



Animal Welfare Institute

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Via Federal eRulemaking Portal

Martha Williams, Director
Madonna Baucum, Chief, Policy and Regulations Branch
U.S. Fish and Wildlife Service
5275 Leesburg Pike
Falls Church, VA 22041-3803

Re: Comments on Negotiating Positions, Nineteenth Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora, Docket Number FWS–HQ–IA–2021–0008

Dear Director Williams and Chief Baucum:

On behalf of the Animal Welfare Institute (“AWI”), we submit the following comments on the U.S. Fish and Wildlife Service’s (“USFWS”) negotiating positions on items on the provisional agenda for the nineteenth Conference of the Parties (“CoP19”) to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (“CITES”). *See* 87 Fed. Reg. 51,441 (Aug. 22, 2022).

The Animal Welfare Institute, founded in 1951 and headquartered in Washington, DC, is a nonprofit charitable institution whose mission is to alleviate animal suffering caused by people. The organization fulfills this mission through public education, research, collaboration, media relations, litigation, outreach to agencies, engaging its members and supporters, and advocacy for stronger laws both domestically and internationally. AWI seeks better treatment of animals everywhere—in the wild, in research, in agriculture, in commerce, and in our communities.

AWI specifically endorses and incorporates by reference the comments filed by the following organizations and coalitions on the USFWS’s negotiating positions on items on the provisional agenda for CITES CoP19: (1) Species Survival Network, on behalf of itself and its member organizations, including AWI; (2) AWI, Center for Biological Diversity, Environmental Investigation Agency, and Natural Resources Defense Council on Working Documents 29.2.1 and 29.2.2; (3) Environmental Investigation Agency, on behalf of itself; and (4) Humane Society International, on behalf of itself and a coalition of organizations, including AWI, on Species Listing Proposal 1. AWI further incorporates by reference the testimony provided by AWI staff at the virtual public meeting held on September 6, 2022.

Additionally, AWI offers supplemental comments on the following: (1) The biodiversity crises and the important role CITES plays in combatting species' declines; (2) Working Documents 12, 13, 14, 15, 48, 49, 50, 52, 54, 55, 66.4.1, 66.4.2, 71.1, 71.2, 83, and 88; and (3) Species Listing Proposals 21, 23, 32, 37, 38, 39, and 40. We would also like to take this opportunity to extend an invitation to the U.S. delegation to attend AWI's two side events, one on combatting the global snaring crisis, and the other on stopping illegal fishing to save the vaquita. More information about these two side events is provided in section IV.

I. Introduction

The world is in the midst of a biodiversity crisis. According to the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (“IPBES”) in its groundbreaking biodiversity report published in 2019, over one million species are at risk of extinction unless we commit to transformative change to protect wild species and their habitats.¹ In addition to the IPBES report, a number of studies have been published in peer-reviewed journals documenting steep declines in terrestrial mammals,² birds,³ reptiles,⁴ amphibians,⁵ sharks,⁶ fish (freshwater⁷ and marine⁸), spiders,⁹ insects,¹⁰ and other groups of species.

¹ Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services. 2019. Global assessment report on biodiversity and ecosystem services. E. S. Brondizio, et al. (editors). IPBES secretariat, Bonn, Germany. 1148 pages. Available at: <https://doi.org/10.5281/zenodo.3831673>

² Rija, A.A., et al. 2020. Global extent and drivers of mammal population declines in protected areas under illegal hunting pressure. PLoS ONE 15(8): e0227163. Available at: <https://doi.org/10.1371/journal.pone.0227163>; Ripple, W.J., et al. 2015. Collapse of the world's largest herbivores. Science Advances, 1:e140010; Ripple, W.J., et al. 2014. Status and Ecological Effects of the World's Largest Carnivores. Science, e 343, 1241484.

³ Lees, A.C., et al. 2022. State of the world's birds. Annual Review of Environment and Resources, 47 (1) 1543-5938. Available at: <https://www.annualreviews.org/doi/pdf/10.1146/annurev-environ-112420-014642>

⁴ Saha, A., et al. 2018. Tracking Global Population Trends: Population Time-Series Data and a Living Planet Index for Reptiles. Journal of Herpetology, Vol. 52, No. 3, 259–268. Available at: <https://meridian.allenpress.com/journal-of-herpetology/article/52/3/259/197819>

⁵ Kiesecker, J.M. 2011. Global stressors and the global decline of amphibians: tipping the stress immunocompetency axis. Ecological Research, 26: 897–908. Available at: <https://link.springer.com/content/pdf/10.1007/s11284-010-0702-6.pdf>

⁶ Pacoureau, N., et al. 2021. Half a century of global decline in oceanic sharks and rays. Nature, 589, 567–571.

⁷ He, F., et al. 2019. The global decline of freshwater megafauna. Global Change Biology, DOI: 10.1111/gcb.14753. Available at: <https://r.jordan.im/download/ecology/he2019.pdf>.

⁸ Christensen, V., et al. 2014. A century of fish biomass decline in the ocean. Marine Ecology Progress Series, Vol. 512: 155–166. doi: 10.3354/meps10946. Available at: <https://www.int-res.com/articles/theme/m512p155.pdf>

⁹ Branco, V.V. and Cardoso, P. 2020. An expert-based assessment of global threats and conservation measures for spiders. Global Ecology and Conservation, 24 e01290. Available at: <https://www.sciencedirect.com/science/article/pii/S2351989420308313?via%3Dihub>

¹⁰ Sanchez-Bayo, F. and Wyckhuys, K.A.G. 2021. Further evidence for a global decline of the entomofauna. Austral Entomology (2021) 60, 9–26. Available at: <https://onlinelibrary.wiley.com/doi/pdf/10.1111/aen.12509>

Additionally, even a brief perusal of the International Union for Conservation of Nature (“IUCN”) Red List of Threatened Species¹¹ reveals that, despite the IUCN’s species imperilment designations and the efforts being made by governments and Parties to multi-lateral environmental agreements (“MEAs”), including CITES, to address such threats nationally, regionally, and internationally, the majority of IUCN-assessed species have a decreasing population trend.

Nearly all of the documented declines have a common denominator—human activity. Among the many human-caused threats to global biodiversity, overexploitation for trade, both domestic and international, is a key driver of decline for many species. Habitat loss and fragmentation, climate change, pollution, extractive industries, and a multitude of other threats are also decimating the world’s wildlife and wild places.¹² Considering the intrinsic value of nature and wild animals, the numerous benefits associated with biodiversity, parks, preserves, and other protected wild places, and the ecosystem services provided by wildlife, small and large, the ongoing destruction of our global wildlife heritage represents a threat to us all.

