and are enforceable. The Canadian public consultation confirms the Peregrine proposal and its rationale.

Executive Summary

Prioritise *status corrections* and *housekeeping* listings; support *tight, auditable annotations* where controls are practical; and **seek withdrawal or oppose proposals** that lack fit with Conf. 9.24 criteria, have low NDF feasibility, or will not address the dominant threat pathway. For aquatic species, default to FAO EAP conclusions.

Recommendations at a glance

Support

- **Prop. 7** *Guadalupe fur seal* (I → II): Status correction; trade not a driver; II maintains oversight.
- **Prop. 8** *Caribbean monk seal* (Delete from I): Extinct; housekeeping.
- **Prop. 17 (Canada/USA)** *Peregrine falcon* (I → II): Recovery documented; II retains NDFs and marking; admin burden reduced. (Converges with Canada's lodgement.)
- **Prop. 22 & 23** *Galápagos iguanas* (II → I): Single-country endemics; look-alike risks; I is proportionate deterrence.
- **Prop. 24** *Bitis harena/parviocula* (Include in I): Ultra-restricted Ethiopian vipers; trade pressure; I justified.
- **Prop. 26** *Kinixys homeana* (II → I): Trade-driven declines; I to curb laundering.
- **Prop. 40 (North America)** *Panax quinquefolius* — **amend annotation #3**: Exempt finished retail slices from **artificially propagated** plants; no risk to wild harvest controls. (Converges with US/Canada implementation practicality.)
- **Prop. 42, 44, 48** (plants housekeeping/taxonomy or targeted upgrades): Improve clarity; tackle succulent poaching.

Support with Amendments

- **Prop. 9 & 10** (Namibia rhinos): Tight annotations; horn marking/DNA; review clauses/suspension triggers.
- **Prop. 13 & 14** (Southern African elephants): Conditional support for controlled stock mechanisms/harmonised Annotation A10 with forensic inventory and MIKE/ETIS surveillance.
- **Prop. 27** Palearctic water frogs — **Support with amendments (Canada to seek)**: 18-month implementation delay; clarify scope to wild-sourced meat/live; require DNA protocols and HS-code alignment.
- **Prop. 43, 49, 51** (plants): Narrow, enforceable annotations; quotas/reviews where needed.

Request Withdrawal (*Aquatic Proposals 28–37*)

- **Prop. 28** *Oceanic whitetip* (II → I); **Prop. 29** *Tope & smoothhounds* (→ II); **Prop. 30** *Mobulidae* (II → I); **Prop. 31** *Whale shark* (II → I); **Prop. 32–33** *Rhino rays zero-quota under II*; **Prop. 34** *Gulpers* (→ II); **Prop. 35–37** *Eels/sea cucumbers additions*:
Rationale: Dominant mortality is from fisheries bycatch/effort, not licit international trade; RFMO and national fisheries controls are the leverage points. FAO EAP assessments focus on fit with Conf. 9.24 criteria and often did not support several proposed uplistings; Secretariat provisional views vary by taxon. Convergence with FAO EAP is high; notably, FAO EAP did not support Appendix-I for oceanic whitetip. Canada could emphasise FAO-led consistency, NDF feasibility, and enforceability at scale.

Oppose

- **Prop. 2, 5, 6, 12, 16, 18, 25, 38, 39, 41, 45, 47:** Insufficient trade-driven risk; weak NDF feasibility or look-alike/admin burdens; better addressed by national or targeted App. III measures.

Proposal Annex

Prop. 17 — *Falco peregrinus* (Canada/USA): Appendix I → II — Support

Conf. 9.24 mapping. Annex 1 thresholds for Appendix I are no longer met at the global level; international commercial trade is limited and primarily captive-bred. Annex 4 feasibility is strong: existing closed breeding registries, marking (rings/microchips), and DNA tools enable reliable NDFs. **Canadian considerations:** Canada co-proposed this change; downlisting reduces unnecessary burden while retaining permit oversight and traceability. **Alignment:** Converges with the joint recommendations; Secretariat process noted; no FAO EAP role.

Prop. 40 — *Panax quinquefolius* (American ginseng): amend annotation #3 — Support

Conf. 9.24 mapping. Status-neutral, scope-clarifying change exempting **finished, retail-packaged sliced roots** from **artificially propagated** plants. Wild roots and bulk derivatives remain controlled; NDF systems in Canada/USA unchanged. **Canadian considerations:** Minimises low-risk permit friction for Canadian growers while preserving wild-harvest safeguards and inspections. **Alignment:** Converges with the joint recommendations; Secretariat process noted; no FAO EAP role.

Prop. 28 — *Carcharhinus longimanus* (Oceanic whitetip): II → I — Request Withdrawal

Conf. 9.24 mapping. Dominant threat is tuna-fishery bycatch; RFMO non-retention and safe-release rules are the operative controls. Appendix-I would add paperwork without reducing at-sea mortality; Annex 4 “likely effectiveness” not met. **Alignment:** Converges with the joint recommendations and FAO EAP’s conclusion that Appendix-I is not warranted; Secretariat provisional assessments are published by proposal and vary by taxon. **Canadian considerations:** Emphasise RFMO compliance, EM/observer coverage, and handling protocols as the real levers; ensure any CITES action does not dilute fisheries-management focus.

