

SUSTAINABLE USE VOTING GUIDE

20TH MEETING OF THE CONFERENCE OF THE PARTIES

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

SAMARKAND, UZBEKISTAN

24 NOVEMBER – 5 DECEMBER, 2025

Safari Club International, Safari Club International Foundation, and The European Federation for Hunting and Conservation Position Statements on Select Species Proposals and Documents

CITES 20th Meeting of the Conference of the Parties
Samarkand, Uzbekistan 24 November – 5 December 2025

Safari Club International (SCI) is a non-governmental organization with more than 160 Chapters and 100,000 members and advocates throughout the world. SCI's missions include the conservation of wildlife, protection of the hunter, and education of the public concerning hunting and its use as a sustainable use conservation tool.

Safari Club International Foundation (SCIF) is a non-profit organization that funds and directs worldwide programs dedicated to wildlife conservation and outdoor education and demonstrates the constructive role that hunting plays in wildlife conservation.

The European Federation for Hunting and Conservation (FACE) is an international non-profit-making non-governmental organisation representing the interests of Europe's 7 million hunters. FACE is made up of its Members: national hunters' associations from 37 European countries including the EU-27. FACE also has 6 Associate Members, including Safari Club International, and has its Secretariat in Brussels. FACE upholds the principle of sustainable use and has been a member of the International Union for Conservation of Nature (IUCN) since 1987.

Table of Contents

Prop. 1: Bontebok – Support . . . . . **pg. 4**

Prop. 2: Dorcas gazelle – Oppose . . . . . **pg. 5**

Prop. 3: Saiga antelope – Support. . . . . **pg. 5**

Prop. 4: Southern giraffe – Support . . . . . **pg. 5**

Prop. 5: Okapi – Oppose . . . . . **pg. 6**

Prop. 6: Striped hyena – Oppose . . . . . **pg. 6**

Prop. 7: Guadalupe fur seal – Support . . . . . **pg. 6**

Prop. 9: Southern white rhino – Support . . . . . **pg. 7**

Prop. 10: Black rhino – Support . . . . . **pg. 7**

Prop. 13: African elephant – Support . . . . . **pg. 8**

Prop. 14: African elephant – Support . . . . . **pg. 8**

Prop. 17: Peregrine falcon – Support . . . . . **pg. 8**

Prop. 25: Rattlesnakes – Oppose . . . . . **pg. 9**

Prop. 35: Eel – Oppose . . . . . **pg. 9**

Doc. 4: Rules of Procedure – Part Support/Part Oppose . . . . . **pg. 9**

Doc. 14: Enhancing the Work and Efficiency of the Convention – Support . . . . . **pg. 10**

Doc. 16.3: Joint CITES-CMS African Carnivores Initiative – Support. . . . . **pg. 10**

Doc. 19: Language strategy for the Convention – Support . . . . . **pg. 10**

Doc. 27: Engagement of Indigenous Peoples and Local Communities – Support . . . . . **pg. 10**

Doc. 28: Draft Resolution on the Creation of an Advisory Subcommittee of PLFF – Support . . . . . **pg. 10**

Docs. 29.1 and 29.2: Livelihoods – Support . . . **pg. 11**

Doc. 30: Integrating Human Rights, Livelihoods, and Food Security into the Implementation of CITES – Support . . . . . **pg. 11**

Doc. 41: CITES Big Cats Task Force – Support . . . **pg. 11**

Doc. 45: Illegal Trade in Cheetahs – Support . . . **pg. 11**

Doc. 48: Proposed Amendment to Resolution Conf. 12.3 – Part Support/Part Oppose . . . . . **pg. 11**

Doc. 50: Non-Detriment Findings – Support . . . . **pg. 12**

Doc. 55: Purpose of Transaction Codes – Part Support/ Part Oppose . . . . . **pg. 12**

Doc. 63: Definition of the Term 'Acceptable and Appropriate Destinations' – Support . . . **pg. 12**

Doc. 71: Assessment of Appendix-I Listed Species – Support . . . . . **pg. 12**

Doc. 72: Identifying Information on Species at Risk of Extinction Affected by International Trade – Oppose . . . . . **pg. 12**

Doc. 73: Trade in Endemic Species – Oppose . . . **pg. 13**

Doc. 76.2: Implementing Aspects of Resolution Conf. 10.10 on the Closure of Domestic Ivory Markets – Oppose . . . . . **pg. 13**

Doc. 76.3: Ivory Stocks and Stockpiles – Oppose . **pg. 13**

Doc. 76.6: Results of The African Elephant Dialogue Meeting – Support . . . . . **pg. 13**

