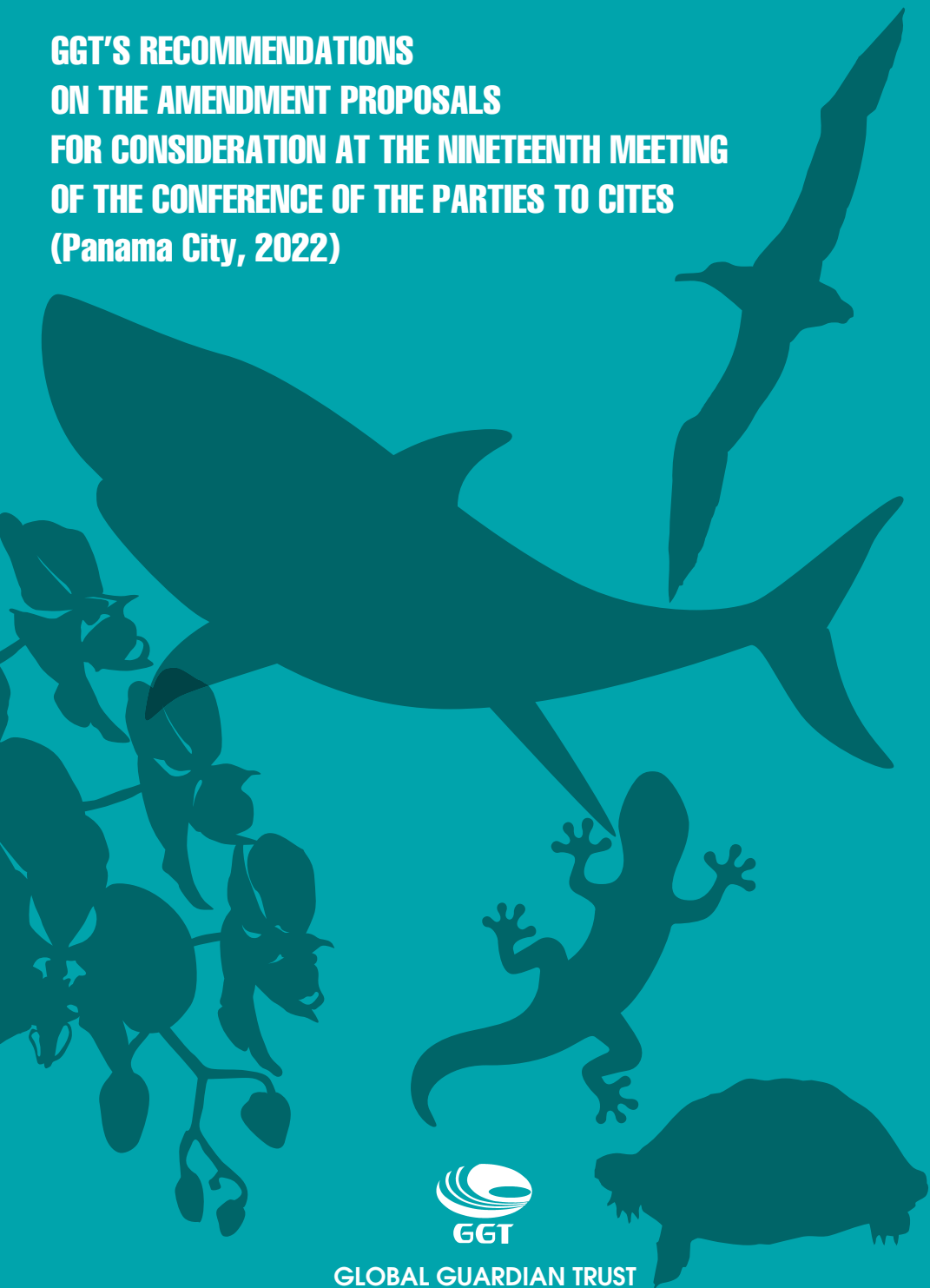


**GGT'S RECOMMENDATIONS
ON THE AMENDMENT PROPOSALS
FOR CONSIDERATION AT THE NINETEENTH MEETING
OF THE CONFERENCE OF THE PARTIES TO CITES
(Panama City, 2022)**



GLOBAL GUARDIAN TRUST

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SUMMARY OF THE RECOMMENDATIONS

Proposal	Species	Amendment	Recommendation
1	<i>Hippopotamus amphibius</i> hippopotamus	II → I	No
2	<i>Ceratotherium simum simum</i> white rhino	I → II	Yes
3	<i>Ceratotherium simum simum</i> white rhino	annotation	Yes
4	<i>Loxodonta africana</i> African elephant	annotation	Yes
5	<i>Loxodonta africana</i> African elephant	II → I	No
6	<i>Cynomys mexicanus</i> Mexican prairie dog	I → II	Yes
7	<i>Branta canadensis leucopareia</i> Aleutian Canada goose	I → II	Yes
8	<i>Kittacincla malabarica</i> white-rumped shama	0 → II	Yes
9	<i>Pycnonotus zeylanicus</i> straw-headed bulbul	II → I	Yes
10	<i>Phoebastria albatrus</i> short-tailed albatross	I → II	Yes
11	<i>Caiman latirostris</i> broad-snouted caiman	I → II	No
12	<i>Crocodylus porosus</i> saltwater crocodile	I → II	Yes
13	<i>Crocodylus siamensis</i> Siamese crocodile	I → II	Yes
14	<i>Physignathus cocincinus</i> water dragon	0 → II	Yes
15	<i>Cytodactylus jeyporensis</i> hill gecko	0 → II	Yes
16	<i>Tarentola chazaliae</i> helmethead gecko	0 → II	Yes
17	<i>Phrynosoma platyrhinos</i> desert horned lizard	0 → II	No
18	<i>Phrynosoma</i> spp. horned lizards	0 → II	No
19	<i>Tiliqua adelaidensis</i> bluetongue lizard	III → I	Yes
20	<i>Epicrates inornatus</i> Puerto Rican boa	I → II	Yes
21	<i>Crotalus horridus</i> timber rattlesnake	0 → II	No
22	<i>Chelus fimbriata, C. orinocensis</i> Amazon matamata	0 → II	Yes
23	<i>Macrochelys temminckii, Chelydra serpentina</i> snapping turtle	III → II	No
24	<i>Graptemys</i> 5 spp. map turtle	III → II	No
25	<i>Batagur kachuga</i> roofed turtle	II → I	No
26	<i>Cuora galbinifrons</i> box turtle	II → I	Yes
27	<i>Rhinoclemmys</i> spp. wood turtles	0 → II	No
28	<i>Claudius angustatus</i> musk turtle	0 → II	No
29	<i>Kinosternon</i> spp. mud turtles	0 → I,II	No
30	<i>Staurotypus salvinii, S. triporcatus</i> musk turtles	0 → II	Yes
31	<i>Sternotherus</i> spp. musk turtles	0 → II	Yes

