



**SUMMARY OF ISSUES TO BE DISCUSSED AT
THE SEVENTY-EIGHTH MEETING OF THE
CITES STANDING COMMITTEE**

3-8 February 2025; Geneva, Switzerland

All meeting documents prepared by the CITES Secretariat unless otherwise indicated.

SC=Standing Committee AC=Animals Committee PC=Plants Committee RC=Resolution Conf. CoP=Conference of the Parties

ISSUE	PROPOSED ACTION	SSN RECOMMENDATION
1. Agenda SC78 Doc. 1	<ul style="list-style-type: none"> Provides the agenda for the meeting. 	<ul style="list-style-type: none"> No comment.
2. Working programme SC78 Doc. 2	<ul style="list-style-type: none"> Provides working programme for the meeting. 	<ul style="list-style-type: none"> No comment.
3. Rules of Procedure SC78 Doc. 3	<ul style="list-style-type: none"> Provides RoP as amended at SC70. 	<ul style="list-style-type: none"> No comment.
4. Credentials	<ul style="list-style-type: none"> No document. 	<ul style="list-style-type: none"> No comment.
5. Admission of observers SC78 Doc. 5	<ul style="list-style-type: none"> Provides the list of observers. 	<ul style="list-style-type: none"> No comment.
6. Report of the Chairs of the Animals and Plants Committees SC78 Doc. 6	<ul style="list-style-type: none"> Provides a compilation of draft Decisions and amendments to Resolutions as recommended by AC/PC (Annex 1). 	<ul style="list-style-type: none"> No comment.
7. Financial matters SC78 Doc. 7	<ul style="list-style-type: none"> Provides an update on costed programme of work for 2023 and 2024, contributions, income and expenditures (Annexes 1-11); reports on increased costs, including those related to staff; and describes increased costs for Geneva venue rental. Invites SC to note this report, approve the reports on the costed programme of work, and approve transfer US\$ 40,500 budgeted for 2024 (for SC) to year 2025 to cover SC78 costs. 	<ul style="list-style-type: none"> No comment.
8. Report on proposed budget scenarios for 2026-2028 SC78 Doc. 8	<ul style="list-style-type: none"> Requests SC feedback on three budget scenarios: zero nominal growth, zero real growth and incremental growth (Secretariat's proposal). Invites SC to provide feedback on the proposals. 	<ul style="list-style-type: none"> No comment.
9. Administrative matters		
9.1. Report of the Secretariat SC78 Doc. 9.1	<ul style="list-style-type: none"> Requests SC to note report on staffing, administrative changes and audit recommendations. Reports that a resource mobilization strategy will be presented to CoP20. 	<ul style="list-style-type: none"> No comment.
9.2. Report of UNEP on administrative matters SC78 Doc. 9.2	<ul style="list-style-type: none"> Provides a report on financial and administrative support to CITES. 	<ul style="list-style-type: none"> No comment.

