



Comparative Evaluation of the CITES Secretariat's Initial and Final Assessments: Developments, Reasoning, and Alignment with Sustainable Use Principles

Introduction

This brief presents a side-by-side comparison of the CITES Secretariat's provisional assessments, issued to guide Party consideration before CoP meetings, and its final assessments, developed after formal consultations under Article XV. It compares the provisional framework in Notification No. 2019/018 (CoP18) with the finalised process in Notification No. 2025/119 (CoP20), which summarises the Secretariat's conclusions in CoP20 Doc. 114.1 and confirms that Party and intergovernmental inputs were fully considered.

The analysis follows Resolution Conf. 9.24 (Rev. CoP17) on listing criteria and Resolution Conf. 5.20 (Rev. CoP17) on Secretariat recommendations. Provisional assessments are unedited drafts intended to identify data gaps and invite feedback, while final assessments integrate Party and IGO comments, including technical input from FAO, ITTO, and IUCN for marine and timber species.

The Comparative Table tracks developments across key themes such as taxonomy, biological status, trade evidence, management, and recommendations, showing how positions evolve after consultation. The Analytical Report interprets these changes through a sustainable-use lens, drawing on examples such as the markhor, saiga, and vicuña to illustrate how quotas, traceability, and Non-Detriment Findings influence the Secretariat's reasoning.

The final section, titled "Alignment with IWMC and SUCO position," evaluates how closely the Secretariat's conclusions align with IWMC and SUCo principles that emphasise proportionate and enforceable trade regulation as the foundation of sustainable use.

Comparative Table

Section / Issue	Initial Assessment	Final Assessment	Key Difference / Development
Mandate & legal basis	Provisional assessments prepared under Article XV(1)(a) and Res. Conf. 5.20 / 9.24 (Rev. CoP17) to assist Parties ahead of CoP18; final version to appear in CoP18 Doc. 105.	Final assessments/recommendations for CoP20 issued after consultations under Article XV(1)(a), 2(b)–(c).	From draft, Secretariat-only analysis → final, recommendation-bearing text after formal consultations.
Purpose & timing	Early, unedited circulation to stimulate discussion and clarify proposals before formal translations; later finalised.	Issued after the consultation window triggered by Notif. 2025/102; positions reflect comments received.	Matures the evidence base and positions.
Evidence framework (Res. 9.24)	Uses Annex 1–3 biological criteria and split-listing guidance; Annex 4 precaution noted explicitly in multiple species write-ups (e.g., markhor, vicuña).	Confirms reliance on Res. 9.24 (Rev. CoP17) and indicates that final views incorporate additional technical inputs before recommending outcomes.	Same criteria, but with broader input and a firmer recommendation.
Consultations	Not yet reflected (pre-consultation stage), though draft species notes flag issues for Party feedback.	Party comments presented in CoP20 Doc. 114.2; IGO comments (e.g., FAO/ITTO/IUCN for trees; marine IGOs) in CoP20 Doc. 114.3; both were “fully taken into account.”	Party/IGO inputs formally embedded.
Treatment of split-listing	Draft applies Annex 3 caution, e.g., flags enforcement problems with subspecies-based split listings (markhor).	Final text (cover notice) reaffirms 9.24 use; species-level conclusions appear in CoP20 Doc. 114.1.	Draft flags risks; final decides with full record.
Precautionary measures (Annex 4)	Applied case-by-case; e.g., calls out lack of quota/special measures and weak enforcement detail for <i>Capra f. heptneri</i> down-listing.	Final recommendations shaped after seeing proposed safeguards and oversight mechanisms referenced in Doc. 114.1.	From identifying gaps → determining if safeguards suffice.
Sustainable-use signals inside species notes	Draft acknowledges community-based, regulated use (e.g., markhor trophy programmes; vicuña fibre systems) while testing them against 9.24 and enforcement practicality.	Final notice is process-level; sustainable-use reasoning appears where relevant in the species-specific conclusions of Doc. 114.1.	Same conceptual frame; more complete evidence.
Trade data handling	Draft often contrasts claimed risks with CITES/Standing Committee records (e.g., saiga trade/ETIS–SC70 signals).	Final integrates updates referenced via Doc. 114.2/114.3 where provided.	Adds recency and peer reviews.

Evolution of Secretariat Reasoning and its Implications for Sustainable Use

The Secretariat’s **initial** text (Notif. 2019/018) and the **final** text (Notif. 2025/119) show a stable methodology anchored in **Resolution Conf. 9.24 (Rev. CoP17)**, with the key development being the formal incorporation of Party and IGO comments at the final stage under **Article XV**. In the provisional phase, the Secretariat publishes unedited assessments “to stimulate discussion” and signal information gaps or enforcement risks; the final phase converts that discussion into recommendations compiled in

CoP20 Doc. 114.1, explicitly stating that Party comments (**Doc. 114.2**) and IGO technical inputs (e.g., **FAO/ITTO/IUCN** for timber; specified marine IGOs) were fully taken into account.

