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Lausanne, 5 October 2025

The Honourable Dion George
Minister of Fisheries, Forestry and the Environment
Republic of South Africa

Letter sent by Email: MinisterG@dffe.gov.za

Honourable Minister,

It is in my capacity as former Secretary-General of CITES and currently as President of the IWMC World Conservation Trust that I take the liberty of expressing my concern regarding South Africa's proposal to list Abalone (*Haliotis midae*) in Appendix II of CITES. This proposal appears on the agenda of the upcoming CITES CoP20 as Proposal CoP20 Prop. 39.

As you may be aware, the 39 members of the Expert Panel convened by the Food and Agriculture Organization of the United Nations (FAO)—specifically mandated to advise CITES Parties on aquatic species proposals submitted to CoP20—have unanimously and strongly recommended that Proposal 39 be rejected. The CITES Secretariat has also expressed a similar view. Moreover, a number of CITES experts, including two former Secretaries-General and a long-serving Deputy Secretary-General, have characterized the proposal as inconsistent with the provisions of the Convention.

IWMC, following a detailed assessment conducted by a panel of ten independent experts, has likewise recommended that the proposal be withdrawn from the CoP20 agenda. This position has already been endorsed by 97 international, national, and sectoral NGOs that collectively advocate for the sustainable use of wild resources grounded in sound science.

Throughout my many years of engagement with CITES, I have consistently supported initiatives originating from South Africa—save for a single instance concerning the contraceptive programme for elephants in the mid-1990s—out of respect for the professionalism and scientific rigour that have long characterized your country's approach to wildlife management. It is therefore with genuine regret that I find myself compelled, on this occasion, to oppose this particular proposal. I do so not out of disregard, but because I cannot identify any valid

scientific or legal rationale that would justify its adoption, while numerous arguments point to its inconsistency with both the letter and spirit of the Convention.

Given the prevailing expert consensus, it is unlikely that Proposal 39 will garner broad support, except perhaps from a few Parties and NGOs that have historically taken positions at variance with South Africa's. Should the proposal be maintained and brought before the Conference, I fear it could lead to unnecessary confrontation, potentially undermining the strong reputation South Africa has built over the years for credible and principled leadership in the conservation of natural resources. Such an outcome could also inadvertently weaken the standing of other proposals put forward or supported by your Government.

In view of these considerations, I respectfully urge you to contemplate the withdrawal of Proposal 39 and, instead, to consider re-listing Abalone under Appendix III—a measure that would more effectively advance South Africa's conservation objectives while maintaining the integrity of its international standing.

Honourable Minister, please be assured that my approach stems from deep respect for your country, your Ministry, and the dedicated individuals who serve it. I hope you will accept this message in the constructive spirit in which it is offered—as an expression of my enduring commitment to supporting South Africa's exemplary contributions to global conservation.

Cordially,

A handwritten signature in black ink, appearing to read 'E. Lapointe', with a small flourish at the end.

Eugene Lapointe
IWMC President
Former Secretary-General of CITES (1982-1990)