Prop. 29 — *Galeorhinus galeus* & *Mustelus* spp. (tope & smoothhounds): → II — Request Withdrawal

Conf. 9.24 mapping. Mixed stock status; trade signals heterogeneous; NDF feasibility across many look-alike triakids is low without lab tools/HS reforms. Fisheries TACs/closures are primary levers. **Alignment:** Converges with FAO EAP caution; Secretariat has flagged concerns on scope as proposed. **Canadian considerations:** Support targeted fisheries controls and capacity for species-level ID before listing.

Prop. 30 — *Mobulidae* spp. (manta/devil rays): II → I — Request Withdrawal

Conf. 9.24 mapping. Mortality mostly incidental capture; Appendix-I would not change bycatch/survivorship relative to robust RFMO implementation. **Alignment:** Converges with joint recommendations and FAO EAP caution; Secretariat “cannot support uplisting” across much of the package. **Canadian considerations:** Back better enforcement of existing RFMO bans and safe-release standards.

Prop. 31 — *Rhincodon typus* (Whale shark): II → I — Request Withdrawal

Conf. 9.24 mapping. Dominant threats: vessel strikes/bycatch; RFMO set-on bans and safe-release rules exist; additional CITES layer unlikely to be effective (Annex 4). **Alignment:** Converges with FAO-aligned caution; Secretariat views vary. **Canadian considerations:** Encourage EM/observer coverage and maritime-traffic mitigation in hotspots.

Prop. 32–33 — *Glaucostegus spp.* & *Rhinidae spp.* (guitar/wedgefishes): zero-quota under II — Request Withdrawal

Conf. 9.24 mapping. De facto Appendix-I outcome without demonstrating Annex-1 thresholds range-wide; implementation of recent II listings is still maturing; look-alike issues remain. **Alignment:** Converges with FAO EAP's staged, capacity-first approach. **Canadian considerations:** Back e-NDF tools, species-ID capacity, and national effort controls before escalation.

Prop. 34 — *Centrophoridae* (gulpers; 14 spp.): → II — Request Withdrawal

Conf. 9.24 mapping. Deep-sea bycatch dominates; reported trade low/poorly resolved; broad family-wide II listing has weak enforceability and NDF feasibility. **Alignment:** Converges with FAO EAP emphasis on fisheries spatial/effort controls. **Canadian considerations:** Focus on deep-sea closures/EM rather than trade paperwork.

Prop. 35–37 — *Anguilla spp.* / *Actinopyga spp.* / *Holothuria lessoni*: → II — Request Withdrawal

Conf. 9.24 mapping. Risk of black-market displacement where national control systems and traceability are not yet ready; Annex 4 (precautionary measures — including likely effectiveness and control feasibility) and Annex 5 (definitions/explanations) support sequencing national controls before CITES listings. **Alignment:** Converges with FAO EAP's control-readiness principle. **Canadian considerations:** Support traceability pilots and targeted operations first.

Risks & Mitigations

- **Risk of over-reach / weak fits with Conf. 9.24.** Advancing low-evidence, hard-to-enforce listings can dilute CITES credibility and overwhelm NDF capacity. **Mitigation:** Anchor interventions in **Conf. 9.24** criteria, **Annex 4 feasibility**, and FAO EAP advice for aquatic taxa.
- **Enforcement displacement.** De facto prohibitions where domestic controls are unready can shift trade into informal channels. **Mitigation:** Sequence controls (national quotas, traceable supply chains, species-ID capacity) before tightening CITES layers.
- **Misalignment with fisheries science.** Uplistings that do not reduce bycatch undermine outcomes. **Mitigation: Emphasise RFMO compliance (non-retention, safe-release, EM/observers) as primary mortality levers;** use CITES for traceable legal channels and targeted reporting.
- **Domestic/Indigenous rights considerations.** New controls must respect Canadian Indigenous harvesting rights and co-management. **Mitigation:** Reaffirm that any Canadian implementing measures will be co-designed and that NDFs consider Indigenous knowledge and stewardship outcomes (consistent with Canadian policy practice).

Evidence links

- *CITES CoP20 Joint Recommendations of IWMC WCT & SUCo SA (Update)* — positions and rationales summarised herein.
- **FAO Expert Advisory Panel** (Eighth Panel; aquatic proposals, 25 Jul 2025) — methodology and species-by-species assessments used as primary science for marine listings. [FAO Expert Advisory Panel](#)
- **CITES Secretariat** — Provisional assessments of CoP20 proposals (Aug 26–27, 2025); final recommendations to be issued in CoP20 Doc. 114.1. [CITES](#)

Notes on convergence/divergence for Canada to signal in Committee

- **Convergence:** For many **aquatic proposals**, the joint recommendations track **FAO EAP** conclusions on criterion-fit and practicality; support that alignment explicitly.
- **Divergence:** Where the **Secretariat** provisionally supports stricter aquatic listings (e.g., **oceanic whitetip**, per provisional communications), note Canada’s preference to privilege FAO EAP science and **Annex 4** feasibility, and to prioritise RFMO compliance to reduce mortality.