Doc. 76.7: Sustainable Financing for the African Elephant Conservation and Management – Support **pg. 14**

Doc. 80: African Lions – Qualified Support . . . . . **pg. 14**

Doc. 82: Guidance on Non-Detriment Findings for Trade in Leopard Hunting Trophies – Support . . . **pg. 14**

Doc. 102: 'Look-Alike' Criterion – Support . . . . . **pg. 14**

Docs. 105.1 and 105.2: Implications of the Transfer of a Species from One Appendix to Another – Support . . . . . **pg. 15**

Doc. 113: Taxonomy and Nomenclature of African Elephants – Support Option A . . . . . **pg. 15**

Introduction

At the 20th CITES Conference of the Parties, the Parties should focus their efforts strictly on the Convention's core mandate. The purpose of the Convention is not to regulate domestic trade, require domestic wildlife management actions, address threats to wildlife not caused by international trade, or even to ensure net-positive conservation outcomes through international trade. Rather, the mandate of the Convention is to ensure that international trade in specimens of wild animals and plants does not threaten the survival of species.

For every species proposal, the Parties must ensure that robust science indicates specific criteria are met before supporting a listing action. Similarly, if data indicate that a downlisting or removal from the appendices is warranted, Parties should strongly support those actions. Further, Parties should consider the practical implications and limitations of actions taken or pursued at CoP20. If adoption of a recommendation would do little to nothing to enhance conservation of relevant species, the Parties should consider rejecting the recommendation. Thus, for every document addressed at CoP20, Parties must always consider the Convention's core scientific principles and regulatory mandate.

For years, Parties, Observers, and the Secretariat have raised concerns that time, funding, and other resources are chronically in short supply for CITES work. The Parties must give serious consideration to these limitations before adopting actions at this Conference of the Parties. For each CoP cycle, the number of items that must be considered by the Parties grows, and yet, the amount of time and resources allocated for this work does not keep pace. Again, focusing on the Convention's core mandate should help alleviate this problem.

Finally, the Parties should seek opportunities to highlight conservation successes and support proposals to remove or reduce trade restrictions for such species. Irrationally, many Parties and Observers often celebrate the growing number of species listed on the Appendices and increased trade restrictions, as if a growing need for such actions is something worth celebrating. It is not. An ever-increasing list of protected species is an indication that CITES is failing and its actions generally are not effective at promoting wildlife conservation. Rather than celebrating these failures, Parties should seek out conservation successes—amend the appendices as needed in recognition of the success and in proper administration of the Convention—and use those successes as models for how the Convention can truly benefit wildlife conservation.

The following analyses and positions are not exhaustive but rather highlight relevant information on which the CITES Parties can base their decisions with a focus on topics in the domain of sustainable use, international hunting, and adaptive wildlife management.

Species Proposals

Support Proposal 1:

Bontebok (Damaliscus pygargus pygargus)

South Africa proposes to delete bontebok from Appendix II.

Bontebok have made a remarkable recovery from a population size of around 17 individuals in the 1930s to an estimated 9,819 – 11,069 individuals today. Sufficient safeguards are in place in the form of national and provincial legislation, a robust permitting system, and a nationally implemented management plan to ensure that deletion from Appendix II will not lead to overexploitation or detrimental trade. Trade is highly regulated and is not a threat to the species. Bontebok do not meet the criteria for inclusion in Appendix II and precautionary measures are not necessary. Although a meta-population management plan does not yet

exist, South Africa monitors the meta-population through implementation of provincial and industry protocols requiring individual DNA profiles prior to translocation or export. The species should be removed from the Appendices. The Parties should adopt Proposal 1.

Oppose Proposal 2:
Dorcas Gazelle (Gazella dorcas)

Benin, Burkina Faso, Mali, Mauritania, Niger, Nigeria, Senegal, Sudan, and Tunisia propose to include Dorcas gazelle in Appendix II.

The species does not meet the criteria for an Appendix II listing. With more than 50,000 individuals in the wild and a range across North Africa and parts of the Middle East, the species does not have a small population or geographically restricted range. Scientific data does not suggest the species has experienced a marked decline in the last 10 years or three generations. In addition, international trade is not a threat, and there are no indications that it will become a threat without an Appendix II listing. Domestic trade and use may have caused local declines in certain populations. Range states should aim to address these concerns with increased domestic conservation efforts, because a CITES listing would do little to improve the causes of local declines. Thus, the Parties should reject Proposal 2.