CITES cannot independently solve this biodiversity crisis but it can—and must—be part of the solution. To achieve that goal, CITES Parties, including the United States, must be ambitious and far reaching in their efforts to pursue CITES protections for all species that qualify. Parties must also seek to ensure that CITES is interpreted and implemented in a manner consistent with the protection mandate in the Convention’s preamble as well as the precautionary principle enshrined in Resolution Conf. 9.24. AWI was heartened to see the large number of reptile species listing proposals to be debated at CoP19, but was disappointed that other imperiled taxa, including, but not limited to, songbirds, marine ornamental fish, spiders, butterflies, and other insects, were not afforded the same level of priority. We hope that the United States and other Parties provide these taxa with the attention that they urgently require at future CoPs. A CITES listing can be a lifeline for imperiled species that are or may be affected by trade. In addition, the resolutions and decisions adopted at a CoP can advance efforts to protect species and their habitats, while also acting as a springboard for additional genus- or species-specific initiatives within other MEAs.

The biodiversity crisis is not a future problem—it is happening now. Substantive action to address the crisis must, therefore, occur now. AWI strongly encourages the United States to take a leadership role in confronting the biodiversity crisis by supporting, and urging other Parties to support, all of the pro-conservation proposals and working documents to be discussed at the CoP while rejecting, and urging other Parties to reject, those proposals and documents that would undermine conservation gains, diminish the proper function of the Convention, and promote the further exploitation of species through trade.

¹¹ See <https://www.iucnredlist.org/>

¹² Hogue, A.S., and Breon, K. 2022. The greatest threats to species. *Conservation Science and Practice*, e12670. Available at: <https://doi.org/10.1111/csp2.12670>

II. Working Documents

A. Working Document 12 (World Wildlife Trade Report)

We recommend that the United States oppose the series of proposed decisions set forth in this Working Document. Instead, it would be more appropriate to refer the draft Decisions for consideration at CoP20, for several reasons.

First, this would allow the Parties sufficient time to review the pilot Report, which will be submitted to CoP19 as an Inf. Doc, as well as other relevant information, in order to better evaluate the feasibility and usefulness of preparing regular World Wildlife Trade Reports based on wildlife trade price data. The pilot Report was initiated and prepared without prior deliberation from the Parties, and the Working Document does not afford the Parties an opportunity to provide input on the development of future World Wildlife Trade Reports, including on methodologies and terms of reference of such future Reports and what entities constitute appropriate Report authors. The Working Document also does not allow for Parties' review prior to publication. Additionally, the draft Decisions do not properly consider how price data should be collected and interpreted, which is a significant deficiency because price volatility and variability will make interpretation of the collected data difficult.

Second, the preparation of regular World Wildlife Trade Reports would divert limited funds as well as Secretariat time and resources from higher-priority projects. Although the Working Document states that each Report would cost approximately \$90,000 USD to prepare, this is likely a significant underestimate. The Reports would require the analysis and discussion of nearly one million trade records that are reported to the CITES Trade Database annually, which would be costly and require significant time.

Third, the proposal would advance an agenda of elevating trade over conservation by expanding wildlife trade opportunities. Notably, the proposal represents one component of a multi-pronged effort by certain Parties to promote wildlife trade by highlighting the trade's financial benefits. Our concerns with these broader efforts are discussed in greater detail in our comments below on Working Document 14. Paragraph 22 of the Working Document provides a clear indication that the World Wildlife Trade Reports are not intended to be an objective vehicle for gathering and presenting trade data. Rather, these Reports would elevate trade over protection of at-risk species. The case studies referred to in the Working Document are not balanced by other studies demonstrating harm from trade on local communities, including indigenous peoples, as well as harm to wildlife populations and ecosystems. The Working Document and case studies also fail to recognize the economic benefits that local communities derive from non-consumptive uses of wildlife.

Revisiting this proposal at CoP20 is appropriate to allow Parties the opportunity to evaluate and provide oversight and input on these issues and concerns.

B. Working Document 13 (Engagement of Indigenous Peoples and Local Communities)

AWI recognizes the important roles that indigenous peoples and local communities play in informing the CITES decision-making process. Understanding their perspectives on Species Listing Proposals and Working Documents before approving or rejecting such initiatives is important. It is also important to recognize that indigenous peoples and local communities have varied opinions regarding wildlife conservation and trade. Unfortunately, to date the voices of these peoples and communities within CITES have been heavily over-represented in favor of the pro-use/pro-exploitation perspective, with little consideration of those speaking out about the adverse impacts of wildlife trade on indigenous people and local communities or the benefits of non-use or non-consumptive use. For example, most of the case studies on livelihoods available on the CITES website promote the value of wildlife trade to support indigenous peoples and local communities. While this is one perspective in the debate, CITES would benefit from hearing a full range of views from indigenous peoples and local communities, including the many indigenous peoples and local communities who do not support consumptive use of wildlife for global trade.

While AWI does not object to the Working Document's proposed extension of the working group's mandate, the emphasis of the working group should be on promoting the engagement of indigenous peoples and local communities at the national level. The working group should be deliberating the merit of developing Decision text to recommend that Parties expand their national CITES decision-making process to ensure that indigenous people and local communities are better able to participate and share their views. Multiple agencies, including the U.S. Agency for International Development,¹³ the UN Food and Agricultural Organization,¹⁴ and the United Nations Educational, Scientific and Cultural Organization¹⁵ have created best practices guidance to more effectively engage indigenous people, local communities, and minority groups in decision-making processes at the national level. The working group could encourage Parties to consider such guidance but, after that, the working group should be disbanded and no further resources should be devoted to discussions of this matter within CITES.

¹³ U.S. Agency for International Development. 2020. Policy on promoting the rights of indigenous peoples. Available at: <https://www.usaid.gov/sites/default/files/documents/1866/USAID-IndigenousPeoples-Policy-mar-2020.pdf>

¹⁴ United Nations Food and Agricultural Organization. 2021. Free Prior and Informed Consent An indigenous peoples' right and a good practice for local communities. Available at: <https://www.fao.org/3/16190E/i6190e.pdf>

¹⁵ Gamble, S., and McQueen, J. 2019. Best Practices for Indigenous Engagement, the Canadian Commission for UNESCO's Idealab, Available at: [file:///C:/Users/DJ%20Schubert/Downloads/BestPracticesForIndigenousEngagementGeoparks%20\(2\).pdf](file:///C:/Users/DJ%20Schubert/Downloads/BestPracticesForIndigenousEngagementGeoparks%20(2).pdf)

C. Working Document 14 (Livelihoods)

Livelihoods are not an issue addressed in the Convention text. Simply put, CITES is intended to be a science-based international convention to regulate trade of species that are or may become imperiled and that are or may be affected by trade. While decisions made by CITES Parties may impact livelihoods (both positively and negatively), there is nothing in the Convention that requires that livelihood considerations be assessed by Parties when making decisions on Species Listing Proposals or Working Documents. Instead of rejecting this proposal outright as inconsistent with the Convention text, CITES has given proponents hope that it will act to address these concerns by engaging in lengthy discussions of these initiatives, establishing working groups, and continuing to include these issues on CITES meeting agendas. Unfortunately, this creates the perception that CITES welcomes such initiatives and provides certain governments and their allied organizations with reason to continue to push for internal reform within CITES to appease their interests, even if outside the parameters of the Convention.