32	<i>Apalone</i> spp.	American softshell turtle	III → II	No
33	<i>Nilssonina leithii</i>	Leith's softshell turtle	II → I	No
34	Centrolenidae spp.	glass frogs	0 → II	No
35	<i>Agalychnis lemur</i>	lemur leaf frog	0 → II	Yes
36	<i>Laotriton laoensis</i>	Laos warty newt	0 → II	Yes
37	Carcharhinidae spp.	requiem sharks	0 → II	No
38	<i>Sphyrnidae</i> spp.	hammerhead sharks	0 → II	No
39	<i>Potamotrygon</i> 7 spp.	stingrays	III → II	No
40	Rhinobatidae spp.	guitarfishes	0 → II	No
41	<i>Hypancistrus zebra</i>	zebra pleco	III → I	No
42	<i>Thelenota</i> spp.	sea cucumbers	0 → II	No
43	<i>Flora</i> spp.	plants	annotation	Yes
44	<i>Handroanthus</i> spp., <i>Roseodendron</i> spp., <i>Tabebuia</i> spp.	trumpet trees	0 → II	No
45	<i>Rhodiola</i> spp.	stonecrops	0 → II	Yes
46	<i>Afzelia</i> spp.	African mahoganies	0 → II	No
47	<i>Dalbergia sisso</i>	Indian rosewood	II → 0	Yes
48	<i>Dipteryx</i> spp.	cumarus	0 → II	No
49	<i>Paubrasilia echinata</i>	Brazilwood	II → I	No
50	<i>Pterocarpus</i> spp.	African rosewoods	0 → II	No
51	<i>Khaya</i> spp.	African mahoganies	0 → II	No
52	Orchidaceae spp.	orchids	annotation	Yes

RECOMMENDATIONS

Prop.
1

Transfer of the common hippopotamus *Hippopotamus amphibius* from Appendix II to Appendix I (Benin, Burkina Faso, Central African Republic, Gabon, Guinea, Liberia, Mali, Niger, Senegal, Togo)

The common hippopotamus is distributed in 38 countries in Africa. According to the IUCN Red List, its population is stable. The species does not meet the Appendix I listing criteria. The proponents admit that the species does not satisfy the numerical guideline. Yet, the proponents stress the species meets the Appendix I listing criteria, referring to Annex 5 “*where numerical guidelines are cited in this Annex, they are presented only as examples, since it is impossible to give numerical values that are applicable to all taxa because of differences in their biology.*” GGT feels that this is an abuse of Annex 5. In those countries who have witnessed the recent population decline, the main threat is civil war/unrest causing illegal killing. This problem will not be solved by listing the species in Appendix I. In addition, CITES has nothing to do with other threats such as commercial development, agriculture and dam construction. These must be solved domestically. Eastern Africa and Southern Africa are strongholds for the species. It seems the proponents have consulted other range States but the results are not clear, in particular from these stronghold countries. The hippopotamus is totally protected in 14 range States, out of which Burkina Faso, Central African Republic, Gabon, and Niger are the co-proponents of the proposal. These countries should strengthen their enforcement activities. Under the circumstances, the proposal should be **rejected**.

Prop.
2

Transfer of the Namibian population of the southern white rhinoceros *Ceratotherium simum simum* from Appendix I to Appendix II (Botswana, Namibia)

The white rhinoceros consists of two subspecies, *Ceratotherium simum simum* and *C. s. cottoni*. The latter, northern white rhinoceros, is almost extinct with only two females left. The former, southern white rhinoceros had been extirpated from most of the range States including Namibia. However, South African remaining population became subject to protection and has increased rapidly. Rhinos have been reintroduced from South Africa to Namibia, Botswana, Zimbabwe, Mozambique and Eswatini. Sixteen rhinos were reintroduced from South Africa to Namibia in 1975 and the population has since then increased up to more than 1,200. The species as a whole does not meet the Appendix I listing criteria, nor Namibia’s population. The population has increased substantially, not because of CITES but because of Namibia’s effort. Such efforts must be rewarded. The number of rhinos killed illegally has increased recently but it is negligible

compared to the total number of animals protected. The proposal aims to export live animals and hunting trophies. Live animals are to be exported for *in-situ* conservation purposes. Without approving this proposal, the integrity of CITES would be questioned. The proposal should be **adopted**.

Prop. 3 Amendment of the annotation for the Eswatini population of the southern white rhinoceros *Ceratotherium simum simum* (Eswatini)

The white rhino populations of South Africa and Eswatini are listed in Appendix II with annotation. Eswatini's population was transferred from Appendix I to Appendix II at CoP13 with annotation. Eswatini submitted proposals for CoP17 and CoP18 aimed at an international trade in rhino horns. The proposals were rejected. Eswatini's intention was to sell rhino horns coming from the stockpiles and horns from non-lethal harvesting. It should be pointed out that most populations of the vicuna (*Vicugna vicugna*) were transferred from Appendix I to Appendix II allowing international trade. The acquisition of rhino horns will also be conducted in a non-lethal way. Eswatini's rhino populations occur in one national park and one game reserve. In addition, it intends to introduce rhinos to one wildlife sanctuary. These three protected areas are not financed by the Government. They need to be self-financed. By using proceeds from selling rhino horns, Eswatini wishes to enhance its effort to conserve its rhino population. It is necessary for this proposal to be adopted, in particular considering the recent COVID-19 pandemic which has affected the tourism destined for the two protected areas. Listing rhinos in Appendix I has proven to be a failure and innovative approaches need to be taken. This proposal is one of such approaches and as such, it should be **adopted**. The adoption of the proposal is in the best interest of the conservation of the species as well as of biodiversity. Those who oppose this proposal are encouraged to provide Eswatini with financial assistances.

Prop. 4 Amendment of the annotation for the African elephant *Loxodonta africana* populations of Botswana, Namibia, South Africa and Zimbabwe (Zimbabwe)

The African elephant was transferred from Appendix II to Appendix I at its seventh meeting of the Conference of the Parties (Lausanne, 1989) despite the general recognition that some of the southern African populations did not meet the Appendix I listing criteria. The elephant populations of Botswana, Namibia and Zimbabwe were transferred to Appendix II in 1997 and South African population in 2000. The Conference of the Parties should have supported the proposals submitted by southern African countries without any condition attached. The present proposal aims to delete some sub-paragraphs of the annotation. If this proposal is adopted, the four countries, i.e., Botswana, Namibia, South Africa and Zimbabwe will be able to export their stockpiled ivories from natural mortality and problem animal control. If this is the case, it will be in the best interest of the conservation of the African elephant and will be in

line with the original intent of CITES. GGT welcomes this proposal and recommend that it be **adopted**. Continuing to reject their proposals is the punishment for the conservation success of southern African countries.

**Prop.
5**

Transfer of the populations of the African elephant *Loxodonta africana* of Botswana, Namibia, South Africa and Zimbabwe from Appendix II to Appendix I (Burkina Faso, Equatorial Guinea, Mali, Senegal)

Most parts of the document are identical to those of the unsuccessful proposals submitted in the past. The plight now faced by African elephants started in 1989 when the Conference of the Parties adopted a transfer of the species as a whole from Appendix II to Appendix I despite the unanimous recognition that southern African populations did not meet the Appendix I listing criteria. Those who supported an Appendix I listing need to take the responsibility because that decision brought about the present situation. The elephant populations of Botswana, Namibia and Zimbabwe were transferred back to Appendix II in 1997 and that of South Africa in 2000. Subsequently, international ivory trade took place twice, but both were 'one-off trade'. This decision exacerbated the situation because such trade precluded a possibility of establishing a long-term management strategy. According to the supporting statement, if all African elephant populations are considered as a whole, the species meets the Appendix I listing criteria. At the same time, the proponents admit that individual country populations may be listed separately in Appendix II. However, the proponents argue that split-listings should be avoided referring to the listing criteria: "*Listing of a species in more than one Appendix should be avoided in general in view of the enforcement problems it creates*". The history of CITES, however tells us that 'split-listings' was beneficial to many species including vicuna and crocodiles. For example, the Nile crocodile populations of Kenya and Ethiopia are listed in Appendix II, creating 'split-listings' for the species. If 'split-listings' works negatively, their populations should be transferred to Appendix I. Furthermore, the proponents make a reference to Resolution Conf. 9.24 Annex 4: "*By virtue of the precautionary approach and in cases of uncertainty regarding the status of a specie or the impact of trade on the conservation of a species, the Parties shall act in the best interest of the conservation of the species concerned and, when considering proposals to amend Appendix I or II, adopt measures that are proportionate to the anticipated risks to the species*". It should be stressed that this paragraph does not mean that in cases of uncertainty, international trade should not be permitted. On the contrary, the best interest of the conservation of the African elephant can be achieved through allowing international trade in ivory with an annual export quota. By allowing ivory trade on a regular basis, exporting countries will be able to establish more pragmatic, long-term elephant conservation programmes, which is indeed in the best interest of the conservation of the African elephant. There should be clear recognition that there are two different groups of countries, the one who failed to conserve elephants and the other who succeeded. By submitting this kind of proposal repeatedly, the former's country group is asking the latter to adopt the