Support Proposal 3:
Saiga Antelope (Saiga tatarica)

Kazakhstan proposes to amend annotation A2 to Saiga tatarica to read: "Zero export quota for wild specimens traded for commercial purposes, except for specimens from the population Saiga tatarica of Kazakhstan."

The Kazakh saiga population has grown significantly since 2016 (and since 2003 before that), from about 75,700 individuals to more than 2.8 million in 2024. Kazakhstan now holds 99% of the global population of Saigo tatarica. The Parties should recognize this tremendous growth, support creation of additional incentives for the conservation of the species, and amend annotation A2 to allow for commercial trade of saiga from Kazakhstan, in line with a standard Appendix II listing. The Parties should adopt Proposal 3.

Support Proposal 4:
Southern Giraffe (Giraffa camelopardalis)

Namibia, South Africa, United Republic of Tanzania, and Zimbabwe propose to delete the giraffe populations of Angola, Botswana, Eswatini, Malawi, Mozambique, Namibia, South Africa and Zimbabwe from Appendix II.

It is now widely accepted that there are four different species of giraffe, including the southern giraffe. Proposal 4, in effect, recognizes the four distinct species and their differing conservation status. In fact, the southern giraffe does not meet the criteria for listing on the CITES Appendices and likely should not have been listed in the first place. However, because CITES does not yet recognize the four different species, the proposal would instead delete nearly all southern giraffe range states from the existing giraffe Appendix II listing. The giraffe population in the relevant 8 range states is large and growing.

Habitat for the southern giraffe is stable to increasing across all southern African range states. In South Africa in particular, the increase in private ownership of giraffes, and the economic interest in conserving a thriving population, has increased available habitat. Sufficient domestic regulatory measures are in place across all southern African range States to regulate offtake and ensure sustainable trade. In short, none of the criteria for inclusion in Appendix II are met.

Any concerns about split-listing are (1) largely rebutted by the widely accepted recognition of four separate species of giraffe, and (2) refuted by the split-listings already in the Appendices. A number of species are split-listed such that some populations are on the Appendices and others are not. For example, Mexico's populations of bighorn sheep (Ovis canadensis) and pronghorn (Antilocapra americana) are on the Appendices; populations of those species in other range states are not listed. Cyprus's population of mouflon (Ovis gmelina) is listed on Appendix I; other populations of the species are not. CITES also regularly split-lists species between the Appendices at the national level. Proposal 4 would be no different than these other split-listings. The Parties should not rely on the guidance for split-listing only when it suits their needs as an excuse to not recognize a science-based downlisting or delisting. The Parties should adopt Proposal 4.

Oppose Proposal 5:
Okapi (Okapia johnstoni)

Democratic Republic of the Congo proposes to include okapi in Appendix I.

Although okapi may meet the biological criteria for inclusion in Appendix I, the species is neither affected by legal international trade nor is there a risk of increased demand for legal international trade. The Democratic Republic of Congo should be commended for its efforts to prevent further declines in okapi habitat, combat okapi poaching, and stop okapi trafficking, but an Appendix I listing would not address these concerns. Proposal 5 states that "inclusion in Appendix I will contribute to enforcement efforts" but does not explain how or why an Appendix I listing would do so, especially considering the species is "totally protected" under existing domestic law. For these reasons, the Parties should reject Proposal 5.

Oppose Proposal 6:
Striped Hyena (Hyaena hyaena)

Tajikistan proposes to include striped hyena in Appendix I.

The primary threats to the striped hyena include habitat loss, human-wildlife conflict, direct persecution, and illegal domestic trade. International trade – legal or illegal – is not a threat, and a CITES Appendix I listing would not address the primary concerns for the species. Further, the species does not meet the biological criteria for inclusion in Appendix I. The species does not have a small population or geographically restricted range. And the species likely has not experienced a marked decline in the last 10 years or three generations. The Parties should reject Proposal 6.

Support Proposal 7:
Guadalupe Fur Seal (Arctocephalus townsendi)

Mexico and the United States of America propose to transfer Guadalupe fur seal from Appendix I to Appendix II.

Mexico and the United States reviewed the status of the Guadalupe fur seal pursuant to the Periodic Review process. The results of the review support transferring the species from Appendix I to Appendix II, because the species no longer meets the criteria for inclusion in Appendix I. The Parties should adopt Prop. 7 as proper administration of the Convention.

Support Proposal 9:
Southern White Rhino (Ceratotherium simum simum)

Namibia proposes to amend the annotation for the southern white rhino population of Namibia listed in Appendix II for the exclusive purposes of allowing international trade in live animals for in-situ conservation; hunting trophies; and rhino horn stocks owned by the Namibian government and private landowners, subject to restrictions.

