



environmental
investigation
agency

CITES

October 2025

KEY PRIORITIES AND RECOMMENDATIONS FOR CITES CoP20

ACKNOWLEDGEMENTS

This briefing was written by EIA UK and EIA US and edited by EIA UK. The contents are the sole responsibility of EIA.

EIA wishes to thank its numerous supporters whose long-term commitment to the organisation's mission and values helped make this work possible.

ABOUT EIA

The Environmental Investigation Agency (EIA) investigates and campaigns against environmental crime and abuse. Our undercover investigations expose transnational wildlife crime, with a focus on elephants, pangolins and tigers, and forest crimes such as illegal logging and deforestation for cash crops. We work to avert climate catastrophe by investigating the criminal trade in refrigerant gases, strengthening and enforcing regional and international agreements that tackle fossil fuels and climate super-pollutants, including ozone-depleting substances, hydrofluorocarbons and methane, and promoting sustainable cooling. We seek to safeguard global marine ecosystems by addressing the threats posed by plastic pollution, bycatch and commercial exploitation of whales, dolphins and porpoises.

EIA UK

62-63 Upper Street,
London N1 0NY UK
T: +44 (0) 20 7354 7960
E: ukinfo@eia-international.org
eia-international.org

EIA US

PO Box 53343
Washington DC 20009 USA
T: +1 202 483 6621
E: info@eia-global.org
eia.org

Environmental Investigation Agency UK

UK Charity Number: 1182208

Company Number: 07752350

Registered in England and Wales



INTRODUCTION

THE Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) is an international agreement which seeks to ensure that trade in specimens of wild animals and plants does not threaten their survival.

Between 23 November and 5 December 2025, representatives of the 185 countries that are signatories to CITES will gather in Samarkand, Uzbekistan for the 20th meeting of the Conference of the Parties (CoP20) to review the implementation of the Convention and make changes to the lists of species in its Appendices which receive different levels of protection from trade.

EIA will be actively engaging at CoP20 on a range of key issues relating to the protection of elephants, rhinos, Asian big cats, pangolins and vaquita porpoises, in addition to broader compliance and enforcement issues.

The table on page 3 contains a summary of EIA's position on key proposals and working documents. Our detailed comments and recommendations start from page 5.



Proposals/Documents	EIA Recommendation	Page (clickable link)
Prop. 3 Amend the annotation for the population of <i>Saiga tatarica</i> of Kazakhstan (Kazakhstan)	Reject Proposal 3.	5
Prop. 9 Amend the annotation of the population of <i>Ceratotherium simum simum</i> of Namibia listed in Appendix II to allow for international commercial trade in rhino horn (Namibia)	Reject Proposal 9.	6
Prop. 10 Transfer the population of <i>Diceros bicornis bicornis</i> of Namibia from Appendix I to Appendix II with an annotation to allow for international commercial trade in rhino horn (Namibia)	Reject Proposal 10.	7
Prop. 13 Trade in registered ivory stocks of Namibian origin (Namibia)	Reject Proposal 13.	8
Prop. 14 Amendments to Annotation A10 (Botswana, Cameroon, Côte d'Ivoire, Namibia and Zimbabwe)	Reject the proposed amendments to paragraph f) of Annotation A10. Adopt the proposed deletion of paragraphs g) and h) of Annotation A10.	9
Doc. 35.2 Review of National Ivory Action Plan	Support.	10
Doc 35.3 Draft Decision on Totoaba	Support with amendments to incorporate key actions and timelines for Mexico, China and other range, transit and destination states.	10
Doc. 41 CITES Big Cats Task Force	Support with amendments to draft decision 20.CC to allow for the convening of a Big Cats Task Force meeting in the intersessional period between CoP20 and CoP21.	11
Doc. 42 Implementation of the priority recommendations of the review of the ETIS Programme	Support with further actions.	12
Doc. 44 Ivory seizures and domestic ivory markets	Support.	12
Doc. 59 Stocks and stockpiles	Support with amendments to the definition in recommendation a).	13
Doc. 76.1 Implementation of Resolution Conf. 10.10 (Rev. CoP19) on <i>Trade in elephant specimens</i>	Support with amendments to recommendation k), oppose the deletion of 19.107-19.108 as contained in recommendation l) and consider their renewal instead. Encourage consideration of recommendations in conjunction with Docs. 35.2, 76.2, 76.3 and 76.5.	14

Proposals/Documents	EIA Recommendation	Page (clickable link)
Doc. 76.2 Implementing aspects of Resolution Conf. 10.10 (Rev. CoP19) on the closure of domestic ivory markets	Support and consider further action to invite Japan to implement market closure.	15
Doc. 76.3 Ivory stocks and stockpiles	Support.	16
Doc. 76.5 Report on the Elephant Trade Information System (ETIS)	Support with amendments as appropriate and agree to include the network analysis in future ETIS reports.	17
Doc. 77.1 Implementation of Resolution Conf. 12.5 (Rev. CoP19) on <i>Conservation of and trade in tigers and other Appendix-I Asian big cat species</i>	Oppose the deletion of Decision 18.105 on leopards as it has not been implemented properly and evidence shows urgent and specific actions are required. Consider further actions to improve the reporting process for Asian big cats.	17
Doc. 77.2 Asian big cats in captivity	Support with amendments to draft decision 20.AA to improve its clarity and align its language with existing CITES recommendations	19
Doc. 79.1 Implementation of Res. Conf. 17.10 (Rev. CoP19) on <i>Conservation of and trade in pangolins</i>	Support with amendments to draft decision 20.FF to allow the for the Standing Committee to make time bound, measurable recommendations. Adopt further specific measures to address illegal trade in pangolins including assessing the implications of China's legal domestic market for pangolin specimens.	20
Doc. 79.2 Report on Decisions 18.238, 18.239, 19.200, 19.203 and 19.204	Support with amendments to draft decision 20.CC to broaden the scope of programmes eligible for financial and technical assistance.	21
Doc. 84 Rhinoceroses (<i>Rhinocerotidae spp.</i>)	Support with amendments to establish an intersessional working group and further actions.	22
Doc. 85.1 Saiga antelope (<i>Saiga spp.</i>): Report of the Secretariat	Support with amendments and further actions.	24
Doc. 85.2 Saiga antelope (<i>Saiga spp.</i>): Document by Kazakhstan and the Russian Federation	Support with amendments.	24
Annex A - Decisions 18.226 (Rev. CoP19); 19.107 and 19.108	Adopt suggested amendments	25
Annex B - Draft Decisions on Totoaba (CoP20 Doc. 35.3)	Adopt suggested amendments	26

PROPOSALS FOR AMENDMENT OF THE APPENDICES

PROP. 3 AMEND THE ANNOTATION FOR THE POPULATION OF *SAIGA TATARICA* OF KAZAKHSTAN (KAZAKHSTAN)

Proposal 3 seeks to amend the annotation for *Saiga tatarica* by adding the wording “except for specimens from the population *Saiga tatarica* of Kazakhstan”, which would effectively allow international commercial trade in saiga specimens sourced from Kazakhstan.

If adopted, this proposal would present significant risks to saiga populations in other range states and may exacerbate illegal trade in saiga products.

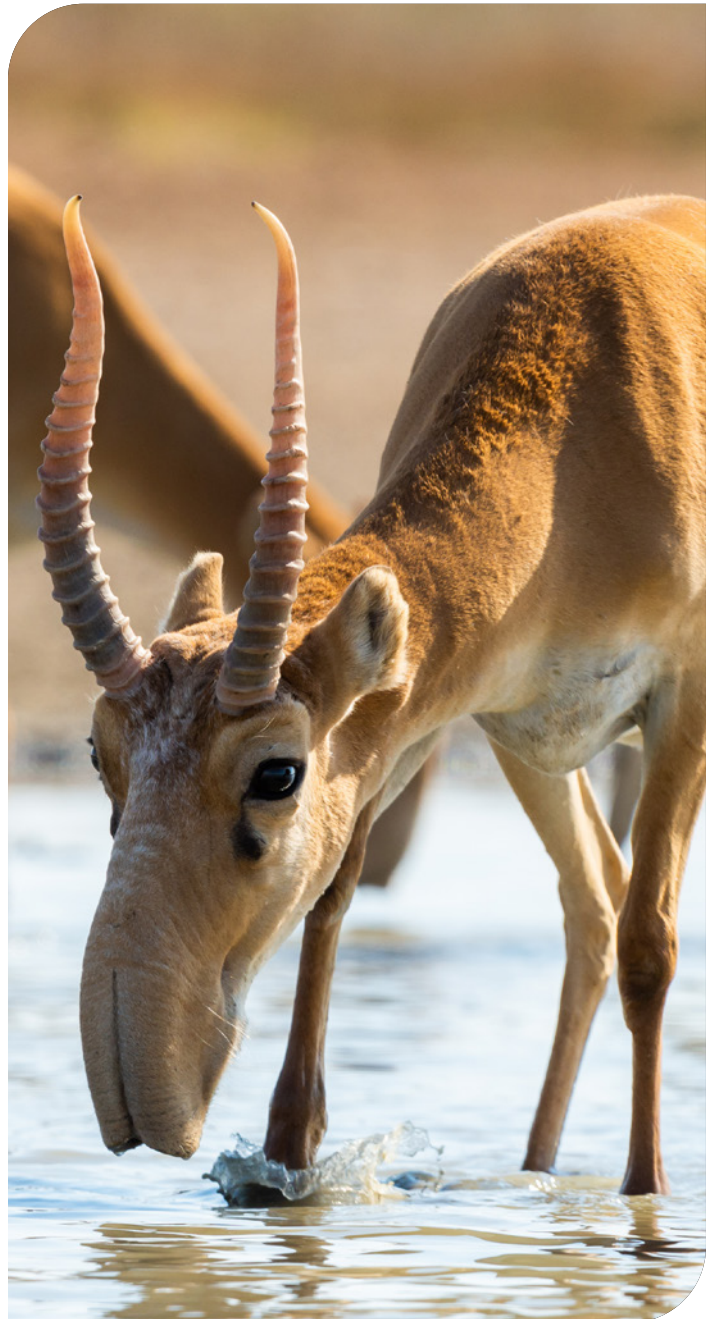
The recovery of key saiga populations in Kazakhstan is a welcome conservation good news story and Kazakhstan should be commended for its efforts in this regard.

However, while the majority of saiga are located in Kazakhstan, allowing international commercial trade in saiga horn from Kazakhstan would impact other saiga range states, including those which have not enjoyed Kazakhstan’s impressive saiga population rebound. This would include impacts on law enforcement, poaching and trafficking of other range states’ saiga populations as well as potential illegal trade of saiga from Kazakhstan through their territories.

Important consumer countries have been unwilling or unable to share information on the number of their saiga horn stockpiles, the volume of saiga horn kept in stockpiles, the amount of saiga horn consumed annually and the amount of horn owned by private individuals, traditional medicine companies and/or other state-run institutions. Without this information, there is a significant risk that legal saiga horn exports could facilitate the laundering of poached or illegally exported saiga horn into consumer markets.