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<p>10. Emerging operational matters of the committees</p> <p>SC78 Doc. 10</p>	<ul style="list-style-type: none"> Proposes new text in RC 18.2 (Annex 3) on <i>Establishment of Committees</i>: <ul style="list-style-type: none"> –Regarding guidance on meeting arrangements under exceptional circumstances to allow for hybrid or online meetings; and –To allow regional representatives to read statements from affected Parties not present; and allow for remote participation of Parties subject to compliance procedures. Notes that the number of Decisions directed to the Committees more than doubled from CoP15 to CoP19. Proposes addition to SC/AC/PC RoP (AC/PC Rule 19, SC Rule 20), that recommendations of the Chair related to intersessional work of the Committee be considered agreed if no objection is received within ten days. 	<ul style="list-style-type: none"> SSN recommends that SC adopt the amendments with the exception of the change to AC/PC Rule 19, SC Rule 20) regarding approval of intersessional work; Parties should be provided at least 20 days to respond.
<p>11. Access to funding</p> <p>SC78 Doc. 11</p>	<ul style="list-style-type: none"> Provides amendments to RC 19.1 on <i>Financing and the costed programme of work for the Secretariat for the triennium 2023-2025</i> (Annex) to, <i>inter alia</i>, incorporate related Decision that invites Parties to provide non-reimbursable loan of personnel services to the CITES Secretariat and the Secretariat to continue its work related to the GEF. 	<ul style="list-style-type: none"> SSN recommends that SC revise Decisions 19.8 and 19.9 in order to maintain the requirement that the Secretariat should report to SC on these issues, and SC to make recommendations to CoP21.
<p>12. Arrangements for CoP20</p> <p>SC78 Docs. 12.1-12.6</p>	<ul style="list-style-type: none"> Provides documents on draft provisional agenda, work programme, Rules of Procedure (CoP) and the sponsored delegates project. <u>Regarding RoP of the CoP</u>: SC78 Doc. 12.4 proposes an amendment to the CoP RoP that all proposals will be introduced and decided on in a stepwise process and the conference shall first decide on the proposal that will have the least restrictive effect; if a proposal to increase trade is adopted, “then no further decision will be made on proposals to add restrictions on the same trade for the same taxon”. Notes that there was insufficient time for discussion. 	<ul style="list-style-type: none"> <u>Regarding CoP RoP</u>: SSN recommends that SC support the proposal but oppose the addition of the sentence that begins “If any proposal . . .” and the text following the asterisk. SSN believes this text overly complicates the rule and creates confusion. While SSN supports deciding the most restrictive proposals first, SSN recognizes that this rule has been subject to much debate and supports a rule that provides as much clarity as possible.
<p>13. Arrangements for meetings of the Conference of the Parties</p> <p>SC78 Doc. 13</p>	<ul style="list-style-type: none"> Invites SC to: <ul style="list-style-type: none"> –Acknowledge Panama’s offer to host CoP21; –Request Secretariat to include a new budget line in the operational budget under the CITES Core Trust Fund (CTL) for the triennium 2026-2028; and –Submit draft Decisions (Annex) to CoP20 that, <i>inter alia</i>, direct Secretariat to prepare guidance on raising funds for organization of CoPs and on reducing costs of CoPs (for example, by reducing the length of meetings or restricting attendance), and SC to provide inputs on the guidance. 	<ul style="list-style-type: none"> SSN recommends that SC submit the Decisions, but amend them to direct Secretariat to request input from Parties on the guidance via a Notification. SSN recommends rejecting any possibility of reducing meeting length or restricting attendance, both of which would hinder the participation of Parties and civil society in CITES decision-making.
<p>14. CITES Strategic Vision</p> <p>SC78 Doc. 14</p>	<ul style="list-style-type: none"> Provides amendments to RC 16.4 on <i>Cooperation of CITES with other biodiversity-related conventions</i> (Annex 1) and RC 18.3 on <i>CITES Strategic Vision: 2021-2030</i> (Annex 3); and areas of alignment between the CITES Strategic Vision and the 	<ul style="list-style-type: none"> SSN recommends that SC: <ul style="list-style-type: none"> –Adopt the amendments to RC 16.4 and RC 18.3; <u>Regarding Annexes 1-3</u>: Agree to the recommendations in para 19. a-c, e, f.