Namibia's white rhino population has grown from 16 animals in 1975 to 1,500 individuals by 2024, the world's second largest behind South Africa, with an annual growth rate of 6.7%. From 2022 to 2024, a total of 43 white rhinos were hunted, around 0.9% of the population annually. In those three years, 124 live animals were also exported by Namibia, less than 3% of the population annually. Namibia is successfully monitoring its white rhino population and has demonstrated commitment, ability, and achievement in conservation. Nevertheless, the split-listing of white rhino has had an adverse effect on white rhino populations and limited Namibia's ability to generate revenue for conservation. Allowing strictly regulated commercial trade in rhino horn would help generate such revenue, motivate private landholders to increase rhino ownership, and contribute to Namibia's successful conservation efforts.

When considering the biological status of Namibia's white rhino population, the Parties have already determined at CoP19 that they do not consider Namibia's southern white rhino population to be small, to have a restricted range, or to be in decline. Thus, the population does not meet the biological criteria for Appendix I. The Appendix II annotation for white rhino should be amended as proposed to reflect the conservation gains achieved by Namibia and to further increase the benefits that Namibia can achieve with additional legal, well-regulated trade in white rhino specimens.

Even if the Parties do not fully support the proposed amendments in Proposal 9, they should support the proposal as it relates to hunting trophies. Namibia has a well-managed hunting program and exports only a small number of hunting trophies each year, comprising less than 1% of the national population annually. Satisfactory safeguards are in place to ensure that trade in hunting trophies is sustainable and beneficial to rhino conservation efforts. If the Parties are not supportive of sustainable trade in rhino horn, they should nevertheless adopt an amendment such that the annotation would include Namibia's southern white rhino population in Appendix II for the purpose of trade in hunting trophies.

Support Proposal 10:
Black Rhino (Diceros bicornis bicornis)

Namibia proposes to transfer Namibia's population of black rhino from Appendix I to Appendix II for the exclusive purpose of allowing trade in registered rhino horn, subject to restrictions.

Namibia rightly asserts that transferring its population of black rhino from Appendix I to Appendix II will help to conserve the species by providing more benefits of its sustainable use. Funds from sale of rhino horn will be used to address the increasing financial burden of conserving rhino in the face of poaching pressures. The Parties should recognize the conservation successes that Namibia has achieved, assist Namibia in continuing those successes through sustainable use, and adopt Prop. 10.

Support Proposal 13:
African Elephant (Loxodonta Africana)

Namibia proposes to amend annotation A10 to allow Namibia to trade in registered stocks of raw ivory, subject to restrictions.

Annotation A10 should be amended as proposed. The annotation as currently written is no longer relevant or appropriate. Elephant populations in southern Africa, and specifically the four Appendix-II countries, are secure (approximately 256,000 or 61.6% of all elephants in Africa) and, in many areas, expanding. Resources and incentives are urgently needed to support community conservation programs and mitigate human-wildlife conflict. CITES has not recognized the achievements of countries with large elephant populations and has repeatedly discounted the importance of southern Africa's conservation needs, while undermining community programs. Ivory sales should be a critical source of revenue for elephant conservation and proceeds of allowed trade will be used exclusively for elephant conservation and community development programs, as limited by the annotation.

Support Proposal 14:
African Elephant (Loxodonta Africana)

Botswana, Cameroon, Côte d'Ivoire, Namibia, and Zimbabwe propose to amend annotation A10 in accordance with the agreement reached at the CITES Dialogue Meeting for African Elephant Range States.

The Parties should welcome the consensus achieved at the CITES Dialogue Meeting for African Elephant Range States and support Proposal 14. Amendments proposed would harmonize and simplify the annotation relating to the trade in those African elephant populations included in Appendix II.

Support Proposal 17:
Peregrine Falcon (Falco peregrinus)

Canada and the United States of America propose to transfer Peregrine falcon from Appendix I to Appendix II.

The Peregrine falcon no longer qualifies for Appendix I, with a large global population and no trade-driven threats. International trade is minimal, well-regulated, and involves mostly captive-bred birds. Any necessary precautionary safeguards are met because although demand for trade will continue with an Appendix II listing, range States have implemented appropriate enforcement controls and will continue to be responsible for regulating trade in and use of the species. Further, the Parties should reject unsubstantiated speculation that transferring the falcon from Appendix I to Appendix II would increase incentives for trafficking of wild-sourced specimens. Transferring the species from Appendix I to Appendix II does not make illegal trade any more or less illegal; nor does transferring the species affect many existing controls implemented by range States.