wildlife policy that proved to have been failed. In conclusion, there is no justification for transferring the elephant populations of Botswana, Namibia, South Africa and Zimbabwe to Appendix I. The proposal should be **rejected**. It is interesting to note that the proponents mention that “*if IUCN’s formal recognition of savanna and forest elephants as two separate species is transposed in the CITES Appendices, there are concerns that this taxonomic update could potentially spur proposals within CITES to reopen the international commercial trade in savanna African elephant ivory trade...*” The proponents clearly recognize that the elephant status varies from country to country.

Prop. 6 Transfer of the Mexican prairie dog *Cynomys mexicanus* from Appendix I to Appendix II (Mexico)

The Mexican prairie dog is endemic to Mexico. This species has been listed in Appendix I since 1975. The species is fully protected under Mexico’s legislation. In relation to the Periodic Review process, Mexico explained its review result on the species and recommended the transfer from Appendix I to Appendix II, which Animals Committee endorsed (AC31, online). Accordingly, this proposal was submitted for consideration at CoP19. It is unlikely that an Appendix II listing will cause any negative impact on the survival of the species because any commercial use is not anticipated. The proposal should be **adopted**.

Prop. 7 Transfer of the Aleutian cackling goose *Branta canadensis leucopareia* from Appendix I to Appendix II (USA)

The Aleutian cackling goose *Branta canadensis leucopareia* used to be considered a subspecies of the Canada goose *Branta canadensis* and has been listed in Appendix I since 1975. The Canada goose *Branta canadensis* was split into two different species based on taxonomic studies, the Canada goose *B. canadensis* and the cackling goose *B. hutchinsii*. The cackling goose comprises 5 subspecies including this subspecies *B. hutchinsii leucopareia*. The proposal was submitted as a result of the Periodic Review of the Appendices. This subspecies breeds on the Aleutian and Semedi Islands and winter mainly in the western part of the US. This population is thriving and subject to hunting. A small population was reintroduced in the Kuril Islands thanks to the joint efforts by US, Japan and Russia and approximately 5,000 birds winter in northern Japan where the Aleutian cackling goose is totally protected. A transfer of the subspecies to Appendix II will not cause any negative impact and as such, the proposal should be **adopted**. The proponent may wish to consider a possibility of deleting the Aleutian cackling goose from CITES Appendix II in the future.

Prop. 8 Inclusion of the white-rumped shama *Kittacincla malabarica* in Appendix II (Malaysia, Singapore)

The white-rumped shama is widely distributed in southern Asia from India through Thailand to Indonesia. This species is a popular cage bird due to its

singing ability. According to the supporting statement, it seems that several range States have regulations on domestic trade and border control. Although it seems unlikely that this species is facing a risk of extinction, there have been many seizure incidents. Listing in Appendix II would facilitate the monitoring of cross-border trade. GGT recommends that the proposal be **adopted**.

Prop. 9 Transfer of the straw-headed bulbul *Pycnonotus zeylanicus* from Appendix II to Appendix I (Malaysia, Singapore, USA)

As is the case with the white-rumped shama (Prop. 8), this is one of the most sought-after species for cage birds. The population is in decline. Historically, the straw-headed bulbul occurred in Myanmar, Thailand, Malaysia, Brunei Darussalam, Singapore and Indonesia. It is believed that the species is now extinct in Thailand and Myanmar. The main threats are trapping for the cage-bird trade and habitat loss. Most of the range States are supportive of the proposal. GGT recommends that the proposal be **adopted**. However, it should be noted that an Appendix I listing by itself may not solve the problem. What is needed is to strengthen enforcement activities by all range States. This could be done without transferring the species to Appendix I.

Prop. 10 Transfer of the short-tailed albatross *Phoebastria albatrus* from Appendix I to Appendix II (USA)

This proposal was submitted as a result of the Periodic Review of the Appendices. This species is found in the northern Pacific Ocean. It breeds mainly on Torishima Island, Japan. The population of Torishima Island was believed to be extirpated a century ago caused by feather harvests. After the nesting population was rediscovered, a series of conservation measures have been taken leading to the recovery of the species. The population size is now estimated more than 5,000 including breeding individuals. The major threats are erosion and volcanic eruption on Torishima Island as well as ocean contamination. To avoid erosion, *Miscanthus* grasses have been planted. Another conservation activity includes the translocation of albatross chicks to Mukojima Island. These conservation programmes have been effectively implemented. In Japan, the short-tailed albatross is a fully protected species. Even if the species is transferred from Appendix I to Appendix II, any negative impact is not foreseen. Rather, such a transfer is considered to be a conservation success. The proposal should be **adopted**.

Prop. 11 Transfer of the Brazilian population of the broad-snouted caiman *Caiman latirostris* from Appendix I to Appendix II (Brazil)

The broad-snouted caiman is distributed in Argentina, Bolivia, Brazil, Paraguay and Uruguay. The species is listed in Appendix I except the population of Argentina which is listed in Appendix II. The population of Brazil is large and does not meet the Appendix I listing criteria. There are five commercial farms in

Brazil producing broad-snouted caimans, one of which is registered with the CITES Secretariat. An Appendix II listing will enable the remaining four farms to export the products. However, they can also export the products without transferring to Appendix II if registered with the Secretariat. It is not clear from the supporting statement how an Appendix II listing would be beneficial to wild populations. According to the supporting statement, it seems that Brazil will not allow the export of ranched or wild harvested specimens. Ranching is more beneficial to the species from a conservation point of view than farming and harvesting in the wild. This possibility should be pursued in the future. In conclusion, GGT sees no rationale behind this proposal at the moment and as such, the proposal should be **rejected**.

**Prop.
12**

Transfer of the Palawan population of the saltwater crocodile *Crocodylus porosus* from Appendix I to Appendix II with a zero quota for wild specimens (Philippines)

The species is distributed from India through Indonesia to Vanuatu. The populations of Australia, Indonesia, Malaysia and Papua New Guinea are listed in Appendix II. Other populations are listed in Appendix I. The species as a whole is abundant and does not meet the Appendix I listing criteria. The Crocodile Farming Institute (CFI, current Palawan Wildlife Rescue and Conservation Center) was established in Puerto Princesa on Palawan in 1988 as a joint venture between the Philippines and Japan. Since its inception, CFI has conducted studies on crocodiles in the Philippines and captive breeding technique. These efforts led to successful breeding in captivity and population increase in the wild. The population of Palawan does not meet the Appendix I listing criteria and should be transferred to Appendix II. The approval of the proposal is the first step towards ranching programmes, thus creating incentives for local communities to tolerate human-crocodile conflicts. GGT recommends that the proposal be **adopted**. It should be pointed out that CFI has contributed to the conservation of *C. porosus* and more importantly, *C. mindorensis*. In this regard, the governments of both the Philippines and Japan should be commended.