Instead, consideration of livelihood matters are best addressed at the national level when implementing CITES decisions (as CITES Parties have previously agreed (*see e.g.*, Resolution Conf. 8.3 (Rev. CoP13)). This is not to suggest that livelihoods are not important. They are. It is only to note that they should not become a criteria that Parties use when assessing the merits of Species Listing Proposals or Working Documents.

These Decisions are biased in favor of promoting a pro-use/pro-exploitation perspective and fail to seek or promote the need for a balanced representation of view of the impacts of wildlife trade on livelihoods. Moreover, the review and guidance text contained in the document are incomplete, biased, fail to consistently use relevant terms, and ignore the need for guidance on the equitable distribution and maximization of benefits to indigenous peoples and local communities from existing trade. Instead, the text promotes the objective of maximizing trade with no apparent consideration of the impacts of such trade on the survival of the species in the wild. Fundamentally, the purpose of the Convention is to regulate trade, not promote it. The Secretariat and the Parties should spend their limited resources accordingly.

The majority of CITES Parties understand this purpose as evidenced, in part, by their rejection of certification schemes in the past, not to mention that there is little evidence of claimed positive effects of certification on rural livelihoods. If anything, CITES should direct the Parties supportive of this document to the Convention on Biological Diversity, as it is better suited to address these matters, particularly the equitable distribution of the benefits from wildlife trade and associated value chains, which fall within its legal remit.

In light of the biodiversity crisis and the enormous existing workload of the Secretariat and its committees, continuing to engage in debates over issues that are better addressed and more clearly fall under the remit of other international organizations hinders the work that must be done within CITES to ensure the proper regulation of sustainable trade and prevention of illegal trade. Consequently, we encourage the United States to oppose this Working Document, consider the Secretariat's work on this issue to be complete, and reject the proposed renewal of Decisions 18.33 and 18.35 (Rev. CoP19).

D. Working Document 15 (Participatory Mechanisms for Rural Communities in CITES)

We encourage the United States to oppose this Working Document. Representatives of rural communities should have a seat at the CITES table, but they should be subject to the same policies and procedures as other observers and observer organizations. Just as conservation NGOs have organized international and national coalitions to work on CITES issues, representatives of rural communities could do the same, thereby potentially amplifying their voices and interests at the international, regional, national, and local levels. The proposal contained in Working Document 15 to establish a rural communities advisory subcommittee or permanent committee within CITES should be rejected due to financial implications and a complete lack of clarity on how the committee would be formed to ensure equitable geographic representation and a balance of perspectives. The proposal would also elevate the interests of a particular stakeholder group over that of other stakeholder groups that have just as much interest in wildlife conservation and the regulation of wildlife trade. A document similar to Working Document 15 was rejected at CoP17 and the same fate should await this document at CoP19, ideally with a clear indication from the United States and other Parties that this concept is not consistent with the proper functioning, financial health, and equitable consideration of interests within CITES.

E. Working Document 48 (Definition of the Term Appropriate and Acceptable Destination)

AWI encourages the United States to request the renewal of Decisions 18.152-18.156 to permit ongoing working group discussions of the two sets of guidance documents, one on determining whether trade would promote in situ conservation, and the other on determining whether a proposed recipient of live African elephants and/or southern white rhinoceros is suitably equipped to house and care for the animals. Otherwise, the United States should oppose this Working Document.

Regarding the guidance on in situ conservation, there was no consensus amongst the working group members on this matter. Concerns were repeatedly expressed by some members that the guidance was inconsistent with the working group's Terms of Reference because the co-chairs put forth a document for discussion that assumed, without evidence, that ex situ trade promotes in situ conservation for all species.

At a minimum, the United States should request that both guidance documents, if approved by the Parties, explicitly exclude wild African elephants based on the following: (1) the clear intent of RC11.20 (Rev. CoP18) that wild caught African elephants should only be traded to in situ conservation programs within their natural range; (2) the indisputable position of the IUCN African Elephant Specialist Group that ex situ trade in wild caught elephants has no benefit to in situ conservation; and (3) the majority of range States agree that the only appropriate and acceptable destinations are in situ conservation programs within the species' natural habitat, as reflected by the vote on amendments to Res. Conf. 11.20 at CoP18.

Furthermore, given the conservation status of rhinoceroses as well as the physical and psychological needs that must be fulfilled to ensure a high quality of life, the United States should advocate that trade in this species, including southern white rhinos, be limited to safe, natural habitat within their historic ranges and that captive facilities, particularly those outside the species' historic range, should not be considered to be "suitably equipped" to house and care for the animals.

F. Working Documents 49 and 43.2 (Introduction from the Sea)

We support the proposed decisions in this Working Document as well as in Working Document 43.2 on making non-detriment findings for specimens of Appendix II species taken in the marine environment not under the jurisdiction of any state. However, we suggest minor amendments to both.

For Working Document 49 we suggest amending Decision 19.DD so that the Standing Committee would submit its recommendations regarding possible amendments to the Annex to Resolution Conf. 14.6 (Rev. CoP16) directly to CoP20 rather than to the Secretariat. We also note that the term "CITES trade from areas beyond national jurisdiction" is not quite accurate and should instead read "CITES provisions for specimens taken from areas not under the jurisdiction of any State".

For Working Document 43.2 we recommend that the proposed workshop be given an express mandate to propose a definition for "international scientific authorities".

G. Working Document 50 (Disposal of confiscated specimens)

AWI encourages the United States to support this Working Document but to seek amendments to the Decision text to direct the CITES Animals and Plants Committees to engage in a full review of Resolution Conf. 17.8 and to make recommendations to CoP20 on potential revisions to the text to ensure that the Resolution is consistent with the Convention. The Convention text makes clear that "[w]here a living specimen is confiscated as a result of measures referred to in paragraph 1 of this Article: . . . (b) the Management Authority shall, after consultation with the State of export, return the specimen to that State at the expense of that State, or to a rescue centre or such other place as the Management Authority deems appropriate and consistent with the purposes of the present Convention."¹⁶

Yet, under Resolution Conf. 17.8, Parties are provided the options of "disposing" of confiscated live animals by, among other possibilities, sale to traders, commercial breeders, or laboratories. Providing confiscated live animals to traders or commercial breeders would seemingly ensure that the illegally traded specimens, or their progeny, would eventually enter the trade chain in the future. Providing these animals to a laboratory, particularly if used for experimentation, would compound the suffering that the animal has already endured. Both of

¹⁶ CITES at Article VIII (4) and (4)(b).

these options are clearly inconsistent with the Convention’s goal of ensuring that international trade in listed species does not threaten the species’ survival in the wild, and thus this language should be removed from Res. Conf. 17.8.

In addition, we encourage the United States to advocate at CoP19 that Parties urgently develop, in collaboration with species-specialists, zoological park professionals, professionals from rescue centers and sanctuaries, and civil society, meaningful action plans for ensuring the humane management of live, confiscated animal species as called for under Res. Conf. 17.8, Annex 3. To date, few Parties have developed such plans.