It is unclear how saiga horn consumer countries can maintain domestic markets for saiga products, given that all exports from range states ceased in the 1990s and no domestic saiga horn production capabilities exist in consumer countries. Based on reported stockpile volumes to CITES in 2006, stockpiles should by now be depleted without a legal source of resupply.¹

Given regular reports of illegal trade in saiga horn, it is likely that a significant amount of saiga horn in circulation was sourced illegally. Indeed, a recent case from February 2025 in China involving the seizure of more than 1,600 saiga horns and the arrest of multiple individuals on charges related to wildlife trafficking and cigarette smuggling demonstrates the ongoing role of organised crime in the illegal international saiga horn trade.²



EIA RECOMMENDS THAT CoP20:

**REJECT PROPOSAL 3
SUBMITTED BY KAZAKHSTAN**

PROP. 9 AMEND THE ANNOTATION OF THE POPULATION OF *CERATOTHERIUM SIMUM* OF NAMIBIA LISTED IN APPENDIX II TO ALLOW FOR INTERNATIONAL COMMERCIAL TRADE IN RHINO HORN (NAMIBIA)

Rhino populations globally remain at risk from poaching and illegal trade and Namibia in particular continues to experience high levels of poaching. Rhino poaching increased by nearly eight percent in Namibia in 2024, with 83 rhinos killed compared to 77 in 2023.

According to the rhino conservation and trade report prepared by the IUCN African and Asian Rhino Specialist Groups and TRAFFIC for CoP20, poaching and transnational trafficking of rhino horns remain a major threat to African, with Namibia and other range states still suffering intense poaching pressure. The continental white rhino population is now 15,752, down 11.2 per cent since 2023 and at its lowest point since the current rhino poaching crisis began nearly two decades ago.³

If adopted, Prop. 9, which aims to allow for commercial international trade in white rhino horn, is expected to trigger increased demand, rhino poaching and illegal trade in rhino horn. These risks would not be limited to Namibian rhinos and would impact rhino populations across Africa and Asia; however, Prop. 9 fails to acknowledge the potential negative ramifications for rhino populations found across Africa and Asia.

The pilot framework proposed to initially limit sales of white rhino horn to 200kg would not be legally binding and fails to address the core risks associated with legalising rhino horn trade and therefore cannot be considered precautionary.

Moreover, Namibia did not consult any other rhino range states on its proposal because, according to the proponent, the proposal “only pertains to the Namibian population”. Only the Association of Private Rhino Owners of Namibia was consulted. The failure to consult other rhino range states is wholly inappropriate, given the exorbitant risks to the safety and conservation of their rhino populations presented by this proposal.

The proponent’s estimates of “current and future demand” appear to be based on illegal trade data, which is not an appropriate proxy for estimating levels of potential legal trade and fails to account for the risk of demand increasing exponentially if commercial trade is legalised. Rhino horn trade is illegal in end-use countries such as China and Vietnam and therefore there are no apparent viable prospective trading partners.

Claims in the proposal that demand-reduction campaigns have “largely failed” ignore notable downward poaching trends in several rhino range states and the impacts of improved enforcement in end-use countries.⁴

If adopted, this proposal would dramatically undermine ongoing demand reduction efforts, the proposed actions on demand reduction endorsed at the CITES Rhinoceros Enforcement Task Force meeting held earlier this year and Decision 18.116 on demand-reduction which is proposed for renewal at CoP20.⁵ Moreover, allowing international commercial trade in rhino horn would contravene demand-reduction provisions in Resolution 9.14 that urge Parties to implement targeted strategies for reducing the use and consumption of rhino parts and derivatives, with the aim of achieving measurable change in consumer behaviour.



EIA RECOMMENDS THAT CoP20:

**REJECT PROPOSAL 9
SUBMITTED BY NAMIBIA**

The proposal envisions the Rhino DNA Index System (RhODIS) would serve as the bedrock mechanism to ensure traceability and legality of trade in Namibian rhino horn. However, the reality is that RhODIS would simply not be, nor was it ever intended to be, fit for purpose as a backstop to ensure traceability of commercial rhino horn trade.

RhODIS is a programme run out of the University of Pretoria's Veterinary Genetics Laboratory and has an important role to play with respect to aiding enforcement efforts related to poaching and illegal trade; however, the programme has been encumbered by capacity and funding challenges for years, has been caught up in political battles within South Africa over which entity should have the authority to manage the programme and regularly faces sampling backlogs due to insufficient funding. It is not clear from the proposal how these challenges would be overcome, nor is it clear whether the RhODIS programme or the South African Government were consulted on the proposition for utilising RhODIS in this fashion.

PROP. 10 TRANSFER THE POPULATION OF *DICEROS BICORNIS BICORNIS* OF NAMIBIA FROM APPENDIX I TO APPENDIX II WITH AN ANNOTATION TO ALLOW FOR INTERNATIONAL COMMERCIAL TRADE IN RHINO HORN (NAMIBIA)

Most of the concerns regarding expected impacts on rhino poaching and illegal trade in rhino horn that would result from the proposed commercial trade in white rhino horn addressed in EIA's comments on Prop. 9 are equally applicable to the proposed commercial trade in black rhino horn in Prop. 10. However, given the Critically Endangered status of black rhinos, the stakes are even higher for this species.

The envisioned one-off sale of more than 4.6 tonnes of black rhino horn fails to address the core risks associated with legalising rhino horn trade, ignores the lessons learnt from the 2008 ivory one-off sale's impact on demand for ivory and elephant poaching and therefore cannot be considered precautionary.⁶ Moreover, because the proposed Appendix II listing annotation language does not refer to a one-off sale of horn, this purported "limited" trade would not be legally binding. If Prop. 10 is adopted, there would be no legal restrictions on the amount of black rhino horn that Namibia could trade for commercial purposes now or in the future.

Black rhinos clearly meet the criteria for listing in Appendix I: their population remains small and they are highly vulnerable to poaching and illegal trade. According to the 2024 report of the Chair of the IUCN African Rhinoceros Specialist Group, as of the end of 2023 the continental black rhino population comprised 6,421 individuals, which represented a decline of one per cent compared to 2022,⁷ and an approximately 94 per cent decline from the estimated 100,000 black rhinos present in Africa as of 1960, which at the time was considered a dramatic population reduction resulting from overhunting and anthropogenic land use change.⁸ The black rhino population of Namibia is particularly at risk and has declined by 2.7 per cent from 2022-24 to fewer than 2,100 individuals due to poaching pressure.⁹

The Chair's report further stated that "the drop in black rhino numbers is of concern and is understood to be largely a result of the loss of south-western black rhino (*D. b. bicornis*) numbers in Namibia, which reported 2,195 in 2022 and 2,113 in 2023."¹⁰ Namibia's black



EIA RECOMMENDS THAT CoP20:

**REJECT PROPOSAL 10
SUBMITTED BY NAMIBIA**

rhino population continued to decline to an estimated 2,098 individuals according to Prop. 10 proposal, despite the proponent's claim that it has been "successful in suppressing illegal killing".

As with Prop. 9, Namibia failed to consult any other rhino range states on this proposal, despite the major risks that international commercial trade in rhino horn would present to rhino populations globally.

PROP. 13 TRADE IN REGISTERED IVORY STOCKS OF NAMIBIAN ORIGIN (NAMIBIA)

EIA urges Parties at CoP20 to reject Proposal 13, in which Namibia seeks approval to trade more than 46 tonnes of registered raw ivory (whole tusks and pieces) for commercial purposes.

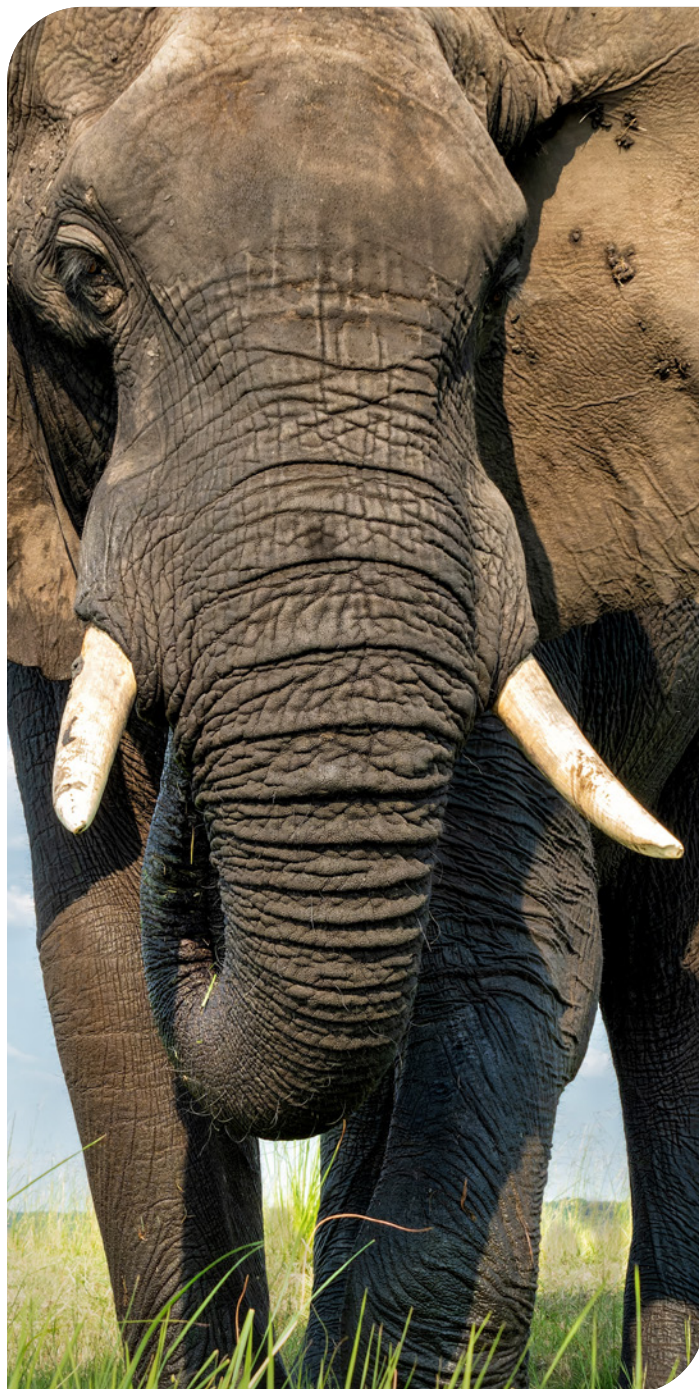
Authorising such a sale would undo decades of hard-won progress to end the international ivory trade and aid the recovery of elephant populations. It would also undermine global momentum to close domestic ivory markets, reduce demand and strengthen enforcement. This is echoed in the Secretariat's provisional assessment which concludes "it is not clear [...] that the precautionary safeguards in Annex 4 to Resolution Conf. 9.24 (Rev. CoP17) have been fully addressed".¹¹

The proposal disregards clear evidence of the devastating consequences of legal ivory trade. Previous one-off sales under CITES fuelled demand in Asian markets, triggered sharp increases in poaching and trafficking and contributed to catastrophic declines in elephant populations such as Tanzania and Mozambique. The one-off ivory sales in 1999 and 2008, particularly the latter, had a significant proven impact on stimulating demand for ivory, with an approximately 66 per cent increase in poaching rate and a 71 per cent increase in ivory being smuggled out of Africa.¹²

Because of these wide-reaching and devastating impacts, CITES Parties have consistently and decisively rejected every attempt to resume ivory trade since 2008 and have instead chosen to prioritise the closure of all remaining legal markets. Namibia's proposal to CITES CoP20 runs against this global momentum and disregards the lessons learnt from previous sales.

Crucially, Namibia also fails to acknowledge that there is no viable market for its stockpile. Historic trading partners, including China, have shut down or restricted their ivory markets in recognition of the role they play in driving illegal trade and decimating elephant populations in the wild. There is therefore no realistic or responsible outlet for Namibia's ivory.

Namibia's proposal puts all African elephants – both Endangered savanna elephants and Critically Endangered forest elephants – at risk of increased illegal trade. Elephants are a transboundary species and are threatened by criminal groups that operate transnationally. Indeed, after the 2008 one-off sale the surge in poaching was not confined to the selling countries but spread across the continent, forcing many governments to bear the heavy costs of combating trafficking. Yet despite the consequences of Namibia's proposal for other elephant populations, no consultation with other Parties that might be affected by this proposal appears to have taken place.