**Prop.
13**

Transfer of the Thai population of the Siamese crocodile *Crocodylus siamensis* from Appendix I to Appendix II with a zero quota for wild specimens (Thailand)

The Siamese crocodile is distributed in Cambodia, Indonesia, Lao PDR, Thailand and Viet Nam. The total population in Thailand is estimated to be more than 100. Most of them are found within protected areas. There are a large number of crocodile farms in Thailand and 29 farms are registered with the CITES Secretariat as producing the Siamese crocodile in captivity. In addition, approximately 900 facilities are keeping the Siamese crocodile. At CoP 16 (Bangkok, 2013), Thailand submitted a proposal similar to the present proposal, which was rejected at Committee I and Plenary. The extant range States, i.e.,

Cambodia, Indonesia, Lao PDR, Thailand and Viet Nam were all supportive of the proposal. The approval of the proposal will enable unregistered farms to export their products. Even though the Thai population is transferred to Appendix II, wild populations will not be at risk. It is important to note that all the range States supported the previous proposal in 2013. On condition that they maintain their positions, the proposal should be **adopted**. GGT is aware that the Thai population of the Siamese crocodile does not meet the Appendix II listing criteria because the population in the wild is very small. However, a large number of the crocodiles are being kept in captivity and this should be taken into consideration.

Prop. 14 Inclusion of Indo-Chinese water dragon *Physignathus cocincinus* in Appendix II (EU, Viet Nam)

The species is distributed in China, Viet Nam, Lao PDR, Cambodia and Thailand. It may also occur in Myanmar. The threats to the survival of the species include food consumption, pet trade and habitat loss and degradation. Of these threats, international pet trade is a major concern. A large number of live specimens were imported into US and EU. In China and Thailand, the species is protected under their laws. An Appendix II listing will help monitor trade volume and enable range States to conduct NDF. Consultations have been made with all range States, but it is unclear if they are supportive. On condition that they support an Appendix II listing, the proposal should be **adopted**.

Prop. 15 Inclusion of the Jeypore hill gecko *Cyrtodactylus jeyporensis* in Appendix II (India)

The Jeypore hill gecko is endemic to Eastern Ghats, India and has been recorded from very few localities. Little is known of the population status and other biological aspects. Since it occupies a very small area of distribution, threats such as commercial use, habitat loss and mining would have a negative impact on the survival of the species. The species is not protected under Indian law but the acquisition of the species requires prior permission. Live specimens are being sold through internet advertisement outside India. An Appendix II listing will enable Indian authorities to collect trade data, thereby taking appropriate measures. The proposal should be **adopted**. Meanwhile, India needs to expedite its process to include the species as protected under the Wild Life Act.

Prop. 16 Inclusion of the helmethead gecko *Tarentola chazaliae* in Appendix II (Mauritania and Senegal)

The helmethead gecko is distributed in western North Africa, mainly in Morocco and Western Sahara. The southernmost tip of the distribution is found in Mauritania. It is unclear whether this species occurs in Senegal. Little is known of its population status. However, it seems that the species meets the Appendix II listing criteria. The proponents, i.e., Mauritania and Senegal have no regulation

with regard to this species. International pet trade for this species does exist. It is unknown if the proponents consulted Morocco. Conditional on Morocco's support, the proposal should be **adopted**.

Prop. 17 Inclusion of the desert horned lizard *Phrynosoma platyrhinos* in Appendix II (USA)

The desert horned lizard is distributed in US and Mexico, occurring in desert shrublands. In Mexico, it is marginally found in Baja California. The population is stable in most distribution areas. All range States within the US have regulations prohibiting commercial collection of desert horned lizards. Even if the species is listed in Appendix II, much would not be gained. As such, the proposal should be **rejected**. The species may be included in Appendix II as a result of the adoption of Mexico's proposal to include all *Phrynosoma* species (Prop. 18). In that case, the US is encouraged to be with vigilance in order to avoid any possible smuggling through Mexico.

Prop. 18 Inclusion of the horned lizards *Phrynosoma* spp. in Appendix II (Mexico)

According to the supporting statement, the genus *Phrynosoma* comprises 21 species. The species in the genus *Phrynosoma* as a whole are found from Canada to Mexico. The main distributional area is Mexico and the US. *P. blainvillii*, *P. corroense*, *P. coronatum* and *P. wigginsi* are already listed in Appendix II. The proponent proposes to include *P. asio*, *P. braconnieri*, *P. modestum*, *P. orbiculare*, *P. platyrhinos*, *P. solare* and *P. taurus* in Appendix II in accordance with the Conf. 9.24 Annex 2a criterion. The inclusion of *P. platyrhinos* in Appendix II is proposed by the US as well (see Prop.17). All other *Phrynosoma* species are proposed for a look-alike reason. Some species do not occur in Mexico. Mexico consulted Canada and USA but no response is provided in the supporting statement. Several species are protected under Mexico's regulation. As is the case with Prop.17, the proposal should be **rejected**.

Prop. 19 Transfer of the pygmy bluetongue lizard *Tiliqua adelaidensis* from Appendix III to Appendix I (Australia)

The pygmy bluetongue lizard is endemic to Australia and only found in the state of South Australia. According to the supporting statement, the pygmy bluetongue lizard has not been permitted to be exported live from Australia commercially since at least 1982. In addition, Australia has not permitted the exportation of live specimens for non-commercial purposes since at least 2002. Nevertheless, live bluetongue lizards in the genus *Tiliqua* are popular among reptile hobbyists in Europe, North America, Southeast Asia and East Asia. Live specimens of the pygmy bluetongue lizard are found for sale on online advertisements, for instance in Germany, UK, Russia and Japan. The major threats include alteration of land use and agriculture activities. There is a fear that ongoing

illegal trade may have a negative impact on the survival of the species. The species has been listed in Appendix III since June 2022. It seems likely that the species meets the Appendix I listing criteria and as such, the proposal should be **adopted**.

Prop. 20 Transfer of Puerto Rican boa *Epicrates inornatus* from Appendix I to Appendix II (USA)

The species is endemic to Puerto Rico. This proposal to transfer the species to Appendix II arises from Resolution on Periodic Review of the Appendices in accordance with the decision made by the Animals Committee. The species is considered a habitat generalist and widely found on Puerto Rico. The population size throughout Puerto Rico is estimated to be more than 30,000. There seems very few international trade if any. Since the species does not qualify for an Appendix I listing, the proposal should be **adopted**.

Prop. 21 Inclusion of the timber rattle snake *Crotalus horridus* in Appendix II (USA)

The timber rattle snake was historically distributed in the US and Canada. The latter's population seems to have been extirpated. The species is widely found in the eastern part of US. The US submitted a proposal to include the species in Appendix II for consideration at CoP 10 (Harare, 1997). At that time, EU and Switzerland did not support the proposal. They preferred an Appendix III listing but nevertheless, the US did not list the species in Appendix III. According to the supporting statement, the threats include road mortality, persecution, illegal collecting and poaching and habitat loss and fragmentation. It seems unlikely that international trade is a major threat. All other threats can be solved within the US in co-operation with each State where the species occurs. Under the circumstances, GGT recommends the proposal be **rejected**.