H. Working Document 52 (Transport of Live Specimens)

AWI thanks the United States for its leadership on this issue and for submitting this document for consideration at CoP19. While not all stakeholders agree on the need for or benefits of wildlife trade, there should be universal support for the necessity of rigorous and humane transportation standards for live animals that are in trade. Consistent application of robust rules, guidelines, and conditions for transport of live animals is not only required by the Convention, but also is essential to attempt to reduce the stress and trauma experienced by live animals in trade. Moreover, it is necessary to mitigate the risk of zoonotic pathogen propagation and transmission between animals and people.

AWI strongly supports the Decision text directing the Secretariat to work with the International Air Transport Association to make its Live Animals Regulations (for animals) and Perishable Cargo Regulations (for plants) available to all parties free of charge. Such guidelines are of little value if, as a result of their cost, most Parties are unable to acquire them to ensure that live animals and plants are transported in a manner consistent with the guidelines’ standards. Ideally, the guidelines should also be made available to all CITES stakeholders in the languages of the Convention.

While the proposed Decision text contained in Working Document 52 is welcome, AWI encourages the United States to consider amendments to the text to: (1) allow Parties and stakeholders to provide input on the regular review and revision of non-air transport guidelines; (2) establish a joint Animals and Plants Committee working group with a clear mandate to review the guidelines, develop amendments, clarify compliance responsibilities, and review implementation as required by Resolution Conf. 10.21 (Rev. CoP16);¹⁷ (3) urge Parties to amend their national legislation to require adherence to the guidelines during all stages of live specimen transport; and, (4) explicitly require adherence to these guidelines as a condition of import and export permits.

¹⁷ Paragraph 2(e) of Res. Conf. 10.21 (Rev. CoP16) states that “the Standing Committee and the Secretariat, in consultation with the Animals and Plants Committees and IATA, regularly review, revise and approve amendments to the CITES guidelines for the non-air transport of live animals and plants.” (emphasis added).

I. Working Document 54 (Review of the Provisions of Resolution Conf. 17.7 on Review of Trade in Animal Specimens Reported as Produced in Captivity)

AWI encourages the United States to support this Working Document but to seek important revisions to the proposed amendments to Resolution Conf. 17.7 (Rev. CoP18) to ensure that out-of-date information is identified, to utilize new information where available in conducting the captive breeding assessments, and to ensure that no species/country combination of concern is removed from the assessment process prematurely.

As this process has yet to be completed for the first set of species/country combinations identified at the 31st meeting of the Animals Committee, it is inevitable that there may be some procedural questions that come up over time—as has occurred here. The proposed amendments to the Resolution text are intended to address some of these questions while ensuring that there is a compliance process in place to address concerns about whether captive breeding operations are complying with the Convention.

As agreed during the June 2022 virtual meeting of the CITES working group reviewing this matter, the date of the IUCN species assessment is to be included in the analysis so that Parties and observers can take that into consideration during the decision-making process. As some species assessments are decades old, relying on such dated information may not be effective in identifying the species/country combinations of captive-bred species for which there is some concern about Convention compliance.

Similarly, even if the IUCN species assessment has been conducted recently, other, more up-to-date information about the species status, threats, reproductive characteristics, and captive breeding/husbandry should be taken into consideration in preparing and evaluating the list of species/country combinations for potential inclusion in this compliance process.

Finally, for species/country combinations that are already under review pursuant to other CITES compliance processes (e.g., Review of Significant Trade), and that may also be subject to the compliance process under Resolution Conf. 17.7, those combinations should only be excluded from the latter decision-making process if the captive breeding of the species is being considered as part of any alternative compliance process.

J. Working Document 55 (Registration of Operations that Breed Appendix I Animal Species in Captivity for Commercial Purposes)

AWI thanks the United States for submitting this Working Document seeking much needed revisions to Resolution Conf. 12.10, which permits Parties to seek CITES registration of facilities breeding Appendix I listed species in captivity. If approved, such facilities would be permitted to engage in the commercial trade of the species. Since an Appendix I listing generally prohibits the commercial trade in species, Resolution Conf. 12.10 represents a significant circumvention of the Convention's core prohibitions by facilitating the legal

commercial trade in some of the world’s most imperiled species. Despite the possibility that this registration process may facilitate the illegal laundering of wild-caught Appendix I specimens, this Resolution has not been reviewed or updated since its adoption in 2001, more than twenty years ago. Furthermore, no assessment or audit has been done to ensure that registered facilities continue to operate in accordance with the breeding and other animal care standards included in its registration application. Nor are there any measures to determine if such operations are providing a conservation benefit, or instead acting as a vehicle to facilitate illegal trafficking in live wildlife and their parts and derivatives.

AWI is undertaking a review of all of the current facilities that have received a captive breeding registration under the procedures contained in Resolution Conf. 12.10. While the review remains ongoing, the initial analysis reveals that over 570 facilities, breeding 76 species in over 35 countries, are currently registered with the Secretariat. AWI will make its analysis available to the USFWS by October 31, 2022, so that the information can be used by the United States, as well as by AWI and its allied organizations, to further support the proposed revisions to the Resolution text and to garner support from other Parties. AWI looks forward to the opportunity to collaborate with the United States to obtain approval for this important Working Document at CoP19.

K. Working Documents 66.4.1 and 66.4.2 (International Trade in live African Elephant Specimens: Proposed revision to Resolution Conf. 10.10 (Rev. CoP18) on Trade in Elephant Specimens (66.4.1) and Clarifying the framework: Proposal of the European Union (66.4.2))

AWI encourages the United States to fully support Working Document 66.4.1, and to partially support Working Document 66.4.2. Working Document 66.4.1 directly responds to a request made by Parties at SC74 to develop a way forward to address the trade in live, wild caught African elephants that would resolve certain concerns raised by the approval of the amendments to Resolution Conf. 11.20 at CoP18. The proposed resolution to Resolution Conf. 10.10 would provide Parties with clear language applicable to the live trade in all wild caught African elephants regardless of their location or CITES listing.

The IUCN African Elephant Specialist Group has made clear that it opposes the removal of African elephants from the wild for any captive use.¹⁸ There is no conservation value in relegating African elephants to a lifetime of confinement, and there is ample scientific evidence that the physical, psychological, and behavioral health of elephants in captivity is severely compromised.¹⁹ While the United States has permitted the import of wild caught African

¹⁸ “Believing there to be no direct benefit for in situ conservation of African elephants, the African Elephant Specialist Group of the IUCN Species Survival Commission does not endorse the removal of African elephants from the wild for any captive use.” 2003 Statement of the IUCN African Elephant Specialist Group. Available at: <https://www.iucn.org/ssc-groups/mammals/african-elephant-specialist-group/afesg-statements/removal-african-elephants-captive-use>

¹⁹ Jacobs, B., et al. 2022. Putative neural consequences of captivity for elephants and cetaceans. *Rev. Neurosci.* 2022; 33(4): 439–465; Mason, G.J., and Veasey, J. 2010. What Do Population-Level Welfare

elephants for zoos, the most recent example being the import of 18 elephants from Eswatini in 2016, the best available scientific evidence makes clear that leaving the animals in their natural habitat within their historic range best protects the species and provides the greatest conservation benefits.