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	<p>Kunming-Montreal Global Biodiversity Framework and its monitoring framework (Annex 2).</p> <ul style="list-style-type: none"> Regarding indicators for Objective 1.4, notes most Party support an additional indicator: “The number and proportion of species identified as threatened with extinction that are or may be affected by international trade on the basis of information in the IUCN Red List of Threatened Species that are included in the CITES Appendices” but notes the need for a methodology to measure it;invites SC to consider the merit of continuing work on an additional indicator for Objective 1.4. 	<p><u>Regarding indicators for Objective 1.4:</u></p> <ul style="list-style-type: none"> –Agree to the draft indicator proposed by the Secretariat in para 18, which was supported by most Parties. –Recommend under para. 19.d that work to outline a methodology for regularly measuring this new indicator continue, based on the methodology outlined in para. 19(a), in collaboration with UNEP-WCMC and other partners.
<p>15. Role of CITES in reducing risk of future zoonotic disease emergence associated with international wildlife trade</p> <p>SC78 Doc. 15</p>	<ul style="list-style-type: none"> Submitted by the Co-Chairs of the related SC working group. Provides, from AC33, a list of possible actions to address this issue (Annex 1) and draft Resolution (Annex 2). Recommends there is no need for a related advisory body and that SC agree that Decision 19.17 para. c) and d) be revised to continue work on a draft Resolution and other measures continue intersessionally. 	<ul style="list-style-type: none"> CITES authorities need clarity and guidance on their role in incorporating One Health principles into all aspects of trade in CITES species. SSN encourages SC to recommend that Parties submit a Resolution incorporating such guidance to CoP20, based on the draft in Annex 2 and SC78 Inf. 12. SSN urges SC to incorporate the recommendations in Annex 1 into draft Decisions for CoP20.
<p>16. Cooperation with Multilateral Environmental Agreements and other international organizations</p> <p>SC78 Doc. 16</p>	<ul style="list-style-type: none"> Provides a report on recent related activities by the Secretariat. Invites SC to submit to CoP20: <ul style="list-style-type: none"> –A draft Partnership Strategy (Annex); and –A draft Decision encouraging Parties to strengthen cooperation among the biodiversity-related agreements at the national level. 	<ul style="list-style-type: none"> SSN recommends that SC not agree to the draft partnership strategy at this meeting, and submit Decisions to CoP20 directing: <ul style="list-style-type: none"> –SC to consider the draft intersessionally, and –Secretariat to provide SC with a compendium of current partnerships. –Suggested partnerships should be subject to approval by the Parties on a case-by-case basis. SSN is concerned that: <ul style="list-style-type: none"> –Though Decision 19.20 is titled “Cooperation with Multilateral Environmental Agreements and other international organizations”, the draft strategy describes potential partnerships with stakeholders, such as industry and finance, whose priorities may not reflect those of CITES. –The proposed strategy would involve the Secretariat in issues that extend beyond the mandate of the Convention; –Focus should be on core CITES functions given limited resources.
<p>17. Cooperation with the IPBES Assessment report on the sustainable use of wild species</p> <p>SC78 Doc. 17</p>	<ul style="list-style-type: none"> Submitted by Chair of the related SC working group. Provides a list of Resolutions and Decisions relevant to related IPBES findings (Annex 1) and a list of drivers of sustainable use and knowledge gaps, challenges and research priorities (Annex 2). Invites SC to agree to draft Decisions (para. 9) that, <i>inter alia</i>, direct SC to review these documents and propose amendments to CITES Resolutions as appropriate. 	<ul style="list-style-type: none"> SSN recommends that SC reject the draft Decisions; it is not appropriate to review a large number of Resolutions and Decisions based on the IPBES Assessment. Not all working group members were consulted on the updated table in Annex 1 or draft Decisions.