Prop. 22 Inclusion of the matamata turtles *Chelus fimbriata* and *C. orinocensis* in Appendix II (Brazil, Colombia, Costa Rica, Peru)

The genus *Chelus* comprises two species, *C. fimbriata* and *C. orinocensis*. The former is widely distributed in the Amazon Basin and Mahury River drainage. The latter has a more restricted distribution area. The threats include habitat loss and fragmentation and international pet trade destined for EU and the US. Some range States have regulations, prohibiting the export of matamatas but it seems demand for pet trade is increasing. The proponents did not consult with other range States including Bolivia, Ecuador, Guyana and Venezuela. On condition that these range States support the proposal, GGT recommends the proposal be **adopted**.

**Prop.
23**

Transfer of the alligator snapping turtle *Macrochelys temminckii* and the common snapping turtle *Chelydra serpentina* from Appendix III to Appendix II (USA)

These two species are endemic to the US and are already listed in Appendix III at the request of the US. This proposal aims to transfer the two species from Appendix III to Appendix II. The common snapping turtle is included for a look-alike reason. *M. suwanniensis* and *M. apalachicola*, both endemic to the US, are treated as synonyms of *M. temminckii* in the proposal. The major threats are habitat loss and modification, harvest and collection, predation and fishing activities. A large number of the two snapping turtles have been exported to China, Hong Kong and Macao. Most of the common snapping turtle exported are those born in captivity. According to the supporting statement, almost all exported *M. temminckii* specimens are taken from the wild. There is a large discrepancy between the two species. More accurate data would be required. It seems likely all range States within the US prohibit harvesting the alligator snapping turtle for commercial purposes. Also, most range States prohibit personal harvest. GGT does not believe an Appendix II listing will solve the existing problem and as such, the proposal should be **rejected**.

**Prop.
24**

Transfer of five species of the broad-headed map turtles in the genus *Graptemys* from Appendix III to Appendix II (USA)

The genus *Graptemys* comprises 13 species. All species are already listed in Appendix III at the request of the US. The proposal aims to transfer five species from Appendix III to Appendix II, i.e., *G. barbouri*, *G. ernsti*, *G. gibbonsi*, *G. pearlensi* and *G. pulchra*. All these five species are endemic to the US. In practice, there is no difference between Appendix III listing and Appendix II listing. Considering the current Appendix III listing was made at the request of the US, GGT sees no rationale to list them in Appendix II and as such, it is recommended the proposal be **rejected**.

**Prop.
25**

Transfer of the red-crowned roofed turtle *Batagur kachuga* from Appendix II to Appendix I (India)

The red-crowned roofed turtle is distributed in India and Bangladesh. The status of the species is not clear but it is considered to be extinct in Bangladesh. The species is already listed in Appendix II. The species is totally protected in India. Under Indian law, hunting and collection of the species is prohibited, hence export from India. Little is known of the level of illegal trade. Even if the species is transferred to Appendix I, illegal trade would continue. What India needs is to strengthen its enforcement activities. As such, the proposal should be **rejected**.

Prop. 26 Transfer of the Indochinese box turtle *Cuora galbinifrons* from Appendix II to Appendix I (EU, Viet Nam)

The Indochinese box turtle occurs in forested area of southern China, Lao PDR and Viet Nam. This species was included in Appendix II at CoP11 (Gigiri, 2000), together with other *Cuora* species. At CoP16 (Bangkok, 2013), Parties established a zero quota on wild specimens for commercial purposes for this species. Although little is known of the status, the population size seems very small. In China, Lao PDR and Viet Nam, the species is protected from exploitation. Nevertheless, illegal trade both internally and internationally exists in these range States. The Animals Committee is supportive of transferring the species to Appendix I and GGT feels that the proposal should be **adopted**. However, an Appendix I listing would not improve the situation without efforts to strengthen border control and internal enforcement.

Prop. 27 Inclusion of the neotropical wood turtles *Rhinoclemmys* spp. in Appendix II (Brazil, Colombia, Costa Rica, Panama)

The genus *Rhinoclemmys* consists of nine species. The species are distributed in Central and South America, ranging from Mexico to Brazil. The main threats to these species are habitat destruction and fragmentation caused by development activities. International trade has less negative impact on the species than other intrinsic and extrinsic factors including domestic use. It seems that these species are easy to be bred in captivity. An Appendix II listing would not contribute to the conservation and management of these species. Under the circumstances, the proposal should be **rejected**.

Prop. 28 Inclusion of the narrow-bridged musk turtle *Claudius angustatus* in Appendix II (Mexico)

This species is distributed in Belize, Guatemala and Mexico. The main threats include illegal trade for meat consumption and habitat degradation. It seems unlikely to prevent these threats from occurring even after listing in Appendix II. The specimens are being exported legally and illegally for pet trade and meat consumption. Mexico consulted Guatemala and Belize in March 2022 well in advance of CoP19 but no response are provided in the supporting statement. Most of the specimens exported from Mexico originate from captive breeding facilities. It would be difficult to conclude that listing in Appendix II contribute to the conservation of the species. According to the supporting statement, wild specimens have been harvested and laundered as captive bred specimens. This problem can be solved without including the species in Appendix II. Under the circumstances, the proposal should be **rejected**.

**Prop.
29**

Inclusion of the mud turtles *Kinosternon cora* and *K. vogti* in Appendix I and other *Kinosternon* spp. in Appendix II (Brazil, Colombia, Costa Rica, EL Salvador, Mexico, Panama, USA)

The genus *Kinosternon* comprises 22 species. These species are distributed from US to Argentina. The proposal aims to include 20 *Kinosternon* species in Appendix II and two species (*K. cora* and *K. vogti*) in Appendix I. *K. cora* and *K. vogti* are endemic to Mexico. Among these 22 species, 7 species are proposed for inclusion in Appendix II for a look-alike reason. The major threats to the species in the genus are habitat destruction, human consumption and illegal harvest for domestic and international pet trade. Other threats include the introduction of invasive species, wildfires, water pollution and droughts. According to the supporting statement, there seem to be captive breeding facilities. The proponents are more concerned about *K. cora* and *K. vogti* than other *Kinosternon* species. According to the supporting statement, it seems difficult to distinguish between species. Listing these species in both Appendix I and Appendix II would create difficulty for non-experts, thus obscuring the objective of the proposal. The proposal should be **rejected** as it stands. The proponents may wish to amend the proposal in order to include *K. cora* and *K. vogti* in Appendix II, not in Appendix I.

**Prop.
30**

Inclusion of the musk turtles *Staurotypus triporcatus* and *S. salvinii* in Appendix II (El Salvador, Mexico)

The musk turtle *S. triporcatus* is distributed in Belize, Guatemala, Honduras and Mexico. *S. salvinii* is distributed in Belize, El Salvador, Guatemala and Mexico. Both species mostly occur in Mexico, Belize and Guatemala. The former is proposed based on the Annex 2a criterion of Conf. 9.24 and the latter for a look-alike reason. According to the supporting statement, there are 14 facilities in Mexico that are allowed to export captive bred specimens. International trade in *S. triporcatus* is for meat consumption, mainly destined for China. Although Mexico authorizes the export of captive bred specimens, illegal trade in *S. triporcatus* does exist. Mexico consulted with other range States. El Salvador agreed to become a co-proponent and Honduras supported the proposal. However, these two countries do not represent the main distribution area. It is not clear from the supporting statement if Belize and Guatemala are in favour of the proposal. Conditional on their support, GGT recommends the proposal be **adopted**.