Regarding Working Document 66.4.2, the portion of the Document pertaining to the European Union's proposal to subject the merits of trade in live, wild caught African elephants to more debate is unnecessary and would serve no meaningful purpose other than to delay a decision on amending Resolution Conf. 10.10 to permanently address this matter. Considering the discussion pertaining to amendments to Resolution Conf. 11.20 at CoP18, which the majority of range states and the European Union supported, there is no need for further debate on this topic. The proposed amendments to Resolution Conf. 10.10 address many, if not all, of the concerns expressed by Parties about the amendments to Resolution Conf. 11.20 from CoP18.

In contrast, the portion of the Document regarding the need to resolve ongoing questions about dealing with reservations on annotations is in need of ongoing discussion. AWI encourages the United States to support that portion of Working Document 66.4.2 and to recommend that the Standing Committee establish a working group to further analyze this matter, and, if appropriate, to develop recommendations to address these issues and to amend all relevant resolutions, including Resolution Conf. 11.21 (Rev. CoP18), for consideration at CoP20.

L. Working Documents 71.1 and 71.2 (Pangolins)

Pangolins remain the world's most trafficked mammal species. In 2021 alone, according to the Cambridge Conservation Initiative, over 23.5 tons of pangolins, including live and dead animals, as well as their parts and derivatives, were traded illegally.²⁰ After decimating populations of its own and other Asian pangolin species, the demand from Asia, and particularly China, is driving the massive over-collection of African pangolin species. It is not the case that the Appendix I listing of all pangolin species approved by the Parties in 2016 was ineffective but, rather, that range, transit, and consumer countries have not yet effectively implemented enforcement actions, robust stockpile management programs, demand reduction campaigns, and conservation education initiatives to slow or stop the illegal trade in these species. Nor have they closed domestic markets that provide a means to sell illegally-sourced pangolins and their products.

Many of these countries are also failing to satisfy their CITES obligations regarding the conservation and management of pangolins as reflected in Resolution Conf. 17.10. Many range states, for example, have very little information about the population status of pangolins, as few have conducted population assessments or engaged in any credible effort to monitor pangolin

Indices Suggest About the Well-Being of Zoo Elephants? *Zoo Biology*, 29: 256–273; Clubb, R., et al. 2008. Compromised survivorship, fecundity and population persistence in zoo elephants. *Science*, 322 (5908), p. 1649. Available at: <https://doi.org/10.1126/science.1164298>.

²⁰ See <https://www.traffic.org/what-we-do/species/pangolins/>;
<https://www.cambridgeconservation.org/the-plight-of-the-pangolin-the-worlds-most-trafficked-mammal/>

populations to understand the impact of illegal collection and other threats to the species. Considering the ease with which wild pangolins can be caught, having a robust population assessment and monitoring program is imperative if species conservation is to be achieved. There is also a fundamental failure by range, transit, and consumer countries to provide the requested reports, as outlined, for example, in Decisions 18.238-18-243 adopted at CoP18, to the Secretariat for analysis and subsequent review by the Animals Committee.

The IUCN report on pangolins submitted to CITES SC74 (*see* Annex 2 to CITES SC Doc. 73) provides compelling evidence of the failures of range, transit, and consumer countries to implement CITES Resolutions and Decisions to protect pangolins and stop illegal trade in the species. Where available, the IUCN summarized what is known about the status of pangolin populations in all range states and has provided estimates, based on the best available data, of the number of pangolins in illegal international trade. According to its analysis, between 2016 and 2020, an estimated 258,466 pangolins were traded illegally in the form of scales, individuals (including live animals, bodies and skins), meat, medicines, and other derivatives. This may be an underestimate of the quantity of pangolins in illegal international trade. Based on the IUCN's review of additional evidence, over 600,000 pangolins could have been traded annually between 2016 and 2019, while collection for local use potentially dwarfs this figure with anywhere from 400,000 to 2.7 million pangolins hunted annually in Central Africa.

Furthermore, it is clear from the IUCN's report that illegal trade of pangolins occurs in the majority of range states, with upward of nearly 300,000 pangolins and their derivatives seized between 2016 and 2020. According to the Environmental Investigation Agency, which maintains a global database containing wildlife trade seizure data, the number and quantity of seizures has increased since all pangolin species were listed on Appendix I. Globally, between 2012 and 2016, there were 656 pangolin seizure incidents involving 89,424 kilograms whole weight²¹ of pangolins (not including scales) and 56,321 kilograms of scales. During those years, Hong Kong Special Administrative Region ("SAR"), China, Uganda, and Vietnam were the top countries for reported seizures. In the five years (2017-2021) since all pangolin species were listed in Appendix I, there were 1,312 pangolin seizure incidents involving 50,853 kilograms whole weight of pangolins (not including scales) and 287,992 kilograms of scales. During these years, the top countries for reported seizures were China, Nigeria, Hong Kong SAR, and Vietnam. More recently, in the years since CoP18 in August 2019, the total number of pangolin seizure incidents is 946, involving 34,627 kilograms whole weight of pangolins (not including scales) and 165,390 kilograms of scales. The top countries for reported seizures for this period are China, Singapore, Vietnam, and Nigeria. The increase in seizures may be a product of improved enforcement by Parties in response to the Appendix I listing or, alternatively, it could be an indication of a greater number of pangolins in trade.

The Secretariat's report on pangolins (Working Document 71.1) provides amended Decision text as approved at CITES SC74. That language is weak and insufficient to address the

²¹ Whole weight refers to the weight of live pangolins, pangolin carcasses, and other pangolin products not including scales.

myriad and increasing threats to pangolins. Conversely, Working Document 71.2, submitted by the United Kingdom, provides a more comprehensive review of the threats facing the species. It also more directly addresses needed reforms to both Resolution Conf. 17.10 and pangolin Decision text to encourage Parties to increase their efforts, particularly within range, transit, and consumer countries, to conserve pangolins and combat trafficking in the species. This must include strengthening enforcement efforts, closing domestic pangolin markets, and improving stockpile management (and ideally destroying stockpiled pangolin products). It should also request ongoing reporting to the Secretariat for consideration by the CITES Animals and Standing Committees. As Working Document 71.2 provides a far stronger foundation for Parties, including pangolin range, transit, and consumer countries, to address illegal trade and conserve pangolins, AWI strongly encourages the United States to support this document. Should the United States be willing to request any amendments to this document, we encourage it to consider amending the revised Decision text to direct the CITES Standing Committee to recommend trade sanctions against those Parties who consistently fail to meet the pangolin reporting requirements.