EIA RECOMMENDS THAT CoP20:

**REJECT PROPOSAL 13
SUBMITTED BY NAMIBIA**

PROP. 14 AMENDMENTS TO ANNOTATION A10 (BOTSWANA, CAMEROON, CÔTE D'IVOIRE, NAMIBIA AND ZIMBABWE)

Submitted by Botswana, Cameroon, Côte d'Ivoire, Namibia and Zimbabwe, the proposal seeks amendments to Annotation A10 pertaining to the elephant populations of Botswana, Namibia, South Africa and Zimbabwe.

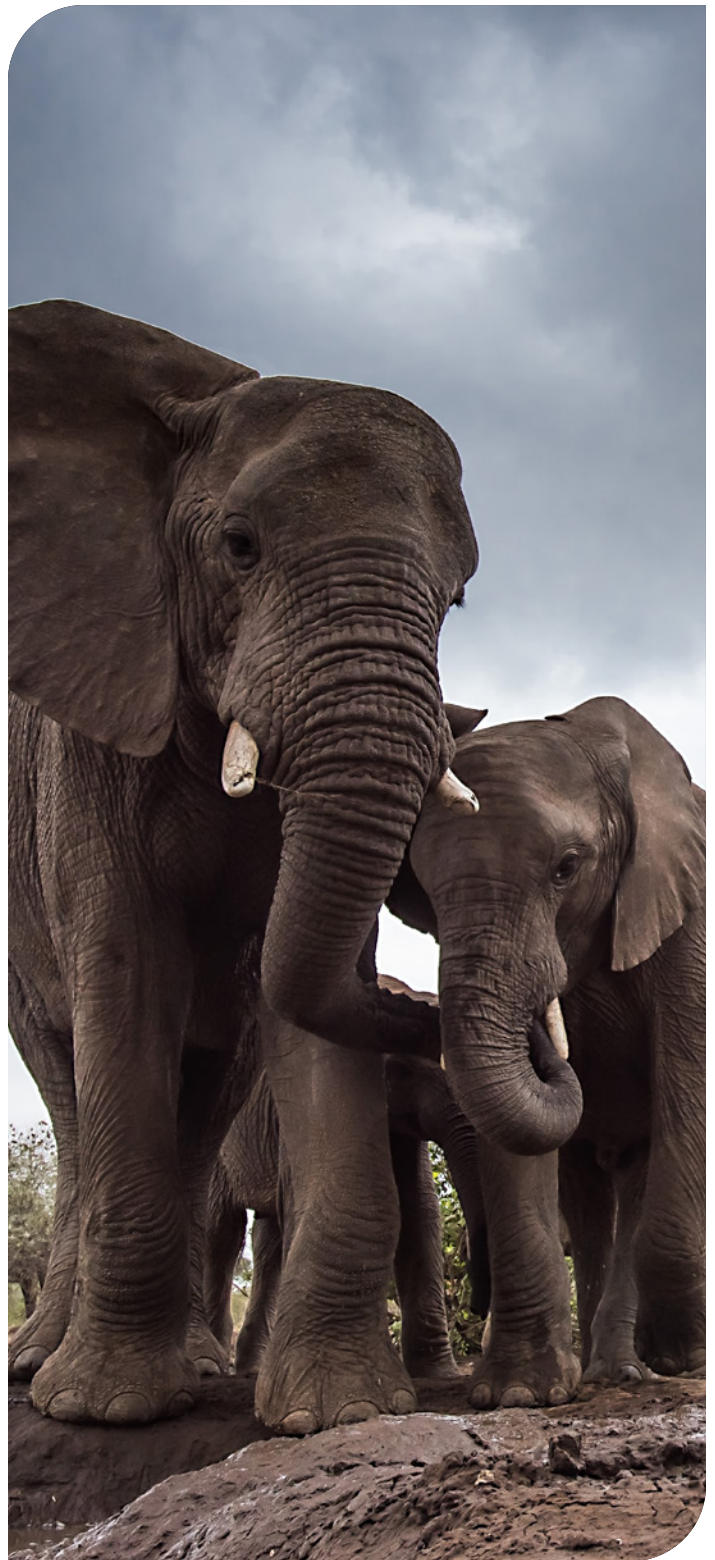
At SC77, the Standing Committee implemented Decision 19.167 and called for a dialogue meeting of African elephant range states to consider a harmonisation of the conditions to trade in live African elephants and to propose relevant changes to Annotation A10. Prop. 14 results from the outcome of the African Elephant Dialogue Meeting held in Botswana in 2024.

EIA supports several of the proposed revisions to Annotation A10, including the deletion of paragraphs g) and h), as well as specifying that a proposal from the Secretariat is not required for the Standing Committee to reach a determination that trade should cease partially or completely in the event of non-compliance or detrimental impacts on elephant populations.

In terms of paragraph f) relating to trade in ivory products, the current language clearly limits exports from Namibia of certified ekipas (traditional ivory amulets belt) to non-commercial purposes only and ivory carving exports from Zimbabwe to non-commercial purposes only. However, the proposed amendments to paragraph f), seemingly to streamline the text, introduces ambiguity which could be interpreted to allow commercial trade in ivory carvings from Zimbabwe. EIA recommends retaining the existing language for paragraph f) to ensure there is no risk of misinterpretation.

EIA is of the view that trade in live elephants taken from the wild should occur only in instances where it will contribute to *in situ* conservation programmes or secure areas in the wild, as described in paragraph 1 of Resolution Conf. 11.20 (Rev. CoP18).

Additionally, while the trade and trafficking of ivory constitute primary threats to the survival of elephant populations, EIA remains concerned about the potential negative conservation impacts of unsustainable and/or illegal trade in other elephant parts and derivatives. EIA strongly urges Parties to abide by the precautionary principle when considering any trade in elephant specimens to ensure that no action is taken that may contribute to elephant poaching, illegal trade or any other negative conservation impacts to wild elephant populations.



EIA RECOMMENDS THAT CoP20:

REJECT PROPOSED AMENDMENTS
TO PARAGRAPH f) AS CONTAINED IN
ANNOTATION A10

ADOPT PROPOSED DELETION OF
PARAGRAPHS g) AND h) AS CONTAINED
IN ANNOTATION A10

WORKING DOCUMENTS

DOC. 35.2 REVIEW OF NATIONAL IVORY ACTION PLAN

EIA RECOMMENDS THAT CoP20:

SUPPORT RECOMMENDATIONS a), b) AND c) CONTAINED IN DOC 35.2

This document summarises the outcomes of SC78 regarding the Review of the National Ivory Action Plan Process (Decisions 19.68-19.70), which was completed by an external consultant.

At SC78, the Secretariat proposed amendments to all five steps of the NIAP Guidelines contained in Annex 3 of Resolution Conf. 10.10 (Rev. CoP19), in line with certain conclusions in the Review.

Although the Secretariat's proposed amendments were welcomed by the Standing Committee, it was also determined that they did not fully account for the entirety of the Review's findings. Consequently, SC78 agreed to recommend that CoP20 instructs the Secretariat to undertake further analysis of the Review and to develop additional recommendations for consideration at CoP21.

EIA fully supports this proposed way forward. The Review's findings, if implemented correctly, can help the NIAP process become more user-friendly, purposeful and effective.

DOC 35.3 DRAFT DECISION ON TOTOABA

EIA RECOMMENDS THAT CoP20:

AMEND THE DECISION TEXT TO INCLUDE THESE KEY ACTIONS AND TIMELINES AS DETAILED IN **ANNEX B** ([SEE PAGE 26](#))

CoP20 Doc. 35.3 has been prepared by the Secretariat and provides the draft decision text on totoaba fish. Time is running out for vaquita porpoises in Mexico's Gulf of California, where fisheries bycatch in illegal nets has led to their rapid demise, with only about 10 individuals remaining.

It is important that timelines in the Decision text against actions that have yet to be completed reflect the urgency of the situation facing vaquitas.

Mexico has yet to fully implement its own 2020 Vaquita Regulation and Compliance Action Plan. As a priority, in addition to items in the draft Decision text, Mexico should:

- fully implement the Regulation and CAP, within six months, including:
 - scale up activities in support of selective fishing gear development and use, including by reactivating the Expert Committee on Fishing Technologies (ECOFT) to advise on the transition to alternate gear and by implementing dedicated programmes in this regard, in consultation with stakeholders to ensure inclusivity and acceptance
 - develop and implement an enforcement plan to detect and deter any displacement of illegal totoaba fishing to areas adjacent to the Vaquita Zero-Tolerance Area (Zo) and Vaquita Refuge Area (VRA)
 - urgently expand the boundaries of the Zo and VRA to align with documented distribution of the vaquita and ensure that enforcement efforts to prevent illegal fishing are fully implemented in this larger area.

As well as strengthening information and intelligence-gathering to map out criminal networks and facilitate arrests and prosecutions, China and other destination countries should:

- direct e-commerce and social-media platforms (e.g. WeChat, Weibo, Taobao) to deploy tools to remove all totoaba product listings

- report on the implementation of China's April 2024 Action Plan on Combatting Illegal Trade in Totoaba, including the number of market inspections and joint enforcement operations, quantities of totoaba maws seized and their provenance, number of arrests, prosecutions, convictions and penalties imposed, a trend analysis and next steps.

All range, transit and consumer states should:

- develop, implement and monitor coordinated demand-reduction campaigns, whose effectiveness is measured through consumer surveys, within six months
- strengthen information and intelligence-gathering regarding individuals within their country managing and organising illegal transit and trade involving totoaba specimens, analyse data gathered to map out criminal networks and target their activities through intelligence-driven investigations and operations to facilitate their arrest and prosecution
- convene outreach programmes with major courier, express carrier and sea freight companies operating in ports of entry (e.g. UPS, FedEx, DHL, Maersk) to develop compliance measures and report on company participation and any seizures facilitated through these measures to SC80 and SC81.

DOC. 41 CITES BIG CATS TASK FORCE

EIA RECOMMENDS THAT CoP20:

SUPPORT THE ADOPTION OF THE DRAFT DECISIONS IN THE ANNEX TO THE DOCUMENT WITH THE FOLLOWING AMENDMENTS TO DRAFT DECISION 20.CC:

"20.CC The Standing Committee shall:

- a) consider the report and recommendations of the Secretariat in accordance with Decision 20.BB and determine whether a meeting, physical or online, of the Big Cats Task Force would be appropriate to discuss gaps and best practices in implementation of the strategies, measures and activities outlined in the CITES Big Cats Task Force outcome document, and if so instruct the Secretariat, subject to external resources, to convene such a meeting and report on the outcome of the meeting to the 82nd meeting of the Standing Committee;
- b) based on the implementation of Decision 20.AA and paragraph a) of this Decision, and make recommendations to the Parties or the Secretariat as appropriate; and
- b) c) report on the implementation of the present Decision to the 21st meeting of the Conference of the Parties together with any recommendations it may have."

Submitted by the Standing Committee, this document reports on the implementation of Decisions relating to the CITES Big Cats Task Force. It proposes the adoption of decisions encouraging Parties to implement the strategies, measures and activities in the Big Cats Task Force outcome document.

It has already been more than two years since the Big Cats Task Force meeting was held in April 2023. Many of the outcomes of the Big Cats Task Force relate to implementation of already existing recommendations such as those in Res. Conf. 12.5 (Rev. CoP19). By the time of CoP21, it would have been more than five years since the meeting of the Big Cats Task Force. Should funding be available for it, it would be useful to have a meeting of the Big Cats Task Force held in the intersessional period between CoP20 and CoP21. This could be in an online or hybrid form to save resources. This would allow the relevant Parties to have more of a role in driving the implementation of the Big Cats Task Force outcomes.