Recognizing the species' recovery reinforces CITES' credibility. Updating the species' status reflects successful conservation and strengthens trust in CITES as a science-based Convention. The following statement from Proposal 17 demonstrates precisely the sort of reasoning that should inform CITES decision-making: "All factors considered, Canada views transfer of the Peregrine Falcon from Appendix I to Appendix II to be low risk for the species conservation. Transfer to Appendix II would be an opportunity to demonstrate the success of CITES for a species with a healthy population, despite ongoing threats, and that does not meet the CITES biological criteria for retention in Appendix I. Such a transfer will reduce administrative measures for a species where most individuals traded at low levels are captive bred, allowing Parties to dedicate limited resources to where they would achieve a greater conservation impact." The Parties should adopt Proposal 17.

Oppose Proposal 25:
Rattlesnakes (Crotalus spp. & Sistrurus spp.)

Bolivia and Mexico propose to include Crotalus lepidus and Crotalus ravus in Appendix II, and to include the genera Crotalus and Sistrurus in Appendix II as all species of the genera look-alike.

Crotalus lepidus or Crotalus ravus do not meet the criteria for inclusion in Appendix II. International trade of these species largely occurs between Mexico and the United States, and legal trade is mostly in captive-bred specimens. Although recent population estimates are unavailable, both species were assessed as Least Concern in the 2007 IUCN Red List assessment, and the IUCN concludes that it is "very unlikely" that either species meets the criteria for inclusion in Appendix II. The Parties should reject listing either species.

Because Crotalus lepidus or Crotalus ravus do not meet the criteria for an Appendix II listing, the two genera do not qualify for inclusion in Appendix II based on look-alike concerns. In addition, the relevant species actually do not look very similar and are relatively easy to distinguish based on external markings, size, and other features. The Parties should reject all aspects of Proposal 25.

Oppose Proposal 35:
Eel (Anguilla spp.)

The European Union, Honduras, and Panama propose to include Anguilla spp. in Appendix II with a delayed entry into effect.

Listing the Anguilla genus will provide little conservation benefit, while negatively impacting sustainable fisheries, particularly well-regulated fisheries in the United States. Neither the American eel nor the Japanese eel meets the criteria for an Appendix II listing. Neither species has a small population or restricted range. Any risk from international trade of these species is low, and a CITES listing likely would result in unintended negative consequences.

The Parties should reject Proposal 35. Rather than listing the genus on Appendix II, the Parties should adopt the resolution for Anguilla proposed in Document 87.

Working Documents

Part Support / Part Reject Document 4:
Rules of Procedure

Rule 25.6 of the Rules of Procedure has been the subject of working group deliberations for several CoP cycles without consensus amongst the participants. The proposed amendments in Doc. 4 represent a compromise of differing viewpoints regarding how the Parties should treat overlapping species proposals.

The Parties should adopt the proposed amendments to Rule 25.6, as contained in paragraph 14 of Doc. 4. But the Parties should reject the draft Decision in Annex 1. The draft Decision would continue consideration of additional amendments that are not necessary for efficient administration of the Convention, and the Parties need not spend additional time and resources reviewing a single paragraph of the Rules of Procedure.

Support Document 14:
Enhancing the Work and Efficiency of the Convention

As explained in the introduction, the workload of CITES is unsustainable for the Secretariat, Parties, Committees, and many other stakeholders. The Parties are encouraged to fully support efforts to focus on work that ensures the essential function of the Convention is effective.

Doc. 14 proposes to adopt and test the use of a draft matrix to prioritize tasks based on certain assessment factors, the results of which would guide the Committees in determining the importance and priority of relevant tasks. This is a positive step in the right direction, but the Parties must ensure the prioritization matrix is used for its intended purpose—to alleviate the workload and focus on necessary items—and not to create additional work or bog down CITES meetings with more contested process. The Parties should adopt the draft Decisions in Doc. 14.

Support Document 16.3:
Joint CITES-CMS African Carnivores Initiative

The Parties should support the outcomes that the range States agreed to at the Second Meeting of range States of the Joint CITES-CMS African Carnivores Initiative. The outcomes that are relevant to the CITES mandate are reflected in the draft Decisions included in Annex 2 of Doc. 16.3. The other recommendations of Doc. 16.3 provide for continued engagement within the ACI Program of Work beyond 2025. The Parties should adopt the recommendations in Doc. 16.3.