M. Working Document 83 (Identifying Species at Risk of Extinction for CITES Parties)

AWI encourages the United States to support this Working Document as it represents a much needed initiative to ensure that species/subspecies in need of CITES protections are proposed for listing. While tens of thousands of species have already been afforded the protection offered by a listing under CITES Appendix I and II, considering the ongoing global biodiversity crisis, it is imperative that future listings focus on the species/taxa most in need of protections to reduce the impact of international trade on their survival.

However, in supporting this Working Document, AWI encourages the United States to make clear that the IUCN Red List should not be the sole source of information used to assess species status and trends, and that species for which data are not available for a specific designation must not be ignored. The IUCN Red List is a valuable tool to obtain information about a species status, population trend, and threats. Yet, since many IUCN species assessments are out-of-date, including some that are decades old, those assessments, including their categorization of species into IUCN categories of imperilment and population trend data, may not always be reliable. Consequently, when developing the process and criteria to identify species at risk of extinction, other credible sources of information, including the published scientific literature, consultation with species experts, and websites/databases of information about ecology and threats to species, should also be consulted.

In addition, it should be emphasized that species designated as “data deficient” (DD) by the IUCN should warrant consideration for review since, as has been documented in multiple published studies,²² many data deficient species may be at a higher risk of extinction than species

²² See, e.g., Borgelt, J., et al. 2022. More than half of data deficient species predicted to be threatened by extinction. *Communications Biology*, 5, Article number: 679. Available at:

for which data is sufficient for categorization. Indeed, in a recently published analysis of IUCN DD species, researchers using machine learning-derived probabilities found that for 7,699 DD species, comprising 17 percent of the entire IUCN spatial datasets, DD “species as a group may in fact be more threatened than data-sufficient species.” In addition, they “found that 85% of DD amphibians are likely to be threatened by extinction, as well as more than half of DD species in many other taxonomic groups, such as mammals and reptiles.”²³ This demonstrates that the IUCN Red List should be one tool of many used to identify species that satisfy the criteria for listing in the Appendices.

N. Working Document 88 (Communications Concerning Amendments to the Appendices received by the Depositary Government after CoP18)

We encourage the United States to support the proposed amendments to Resolution Conf. 11.21 (Rev. CoP18) on use of annotations, Resolution. Conf. 4.6 (Rev. CoP18) on submission of draft working documents, and Resolution Conf. 4.25 (Rev. CoP18) on reservations. The proposed amendments would provide useful clarification that the communications accepted in Notification No. 2019/052 do not constitute valid and permissible reservations, and that Reservations to Amendments only apply to the specific Amendment at issue, such that the reserving Party must continue to comply with the version of the Annotation that was in effect prior to the amendment.

We also encourage the United States to support adding a new paragraph to Resolution Conf. 4.25 (Rev. CoP18) that specifically addresses what would happen in the event that Parties vote to uplist African elephants to Appendix I (*see* Species Listing Proposal no. 5 submitted by Burkina Faso, et al.) and certain Parties enter a reservation. We recommend that this paragraph state:

AGREES that in the case of split-listings, where one or more population/subspecies/species of an already listed taxon is transferred to a different Appendix, a reservation that is entered in accordance with Article XV (15), paragraph 3, applies only to the amendment made to the population/subspecies/species that is transferred, and has no substantive effect on any other portion of the already listed taxon. The reserving Party remains bound by the version of the listing, including any annotations, in effect prior to the amendment.

<https://www.nature.com/articles/s42003-022-03638-9>; Walls, R.H.L. and Dulvy, N.K. 2020. Eliminating the dark matter of data deficiency by predicting the conservation status of Northeast Atlantic and Mediterranean Sea sharks and rays. *Biological Conservation*, 246. Available at: <https://doi.org/10.1016/j.biocon.2020.108459>; Bland, L.M., et al. 2016. Toward reassessing data-deficient species. *Conservation Biology*, 31:3, 531–539; Bland, L.M., et al. 2015. Predicting the conservation status of Data Deficient species. *Conservation Biology*, 29:1, 250-259. Available at: <https://doi.org/10.1111/cobi.12372>; Howard, S.D. and Bickford, D.P. 2014. Amphibians over the edge: silent extinction risk of Data Deficient species. *Diversity and Distributions* 20, 837–846.

²³ Borgelt, J., et al. 2022. More than half of data deficient species predicted to be threatened by extinction. *Communications Biology*, 5, Article number: 679. Available at: <https://www.nature.com/articles/s42003-022-03638-9>

This language is derived from Inf. Doc 12 submitted by the United States to SC74.

III. Species Listing Proposals

AWI thanks the USFWS for its submission (as the proponent or co-proponent) of 14 species listing proposals and strongly encourages the United States to remain firmly in support of these important listing initiatives, despite any opposition they may face. The United States' species listing proposals cover taxa or species that clearly qualify for CITES protections, based on scientific evidence and ample trade data.

AWI understands that some Parties and regional entities have raised concerns about species listing proposals for endemic species and for genus-level proposals. An analysis of listing proposals from past CoPs demonstrates, however, that a significant number of endemic species and genus-level listing proposals have been put forward and adopted by the Parties, establishing that this is an important vehicle for protecting species harmed by trade. We encourage the United States to utilize the information provided below during its negotiations with other Parties and, if such concerns are raised during the debate at the CoP, to counter such interventions with this compelling evidence.

Specifically, since CoP14 in 2007, proposed listings for 35 of 42 species (83 percent) endemic to a particular country or geographically limited region have been successful (*see* attached Appendix, Table 1). Since CoP15 in 2010 there have been 14 family- or genus-level listing proposals and 13 of the proposals have been successful. The only proposal that was rejected was the glass frog proposal at CoP18 (*see* attached Appendix, Table 2).

Regarding specific species listing proposals, the inclusion of nearly two dozen reptile species proposals on the CoP19 agenda reflects the dire status of reptiles globally and the significant number of these species in trade, primarily for food and pets. It is imperative that the proposals seeking to list or uplist reptile species as well as amphibian species, are approved, and we strongly encourage the United States to support these initiatives.

A. Proposal 21 (Timber rattlesnake)

AWI thanks the United States for proposing this species for inclusion in Appendix II. This species warrants protection under Appendix II due to declining populations caused by numerous threats, including habitat loss, collection through rattlesnake roundups, and vehicle collisions, as well as fragmented distribution, reproductive characteristics (i.e., delayed sexual maturity, low fecundity), relative ease of capture, and protected status (i.e., listed as threatened, vulnerable, or endangered in 23 of 31 U.S. range states).²⁴ An Appendix II listing is important

²⁴ *See, e.g.*, Clark, R.W., et al. 2011. Decline of an isolated timber rattlesnake (*Crotalus horridus*) population: Interactions between climate change, disease, and loss of genetic diversity. *Biological Conservation* 144 (2011) 886–891; *See also*: <https://www.justice.gov/opa/pr/two-florida-men-convicted-philadelphia-conspiring-and-trafficking-protected-reptiles>

to complement any state or national protection initiatives with international protection to regulate future trade.