DOC. 42 IMPLEMENTATION OF THE PRIORITY RECOMMENDATIONS FROM THE REVIEW OF THE ETIS PROGRAMME

EIA RECOMMENDS THAT CoP20:

SUPPORT THE RECOMMENDATIONS CONTAINED IN DOC. 42

ENCOURAGE THE SECRETARIAT, IN CONSULTATION WITH THE MIKE-ETIS TAG AND TRAFFIC, TO INCORPORATE THE INFORMATION CONTAINED IN ANNEX 2D OF COP20 DOC. 76.5 IN ITS REVISION OF THE ETIS DATA VALIDATION PROTOCOL PURSUANT TO DRAFT DECISION 20.AA

At SC78, several Parties raised concerns about the draft ETIS data validation protocol contained in Annex 2a of SC78 Doc. 65.2 (Rev. 1). One of the most important deficiencies with the draft protocol is the potential for Parties to request the removal of non-Management Authority data without justification, which could open the ETIS data validation process to abuse.

The draft decisions in this document recommended by the Standing Committee will allow for the revision of the draft ETIS data validation by the Secretariat, in consultation with the MIKE-ETIS TAG and TRAFFIC, for consideration by the Standing Committee.

In addition to the concerns with the draft ETIS data validation protocol discussed at SC78, Annex 2D of CoP20 Doc. 76.5, authored by TRAFFIC, identifies other challenges associated with unresolved data validation requests which could impact the outcomes of future ETIS analyses and subsequent decisions taken regarding the inclusion of Parties in the NIAP process. EIA therefore encourages the Secretariat, together with the MIKE-ETIS TAG and TRAFFIC, to take the information contained in Annex 2D of CoP20 Doc. 76.5 into account in its revision of the ETIS data validation protocol.

DOC. 44 IVORY SEIZURES AND DOMESTIC IVORY MARKETS

EIA RECOMMENDS THAT CoP20:

SUPPORT THE RECOMMENDATION TO DELETE DECISIONS 19.99-19.101.

Submitted by the Standing Committee, CoP20 Doc. 44 summarises the implementation of Decisions 19.99-19.101, which were intended to support decision-making regarding implementation of Resolution Conf. 10.10 (Rev. CoP19) by assessing seizures to help determine if a Party's legal domestic ivory market is contributing to poaching or illegal trade.

The Decisions direct the Secretariat to consult with the MIKE-ETIS Technical Advisory Group (TAG) and TRAFFIC on the feasibility of an analysis of ETIS data connected to each Party with a legal domestic ivory market for commercial trade. At SC77, the Secretariat gave an update on progress and reported on concerns expressed by the MIKE-ETIS TAG and TRAFFIC, including stated challenges in how to identify Parties with legal domestic markets, and what data to assess. Following SC77, Parties were requested to respond to Notification 2024/082 to share further input on the selection criteria and information. The limited Party responses are summarised in SC78 Doc. 65.4, as are the available sources of information, previous processes to obtain relevant information, perceived challenges and the advice of the MIKE-ETIS TAG and Subgroup.

At SC78, the Secretariat proposed the deletion of decisions pertaining to the closure of domestic ivory markets, including Decisions 19.99-19.101, deeming the analysis infeasible. EIA believes that while the analysis of seizures related to Parties with legal ivory markets would be challenging, it is not infeasible. A member of the Subgroup proposed discussing alternative approaches to undertake the analysis, including by assessing all Parties in a preliminary analysis that seeks to identify the correlation between illegal ivory trade and any level of domestic ivory trade.

However, the Standing Committee reviewed the available information and ultimately agreed that Decisions 19.99-

19.101 could be deleted. EIA believes it is an acceptable outcome because newly available ETIS data aggregates contain relevant seizure data for any stakeholder to undertake analyses on seizures related to any Party, regardless of whether the market is perceived to be closed or not (see Doc 76.2 as an example of such an analysis).

While the Secretariat also proposed deleting decisions 18.117-18.119, the Standing Committee agreed to recommend renewing them to maintain reporting accountability for Parties that maintain legal domestic ivory markets (see Doc. 76.2).

EIA believes the closure of domestic ivory markets is essential to implement the international ban on commercial ivory trade. EIA strongly supports maintaining and strengthening existing legislation, regulations and enforcement efforts to improve implementation of ivory market closure.

DOC. 59 STOCKS AND STOCKPILES

EIA RECOMMENDS THAT CoP20:

AMEND THE DEFINITION IN RECOMMENDATION a) (DELETION IN STRIKETHROUGH):

'Stockpiles' refer to any quantity of legally stored dead specimens, including parts and derivatives, of CITES-listed species held by public or private entities. Specimens included in permanent collections held by scientific institutions for non-commercial purposes or by individuals as personal or household effects, ~~as well as seized or confiscated specimens still under an enforcement procedure~~, are excluded from the definition. In general, provisions related to stockpiles in CITES Resolutions and Decisions are intended to ensure that these are secured, managed and disposed of in such a way that the specimens would not enter or re-enter illegal trade and for specimens of species listed in Appendix I not to be used commercially.

SUPPORT RECOMMENDATIONS b), c) AND d) AS PROPOSED.

Submitted by the Standing Committee, this document summarises the outcomes of SC78 regarding the definition of 'stockpiles' for inclusion in the CITES Glossary in accordance with Decision 17.170 (Rev. CoP19).

At SC78, after reflecting on the input received through the intersessional consultations with CITES parties and observers, the Standing Committee agreed to not use the term 'stock' in the context of stored dead specimens. In addition, the proposed definition of 'stockpile' was improved significantly at SC78 with the adoption of textual amendments proposed by Benin in SC78 Inf. Doc. 46. Despite this, EIA believes the proposed definition of stockpiles as presented in this document is weakened by the retention of "seized or confiscated wildlife specimens still under an enforcement procedure" in the list of exemptions.

EIA strongly encourages Parties not to exclude seized wildlife products from the definition of stockpiles. Exclusion would create a significant gap in data and weaken understanding of stockpile management and related risks, particularly as seized wildlife products sometimes remain under an enforcement procedure for lengthy periods of time and can therefore constitute a substantial proportion of stockpiles.

Furthermore, seized wildlife specimens have been vulnerable to theft or diversion during enforcement proceedings. Including seized products in the definition would provide an additional avenue for systematic monitoring and reporting, thereby making any changes in stockpile levels, whether from theft, leakage or mismanagement, more transparent, easier to detect and easier to address. For example, in 2015, ivory seized in Thailand but stored as prosecution evidence in Kenya was stolen and reshipped to Bangkok.¹³ In another case, approximately 300kg of ivory was stolen from a local court in Gabon.¹⁴

Seized specimens should be accounted for as they will either become part of government stockpiles or, if released, pass into private entity ownership and therefore become part of a private stockpile at the conclusion of a court proceeding. Including them in the definition would not impede governments from indicating that the specimens are subject to an enforcement proceeding in relevant reports.

Therefore, EIA believes it is critical for specimens under an enforcement procedure to be considered part of a Party's stockpiles to ensure accurate reporting and to mitigate the risk that instances of missing and/or stolen stockpiled products are not identified.

DOC. 76.1 IMPLEMENTATION OF RESOLUTION CONF. 10.10 (REV. COP19) ON *TRADE IN ELEPHANT SPECIMENS*

EIA RECOMMENDS THAT COP20 IN RELATIONS TO RECOMMENDATIONS k) AND l):

ADOPT DRAFT DECISION 20.AA AS CONTAINED IN ANNEX 6 OF DOC 76.1

SUPPORT RENEWAL OF DECISION 18.226 (REV. COP19) PARAGRAPH a)

PROPOSE RENEWAL OF PARAGRAPH e) OF DECISION 18.226 (REV. COP19), AS PRESENTED IN **ANNEX A** ([SEE PAGE 25](#))

OPPOSE DELETION OF DECISIONS 19.107 AND 19.108 AND INSTEAD RENEWS BOTH DECISIONS WITH FURTHER AMENDMENTS AS PRESENTED IN **ANNEX A** ([SEE PAGE 25](#))

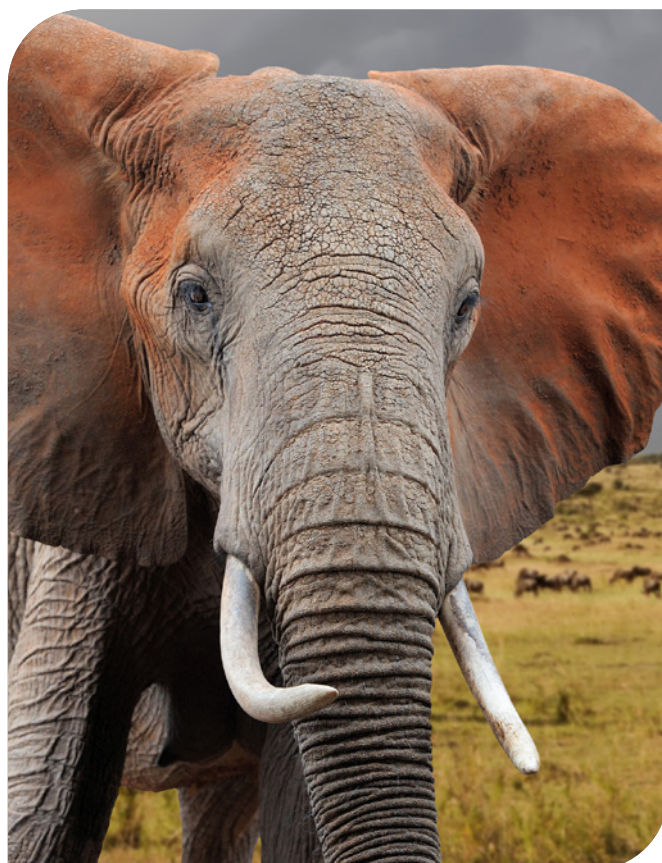
Submitted by the Secretariat, this document is divided into six parts in relation to the implementation of Resolution Conf. 10.10 (Rev. CoP19). EIA suggests that Parties consider recommendations relating to *Closure of domestic ivory markets* and *Stocks and stockpiles (elephant ivory)* in conjunction with those contained in Doc. 76.2 and Doc. 76.3, respectively. Meanwhile, information and recommendations relating to *National Ivory Action Plan Process (NIAP)* should be considered in conjunction with those contained in Doc. 35.2 on the NIAP review and Doc. 76.5 on identification of Parties requiring attention under the NIAP process.

EIA encourages Parties to pay particular attention to Decisions 18.226 (Rev. CoP19), 19.107 and 19.108 on *Trade in Asian elephants (Elephas maximus)*. The current proposal to CoP20 seeks the renewal of paragraph a) of Decision 18.226 (Rev. CoP19), the deletion of the remaining sub-paragraphs of Decisions 18.226 (Rev. CoP19) and the deletion of Decisions 19.107 and 19.108 to CoP20

EIA welcomes the proposed renewal of paragraph a) of Decision 18.226 (Rev. CoP19) an important opportunity to continue monitoring and evaluating the illegal trade threats facing Asian elephants. However, the proposed deletion of Decision 18.226 (Rev. CoP19) paragraph e) and both Decisions 19.107 and 19.108 would seriously weaken oversight by removing all reporting obligations from Parties to the Secretariat and from the Secretariat to the Standing Committee.

EIA therefore calls on CoP20 to also renew 18.226 paragraph e) and Decision 19.107-108 with relevant amendments. Without these provisions, implementation of Decision 18.226 paragraph a) would go unmonitored by the Standing Committee and Secretariat. As a result, accountability will be lost and Asian elephants will not receive the comprehensive discussion they require at future CITES meetings.