Support Document 19:
Language Strategy for the Convention

The draft Decisions recommended for adoption in Doc. 19 continue CITES efforts to implement language services for Arabic, Chinese , and Russian. The Parties should continue to support these considerations and adopt the draft Decisions. Short of full language services for the three languages, the Parties should consider what specific services would be most beneficial for increasing participation and engagement from Parties whose primary languages are Arabic, Chinese, or Russian. It seems likely that interpretation services at the CoP and Committee meetings would be the most useful additional service.

Support Document 27:
Engagement of Indigenous Peoples and Local Communities

Doc. 27 details the outcomes of discussions of the intersessional working group on the engagement of indigenous peoples and local communities since CoP19. The Parties should support publication of the non-binding Guidance on consulting indigenous peoples and local communities on proposals to amend the Appendices on the CITES website and adopt the draft Decisions that address implementation of the outcomes from the intersessional working group discussions. The Parties are also encouraged to come to a conclusion regarding preferred terminology for indigenous peoples and local communities.

Support Document 28:
Draft Resolution on the Creation of an Advisory Subcommittee of the Standing Committee of PLFF, a Related Voluntary Fund, and Their Procedures

The Parties should support the draft resolution in Doc. 28. However, if the Parties do not support establishment of an advisory subcommittee, they nevertheless are encouraged to support mechanisms that provide for

increased engagement with and participation by peoples living alongside species of wild fauna and flora, who very often are most impacted by decisions made through CITES decision-making processes. Critically, even if the draft resolution is not adopted, the Parties can and should undertake early and meaningful consultation with those peoples potentially most impacted by proposals to amend the Appendices.

Support Documents 29.1 and 29.2:
Livelihoods

The Parties should support the outcomes from implementation of the Decisions on livelihoods since CoP19. Documents 29.1 and 29.2 provide different approaches to recognizing the outputs and conclusions of the intersessional working group by proposing differing amendments to Res. Conf. 16.6 (Rev. CoP18). The Parties are encouraged to adopt the amendments to Res. Conf. 16.6 in Doc. 29.2, with the proposed amendments in 29.1 as an alternative.

"Welcoming" the six strategies highlighted in the Guidance for facilitating the participation of indigenous peoples and local communities in legal and sustainable trade in CITES-listed species and "inviting" the Parties to make use of the strategies is the least the Parties should do. The Parties should also support continued incorporation of livelihoods issues into CITES, highlight success stories, and advance the exchange of experiences across regions and between countries.

In addition to adopting the amendments to Res. Conf. 16.6, the Parties should adopt the draft Decisions in Annex 3 of Doc. 29.1.

Support Document 30:
Integrating Human Rights, Livelihoods, and Food Security into the Implementation of CITES

The Parties are encouraged to support the aims of the proposed resolution from Zimbabwe in Doc. 30. In particular, Parties should support the recommendation "that Parties undertake, where appropriate, socio-economic impact assessments for proposals to amend the Appendices and for other regulatory measures that may affect Indigenous Peoples and local communities." Even if the proposed resolution is not adopted, the Parties can incorporate socio-economic impact assessments for species proposals by amending an existing resolution, for example Res. Conf. 16.6.

Support Document 41:
CITES Big Cats Task Force

The Parties should adopt the recommendations in Doc. 41, and relevant Parties should work to implement the outcomes of the Task Force.

Support Document 45:
Illegal Trade in Cheetahs

The Parties should adopt the recommendations in Doc. 45, and relevant Parties should work to implement the outcomes of the Big Cats Task Force related to cheetahs.

Part Support / Part Oppose Document 48:
Proposed Amendment to Resolution Conf. 12.3

The underlying issues identified by the proponents of the proposed amendments are a concern to many exporting Parties. Importing Parties should not routinely question the validity of exporting Party NDFs and permits without specific cause to do so. Further, all Parties should aim to limit imposition of stricter domestic

measures for trade in CITES-listed species. As Doc. 48 notes, additional restrictions and delays in trade havenegative conservation and socio-economic impacts, creating distrust amongst the Parties and stakeholders.

The Parties should support the aim of the proposed amendments to Res. Conf. 12.3. However, it is questionable whether the proposed arbitration process is necessary, and the Parties may want to consider not supporting that particular provision.

Support Document 50:
Non-Detriment Findings

Non-detriment findings are a critical function of CITES, and Parties should provide feedback on the use of the guidance. The Parties should adopt the recommendations in Doc. 50.