B. Proposal 23 (Snapping turtles)

AWI thanks the United States for proposing this species for inclusion in Appendix II. These species continue to be collected, legally and illegally, primarily for the meat trade (both domestic and international), with some turtles destined for the international pet trade.²⁵ Given ongoing habitat loss combined with reproductive characteristics (i.e., delayed sexual maturation, long generation time, low reproductive output), these species are highly vulnerable to overexploitation. Over 500,000 live, wild-caught *Macrochelys temminckii*, the alligator snapping turtle, were exported from the United States from 2006-2020, with over 900,000 *Chelydra serpentina*, the common snapping turtle, the majority being reported as captive-bred, in international trade between 2017 and 2020. These species warrant protection under CITES Appendix II so that future international trade is regulated to ensure that trade is not harming wild populations in the United States and Canada.

C. Proposal 32 (Softshell turtles)

AWI thanks the United States for proposing the inclusion of these species in CITES Appendix II. There is a glaring absence of population studies for these species, but what limited data does exist indicates that the species are declining primarily due to collection for the pet and meat trade, nest predation, and recreational activities. The demand for these turtles from the United States, Canada, Mexico, and other range states in the Americas has only increased as Asian turtle populations have been decimated by over-collection. Furthermore, commercial turtle farms often require wild individuals to improve/enhance their breeding stock, placing more pressure on wild populations. These species are in international trade with over 170,000 live *Apalone ferox* and over 1,600 live *Apalone spinifera* traded between 2016 and 2021. These species deserve the additional protections afforded by an Appendix II listing which will, if approved, increase national oversight for the export of these turtles, including those produced by turtle farms.

D. Proposals 37, 38, 39, and 40 (Sharks)

It is abundantly clear from the scientific literature that many shark and ray species are subject to over-hunting largely for the fin trade but also for trade in other parts, including meat and gill rakers, and, in the case of the freshwater stingray, for the international aquaria trade.²⁶

²⁵ Colteaux, B.C. and Johnson, D.M. 2017. Commercial harvest and export of snapping turtles (*Chelydra serpentina*) in the United States: trends and the efficacy of size limits at reducing harvest. *Journal for Nature Conservation*, 35: 13–19.

²⁶ Pacoureau, N., et al. 2021. Half a century of global decline in oceanic sharks and rays. *Nature*, 589, 567–571; Dulvy, N.K., et al. 2021. Overfishing drives over one-third of all sharks and rays toward a global extinction crisis. *Current Biology*, 31; 4773–4787; Dulvy, N.K., et al. 2014. Extinction risk and conservation of the world’s sharks and rays. *eLife*; 3:e00590. DOI: 10.7554/eLife.00590; Kyne, P.M., et

AWI understands that the regulation of trade in marine species is often controversial among CITES Parties. However, because these species are commercially valuable, and because their reproductive characteristics render them highly vulnerable to over-exploitation, these species, including the bonnethead and other species of hammerhead sharks, multiple species of requiem sharks, guitarfishes, and the freshwater stingray, warrant listing under CITES Appendix II. Therefore, AWI strongly encourages the United States to support species listing proposals 37, 38, 39, and 40.

IV. Invitation to Attend Side Events on Snare-Reduction and Totoaba

A. Snare-Reduction Side Event

AWI will be hosting a side event titled *Combating the Global Snaring Crisis: Insights and Innovations from around the World*. The event is scheduled for Monday, November 14, at 1:00 p.m., in Salon 2. Food and beverages will be provided. The event will feature presentations by experts from several countries who work with local communities and government officials to remove illegal snares and traps from the landscape and to educate local communities about the harm they cause. We cordially invite the United States to send one or more of its delegates to attend this event.

Illegal hunting and trapping poses a major threat to global wildlife populations, particularly in Africa and Asia.²⁷ One of the most common methods of taking wildlife in these regions is the use of homemade snares.²⁸ Snares can be constructed from inexpensive and widely available materials such as rope, nylon, or thin wire cables.²⁹ They are easy to set and conceal, and they are highly effective: in Southeast Asia alone, more than 700 species of mammals are regularly captured in snares.³⁰ This includes numerous species listed in the CITES appendices, such as elephants, rhinoceroses, pangolins, civets, tapirs, bears, wild cats, and dozens of species of primates,³¹ many of whom are the subject of CoP19 species listing proposals and working documents.³² Successful conservation of these species must involve combating the global snaring crisis.

al. 2020. The thin edge of the wedge: extremely high extinction risk in wedgefishes and giant guitarfishes. *Aquatic Conservation Marine and Freshwater Ecosystems*, 30:1337–1361.

²⁷ William J. Ripple et al., *Bushmeat hunting and extinction risk to the world's mammals*, *R. Soc. open sci.* 3:160498 (2016); Thomas N.E. Gray et al., *The wildlife snaring crisis: an insidious and pervasive threat to biodiversity in Southeast Asia*, *Biodiversity Conservation* 27:1031-1037 (2018).

²⁸ Thomas N.E. Gray et al., *The wildlife snaring crisis: an insidious and pervasive threat to biodiversity in Southeast Asia*, *Biodiversity Conservation* 27:1031-1037 (2018).

²⁹ Mike Belecky and Thomas N.E. Gray, *Silence of the Snares: Southeast Asia's Snaring Crisis*, World Wildlife Fund International, 17 (2020).

³⁰ *Id.* at 20-21.

³¹ *Id.*; CITES, Appendices, <https://cites.org/eng/app/appendices.php>

³² CITES, CoP19, Proposals for amendment of Appendices I and II, <https://cites.org/eng/cop/19/amendment-proposals>; CITES, CoP19, Agenda and working documents, <https://cites.org/eng/cop/19/agenda-documents>

Fortunately, a number of conservation organizations and governments are working to reduce the illegal use of snares and traps. During our side event, representatives of the nonprofit organizations KaiNav Conservation, Wildlife Trust of India, and World Wildlife Fund—who work to combat snare poaching in South Africa, India, and Southeast Asia, respectively—will discuss their anti-snaring efforts and how they have effectively partnered with local community members and wildlife officials. The event would offer an excellent opportunity for members of the U.S. delegation to learn more about this important issue and how they can help snare-reduction initiatives across the globe expand and succeed.

B. Totoaba Side Event

In addition, AWI will be hosting, in collaboration with the Center for Biological Diversity, Environmental Investigation Agency, and Natural Resources Defense Council, a side event on totoaba titled *There is Still Hope: CITES' Role in Stopping Illegal Fishing and Saving the Vaquita*. The event is scheduled for November 16, from 5:15-7:00 p.m. in Salon 2. Food and beverages will be provided. Given the leadership of the United States on this issue within CITES, and through its ongoing direct deliberations with Mexico and China, we cordially invite the United States to send one or more of its delegates to attend this event, which will be held immediately before the totoaba agenda items (Working Documents. 29.2.1 and 29.2.2) are scheduled to be discussed by the Parties.

V. Conclusion

Thank you for your consideration of these comments. If you have any questions or there is any additional information we can provide, please do not hesitate to contact us.