**Prop.
31**

Inclusion of the musk turtles *Sternotherus* spp. in Appendix II (USA)

The genus *Sternotherus* consists of six species, i.e., *S. carinatus*, *S. depressus*, *S. intermedius*, *S. minor*, *S. odoratus* and *S. peltifer*. All species in the genus *Sternotherus* are subject to this proposal. These six species are distributed in the eastern part of the US. *S. odoratus* is found in southern Canada as well. The

main threat is habitat loss and degradation, followed by collection for pet trade. A large number of live musk turtles have been exported primarily to East Asia. Import, export and harvest of *S. depressus* is prohibited under US Endangered Species Act. Some musk turtle species are protected at a State level. An Appendix II listing of *Sternotherus* as a whole would help monitor trade volume and assist range States within US in the implementation of their domestic regulations. GGT recommends that the proposal be **adopted**.

Prop. 32 Transfer of the softshell turtles *Apalone* spp. from Appendix III to Appendix II (USA)

This proposal aims to list three species in the genus *Apalone* (Florida softshell turtle *A. ferox*, smooth softshell turtle *A. mutica* and spiny softshell turtle *A. spinifera*) in Appendix II. These three species were listed in Appendix III in 2016 at the request of the US. The Florida softshell turtle is found in southeastern US. The smooth softshell turtle is endemic to the US, with an introduced population in France. The spiny softshell turtle occurs from Canada to Mexico. One subspecies of the spiny softshell turtle, *A. spinifera atra* occurring in northern Mexico is included in Appendix I. According to the supporting statement, “*population trends are difficult to discern given the limited data available.*” These three species are already listed in CITES Appendices and most of the threats can be mitigated through internal efforts. As such, GGT sees no justification for listing the three *Apalone* species in Appendix II. The proposal should be **rejected**.

Prop. 33 Transfer of the Leith’s softshell turtle *Nilssonina leithii* from Appendix II to Appendix I (India)

This species is endemic to India. It used to be abundant but has recently been in decline severely. The main threats to the species are harvesting for meat and habitat degradation such as development, pollution and sand mining. The species is protected under the India’s Wild Life Act and is expected to be subject to stricter regulations. According to the supporting statement, no legal trade records are available for the species. This means that all international trade is illegal. Even though the species is transferred from Appendix II to Appendix I, this situation would not change. As GGT does not see any merit by listing the species in Appendix I, the proposal should be **rejected**.

Prop. 34 Inclusion of the glass frogs Centrolenidae spp. in Appendix II (Argentina, Brazil, Costa Rica, Cote d’Ivoire, Dominican Republic, Ecuador, El Salvador, Gabon, Guinea, Niger, Panama, Peru, Togo, USA)

The proposal aims to include in Appendix II all species in the family Centrolenidae comprising 158 species. Out of 158 species, 12 species are proposed in accordance with the Annex 2a of Conf. 9.24 criteria. Other 146

species are for a look-alike reason. Glass frogs are found from Mexico through Brazil to Argentina. The major threats include habitat loss and fragmentation, water pollution and climate change. The chytrid fungi are another concern. The proponents propose to include in Appendix II 12 species which are in international trade. Although these species may meet the trade criteria to some extent, it seems unlikely that they meet the biological criteria. Consultations were made with range States. It is unclear from the supporting statement if range States are supportive of the proposal. However, many range States declined to become a co-proponent of the proposal. These include Mexico, Guatemala, Belize, Nicaragua, Colombia, Venezuela and Guyana. In conclusion, there is no justification for listing 158 species in Appendix II. The proposal should be **rejected**.

Prop. 35 Inclusion of the lemur leaf frog *Agalychnis lemur* in Appendix II with a zero annual export quota (Colombia, Costa Rica, EU, Panama)

The lemur leaf frog is distributed in Costa Rica, Panama and Colombia. The species has recently experienced significant decline due to chytridiomycosis. The population of Costa Rica has been almost extirpated. In Colombia, the species has a restricted area of distribution in the northern part bordering with Panama. Even in Panama, the species witnessed extensive declines. Habitat loss and fragmentation are considered to be other threats. More abundant species in the genus *Agalychnis* are already listed in Appendix II. All range States are the proponents of the proposal. GGT recommends that the proposal be **adopted**.

Prop. 36 Inclusion of the Lao warty newt *Laotriton laoensis* in Appendix II (EU)

The species is endemic to Lao PDR and occurs north of Vientiane. The species may be locally abundant but has a restricted area of distribution. The main threats include collection for international pet trade, traditional medicine and meat consumption. Habitat loss and degradation is considered another threat. The species was newly described in 2002. Since then, the species has attracted attention from commercial collectors. The species has been protected in Lao PDR since 2008. Nevertheless, the species is offered for sale in UK, Germany, the US, China, Korea and Japan. According to the supporting statement, Lao PDR is the co-proponent of the proposal. If this is the case, GGT has no objection to the proposal and recommends it be **adopted**.

Prop. 37 Inclusion of Carcharhinidae spp. in Appendix II (Bangladesh, Colombia, Dominican Republic, Ecuador, El Salvador, EU, Gabon, Israel, Maldives, Panama, Senegal, Seychelles, Sri Lanka, Syria, UK)

At the outset, it should be pointed out that this proposal has a procedural flaw. Panama as the original proponent of the proposal asked the CITES Secretariat

to issue a Notification dated 30 May. The Secretariat issued a Notification (No. 2022/043) and invited all range States to submit their responses to the Notification by 10 June to Panama's Management Authority. According to Resolution Conf. 8.21 (Rev. CoP16), the proposing Party needs to consult with range States on the substance of the proposal prior to the submission. This must take place before the submission of the proposal to the Secretariat. Where prior consultation does not take place, the proposing Party needs to submit the proposal at least 330 days in advance of CoP 19. It is apparent that these procedures were not followed. In addition, 54 shark species are subject to this proposal. As mentioned above, the Notification was issued on 30 May and range States were asked to respond by 10 June, which means only less than two weeks are available. It would be difficult to meet within this time period considering the number of species subject to the proposal. Furthermore, it is regrettable that many Parties became a co-proponent of the proposal without waiting for the outcome of FAO's deliberation. One might say that they have their own experts. However, it is doubtful that there are other experts more knowledgeable than FAO's experts. According to the result of the FAO Expert Panel, it concluded that the proposal to list all 19 shark species in Appendix II does not meet the CITES criteria as a single proposal. GGT recommends that the proposal be **rejected**. The reasons behind GGT's recommendation are two-fold. First, GGT believes that CITES is not an appropriate forum to deal with commercially exploited marine species. The listing of many commercial fish species, including not-endangered species for a look-alike reason, would create unnecessary administrative burden on CITES authorities. There should be many other species of higher priority. We should avoid easy applications of a look-alike provision. FAO and RFMOs are better suited for dealing with fisheries issues. Secondly, the effectiveness of listing commercially exploited marine species needs to be reviewed as a matter of urgency. Since CoP12 (Santiago, 2002), many commercially exploited marine species, mainly sharks have been included in Appendix II. Listing in Appendix II of marine species has faced many difficulties including introduction from the sea and non-detriment findings. It should be stressed that a large volume of these shark species are globally landed for domestic and international markets. According to the operative paragraph 9 of Resolution Conf. 9.24, the Conference of the Parties resolved *"that, to monitor the effectiveness of protection offered by the Convention, the status of species included in Appendices I and II should be regularly reviewed by the range States and proponents, in collaboration with the Animals Committee or the Plants Committee, subject to the availability of funding."* Nonetheless, the monitoring of the effectiveness has not taken place. In addition to these considerations, our concern is that there are many species subject to significant international trade, including those among 35 look-alike species. The supporting statement focuses on only 19 species. It is difficult to assess the ramification of CITES listing.