Part Support / Part Oppose Document 55:
Purpose of Transaction Codes

Some purpose of transaction codes remain undefined in Res. Conf. 12.3 (Rev. CoP19) on Permits and certificates. The recommendations of Doc. 55 would continue efforts to define all purpose codes, which would assist with consistent application of the codes among all Parties. The Parties should support continuation of this work by adopting the recommendations in Doc. 55, including the proposed amendment to Res. Conf. 12.3, which would define purpose code 'P'.

However, the draft Decision in Annex 2 of Doc. 55, specifically paragraph b), unnecessarily instructs the working group to define purpose codes 'P' and 'Z'. Purpose code 'Z', among others, was previously defined at CoP19, and the definition is already included in Res. Conf. 12.3, subparagraph m) in paragraph 3. Thus, purpose code 'Z' should not be included in the draft Decision. And assuming that the Parties will agree to adopt the proposed definition for purpose code 'P' at CoP20, purpose code 'P' should likewise be removed from the draft Decision. Further, instead of limiting the working group's focus on purpose codes "other than those adopted as of CoP20", which would allow for a significantly broader scope of focus than what is clearly intended, the draft Decision at paragraph b) should state "other than those already defined in Resolution Conf. 12.3 (Rev. CoP19) on Permits and certificates". With those minor amendments, the Parties should adopt the draft Decision in Doc. 55.

Support Document 63:
Definition of the Term 'Acceptable and Appropriate Destinations'

The Parties should renew the Decisions in the Annex to Doc. 63 and provide feedback on experience with using the non-binding guidance related to the definition of the term 'appropriate and acceptable destinations.' When considering whether certain trade is appropriate, Parties are encouraged to recognize both direct and indirect benefits to conservation achieved through trade. Parties are further encouraged to recall that the guidance documents are non-binding and should be treated as such.

Support Document 71:
Assessment of Appendix-I Listed Species

The Parties should end this unnecessary workstream, as recommended in Doc. 71.

Oppose Document 72:
Identifying Information on Species at Risk of Extinction Affected by International Trade

Doc. 72 proposes creation of a mechanism on the CITES website where Parties can upload and access

materials used to identify species at risk of extinction that are or may be threatened by international trade and are not yet regulated under CITES or may be insufficiently regulated. This mechanism, maintained by the Secretariat, would be subject to external resources, but nevertheless is unnecessary, potentially onerous, and likely unhelpful. The quantity and quality of materials the Secretariat would be asked to manage is unknown, and much of what would be included on the CITES website is likely to be available online already, especially peer reviewed materials. Requiring the Secretariat to create and maintain a database of information readily available to Parties by other means would waste the Secretariat's valuable resources and capacity.

Thus, the Parties should reject the draft Decisions in the Annex to Doc. 72. The Parties may want to consider adopting only draft Decision 20.AA, subparagraph a), which would add to the Virtual College capacity-building measures regarding preparation of species proposals.

Oppose Document 73:
Trade in Endemic Species

The Parties should reject the draft Decisions in Doc. 73. The prior consultations requested in draft Decision 20.AA are impractical and could slow down permitting processes. CITES already has robust compliance requirements, including the need for legal acquisition findings, which specifically ensure proof of lawful origin. Thus, imposition of additional obligations on Parties to consult range States is unnecessary. Moreover, draft Decision 20.BB, which calls for a study on trade in threatened endemic species listed in Appendix I and II, would demand additional funding and place further unnecessary work on the Secretariat, which is currently understaffed, potentially straining resources and delaying essential work.

Oppose Document 76.2:
Implementing Aspects of Resolution Conf. 10.10 on the Closure of Domestic Ivory Markets

The Parties should reject the recommendations in Doc. 76.2. The draft Decisions at issue would place additional requirements on Parties related to domestic ivory markets, which are outside the scope of CITES' mandate. The reports and actions requested by the draft Decisions offer limited value to CITES because the trade is domestic. CITES should prioritize international trade oversight rather than creating unnecessary reporting obligations on domestic markets. Parties' sovereignty to manage their internal trade should be respected, allowing Parties to regulate domestic activities in accordance with their national policies.

Oppose Document 76.3:
Ivory Stocks and Stockpiles

The Parties should reject the recommendations in Doc. 76.3. The proponents of this document continue to push for increased reporting by and oversight of elephant range states, despite existing reporting requirements already in place for countries holding ivory stockpiles. This approach appears to intentionally add administrative burdens on those range states. The recommendations are unlikely to reduce illegal ivory trade or enhance stockpile security, as the responsibility for these measures rests squarely with the countries holding ivory. These countries already have legislation and procedures in place to ensure that their stockpiles are properly secured and do not enter illegal markets.