According to SC78 Doc. 65.1, the current population of Asian elephants is approximately 50,000 and they continue to face a significant threat of poaching for their skin and meat. For example, 42 Asian elephants were poached in 2023 alone. EIA research has recently shown that online illegal trade in Asian elephant products, including skins, continues unchecked. As such, in order to preserve the intention of Decision 18.226 paragraph a) CoP20 should also renew paragraph e) and Decisions 19.107–19.108.



DOC. 76.2 IMPLEMENTING ASPECTS OF RESOLUTION CONF. 10.10 (REV. COP19) ON THE CLOSURE OF DOMESTIC IVORY MARKETS

EIA RECOMMENDS THAT CoP20:

SUPPORT THE RENEWAL OF DECISIONS 18.117–119
WITH AMENDMENTS AS PROPOSED IN ANNEX 1

SUPPORT DRAFT DECISIONS DIRECTED TO THE SECRETARIAT, JAPAN,
NEW ZEALAND, SOUTH AFRICA AND ZIMBABWE CONTAINED IN ANNEX 2

PRIORITISE INVITING JAPAN TO IMPLEMENT MARKET CLOSURE,
WITH NARROW EXCEPTIONS.

Submitted by Burkina Faso, Ethiopia, Niger and Senegal, Doc. 76.2 proposes the renewal of Decisions 18.117-18.119 (Rev. CoP19) with amendments, proposes draft decisions for Japan and New Zealand regarding appropriate legislative measures to close their domestic ivory markets and for South Africa and Zimbabwe to provide more information on their domestic ivory trade measures.

Reports submitted under Decision 18.117 (Rev. CoP19) by the European Union, India, Japan, New Zealand, South Africa, Thailand, the UK, the US and Zimbabwe on measures they are taking to ensure their legal ivory markets do not contribute to poaching or illegal trade are analysed in Doc. 76.2 in light of newly available ETIS data aggregates. Analysis is presented on each reporting Party's connection to ivory seizures, measures taken to ensure their domestic market is not contributing to poaching or illegal trade, existing prohibitions and exemptions, the potential contribution to illegal trade and recommended measures for Parties to implement.

Decisions 18.117-119 seek information from Parties to evaluate compliance with the recommendation to close domestic ivory markets contained in Resolution Conf. 10.10 (Rev. CoP19) paragraph 5, and these decisions should be renewed to maintain oversight by the Standing Committee. The newly available ETIS data aggregates can be used as a tool to contribute to evaluations of whether a Party's legal market is contributing to the illegal international trade and to what extent. The proposed amendments to Decisions 18.117-119 would incorporate the ETIS data aggregates into consideration for each Party and for the Standing Committee to make recommendations on whether further legislative or enforcement measures are needed to fully implement Resolution Conf. 10.10 (Rev. CoP19), paragraph 5.

The proposed amendments would direct the Secretariat to follow up on reporting under Decision 18.117 and urge Parties which did not report to the Secretariat following prior Notifications to do so unless the ETIS data aggregates indicate ivory seizures connected to them are at negligible levels. Because low reporting under Decision 18.117 has been a consistent challenge, EIA supports this recommendation.

Doc. 76.2 contains four draft decisions in Annex 2 directed at Parties which maintain legal domestic ivory markets. EIA supports the adoption of all draft decisions contained in Annex 2, especially the draft decision that directs Japan to prohibit the domestic commercial trade in ivory.

EIA has repeatedly provided evidence that demonstrates Japan's legal ivory market – the largest in the world – is poorly controlled and contributes to illegal international trade.¹⁵ Japan's ivory trade regulations do not align with the market closure provisions in Resolution Conf. 10.10 (Rev. CoP19). In practice, Japan's ivory trade exemptions are so broad that all ivory considered pre-Convention and all ivory imported during the two CITES-approved one-off sales can be legally traded.¹⁶

EIA echoes the concerns about Japan's ivory market described in Doc. 76.2, namely regarding the proportion of illegal exports of ivory from Japan and the potential for Japan to be further exploited as an easy source of ivory for traffickers. With large stockpiles of ivory, thousands of registered traders, pervasive loopholes in trade controls and documented seizures of ivory from Japan made in other jurisdictions, Japan's ivory market is ripe for abuse.¹⁷ Japan is currently undertaking a review of its legislation through which it implements its ivory trade regulations, which can provide a key opportunity to institute revisions to comply with Resolution Conf. 10.10 (Rev. CoP19), paragraph 5.

Closing domestic ivory markets has strengthened the implementation of the international ban on commercial ivory trade and slowed elephant poaching, allowing some populations to recover.¹⁸ However, elephants continue to be threatened by the trade in ivory, especially those in West and Central Africa, and further efforts are required to accomplish global closure of domestic ivory markets that are contributing to poaching or illegal trade. Whether the measures taken by those Parties to close domestic ivory markets, with narrow exemptions, as required by Resolution Conf. 10.10 Rev. (CoP19) are sufficient remains a matter for further scrutiny.

DOC. 76.3 IVORY STOCKS AND STOCKPILES

EIA RECOMMENDS THAT CoP20:

SUPPORT THE RECOMMENDATIONS PRESENTED IN COP20 DOC. 76.3

EIA encourages CoP20 to support the recommendations in this document, which was submitted by Burkina Faso, Ethiopia, Kenya, Niger, Nigeria and Senegal, relating to Decisions 18.184 (Rev. CoP19), 18.185 (Rev. CoP19), 19.156 and 19.157 on elephant ivory stocks and stockpiles.

The recommendations in the document seek to strengthen ivory stockpile reporting and oversight without creating new or disproportionate obligations for Parties. Instead, the document seeks to ensure continuity, coherence with MIKE and ETIS, and the effective use of existing reporting systems.

At SC78, the Secretariat's proposal to delete key Decisions on ivory stockpile reporting rather was rejected after objections from elephant range states. However, the Standing Committee did not explicitly recommend renewing the relevant provisions at CoP20.

Doc 76.3 addresses this gap by calling for the renewal of Decisions 18.184 paragraph a), 18.185, and 19.156 paragraph a) with an addition to strengthen oversight and reporting on ivory stockpiles.

EIA strongly supports provisions which encourage effective and comprehensive stockpile reporting. However, though Resolution Conf. 10.10 (Rev. CoP19) directs Parties to report annually on their ivory stockpile status, compliance has been uneven and actual stockpile levels are likely underreported.

SC78 Doc. 54 (Rev.1) identified 36 Parties likely to hold unreported ivory stockpiles. This data gap undermines oversight, creates potential sources for ivory to enter the illegal market and demonstrates why stronger reporting provisions should be adopted instead of rolled back. The growing accumulation of ivory stockpiles around the world also poses a serious risk of leakage into illegal markets.¹⁹

EIA also agrees with the proposed additional paragraph to Decision 18.184 as contained in Annex 2 of CoP20 Doc. 76.3 which calls for comparing Parties' reported ivory disposals with ETIS seizure data. EIA believes this will help identify gaps in reporting and stockpile oversight. For example, if a Party reports low or unchanging ivory stockpiles while ETIS data shows ongoing seizures made by that Party, this discrepancy could indicate potential mismanagement, leakage or underreporting.

EIA therefore strongly advises support for the recommendations in CoP20 Doc. 76.3.



DOC. 76.5 REPORT ON THE ELEPHANT TRADE INFORMATION SYSTEM (ETIS)

EIA RECOMMENDS THAT CoP20:

AGREE TO INCLUDE THE NETWORK ANALYSIS IN FUTURE ETIS REPORTS TO COMPLEMENT THE CLUSTER ANALYSIS AND INFORM DECISIONS REGARDING THE IDENTIFICATION OF PARTIES REQUIRING ATTENTION UNDER THE NIAP PROCESS

SUPPORT THE RECOMMENDATIONS IN DOC. 76.5, INCLUDING DRAFT DECISION 20.AA WITH AMENDMENTS AS APPROPRIATE TO ENSURE ITS SCOPE IS NOT DUPLICATIVE OF OTHER DECISIONS AND WOULD NOT REOPEN ISSUES THAT HAVE ALREADY BEEN ADDRESSED BY THE STANDING COMMITTEE

The results of the exploratory network analysis contained in Annex 2C produced additional insights on the role of Parties affected by the illegal trade in raw and worked ivory and important illegal trade links that were not identified in the cluster analysis. Thus, EIA believes the network analysis could be useful for informing the identification of Parties requiring attention under the NIAP process and in developing targeted recommendations for inclusion in a Party's NIAP.

However, Doc. 76.5 contains no recommendations for future application of the network analysis to complement the cluster analysis, which currently provides the basis for identifying Category A, B, and C Parties affected by illegal ivory trade.

In addition, EIA shares the concerns raised by TRAFFIC in Annex 2D regarding the challenges and risks posed by unresolved ETIS data validation requests and the associated potential impacts on the identification of Parties requiring attention under the NIAP process. In particular, EIA shares the concern of the "risk that Parties wishing to avoid being considered for the NIAP process may submit ETIS data validation requests on records relating to their Party and continuously maintain them as unresolved in order to avoid consideration."

ETIS data validation is one of several issues that would be addressed under draft decision 20.AA; however, it would appear that the information contained in this document on the implications on ETIS analyses of the exclusion of records with unresolved data validation requests would be useful to the Secretariat in its revision of the draft ETIS data validation protocol, to be conducted in consultation with the MIKE-ETIS TAG and TRAFFIC, proposed in CoP20 Doc. 42.

EIA encourages Parties to consider whether draft decision 20.AA should be amended to eliminate components that are already addressed in other targeted decisions submitted for consideration by CoP20 or that have already been addressed by the Standing Committee.

DOC. 77.1 IMPLEMENTATION OF RESOLUTION CONF. 12.5 (REV. COP19) ON CONSERVATION OF AND TRADE IN TIGERS AND OTHER APPENDIX-I ASIAN BIG CAT SPECIES

EIA RECOMMENDS THAT CoP20:

OPPOSE THE DELETION OF DECISION 18.105 AND CALL FOR ITS RETENTION.

ADOPT AMENDMENTS TO RES. CONF. 12.5 (REV. COP19) TO INCORPORATE AN INDEPENDENT REPORTING MECHANISM TO ASSESS IMPLEMENTATION OF THE RESOLUTION AND ASSOCIATED DECISIONS OR ADOPTS A DRAFT DECISION TO CONSIDER THE MATTER OVER THE INTER-SESSIONAL PERIOD.

Submitted by the Secretariat, this document reports on the implementation of Res. Conf. 12.5 (Rev. CoP19) on Asian big cats and associated decisions except for those relating to Asian big cats in captivity. Decision 18.105, which was adopted at CoP18 in 2019 and renewed at CoP19, encourages Parties to take serious consideration of concerns relating to illegal trade in leopards and address them. Further, the Standing Committee at SC77 directed the Secretariat to report on the poaching and seizure of leopards to SC78 based on information received from Parties. The Secretariat's report on these matters, summarised in paragraph 15 of the document, is characterised by a paucity of information and analysis.

Leopards are the Asian big cat species most frequently recovered in seizures. EIA's [Global Environmental Crime Tracker](#), for instance, records a minimum of more than 850 leopard poaching and seizure incidents involving in excess of 1,700 leopards in Asian countries from 2015-24. However, the Secretariat's report only mentions a few isolated incidents in a few countries. Despite the availability of leopard seizure data in the UNODC World WISE database and in Party illegal trade reports, the Secretariat's report does not present or review this data.