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<p>18. World Wildlife Trade Report</p> <p>SC78 Doc. 18</p>	<ul style="list-style-type: none"> • Provides a summary of Party and observer organization feedback on the pilot World Wildlife Trade Report.¹ • Invites SC to consider draft Decisions (Annex) that, <i>inter alia</i>: <ul style="list-style-type: none"> –Invite Parties to compile information on conservation and socio-economic impacts of trade, include price data in annual reports and share these with the Secretariat; –Direct Secretariat to prepare two reports: 1) an “Overview Report” of global trade in CITES-listed species to CoP21; 2) an outline of a “comprehensive World Wildlife Trade Report” for publication at CoP21 and CoP22; and –Direct SC to review these documents and report to CoP21. 	<ul style="list-style-type: none"> • SSN recommends that SC reject the draft Decisions. Preparing a report would not advance the objectives of the Convention, would strain limited resources, and could further polarize debates on issues outside the Convention's scope. Feedback suggests that a comprehensive report is not supported by the majority of stakeholders, though it appears that there may be support for a report focused solely on trade data. • If the draft Decisions are considered, SSN recommends: <ul style="list-style-type: none"> –Deleting draft Decision 20AA: Providing price data for species in trade imposes a significant burden on Parties; the data may be sensitive, and providing it could put added pressure on species with high market value. Conservation impacts are best addressed through current CITES processes (e.g. Review of Significant Trade). As Parties are unlikely to report negative trade impacts on species they export, positive impacts are likely to be overrepresented – as they were in the pilot report. –Maintaining elements regarding an Overview Report in draft Decisions 20BB and 20CC; –Deleting references to a comprehensive report and the associated outline; –Requiring Secretariat to provide draft ToR for an Overview Report for review by SC81; –Requiring Secretariat, once the Overview Report is distributed, to issue a Notification seeking feedback about its utility.
<p>19. CITES and forests</p> <p>SC78 Doc. 19</p>	<ul style="list-style-type: none"> • Invites the SC to, <i>inter alia</i>: provide feedback on a draft report on the interdisciplinary study on CITES and forests (Annex); request Secretariat to share draft with PC and SC Members prior to CoP20; and request Secretariat to submit the final report along with related draft Decisions to CoP20. • States that “possible partnerships that could benefit CITES will be identified (e.g. national and international NGOs, producer associations, certifications, private sector, among others) to support and strengthen the implementation of the compendium” and that this provides “an opportunity for CITES to broaden partnerships and engage in socio-economic and policy coherence initiatives”. 	<ul style="list-style-type: none"> • SSN recommends that SC submit draft Decisions to CoP20 directing SC to consider the draft report interessionally, as this issue remains controversial: <ul style="list-style-type: none"> –Socio-economic issues are outside the CITES mandate; –Resources would better be directed to supporting the CITES Tree Species Programme; –There are concerns about partnerships with industry (see recommendations for Doc.16); and –Parties should be given greater opportunity to provide feedback on such a major undertaking.
<p>20. Language strategy for the Convention</p> <p>SC78 Doc. 20</p>	<ul style="list-style-type: none"> • Reports that the CITES website is available in six languages. • Invites SC to agree to revised Decisions (Annex) to provide any updates, and consideration of interpretation in the six languages for CoP21. 	<ul style="list-style-type: none"> • SSN recommends that SC agree to the revised Decisions.

¹ <https://cites.org/sites/default/files/documents/E-CoP19-Inf-24.pdf>

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<p>21. Capacity-building framework</p> <p>SC78 Doc. 21</p>	<ul style="list-style-type: none"> Proposes that a CITES integrated capacity-building framework could be potentially guided by and aligned with the long-term strategic framework for capacity-building and development of the Kunming-Montreal Global Biodiversity Framework (KMGBF) to support nationally determined priorities for KMGBF implementation. Reports that Secretariat will organize one or more regional consultations and technical workshops that would facilitate the implementation by SC. Invites SC to submit revised Decisions to CoP20 (Annex) in order to undertake this work intersessionally. 	<ul style="list-style-type: none"> SSN recommends that SC submit the draft Decisions with amendments: <ul style="list-style-type: none"> Directing Secretariat to develop ToR for the capacity-building framework; Directing SC to review the ToR; and Submitting the draft capacity-building framework to the Parties for comment via Notification. SSN is concerned about alignment of the framework with KMGBF implementation; SC77 agreed that the objective of the CITES capacity-building framework is to “guide Parties, partners and Secretariat to identify capacity-building needs and to plan, prioritize, coordinate, implement, monitor and review the effectiveness of their capacity-building efforts for the enhanced implementation of the Convention (emphasis added)”, not KMGBF.
<p>22. Implementation of RC 19.2 on Capacity-building</p> <p>SC78 Doc. 22</p>	<ul style="list-style-type: none"> Provides an update on capacity-building activities and invites SC to note the report. 	<ul style="list-style-type: none"> SSN recommends that SC note the report.
<p>23. Compliance Assistance Programme (CAP)</p> <p>SC78 Doc. 23</p>	<ul style="list-style-type: none"> Provides an overview of related activities. Invites SC to agree to draft Decisions that, <i>inter alia</i>, direct Secretariat to continue to assist Parties through the CAP. 	<ul style="list-style-type: none"> SSN recommends that SC note the document and agree to the draft Decisions.
<p>24. CITES Tree Species Programme</p> <p>SC78 Doc. 24</p>	<ul style="list-style-type: none"> Provides an update on related activities. Invites SC to agree to draft Decisions (Annex) that direct Secretariat to, <i>inter alia</i>, report to PC/SC on this program and assess potential for it to be made permanent. 	<ul style="list-style-type: none"> SSN recommends that SC note the document and agree to the draft Decisions.
<p>25. CITES Global Youth Network</p> <p>SC78 Doc. 25</p>	<ul style="list-style-type: none"> Prepared by Bahrain, Denmark, Malaysia, the Philippines, Singapore, the USA, Zambia and Zimbabwe, in consultation with Secretariat. Provides: <ul style="list-style-type: none"> An update on related activities, the network’s vision and mission (Annex 1) and proposed amendments to RC 17.5 (Rev. CoP18) on <i>Youth engagement</i> (Annex 2); A Vision Statement: The CGYN envisions a world where empowered youth from diverse backgrounds lead the way for legal and sustainable wildlife trade, while remaining committed to biodiversity conservation; and A Mission Statement: CGYN aims to empower youth by building knowledge and developing capacity to influence policy while collaborating with experts and communities to raise awareness and educate through diverse channels; encouraging the use of innovative solutions. 	<ul style="list-style-type: none"> While SSN recognizes and values the passion and energy that engaged youth can bring to CITES and species conservation, it is concerned that: <ul style="list-style-type: none"> The vision statement places primary emphasis on trade rather than CITES’ core objectives, and does not sufficiently prioritize biodiversity conservation, which seems to be relegated to a secondary concern. The aims of the proposed summit refer only to “wildlife trade challenges” with no mention of conservation issues other than illegal wildlife trade. Engaged youth should be ideal sources of public education, demand reduction initiatives, etc. The mission focuses on influencing policy, but fails to clearly define its policy objectives. As a result, the Vision and Mission may inadvertently support goals not fully aligned with CITES. CGYN operates without oversight from the Committees and is not guided by any Decisions of the Parties, which could lead to potential conflicts with CITES’ broader goals.