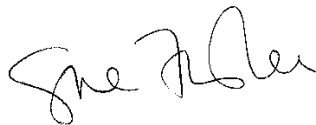
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APPENDIX

Table 1: Endemic species listing proposals considered by CITES since CoP14

CoP	Name	Endemic to	Proposal granted/not granted	Granted (Yes/No)
14	<i>Heloderma Horridum</i>	Guatemala	Inclusion in App. I	Yes
14	<i>Pterapogon kauderni</i>	Banggai Archipelago, Indonesia	Inclusion in App. II	No
14	<i>Cervus elaphus barbarous</i>	Algeria, Tunisia	Inclusion in App. I	No
14	<i>Gazella cuvieri</i>	N. Africa (Algeria, Morocco, Tunisia) (Atlas Mountain range)	Inclusion in App. I	Yes
14	<i>Gazella Dorcas</i>	N. Africa	Inclusion in App. I	No
14	<i>Gazella Leptoceros</i>	N. Africa	Inclusion in App. I	Yes
15	<i>Neurergus Kaiseri</i>	Iran	Unlisted to Inclusion in App. I	Yes
15	<i>Dynastes satanas</i>	Bolivia	Inclusion in App. II	Yes
16	<i>Naultinus</i>	New Zealand	App. III to App. II	Yes
16	<i>Protobothrops</i>	China	Inclusion in App. II	No
16	<i>Geomyola japonica</i>	Japan	Inclusion in App. II	Yes
16	<i>Mauremys amamensis</i>	Viet Nam	Transfer App. II to App. I	Yes
16	<i>Geochelone platynota</i>	Myanmar	Transfer App. II to App. I	Yes
16	<i>Epipedobates machalilla</i>	W.Ecuador	Inclusion in App. II	Yes
16	<i>Malaclemys terrapin</i>	USA, small breeding population in Bermuda	Inclusion in App. II	Yes
16	<i>Chelodina mccordi</i>	Roti Island – Timor West	Transfer App. II to App. I	No
16	<i>Clemmys guttata</i>	USA/ Canada	Inclusion in App. II	Yes
16	<i>Emydoidea blandingii</i>	USA/Canada	Inclusion in App. II	Yes
17	<i>Macaca sylvanus</i>	North Africa	Transfer App. II to I	Yes
17	<i>Abronia Genus</i>	El Salvador / Guatemala / Honduras	Inclusion in App. II	Yes
17	<i>Cnemaspis psychedelia</i>	Vietnam	Inclusion in App. I	Yes
17	<i>Lygodactylus Williamsi</i>	Tanzania	Inclusion in App. I	Yes
17	<i>Paroedura masobe</i>	Madagascar	Inclusion in App. II	Yes
17	<i>Atheris desaixi</i>	Kenya	Inclusion in App. II	Yes
17	<i>Bitis worthingtoni</i>	Kenya	Inclusion in App. II	Yes
17	<i>Dyscophus guineti</i>	Madagascar	Inclusion in App. II	Yes
17	<i>Scaphiophyrne marmorata, Boribory Spinosa</i>	Madagascar	Inclusion in App. II	Yes
17	<i>Telmatobius coelus</i>	Peru/Bolivia	Inclusion in App. I	Yes
17	<i>Paramesotriton hongkongensis</i>	China	Inclusion in App. II	Yes
18	<i>Symarticus reevesii</i>	China	Inclusion in App. II	Yes
18	<i>C. Nigrilabis</i>	Sri Lanka	Inclusion in App. I	No
18	<i>Cophotis ceylanica</i>	Sri Lanka	Inclusion in App. I	Yes
18	<i>Lyriocephalus scutatus</i>		Inclusion in App. I No – is in App. II	No (check this one)
18	<i>Gonatodes daudini</i>	Chatham Bay – Union Island, Geradines	Inclusion in App. I	Yes
18	<i>Paroedura androyensis</i>	Madagascar	Inclusion in App. II	Yes
18	<i>Pseudocerastes urarachnoides</i>	Iran	Inclusion in App. II	Yes

18	<i>Cuora Bourreti</i>	Viet Nam	Transfer from App. II to App. I	Yes
18	<i>Cuora Picturata</i>	Viet Nam	Transfer from App. II to App. I	Yes
18	<i>Muremys annamensis</i>	Viet Nam	Transfer from App. II to App. I	Yes
18	<i>Echinotriton</i>	China	Inclusion in App. II	Yes
18	<i>Tylostotriton</i>	States endemic to China but also found in Viet Nam, Laos, Thailand, Myanmar, India, Nepal and Bhutan	Inclusion in App. II	Yes
18	<i>Achillides Chikae hemeil</i>	Philippines	Inclusion in App. I	Yes

Table 2: Family or Genus level listing proposal considered by CITES Parties since CoP15

CoP/Prop #	Species	Proposal	Proponent	Outcome
CoP.15 Prop. 13	Agalychnis (Leaf frogs) (6 species)	App. II	Honduras & Mexico	Accepted
Cop.16 Prop. 26	Naultinus (green gecko) (9 species)	App. III to II	New Zealand	Accepted
CoP.16 Prop. 32	Family Geoemydidae (8 genera with 15 species) (freshwater box turtle)	App. II	China & US	Accepted
CoP.16 Prop. 36	Family Platysternidae (big headed turtles) (4 species)	App. II to I	US & Vietnam	Accepted
CoP.16 Prop. 38	Family Trionychidae (softshell turtle) (8 species)	App. II	US & China	Accepted
CoP.17 Prop. 26	Abronia spp. (alligator lizards) (29 species)	App. II	EU & Mexico	Accepted
CoP.17 Prop. 27	Rhampholeon and Rieppeleon spp. (African pygmy chameleons) (21 species)	App. II	US, Central African Republic, Chad, Gabon, Kenya Nigeria	Accepted
CoP.17 Prop. 36	Family Trionychidae (softshell/flapshell turtles) (6 species)	App. II	Burkina Faso, Chad, Gabon, Guinea, Liberia, Mauritania, Nigeria, Togo, US	Accepted
CoP.18 Prop. 24	Genus Ceratophora (horned lizards) (5 species)	App. I	Sri Lanka	Accepted
Cop.18 Prop. 27	Goniurosaurus spp. (leopard geckos) (19 species)	App. II	China, EU, Vietnam	Accepted
CoP.18 Prop. 31	Ctenosaura spp. (spiny tailed iguanas) (18 species)	App. II	El Salvador & Mexico	Accepted
CoP.18 Prop. 38	Hyalinobatrachium (Spp. Centrolene, Cochranella, sachatamia) (glass frogs) (104 species)	App. II	Costa Rica, El Salvador, Honduras	Rejected
CoP.18 Prop. 40	Paramesotriton spp. (Asian warty newts) (13 species)	App. II	China & EU	Accepted
CoP.18 Prop.41	Tylostotriton spp. (crocodile newts) (25 species)	App. II	China & EU	Accepted