While population trends for all Appendix I Asian big cats are decreasing, as noted in Annex 4 to document CoP18 Doc. 71.1, the global conservation status for leopards has deteriorated significantly in recent years. In 2016, historical range loss for Asian leopards was estimated to be between 83-87 per cent.²⁰ In South-East Asia, an estimate quoted in the IUCN's 2022 assessment for the species indicated a drastic reduction of more than 80 per cent in ranges where leopards are considered extant compared to 2008²¹ and the 2023 IUCN assessment identifies targeted poaching for the wildlife trade and snaring for bushmeat as the greatest factors contributing to this collapse in the leopard's South-East Asian range.²² During this period, leopards have gone extinct in Lao PDR and Vietnam and functionally, if not fully, extinct in Cambodia.²³

In parallel with these population declines and illegal trade, there is a significant legal domestic market for leopard bone medicinal products²⁴ and bone wine²⁵ in China, a major destination country for illegal leopard parts and derivatives. Given that leopards are not known to be bred in captivity at scale, that the leopard population in China is relatively small and that leopards have been listed on CITES Appendix I since 1975, it is unclear how procurement for these products continues to be met through legal supplies. Res. Conf. 12.5 (Rev. CoP19) recommends the closure of legal domestic markets which are contributing to poaching and illegal trade.

The retention of Decision 18.105 would ensure that focus is maintained on the continuing threats to Asian leopards from trade. This would not be the case if the decision is deleted and the issue subsumed within more generic reporting on Asian big cats required by Res. Conf. 12.5 (Rev. CoP19) and the Big Cats Task Force outcome document.

With some notable exceptions, Res. Conf. 12.5 (Rev. CoP19) and associated decisions have been affected for several years by low levels of responses or non-specific responses by Parties. A good example of this is Decision 18.101, which was first adopted at CoP18 in 2019. Decision 18.101 asks Parties to strengthen law enforcement efforts targeting tourist markets contributing to cross-border illegal Asian big cat trade. This decision arose from Annex 4 to document CoP18 Doc. 71.1 which raised specific concerns regarding illegal big cat trade in Mong La in Myanmar and the Golden Triangle Special Economic Zone in Lao PDR, both near the China border. In the six years since its adoption, none of the relevant country reports on Decision 18.101 have addressed these specific concerns.

EIA appreciates that the reporting burden on Parties and the administrative burden on the Secretariat may be high. However, the current system does not provide the Parties with the best available information or analysis to make evidence-led decisions on Asian big cats. In the run up to CoP20, EIA and other observer organisations will be contributing to an independent report on implementation of Res. Conf. 12.5 (Rev. CoP19) and associated decisions to illustrate the vast amount of information on Asian big cat conservation and trade which is available for analysis and to inform decision-making.

While it may involve more external resources, we are of the view that an assessment by independent consultants (which has occurred in the past for Asian big cats with good results), and which occurs systematically for rhinos under Res. Conf. 9.14 (Rev. CoP19), would lead to more targeted and effective actions for Asian big cats.



DOC. 77.2 ASIAN BIG CATS IN CAPTIVITY

EIA RECOMMENDS THAT CoP20:

ADOPT THE DRAFT DECISIONS IN ANNEX 2 TO THE DOCUMENT WITH THE FOLLOWING AMENDMENTS TO DRAFT DECISION 20.AA:

"Directed to Parties in whose territories there are ~~captive tiger populations facilities that breed large numbers of tigers and facilities housing large numbers of tigers~~

20.AA All Parties in whose territories there are facilities ~~that breed large numbers of tigers and facilities housing large numbers of~~ with captive tigers are encouraged to consider taking the following methodical approach to restrict the captive population to a level supportive to only conserving wild tigers regarding these facilities to improve their conservation and educational value, as well as to put an end to the activities of facilities that do not have conservation and or educational value, that fail to comply with regulations and or pose a risk regarding parts and derivatives from these animals entering illegal trade, in accordance with their domestic legislation:

- a) identify facilities keeping tigers of genetic and conservation value and engage these facilities in internationally recognised coordinated conservation breeding programmes for such animals;
- b) identify facilities keeping tigers in captivity that are suitably located for to ensure public access and that meet husbandry and welfare conditions based on national and international guidelines, and implement support programmes where needed (for example providing guidance on development of educational materials, signs and posters), for these facilities to transform into facilities with educational value that are raising awareness benefitting conservation of tigers in the wild, including bringing the attention of the public to illegal trade and the need to combat it;
- c) implement and enforce measures to reduce the number of tigers in facilities that are not contributing to conservation of wild tigers ~~or have limited educational value~~, by restricting breeding of tigers (e.g., by separating male and female tigers, sterilization or other disposal measures, including euthanasia) within these facilities, and addressing the risk of inbreeding by requiring genetic monitoring, as well as restricting these facilities from acquiring any new animals;
- d) taking into consideration Decision 14.69 that directs Parties to restrict the captive population to a level supportive only to conserving wild tigers and that tigers should not be bred for trade in their parts and derivatives, prohibit the establishment of new facilities keeping tigers in captivity with narrow exemptions where warranted;
- e) assess the need for rescue centres, sanctuaries, or other disposal measures, including euthanasia, etc. as may be required due to the phase-out of captive intensive tiger operations not supportive of conserving wild tigers;
- f) review management practices and controls to regulate activities of facilities keeping tigers in captivity to ensure that they are adequate to prevent tiger specimens from entering illegal trade from or through such facilities, including implementation of the strategies, measures and activities in Section 2 of the CITES Big Cats Task Force outcome document in the annex of SC77 Doc 39.3 licensing of such facilities, accurate record keeping of individual tigers, regular inspections and well-regulated disposal of tigers that die in captivity and handling of carcasses; and
- g) report on the implementation of this approach and in the case of relevant countries report on implementation of country-specific recommendations made by the Standing Committee at its 77th and 78th meetings, in their response to the Notification to the Parties issued by the Secretariat on Asian big cats (Felidae spp.) to facilitate reporting as required in Resolution Conf. 12.5 (Rev. CoP19) on Conservation of and trade in tigers and other Appendix-I Asian big cat species."

Submitted by the Secretariat, this document reports on the implementation of Decisions relating to Asian big cats in captivity. While EIA supports the adoption of the draft decision in Annex 2 to the document, we think some changes are necessary, mainly to improve the clarity of the draft decision.

The chapeau and title of the draft decision use the vague term "large" and this could be replaced with the language in Decision 14.69, which this draft decision furthers implementation of. Apart from vagueness, the problem with using

the term “large” is that captive tiger facilities with small numbers of tigers, but which engage in illegal trade, are as much of a concern as facilities housing high numbers of tigers.

We also think it is important for the decision to consistently refer to educational value of facilities as an aspect of conservation value and not separate from it (Decision 14.69 refers only to conservational value and not educational value) and for any conservation breeding to be part of internationally recognised programmes.

We also propose changes in paragraph f) of the draft decision which help incorporate the outcomes of the CITES Big Cats Task Force. These Big Cats Task Force recommendations cover the subject of licencing, etc, of facilities in greater detail.

DOC. 79.1 IMPLEMENTATION OF RES. CONF. 17.10 (REV. COP19) ON CONSERVATION OF AND TRADE IN PANGOLINS

EIA RECOMMENDS THAT CoP20:

ADOPT THE PROPOSED AMENDMENTS TO RES. CONF. 17.10 (REV. COP19) IN ANNEX 1

ADOPT THE DRAFT DECISIONS IN ANNEX 2 TO THE DOCUMENT WITH THE FOLLOWING AMENDMENTS TO DRAFT DECISION 20.FF:

20.FF “The Standing Committee shall consider the Secretariat’s report in accordance with Decision 20.EE, paragraph b) and make recommendations, including any time-bound and measurable recommendations to the Parties (range, transit, and consumer countries) as appropriate at the 81st and 82nd meeting of the Standing Committee and to the 21st meeting of the Conference of the Parties, as appropriate.”

ADOPT A DECISION DIRECTED EITHER AT CHINA OR THE STANDING COMMITTEE WITH A VIEW TO EXAMINE THE IMPLICATIONS OF CHINA’S LEGAL DOMESTIC MARKETS FOR PANGOLIN SPECIMENS AND WHETHER THIS IS A POTENTIAL COMPLIANCE MATTER GIVEN THAT THE COUNTRY HAS BEEN REPORTED AS THE DESTINATION FOR HIGH LEVELS OF ILLEGAL TRADE FROM VARIOUS PANGOLIN RANGE AND TRANSIT COUNTRIES.

Submitted by the Secretariat, this document reports on the implementation of Res. Conf. 17.10 (Rev. CoP19) relating to pangolins and associated decisions. As the Secretariat’s report mentions at the outset, all eight pangolin species face a high, very high or extremely high risk of extinction and illegal international trade is one of the primary threats to these species. It is therefore unfortunate that, despite the CoP having instructed the Standing Committee through Decision 19.204 to develop time-bound, measurable recommendations for Parties to address illegal trade in pangolins and despite the Secretariat having committed at SC78 to develop such recommendations for the CoP to consider, no such recommendations have been presented to the Parties.

The IUCN report prepared for CoP20 in Annex 3 of the document confirms that from 2016-24, China and Vietnam were the main destination countries for illegal trade in pangolins with China being the most significant destination. The report also confirms that China has not closed its domestic market for pangolin specimens. The IUCN report, citing information documents submitted by China, states that the country has taken regulatory



measures to address illegal trade including removing pangolin scales from the official pharmacopeia, establishing traceability systems, excluding scales from insurance coverage and introducing targets to reduce market size and demand.

These measures, while welcome, do not go far enough to address the most significant driver of illegal international trade in pangolins, which is consumer demand in China. While pangolins have been excluded from the pharmacopeia, [this does not prevent the continued licensing of medicinal products containing pangolin scales](#) as these can be based on standards set out in previous versions of the pharmacopeia.²⁶ In 2023, EIA [documented a minimum of 53 TCM products](#) stated to contain pangolin scales available for sale online on Chinese websites, licensed by the National Medical Products Administration of China, and many of these products continue to be available online.²⁷

The traceability systems employed by China to regulate trade in pangolin scales have been shown to contain weaknesses allowing for laundering of illegal specimens into legal trade.²⁸ A recent Chinese court case provides an example where a licensed pharmaceutical company engaged in illegal procurement of pangolin scales and saiga horn. As per reports in the media, the actions of the company in question resulted in the laundering of 34,218.14kg of pangolin scales which was manufactured into traditional medicines and sold to more than 500 hospitals.²⁹ EIA will be publishing further information based on Chinese court cases which corroborate both China's role as a primary destination for international illegal trade of pangolins as well as the role of its domestic market in contributing to illegal trade.

Given that some pangolin species are at a high or extremely high risk of extinction, there is no assurance these species can survive the gradual demand-reduction measures China states it is pursuing. Further, China has not committed to closing its legal domestic market for pangolins. The Secretariat has referred to declining levels of seizures as a reason for not proposing country specific measures. While the size of seizures may have decreased, they remain significant and there is no assurance that that pangolin species can survive offtake at current levels, especially given that there are so few reliable population estimates for pangolins. Aside from the question of the impact on pangolin species, a legal domestic market which drives poaching and illegal international trade is not in consonance with paragraph 1.d) of Res. Conf. 17.10 (Rev. CoP19) and raises a potential issue of compliance with the Convention.

We therefore urge the CoP to consider an in-session working group to consider time-bound measurable actions. If time does not allow for this at CoP, we urge Parties to propose either a decision directed at China encouraging it to report on measures it will take to ensure that its legal domestic market does not continue to contribute to poaching or illegal trade, or a decision directed at the Standing Committee directing it to examine the issue as a potential compliance matter. We also suggest that the language on time-bound, measurable recommendations is included in draft decision 20.FF (as it is in Decision 19.204) so that the Standing Committee can recommend urgent measures to address pangolin trade.