Support Document 76.6:
Results of The African Elephant Dialogue Meeting

As explained related to Proposal 14, the Parties should welcome the outcomes of the African Elephant

Dialogue Meeting, which were reached by consensus, and adopt the proposed amendments to annotation A10 in Prop. 14 and draft Decisions on sustainable financing for African elephant conservation and management in Doc. 76.7.

Support Document 76.7:
Sustainable Financing for the African Elephant Conservation and Management

The draft Decisions in Doc. 76.7 aim to explore development of mechanisms for sustainable financing for African elephant and ivory stockpile management. As with the other outcomes of the African Elephant Dialogue Meeting, the Parties should adopt the draft Decision in Doc. 76.7.

Qualified Support Document 80:
African Lions

African lions have long been a CITES agenda item with a number of overdue activities that are largely unnecessary and continue to be underfunded. The Parties may wish to adopt the draft Decisions in Doc. 80, but some of the proposed actions are unnecessary and/or duplicative of other African lion and carnivore items. Many range states are successfully implementing CITES requirements related to African lion, particularly those of eastern and southern Africa with by far the largest lion populations that are sustainably used.

However, if the Parties generally support renewal of the Decisions, they should also adopt the revisions to the Decisions, including the amendment that would focus the Animals Committee's review of the GCLA on updates related to the Committee's mandate and the Secretariat's proposed amendments related to the comparative study of African lion population trends.

Support Document 82:
Guidance on Non-Detriment Findings for Trade in Leopard Hunting Trophies

Relevant African range States successfully completed a lengthy and expensive review of leopard hunting quotas, a process that once again represents African range State leadership in sustainable hunting, the non-detrimental effect of well-regulated and conservative limits on trade in hunting trophies, and good implementation of existing regulations for trade in hunting trophies. The CITES leopard quota system has proven to be a useful tool for sustainable use of leopard and a conservation success story of CITES since adoption of Res. Conf. 10.14, except when stricter domestic measures for importation in some instances have impeded the conservation benefits of trade. Since that review, African range States have exchanged information and lessons learned regarding the leopard NDF process, which demonstrates that their NDFs are robust and driven by science. Additional NDF guidance specific to trade in leopard hunting trophies is not necessary. CITES should continue to recognize the positive contributions of the hunting industry to leopard conservation in Africa. The Parties should adopt the amended Decision in Doc. 82 and support ongoing collaboration among the relevant range States with quotas under Res. Conf. 10.14 (Rev. CoP19).

Support Document 102:
"Look-Alike" Criterion

The aim of the Convention is to ensure that international trade in specimens of wild animals and plants does not threaten the survival of the species (i.e., to regulate trade in species that need such protections). Restricting trade in species with little or no resulting positive conservation outcomes is antithetical to the purposes of the Convention and likely detrimental to sustainable use programs that would otherwise provide

more significant conservation benefits. As Doc. 102 explains, the Parties must ensure that decisions to list species for look-alike reasons are accurate, appropriate, proportionate, and applied with the best interest of the species that needs protection. The Parties should adopt the draft Decisions in Doc. 102 and work to develop guidance for the application of criterion A of Annex 2b of Res. Conf. 9.24 (Rev. CoP17).

Support Documents 105.1 & 105.2:
Implications of the Transfer of a Species from One Appendix to Another

Docs. 105.1 and 105.2 both aim to address questions of what Parties should do when trade occurs during "transition periods" between when the Parties decide to list or transfer a species on the Appendices and when the decision enters into force. Parties have expressed broad agreement that guidance and potential amendments to resolutions are needed to address such trade. Doc. 105.1 provides draft guidance and recommends adoption of a draft Decision that instructs the Standing Committee to consider the guidance and recommend amendments as necessary. Doc. 105.2 proposes amendments to Res. Conf. 13.6 (Rev. CoP18). The guidance and amendments to Res. Conf. 13.6 will provide the Parties with clarity on how to handle trade during transition periods and reduce the need for time-consuming and onerous bilateral consultations. The Parties should adopt the recommendations in both Documents.

Support Option A in Document 113:
Taxonomy and Nomenclature of African Elephants

The Parties should support the recommendations in Document 113 and to support Option A over the other two options regarding how the elephant nomenclature changes will be reflected in the Appendices. Although there might be little practical difference between the three options, Doc. 113 explains that including both species in the Appendices clearly establishes that there is a new additional elephant species recognized at the same level as the two existing species and makes it clear that trade is regulated at the species level and that permits and certificates must be issued at the species level. Option A would also be consistent with how nomenclature split updates to the Appendices have been handled in the past.