**Prop.
38**

Inclusion of the hammerhead sharks *Sphyrnidae* spp. in Appendix II (Brazil, Colombia, Ecuador, EU, Panama)

Three species in the family *Sphyrnidae* are already listed in Appendix II, i.e., *Sphyrna lewini*, *S. mokarran* and *S. zygaena*. There are the other six species in the family *Sphyrnidae* (*Sphyrna tiburo*, *S. gilberti*, *S. tudes*, *S. corona*, *S. media* and *Eusphyra blochii*). The proposal aims to list the bonnethead *S. tiburo* in Appendix II in accordance with the Conf. 9.24 Annex 2a criterion and all others in Appendix II for a look-alike reason. The three species already listed in Appendix II are widely distributed throughout tropical and warm temperate seas. *E. blochii* occurs on and near continental shelf waters of Indian and Pacific Oceans from the Arabian Gulf through south Asia to Australia and Papua New Guinea. The other five species occur in the western Atlantic and eastern Pacific Oceans. The FAO Expert Panel considered this proposal and concluded that these species meet the Conf. 9.24 criteria. At the same time, however, the Panel pointed out that some populations do not meet the criteria. The Expert Panel also noted that bonnethead is often used for domestic consumption, yet the fins of bonnethead are secondarily sold in the international fin trade. In other words, even if the species is listed in Appendix II, domestic consumption would continue and fishers might face difficulties in dealing with their fins acquired as fisheries by-products. In addition, most of GGT's views outlined for the previous proposal can be applied to this proposal. As such, the proposal should be **rejected**.

**Prop.
39**

Transfer of the freshwater sting rays *Potamotrygon* spp. from Appendix III to Appendix II (Brazil)

The proposal aims to include two freshwater stingrays *Potamotrygon wallacei* and *P. leopoldi* in Appendix II in accordance with the Conf. 9.24 Annex 2a criterion and other five *Potamotrygon* species for a look-alike reason. All of these species are endemic to Brazil. These two species and the other five species are already listed in Appendix III at the request of Brazil. They have been caught for ornamental purposes. The threats include harvesting for trade, mining, agricultural development, cattle grazing, dam construction and climate change. The FAO Expert Panel concluded *P. wallacei* does meet the Conf. 9.24 criteria. As for *P. leopoldi*, the majority of the Expert Panel concluded that the available data did not provide adequate evidence that the species meets the Appendix II listing criteria. The proposal provides little information on the five look-alike species and therefore it is difficult to grab overall situation. According to the supporting statement, Brazil's current legislation provides for a quota of five stingray species including *P. leopoldi* and *P. wallacei*, a limit of maximum export size. As mentioned above, all *Potamotrygon* species occurring in Brazil are already listed in Appendix III. In practice, there is no difference between Appendix III and Appendix II. What Brazil needs to do is to enhance its management and enforcement activities. Under the circumstances, the proposal should be **rejected**.

Prop. 40 Inclusion of the guitarfishes *Rhinobatidae* spp. in Appendix II (Israel, Kenya, Panama, Senegal)

As is the case with Prop. 37, the proposal has a procedural flaw and for other reasons similar to Prop. 37, the proposal should be **rejected**. The proposal aims to list the family *Rhinobatidae* in Appendix II, six species of which are in accordance with the Conf. 9.24, Annex 1, paragraph C criterion and 31 species for a look-alike reason. Like Prop. 37, a large number of species are proposed for inclusion in Appendix II. The family *Rhinobatidae* is widely and globally distributed but each species shows a specific distribution pattern. According to the supporting statement, the major threats are unsustainable capture and habitat deterioration. The proponents mention that in many regions, guitarfish meat is generally directed into domestic use and fins and skins are destined for international trade. As pointed out by the FAO Expert Panel, however, there is no evidence that international trade is a key driver of exploitation. The Expert Panel concluded that these species do not meet the CITES listing criteria. It is interesting to note that EU's Scientific Review Group finds that the proposal does not meet the required scientific standards. This bolsters GGT's recommendation to reject the proposal.

Prop. 41 Transfer of the zebra pleco *Hypancistrus zebra* from Appendix III to Appendix I (Brazil)

The zebra pleco *Hypancistrus zebra* was first described in 1991. It is endemic to Brazil, occurring in the Amazon basin. This species was listed in Appendix III in 2017 at the request of Brazil. It is known that smuggling does exist through neighboring countries for ornamental fish market. According to the supporting statement, the major threat to the species is the placement of hydroelectric dam. The species is protected in Brazil and capture, transport, sale of wild specimens and captive breeding in Brazil are prohibited. It seems that the species can easily be reproduced in captivity. According to the supporting statement, they are commercially reproduced in Indonesia, Czech and Ukraine. The proposal is poorly documented. Little information is provided in the supporting statement on population size and trend. Under Brazil's law, the species is protected and is already listed in Appendix III. In addition, listing in Appendix I would create serious problems to already established captive breeding facilities outside Brazil. The FAO Expert Panel concluded that the species does not meet the Appendix I listing criteria. Under the circumstances, the proposal should be **rejected**. Brazil may wish to develop the project aimed at captive breeding of the species in question.

Prop. 42 Inclusion of the sea cucumbers *Thelenota* spp. in Appendix II (EU, Seychelles, USA)

The genus *Thelenota* comprises three species which are all subject to this proposal. *T. ananas* and *T. anax* are distributed in Indian and Pacific Oceans. *T.*

rubrarineata is distributed in Pacific Ocean. The species have been subject to commercial exploitation for international trade. Little is known of their population size and trade status and it is difficult to judge the appropriateness of CITES listing. The FAO Expert Panel concluded that the three species are not qualified for an Appendix II listing. As such, this proposal should be **rejected**.

Prop. 43 Amendment of the annotation for flora species including Orchidaceae listed in Appendix I (Canada)

This proposal was submitted by Canada, chair of the Standing Committee, in accordance with the consensus recommendation made by the Standing Committee at SC74 (Lyon, 2022). At SC74, the Working Group on Annotations recommended amendments to the annotations and this was endorsed by SC. The proposal should be **adopted**.

Prop. 44 Inclusion of the trumpet trees *Handroanthus* spp., *Roseodendron* spp. and *Tabebuia* spp. in Appendix II (Colombia, EU, Panama)

The target species of this proposal are *Handroanthus serratefolius* and *H. impetiginosus*. In addition, the proponents propose to include other 111 species belonging to the genera *Handroanthus*, *Tabebuia* and *Roseodendron* for a look-alike reason. *H. serratefolius* is widely distributed in Bolivia, Brazil, Colombia, Ecuador, French Guiana, Guyana, Peru, Suriname, Trinidad and Tobago and Venezuela. The species were also introduced in Cuba and Puerto Rico. *H. impetiginosus* is distributed in Argentina, Bolivia, Brazil, Colombia, Costa Rica, El Salvador, French Guiana, Guatemala, Honduras, Mexico, Nicaragua, Panama, Paraguay, Peru, Suriname and Venezuela. The main threats are deforestation and logging for domestic and international trade. It is extremely difficult and almost impossible to distinguish these 113 species' timber. This is the reason why the proponents included the three genera. It is doubtful that listing 113 species in Appendix II would contribute to the conservation and sustainable use of these species. There are only four range States which responded to the consultation. If the proposal is adopted, the most impacted range States would be Brazil. Nevertheless, Brazil's position is unclear. Under the circumstances, it is recommended that the proposal be **rejected**. There seems to be some regulations in range States in relation to logging and product export. Such regulations need to be strengthened and uniformed among range States in particular with regard to international trade.