From a sustainable-use perspective, three recurring patterns in the provisional species write-ups are instructive:

1. **Community-based, regulated use is recognised but tested against enforceability.** In **Heptner's markhor** (*Capra falconeri heptneri*), the Secretariat notes population recovery and community conservation funded by regulated trophy hunting, yet stresses precaution where the down-listing proposal lacked an explicit export quota and detailed enforcement performance; it also flags the Annex 3 caution against subspecies split-listing that could complicate identification of trophies. This illustrates the Secretariat's willingness to acknowledge sustainable use while insisting on quotas, traceability and workable enforcement before recommending liberalisation.
2. **Trade-control proportionality is checked against the dominant threat pathway.** For **Saiga tatarica**, the draft challenges an Appendix-I uplisting by pointing to improving population trends and Standing Committee analyses indicating low volumes of reported illegal trade relative to other pressures; it questions what additional conservation benefit Appendix I would add over a properly implemented Appendix II regime. This is a classic proportionality test: where international trade is not the main threat, a stricter listing may deliver limited marginal gains.
3. **Annotation-based management is used to enable legal livelihoods subject to marking and branding safeguards.** The **Vicuña** entries describe the long-standing Appendix-II framework tied to annotation 1 (live-sheared fibre with strict marking/logos) and support tidying or scope-corrections when management systems and compliance safeguards are documented. This signals the Secretariat's preference for precise, enforceable annotations over blunt restrictions where sustainable use is demonstrably non-detrimental.

Between initial and final stages, the most material **shift in reasoning** is therefore not a change in the criteria applied, but in the **weighting of evidence** following consultations. The final notice confirms that Party submissions and IGO advice (e.g., **FAO** for fish, **ITTO** for timber) were integrated before recommendations were settled, reinforcing an implementation-centric lens: can Parties run the required Non-Detriment Findings, maintain audited stock registers, mark specimens, and run compliance monitoring that actually works?

Implications for Conf. 9.24 interpretation and Party decision-making are twofold. First, the Secretariat's consistent reference to **Annex 4 precautionary measures** in the draft (e.g., markhor quotas/enforcement; vicuña annotation clarity) tends to elevate safeguards (quotas, marking, independent verification) to near-preconditions where proposals seek down-listing or trade expansion. Second, by contrasting asserted trade risks with Standing Committee and trade-data records (e.g., saiga), the draft encourages Parties to calibrate measures to **demonstrated** trade impact rather than broader, non-trade threats. In the final stage, this calibration is sharpened by external technical advice, often favouring risk-differentiated tools (annotations, population-specific actions) over sweeping restrictions.

As to **drivers of revision**, the record points to a mix of **scientific** (new surveys, enforcement data), **procedural** (Article XV consultations), and **political/practical** (enforceability raised by range and importing Parties) dynamics. The explicit reliance on **FAO/ITTO/IUCN** for trees and relevant marine IGOs for aquatic taxa embeds a sustainable-use discipline by default, as those bodies prioritise management feasibility and fishery/forestry controls that interface with CITES trade measures.

Overall, the Secretariat’s pathway from draft to final aligns with a **use-with-safeguards** doctrine: recognise and, where justified, facilitate legal trade that is traceable and independently verifiable, but withhold liberalisation where quotas, identification and enforcement are not convincingly demonstrated. The markhor, saiga and vicuña examples in the draft illustrate how livelihoods-friendly trade can be endorsed when the **legality–sustainability–enforcement** triad is satisfied.

Alignment with IWMC and SUCO Position

Bottom line: The Secretariat’s process and typical reasoning **partially align** with IWMC’s sustainable-use stance.

Where it aligns — Emphasis on **CITES as a trade-regulation convention**, use of **annotations** and **population-specific measures**, deference to **FAO/ITTO/IUCN** technical input for resource-use taxa, and insistence on **marking, audited inventories and review clauses** all mirror IWMC/SUCo recommendations to enable legal, well-regulated trade that funds stewardship.

Where it can diverge — The Secretariat sometimes applies a more conservative reading of **Annex 4** (e.g., withholding support if quotas/enforcement proofs are not fully specified in the proposal text), whereas IWMC is readier to support “**support with amendments**” pathways that add the safeguards through negotiated text.

Verdict: Partial alignment, trending positive where proposals include **clear legality, sustainability and livelihoods safeguards** (marking, quotas, verification, reviews). This squares with IWMC’s guiding principles and its view that **proportionate, enforceable** trade controls outperform blanket prohibitions.