DOC. 79.2 REPORT ON DECISIONS 18.238, 18.239, 19.200, 19.203 AND 19.204

EIA RECOMMENDS THAT CoP20:

ADOPT THE DRAFT DECISIONS IN THE ANNEX TO THE DOCUMENT WITH THE FOLLOWING AMENDMENT TO DRAFT DECISION 20.CC:

"20.CC Parties, intergovernmental organizations, non-governmental organizations are encouraged to support pangolin range States with resources, including both financial assistance and technical expertise, to implement in-situ pangolin conservation and management programmes developed in response to Decision 18.238."

Submitted by the Standing Committee, this document reports on the implementation of select Decisions relating to pangolins.

There was a low rate of response to Decision 18.238, with only five pangolin range states responding to the notifications issued by the Secretariat. As such, it is not clear whether the pangolin conservation and management programmes described by Parties in their responses (presented in Annex 1 to AC33. Doc. 35) were developed as a response to Decision 18.238 independently by the Parties or in response to paragraph 10 of Res. Conf. 17.10 (Rev. CoP19).

We recommend that the draft decision encouraging support for such programmes not be restricted to these five range states alone. If necessary, the decision could refer to paragraph 10 of Res. Conf. 17.10 (Rev. CoP. 19), which is a more permanent recommendation addressing this topic.

DOC. 84 RHINOCEROSES (*RHINOCEROTIDAE SPP.*)

EIA RECOMMENDS THAT CoP20:

ADOPT THE DRAFT DECISIONS CONTAINED IN ANNEX 1
WITH AMENDMENTS TO DRAFT DECISION 20.AA, PARAGRAPH a):

The Standing Committee shall consider the report and recommendations of the Secretariat and the recommendations of the intersessional working group in accordance with Decisions 20.CC and 20.EE, make recommendations to the Parties or the Secretariat, as appropriate.

ADOPT A NEW DRAFT DECISION 20.EE DIRECTED AT THE STANDING COMMITTEE:

The Standing Committee shall:

a) *establish an intersessional working group to:*

i) *consider the information provided by Parties to the Secretariat on their implementation of Decisions 18.116, 20.AA, and 20.BB;*

ii) *consider the information contained in the report prepared by the IUCN/SSC African and Asian Rhino Specialist Groups and TRAFFIC contained in CoP20 Doc. 84 Annex 3;*

iii) *consider other relevant published literature, peer-reviewed papers, and CITES reports; and*

iv) *make any recommendations as appropriate to SC81, SC82, and CoP21*

b) *consider the recommendations proposed by the intersessional working group at its 81st and 82nd meetings and make recommendations as appropriate*

REQUEST SOUTH AFRICA TO SHARE MORE DETAILS ON THE THEFT OF
712 RHINO HORNS FROM STOCKPILES IN 2024, AS REPORTED IN DOC. 84 ANNEX 3

Doc. 84 and its accompanying Annex 3, which contains the report by the IUCN African and Asian Rhino Specialist Groups and TRAFFIC on rhino conservation and trade, contains a wealth of information and analysis which paints a complex picture of the conservation status of rhinos. EIA welcomes the outcomes of the CITES Rhino Enforcement Task Force meeting, contained in Annex 2, which was held in Pretoria, South Africa in May of this year.

We are encouraged by the reduction in poaching in many range states, which has contributed to the lowest continental poaching rate since 2011. However, the report makes clear that organised criminal networks which control the poaching and transnational trafficking of rhino horns remain a major threat to African and Asian rhinos, with several range states still suffering intense poaching pressure.

The continental white rhino population is now 15,752, down 11.2 per cent since 2023 and at its lowest point since the current rhino poaching crisis began nearly two decades ago.³⁰ This population downturn has been driven by poaching, particularly in South Africa, and recent corrections to estimates for key populations has meant that white rhino numbers are worse than was previously understood.³¹

While the continental black rhino population continues to increase slowly, this increase has been offset by poaching losses in Namibia and South Africa. Namibia has experienced severe poaching in recent years, which has caused its black rhino population to decline by 2.7 per cent from 2022-24 to fewer than 2,100 individuals.³² Indeed, black rhino losses in Namibia and South Africa contributed to a one per cent continental black rhino population decline in 2023,³³ the first time since the 1990s that the population exhibited an annual population decline.

In Asia, the status of the Critically Endangered Sumatran rhino remains precarious, with potentially fewer than three dozen estimated to remain in the wild, and the only remaining wild Javan rhino population has been depleted by a poaching network sourcing horns for onward trafficking, with apparent links to China.³⁴

China remains a critical end-use market for rhino horn, while Vietnam and other countries in South-East Asia such as Lao PDR continue to be exploited as trafficking hubs for rhino horn.³⁵

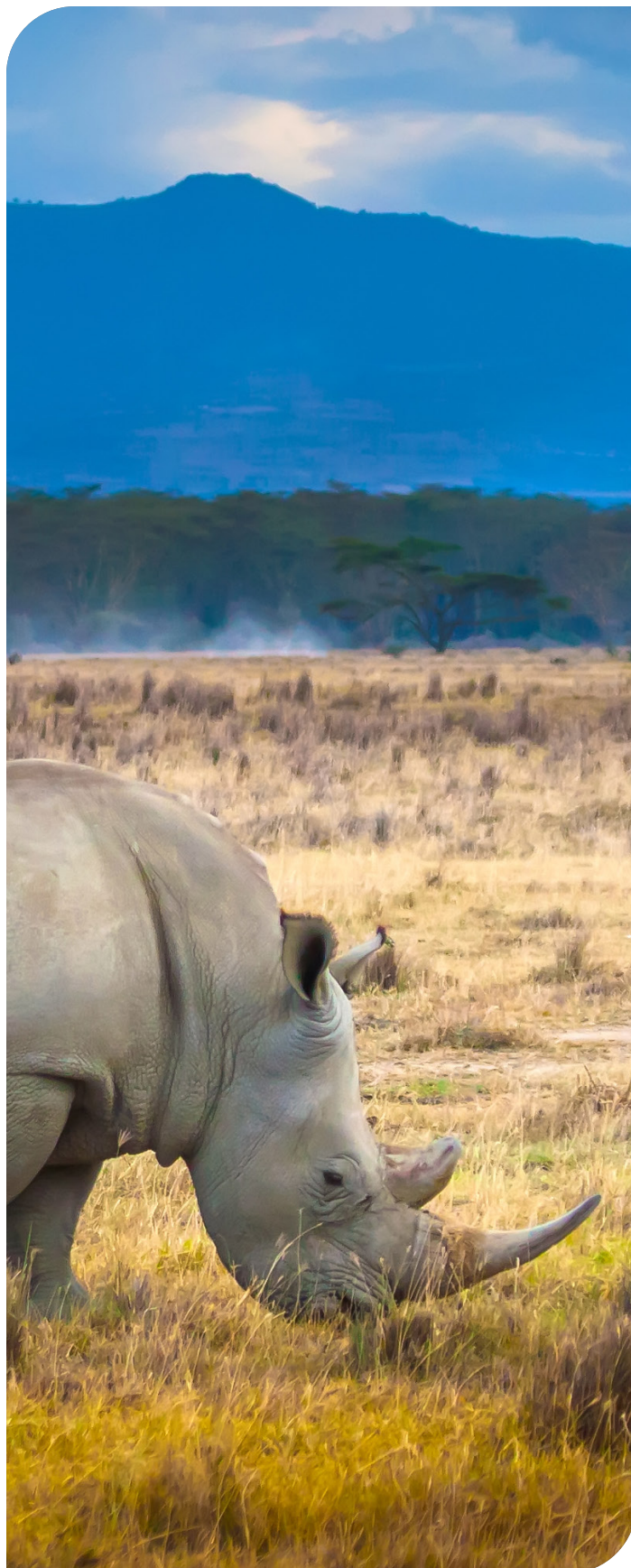
The IUCN/TRAFFIC report contained in Annex 3 provides invaluable data on trafficking trends and contains important analyses which take into account the relatively recent phenomenon of widespread dehorning of rhino populations in key range states; however, it is important to recognise key limitations in the seizure data which can affect results and subsequent analysis – and which underscores why seizure data alone is not sufficient to determine the countries “most affected by rhino horn trafficking”.

For instance, 104 out of 150 of seizures made between 2021-23, or 69 per cent, did not have any accompanying data on international trade routes; some key Parties continue to struggle to submit Annual Illegal Trade Reports, including Vietnam which has not submitted an AITR since 2021. Arguably the most important end-use country – China – does not allow its AITR data to be used for global research and analysis purposes, which may explain its position in the list of countries affected by rhino trafficking. Nonetheless, information collected by EIA and others continues to indicate that China is a critical end-use country for rhino horn trafficked from Africa to Asia.

Meanwhile, rhino horn stockpiles continue to contribute to the illegal trade, as evidenced by the more than 700 horns stolen from South African stockpiles last year – which had not been previously reported – and the recent indictment in South Africa of the well-known rhino breeder John Hume and his alleged co-conspirators on charges related to rhino horn trafficking.³⁶

Despite nearly 100 pages of important information contained in the IUCN/TRAFFIC report, only one of the draft decisions in Doc. 84 is directed to a specific Party – Indonesia. Given the incredibly busy agenda for CoP20, it is unlikely that the information contained in Doc. 84 and its annexes will be adequately discussed and future Standing Committee meetings risk similar challenges experienced at past meetings where Party responses and other information related to the rhino agenda item were given cursory attention due to time constraints.

Given the severity of ongoing rhino poaching, trafficking and enforcement challenges, together with all the information contained in Doc. 84 and its annexes, as well as the information expected to be presented at future Standing Committee meetings resulting from the draft decisions contained in Doc. 84, we strongly urge Parties to propose a decision to direct the Standing Committee to establish an intersessional working group which would allow to fully consider the information contained in Doc. 84, information supplied at future SC meetings, and other relevant literature, and to make recommendations to the Parties and the CoP as appropriate.



DOC. 85.1 SAIGA ANTELOPE (*SAIGA* SPP.) REPORT OF THE SECRETARIAT

EIA RECOMMENDS THAT CoP20:

ADOPT THE DRAFT DECISIONS CONTAINED IN ANNEX 2 WITH THE FOLLOWING ADDITIONAL AMENDMENTS TO DRAFT DECISION 19.213 (REV. COP20), PARAGRAPH b):

"Consistent with the measures directed to saiga range States in MTIWP (2021-2025), the range States of the saiga antelope are encouraged to establish internal market controls for saiga parts, including registration of stockpiles, labelling of parts and products, the number of stockpiles, volume of stockpiles, recording of sources of saiga specimens contained in stockpiles, monitoring and control measures, and registration of manufacturers and traders, and to put in place measures to effectively manage saiga specimen stockpiles where they are absent or inadequate

REQUEST THAT THE SECRETARIAT MAKE THE COMPLETE RESPONSES TO NOTIFICATION TO THE PARTIES NO. 2025/42 AVAILABLE TO ALL PARTIES

The absence of information on the volume and provenance of saiga horn held in stockpiles in consumer and trading Parties is of serious concern given ongoing illegal trade in saiga horn.³⁷ It is unclear how legal domestic markets for saiga horn in important consumer countries are able to continue sourcing saiga horn from stockpiles, given that there has been no legal trade in saiga horn from range states since the 1990s, and there is a significant risk that illegal horn is being laundered into illegal trade. The limited information that has been provided by saiga consumer and trading Parties on stockpiles in recent years is insufficient to assuage these concerns.

In addition, Doc. 85.1 only contains summaries of Party responses to Notification to the Parties No. 2025/42. We encourage Parties to request that the Secretariat make the complete, original responses to the Notification available to all Parties to allow for full transparency and evaluation of responses.