Prop. 45 Inclusion of the stonecrops *Rhodiola* spp. in Appendix II (China, EU, Ukraine, UK, USA)

The proposal aims to list two species in the genus *Rhodiola* (*R. rosea* and *R. crenulata*) in accordance with the Conf. 9.24 Annex 2a criteria and all other *Rhodiola* species (56 species) for a look-alike reason in Appendix II. While *R. rosea* is a widely distributed circumpolar species, *R. crenulata* occurs only in

Nepal, India, Bhutan and China. *Rhodiola* species have long been utilized for traditional medicine and recently started being utilized commercially. Several *Rhodiola* species have been cultivated experimentally but most of the *Rhodiola* species are being harvested from the wild. According to the supporting statement, overcollection for commercial use is the most prominent threat to trade species. In considering the wide distribution of these species and expected future growth in the market, an Appendix II listing could help monitor trade volume, thus assisting range States in establishing more appropriate management measures. GGT recommends the proposal be **adopted**.

Prop. 46 Inclusion of African populations of the pod mahoganies *Azelia* spp. in Appendix II (Benin, Cote d'Ivoire, EU, Liberia, Senegal)

Species in the genus *Azelia* are distributed in sub-Saharan Africa and Southeast Asia. This proposal aims to include four species (*A. africana*, *A. bipindensis*, *A. pachyloba*, *A. quanzensis*) in Appendix II in accordance with the Conf. 9.24 Annex 2a criterion and other three species (*A. bella*, *A. parviflora*, *A. peturei*) for a look-alike reason. These tree species are being used for a variety of purposes, ranging from construction materials to firewood. The major threat to these tree species is logging for international timber trade. Additional threats include habitat loss, harvest for fuelwood, charcoal, livestock fodder and traditional medicine. Out of 36 range States, approximately 10 range States support the proposal but the positions of the rest of the range States are unknown. Unless most of the range States support the proposal, GGT recommends the proposal be **rejected**.

Prop. 47 Deletion of the North Indian rosewood *Dalbergia sissoo* from Appendix II (India, Nepal)

The species is native to Afghanistan, Bangladesh, Bhutan, India, Iran, Iraq, Myanmar, Nepal, Pakistan, Philippines and South Africa. It has been introduced to many other countries including Israel, Australia and US. This tree species is very popular for plantation and easy to propagate artificially. The species was included in Appendix II at CoP17 (Johannesburg, 2016) as a result of the inclusion of the genus *Dalbergia*. Deletion of the species from Appendix II will remove administrative burdens from the authorities. GGT welcomes this initiative and recommends that the proposal be **adopted**.

Prop. 48 Inclusion of the cumarus *Dipteryx* spp. in Appendix II (Colombia, EU, Panama)

The genus *Dipteryx* comprises 14 species, which are widely distributed in Central and South America. Their range States include Venezuela, Brazil, Colombia, Cost Rica, Ecuador, French Guiana, Guyana, Honduras, Nicaragua, Panama, Paraguay, Peru, Bolivia and Suriname. In addition, they may have been introduced to Bahamas, Dominica and Trinidad and Tobago. The proposal aims to include four species (*D. alata*, *D. micrantha*, *D. odorata* and *D. oleifera*)

in Appendix II in accordance with the Conf. 9.24 Annex 2a criterion and other 10 species for a look-alike reason. Little is known of population size and population trend. Regulations have been put in place in many range States in terms of logging and log export. Among many threats, it seems that the main threat is the expansion of agricultural activities. According to the supporting statement, a consultation was distributed by EU to all range States in December 2021. However, none of the responses are available in the document and as such, it is difficult to know if range States are in favour of the proposal, except two co-proponents, Colombia and Panama. Unless most of the range States support the proposal, GGT recommends the proposal be **rejected**.

Prop. 49 Transfer of the Brazilwood *Paubrasilia echinata* from Appendix II to Appendix I (Brazil)

The Brazilwood is endemic to Brazil and has already been listed in Appendix II. Brazil proposes to transfer the species from Appendix II to Appendix I. The Brazilwood is mainly utilized for bows for musical instruments. According to the supporting statement, finished bows are exempted from CITES permit. Brazil's laws prohibit the exploitation of this species from the wild but illegal trade is still rampant. GGT does not feel that a transfer to Appendix I will solve the problem and recommends that the proposal be **rejected**. Rather, Brazil should strengthen its enforcement activities. Without transferring to Appendix I, Brazil may wish to consider the inclusion of the annotation as suggested in the proposal.

Prop. 50 Inclusion of African populations of the padauks *Pterocarpus* spp. in Appendix II (Cote d'Ivoire, EU, Liberia, Senegal, Togo)

The proponents propose to list all *Pterocarpus* species occurring in Africa in Appendix II. *P. erinaceus* and *P. tinctorius* are already listed in Appendix II. The proponents admit that enforcement and customs officers are unlikely to be able to reliably distinguish African *Pterocarpus* species. Even if these species are listed in Appendix II, GGT does not feel that it will solve the problem. There are many regulations and protocols established nationally and at a regional level. As mentioned above, the two species have been listed in Appendix II. The proponents may wish to assess the efficacy of listing the two species in Appendix II, which is not clear from the supporting statement. A consultation was made with all range States. Some support the proposal but most range States' positions are not clear. Under the circumstances, it is recommended that the proposal be **rejected**. It is imperative that each range State strengthens forest management and border control.

Prop. 51 Inclusion of African populations of the African mahoganies *Khaya* spp. in Appendix II (Benin, Cote d'Ivoire, EU, Liberia, Senegal)

The genus *Khaya* comprises six species. The proposal aims to include African populations of these six species in Appendix II. Other populations introduced into

outside Africa are exempted from the proposal. Although little is known of the overall population size and trend, the populations of these species seem to be in decline. There are various threats to these species ranging from logging to traditional medicinal use. According to the supporting statement, legislative measures are in place in many range States, i.e., Angola, Benin, Burkina Faso, Cameroon, CAR, Chad, Comoros, Congo, Cote d'Ivoire, Gabon, Gambia, Ghana, Guinea, Guinea-Bissau, Liberia, Malawi, Mali, Mozambique, Nigeria, Senegal, Sierra Leone, Togo, Tanzania and Zambia. Strengthening legislation and its enforcement would be more required rather than listing these six species in Appendix II. Under the circumstances, GGT recommends that the proposal be **rejected**. Many proposals on timber species were submitted for consideration at CoP19 under EU's initiative (i.e., Prop.44, 46, 48, 50 and 51). GGT is concerned that listing these species in Appendix II would create administrative burdens to developing countries.

Prop. 52 Amendment of the annotation for the orchid *Orchidaceae* spp. (Switzerland)

Under Annotation #4 to the listing of plant species, several parts and derivatives are exempted from the application of CITES requirements. The proponent proposes to amend the annotation by including the new paragraph: (g) finished products packaged and ready for retail trade of cosmetics containing parts and derivatives of *Bletilla striata*, *Cycnoches cooperi*, *Gastrodia elata*, *Pharaenopsis amabilis* or *Phalaenopsis lobbii*. GGT concurs with Switzerland that artificially propagated orchids are globally traded on an enormous scale and pose no conservation risk to the species in the wild. The adoption of the proposal will remove the unnecessary administrative burden. The proposal should be **adopted**.



For the benefit of species and people
(GGT's motto)

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