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<p>26. CITES gender action plan</p> <p>SC78 Doc. 26</p>	<ul style="list-style-type: none"> • Provides a summary of responses to a related Notification (Annex 1), a revised draft outline of the plan (Annex 2) and related information from other multilateral agreements (Annex 3). • Invites SC to submit revised draft Decisions that, <i>inter alia</i>, direct SC to submit the final plan to CoP21. • Reports that no other donors besides the EU came forward to co-finance the preparation of the draft action plan. 	<ul style="list-style-type: none"> • SSN is concerned about the significant additional budgetary and staffing implications for the Secretariat if it is to undertake these actions. Many appear more suitable for Parties to address at the national or local level; or may involve agencies other than national CITES Authorities. • A more practical approach may be a series of non-binding recommendations to Parties (building on the current resolution and elements of the draft plan) and a virtual platform for Parties and other stakeholders with expertise to share relevant publications, policies, and experiences. Training may be more effectively delivered by agencies, individuals or organizations with expertise within a local or national context.
<p>27. Engagement of indigenous peoples and local communities (IPLC)</p> <p>SC78 Doc. 27</p>	<ul style="list-style-type: none"> • Submitted by Chair of the related SC working group. Invites SC to, <i>inter alia</i>, <ul style="list-style-type: none"> –Decide on use of standardized terminology that refers to “Indigenous Peoples, and local communities” (para 19 a); –Review and submit to CoP20, <i>non-binding guidance on consulting Indigenous Peoples, and local communities on proposals to amend the Appendices</i> (Annex); –Submit to CoP20, Decisions AA and BB (para. 19 d) inviting Parties to use the guidance for CoP21, and directing SC to consider Parties’ experiences, whether and how to incorporate ideas for national engagement (para. 10) in RC 16.6 (Rev. CoP18) on <i>CITES and livelihoods</i>; and ideas for engagement at the international level (para. 15). 	<ul style="list-style-type: none"> • SSN is concerned that the report ignores comments by Parties and other working group members, e.g. to amend the guidance to prevent it from becoming an obstacle to listing proposals and a backdoor to amending the listing criteria and process. • SSN recommends that SC: <ul style="list-style-type: none"> <u>Adopt standardized terminology (para 19.a)</u>, but add “as appropriate” before “<i>local communities</i>”. IPLCs should not be referenced as if they are homogeneous groups. <u>Regarding the non-binding guidance</u>: <ul style="list-style-type: none"> –Recommend posting on the CITES website for information only, as with other guidance documents, <i>not</i> submitting it for approval at CoP20, and opposing any proposal to include it in a resolution. –Amend the guidance to: <ol style="list-style-type: none"> 1) make it less prescriptive, including on documenting consultations, timing of contacting other range States (delete deadlines) and consulting with IPLCs, and; 2) delete provisions (on free, prior and informed consent, and expanding the guidance to Appendix III listings), which were not discussed. • Regarding the Decisions: <ul style="list-style-type: none"> <u>Amend Decision 20.AA</u> to invite Parties to note the draft non-binding guidance and share their views. <u>Delete Decision 20.BB</u>; Directing SC to consider Party experience using the guidance is premature; and inappropriate given lack of agreement on the draft; including national engagement into RC 16.6 (Rev. CoP18) would be duplicative, create significant burdens to Parties and ignore sovereignty and jurisdictional differences ; –The ideas for international engagement were opposed by working group members and at previous CoPs. IPLCs should be encouraged to engage with CITES processes according to existing procedures for observers.