DOC. 85.2 SAIGA ANTELOPE (*SAIGA* SPP.) DOCUMENT BY KAZAKHSTAN AND THE RUSSIAN FEDERATION

EIA RECOMMENDS THAT CoP20:

ADOPT THE DRAFT DECISIONS CONTAINED IN ANNEX 1 WITH AMENDMENTS TO DRAFT DECISION 20.AA, PARAGRAPH a)

"eliminate the use of source code "Unknown" (U) and source code "Pre-Convention" (O) to trade in saiga antelope parts and derivatives in commercial purposes."

EIA welcomes the draft decision from Kazakhstan and Russia for Parties to eliminate the use of source code U for trade in saiga specimens. At the same time, ongoing trade in saiga horn with source code 'O' (pre-Convention) presents similar sourcing, laundering and legality concerns, given that these specimens would be at least 30 years old (see EIA comments on Prop. 3 and Doc. 85.1 for additional details).

ANNEX A

SUGGESTED AMENDMENTS TO DECISIONS 18.226 (REV. COP19); 19.107 AND 19.108 TO ENSURE RENEWAL OF PROVISIONS FOR OVERSIGHT BY THE SECRETARIAT AND STANDING COMMITTEE:

New proposed text is underlined. Proposed deletions are shown in ~~strikethrough~~

18.226 (Rev. CoP2019)

Decision directed to: Parties involved in the trade in Asian elephants and their parts and derivatives

All Parties involved in the trade in Asian elephants and their parts and derivatives are encouraged to:

a) undertake, as necessary, investigations into the illegal trade in Asian elephants and their parts and derivatives, and endeavour to enforce, and where necessary improve, national laws concerning international trade in specimens of Asian elephants with the explicit intention of preventing illegal trade; and

b) develop strategies to manage captive Asian elephant populations;

c) ensure that trade in, and cross-border movements of, live Asian elephants are conducted in compliance with CITES, including the provisions in Article III, paragraph 3, for Asian elephants of wild origin;

d) collaborate in the development and application of a regional system for registering, marking and tracing live Asian elephants, requesting as necessary assistance from experts, specialized agencies or the Secretariat; and

e) b) at the request of the Secretariat, provide information on the implementation of this Decision for reporting by the Secretariat to the Standing Committee.

19.107 (Rev. CoP20)

Decision directed to: Secretariat

The Secretariat shall:

a) request a report from Parties on the implementation of paragraphs a) through d) of Decision 18.226 (Rev. CoP 2019);

b) subject to the availability of external funding, in collaboration with range States and other relevant stakeholders, develop requirements for a registering, marking, and tracing system for live Asian elephants, to be presented to Asian elephant range States with the aim of establishing a global system, or alternatively standardized national systems, for registering, marking and tracing live Asian elephants; and

e) b) report any information provided in response to Decision 19.107 (Rev. CoP20) paragraph a) and on the implementation of Decision 19.107 paragraph b), as well as findings and recommendations concerning trade in Asian elephants and their parts and derivatives as appropriate, to the 81st and 82nd meetings of the Standing Committee.

19.108 (Rev. CoP20)

Decision directed to: Standing Committee

The Standing Committee shall consider at its 81st and 82nd ~~78th~~ meetings the information, findings, and recommendations, as per Decision 19.107 (Rev. CoP20), paragraph e) b), and make recommendations to the Secretariat and to Parties, and report to the Conference of the Parties at its ~~20th~~ 21st meeting, as appropriate.

ANNEX B

SUGGESTED AMENDMENTS TO DRAFT DECISIONS ON TOTOABA IN CoP20 DOC. 35.3:

Directed to Parties and relevant stakeholders

20.AA In their implementation of measures and activities to conserve and protect totoaba and vaquita and address poaching and illegal trade affecting these species, Parties and relevant stakeholders are encouraged to:

- a) take into consideration the information contained in the study on totoaba and vaquita available in Annex 7 to document SC78 Doc. 33.12.1;
- b) support efforts related to the recovery and monitoring of wild populations of totoaba and vaquita;
- c) support efforts to eliminate supply of and demand for illegally sourced specimens of totoaba; and
- d) make every effort to support Mexico in the implementation of Decision 20.DD.

Directed to Parties affected by illegal fishing and trafficking of totoabas

20.BB Parties affected by illegal fishing and trafficking of totoabas are encouraged to:

- a) fully implement the measures and activities outlined in the online *Meeting of Range, Transit and Consumer States of Totoaba* agreed outcomes document, as relevant to them, applying strict enforcement measures to prevent and combat this illegal trade and prosecute the criminals involved;
- b) draw upon the secure law enforcement communication channels and tools provided by INTERPOL and the World Customs Organization to share information on seizures and arrests associated with totoaba specimen trafficking; and
- c) engage in awareness-raising activities on the illegal trade in totoaba, and its severe implications for the conservation of vaquitas (*Phocena sinus*), ~~including demand reduction campaigns, as well as activities to eliminate supply and demand for illegally sourced specimens of totoaba~~, taking into consideration the measures and activities outlined in the Meeting of Range Transit and Consumer States of Totoaba agreed outcomes document under the heading Opportunities to eliminate supply and demand for illegally sourced specimens of totoaba, including by:
 - d) ~~develop and implement, within six months, coordinated and targeted demand reduction campaigns as well as activities to eliminate supply and demand for illegally-sourced specimens of totoaba with relevant metrics to measure success.~~
- e) report to the 81st meeting of the Standing Committee on activities conducted and any associated results achieved.

Directed to China and other destination countries

20.CC China and other destinations countries are encouraged to:

- a) strengthen information and intelligence gathering regarding individuals within their country managing and organizing illegal trade involving totoaba specimens, analyze data gathered to map out their criminal networks, and target their activities through intelligence-driven investigations and operations to facilitate their arrest and prosecution; and
- b) request major e commerce and social media platforms (e.g., WeChat, Weibo, Taobao, Xiaohongshu, Facebook) to deploy proactive detection and removal tools for totoaba related listings;
- c) fully implement its April 2024 Action Plan on Combatting Illegal Trade in Totoaba,³⁸ including by conducting and documenting the: 1) number of market inspections and joint enforcement operations, 2) quantities of maws seized and their provenance, and 3) number of arrests, prosecutions, convictions and penalties imposed.

d) report to the 81st and 82nd meetings of the Standing Committee on activities conducted and any associated results achieved.

Directed to Mexico

20.DD Mexico is requested to:

a) pursue the urgent implementation, by June 2026, and thereafter maintain of all aspects of the *Agreement regulating gears, systems, methods, techniques and schedules for the performance of fishing activities with smaller and larger vessels in Mexican Marine Zones in the Northern Gulf of California and establishing landing sites, as well as the use of monitoring systems for such vessels ("the Agreement")*, or any new or revised version of "the Agreement," as well as the Comprehensive Management Plan for Totoaba;

b) continue implementation of measures to effectively prevent fishers from using gillnets in the Vaquita Refuge Area (VRA) and vessels from entering the Vaquita Zero-Tolerance Area (Zo) and to maintain these areas completely gillnet-free, including by:

i) ensuring surveillance on a full-time basis drawing upon all systems at its disposal by installing tamper-proof satellite Vessel Monitoring Systems (VMS) on 100% of all vessels operating in the Upper Gulf of California by 31 December 2025 and;

ii) ~~implementing~~ maintaining a strict zero-tolerance policy concerning unauthorized fishing and fishing gear in these areas; engaging in urgent enforcement efforts, and imposing strict penalties where irregularities are detected, including the seizure of both vessels and unauthorized fishing gear combined with administrative or criminal penalties as applicable.

iii) deploying authorities with legal powers of seizure and arrest, together with the Navy, to effectively prevent, disrupt and put an end to the illegal fishing activities;

iv) maintaining resources to ensure uninterrupted gillnet removal throughout the Gillnet Prohibition Area and to take all necessary measures to destroy confiscated nets.

v) Urgently expand the boundaries of the Zero Tolerance Area and Vaquita Refuge to align with documented distribution of the vaquita and ensure that enforcement efforts to prevent illegal fishing are fully implemented in this larger area.

c) scale up activities in support of selective fishing gear development and use, including by reactivating the Expert Committee on Fishing Technologies (ECOFT) to advise on the transition to alternate gear, and by implementing dedicated programmes in this regard, in consultation with stakeholders to ensure inclusivity and acceptance;

d) maintain strict control over the activities of vessels to which fishing permits with alternative gear were granted to ensure that only the alternative gear is used as authorized by the permits and that strict action is taken when any irregularities are detected;

e) continue delivering activities through awareness and sensitization programmes in pursuit of behaviour change regarding the use of alternative fishing gear that does not pose a threat to the vaquita and to deter illegal activities;

f) take urgent measures to address illegal totoaba fishing displaced due to strengthened measures deployed at the Zo and VRA.

g) further strengthen intelligence gathering and analyses of information and data to map out the criminal groups in Mexico involved in illegal fishing and totoaba specimen trafficking, and to address them through intelligence-driven enforcement operations; and

h) submit a report on the implementation of Decision 20.DD to the Secretariat 90 days in advance of the 81st meeting of the Standing Committee, for it to be made available to the Committee for consideration.

Directed to the United States of America and other Parties affected by illegal fishing and trafficking of totoabas

20.EE *The United States of America and other Parties affected by illegal fishing and trafficking of totoabas are encouraged to:*

- a) within 12 months, strengthen information and intelligence gathering regarding individuals within their territory facilitating the transit of illegal totoaba specimen consignments through their territory, their modus operandi to receive, store and export such illegal consignments, and to target their activities through intelligence-driven investigations and operations, including by sharing information with authorities in Mexico and China and other destination countries, as appropriate, in support of follow up investigations across the illegal trade chain;
- b) in their implementation of measures and activities to address totoaba specimen trafficking, consider the risk of commercial seafood shipments transiting their territory, being used to conceal and smuggle illegal totoaba swim bladder consignments and to apply strict inspection measures to such shipments originating from and destined to Parties known to be affected by totoaba specimen trafficking, as well as review related national practices to ensure that the measures in place are effective and adapted as may be needed to respond to any newly identified trends; and
- c) report to the 81st meeting of the Standing Committee on the activities conducted and any associated results achieved.

Directed to China, Mexico, and the United States of America

20.FF China, Mexico, and the United States of America are requested to jointly submit, through the Chair of the Trilateral Enforcement Contact Group (TECG), a report to the 81st meeting of the Standing Committee on the activities conducted in accordance with the TECG terms of reference, as well as associated results achieved, as appropriate.

Directed to the Secretariat

20.GG **The Secretariat shall:**

- a) seek information from Parties on their implementation of Decisions 20.AA and 20.BB;
- b) report to the 81st meeting of the Standing Committee on its implementation of Decision 20.GG together with any recommendations it may have including potential trade suspensions against any range and/or consumer states of totoaba under Res. Conf. 14.3 (Rev. CoP19) if timely progress has not been made in implementing 20.CC, 20.DD and/or 20.EE.

Directed to the Standing Committee

20.HH The Standing Committee shall review the reporting submitted by Parties and the Secretariat in accordance with Decisions 20.CC to 20.GG and make recommendations as appropriate including potential trade suspensions against any range, transit, and/or consumer states of totoaba under Res. Conf. 14.3 (Rev. CoP19) if timely progress has not been made in implementing 20.CC, 20.DD and/or 20.EE.



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EIA UK

62-63 Upper Street, London, N1 0NY, UK
eia-international.org
+44 (0)20 7354 7960

EIA US

PO Box 53343, Washington DC, 20009, USA
eia.org
+1 202 483 6621