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<p>28. Livelihoods</p> <p>SC78 Doc. 28</p>	<p>Submitted by the Co-Chairs of the related SC working group. Invites SC to agree to submit to CoP20:</p> <ul style="list-style-type: none"> • Six “strategies for maximizing benefits to Indigenous Peoples and local communities from trade in CITES-listed species” (Annex 1) developed as part of guidance on the same; and • Amendments to RC 16. 6 (Rev. CoP18) on <i>CITES and livelihoods</i> that: <ul style="list-style-type: none"> --Incorporate reference to the six strategies (Annex 2), and related draft Decisions that, <i>inter alia</i>, invite Parties to share their experiences using certification and labelling systems for products of CITES-listed species from IPLCs; --Direct Secretariat to support development of case studies on the use of certification and labelling systems; organize a technical workshop on certification and labelling systems; and --Direct SC to establish a working group to review case studies on both livelihoods (if available) and certification and labeling systems. 	<ul style="list-style-type: none"> • SSN is concerned that the report does not reflect lack of agreement among working group members. • SSN recommends that SC: <ul style="list-style-type: none"> --<u>Reject proposals to amend RC 16.6</u> (Rev. CoP18) to include reference to the 6 strategies. These go beyond the scope of CITES, and contain unwarranted assumptions that trade is always beneficial; --<u>Oppose posting the 6 strategies or guidance</u> on the CITES website as non-binding guidance. If SC goes ahead, amend the guidance to address comments by working group members that CITES does not advocate for or facilitate trade, clarify strategies are for information only, and amend: <ol style="list-style-type: none"> a) Change the title to: <i>Strategies for maximizing the benefits for Indigenous Peoples, and as appropriate local communities of CITES implementation</i>; b) Amend strategy 2 to “Ensure an enabling environment ... in <u>international-commercial trade protection and management</u> in CITES-listed species”; international trade in CITES-listed species is not <i>per se</i> beneficial to IPLCs. The current text could undermine the right of Parties to implement stricter domestic measures; c) Delete strategies 2. d), 3, 4, 5 and 6. --<u>Delete draft Decision 20.BB paragraphs b, c and d.</u> certification schemes have been rejected in the past, and trade promotion is not a CITES objective. --<u>Delete draft Decision 20.CC.</u>
<p>29. Demand reduction to combat illegal trade</p> <p>SC78 Doc. 29</p>	<ul style="list-style-type: none"> • Provides an overview of related activities. • Invites SC to agree to draft Decisions that, <i>inter alia</i>: <ul style="list-style-type: none"> --Invite Parties to share experiences using the CITES guidance for demand reduction strategies, and suggest priority species for additional efforts; and --Direct Secretariat to analyze Parties responses, organize pilot projects to promote use of the guidance;and support Parties implementing demand reduction strategies. 	<ul style="list-style-type: none"> • SSN recommends that SC agree to the draft Decisions.
<p>30. Review of Resolutions and Decisions</p> <p>SC78 Doc. 30</p>	<ul style="list-style-type: none"> • Invites SC to submit to CoP20: <ul style="list-style-type: none"> --Generally non-substantial amendments to a number of RCs (para. 2, Annexes 1-3); --Draft Decisions directing SC, with Secretariat support, to review RC 10.4 (Rev. CoP14) on <i>Cooperation and synergy with the Convention on Biological Diversity</i> and RC 13.2 (Rev. CoP14) on <i>Sustainable use of biodiversity: Addis Ababa Principles and Guidelines</i> to reflect the most recent developments under the Convention on Biological Diversity and other relevant intergovernmental bodies. 	<ul style="list-style-type: none"> • SSN recommends that SC agree to the non-substantive and minor substantive changes recommended by the Secretariat, but reject the Draft Decisions. The merits of the proposed review do not justify the additional burden on the workloads of SC and the Secretariat.

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31. National laws for implementation of the Convention		
<p>31.1. Report of the Secretariat</p> <p>SC78 Doc. 31.1</p>	<ul style="list-style-type: none"> • Provides a report on legislative progress of select Parties (Annex) and preliminary elements of guidance on the implementation of the Convention (e.g., issuance of permits and certificates) in the event of exceptional circumstances that impede the proper functioning of CITES at the national level. • Invites SC to: <ul style="list-style-type: none"> –Agree for all Parties to suspend trade in all CITES-listed species for commercial purposes with Comoros, Lebanon, and Mongolia; –Request Secretariat to issue warnings to eight Parties that have not reported progress for three years; and –Consider the preliminary elements of a draft guidance; and request Secretariat to post the guidance to the CITES website prior to CoP20. 	<ul style="list-style-type: none"> • SSN recommends that SC agree to the recommendations but oppose the recommendation to post the additional action regarding the proposed preliminary elements of guidance on the CITES website. –Any guidance regarding implementation of the Convention should be reviewed and adopted by the CoP; and –The exact scope and nature of the guidance is not clear from Secretariat's report; further deliberation and additional input from Parties may be necessary.
<p>31.2. Request by the Sultanate of Oman to lift the suspension of international trade</p> <p>SC78 Doc. 31.2</p>	<ul style="list-style-type: none"> • Provides an update on legislative progress made by Oman to implement CITES, including its <i>Law on Wildlife Trade Regulation</i> and related regulations (Annexes 1 and 2). 	<ul style="list-style-type: none"> • No comment.
32. National reports		
<p>32.1. Submission of annual reports</p> <p>SC78 Doc. 32.1</p>	<ul style="list-style-type: none"> • Recommends that the Secretariat, based on materials received at the start of SC78, determine which Parties have failed to provide their annual reports for three consecutive years; notification of a trade suspension will be issued 60 days after the close of SC78. This may include: Bahamas, Guinea Bissau, Liberia, Malawi, Mali, Paraguay and Samoa. 	<ul style="list-style-type: none"> • SSN recommends that SC agree to the recommendations.
<p>32.2. Revised Guidelines for the preparation and submission of CITES annual reports and Guidelines for the preparation and submission of CITES annual illegal trade report</p> <p>SC78 Doc. 32.2</p>	<ul style="list-style-type: none"> • Invites SC to approve amendments (para. 3, 7, 8 and Annexes) to the Guidelines for the preparation and submission of CITES annual reports and the amendments to the <i>Guidelines for the preparation and submission of CITES annual illegal trade reports</i>. • Amendments are related to seahorses, stony corals, worked ivory, agarwood taxa, and specimens taken from areas beyond national jurisdiction. 	<ul style="list-style-type: none"> • No comment.
33. Compliance matters		
<p>33.1. Implementation of Article XIII and Resolution Conf. 14.3 (Rev. CoP19) on CITES compliance procedures</p> <p>SC78 Doc. 33.1</p>	<ul style="list-style-type: none"> • Provides updates on compliance and invites SC with regard to: <ul style="list-style-type: none"> –<u>European Union and United Kingdom</u> (live Appendix I species, <i>Amazona imperialis</i>, <i>A. arausiaca</i>, <i>Cyanopsitta spixii</i>): [Provides update on facility registration; notes no further information from 	<ul style="list-style-type: none"> • SSN recommends that SC adopt the Secretariat's recommendations regarding individual Parties and, also: <ul style="list-style-type: none"> –<u>European Union and United Kingdom</u>: Note that these species are protected within their range States; request Secretariat to encourage current holders to return the

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	<p>Dominica] Invite Brazil and Germany to engage on a way forward on <i>C. spixii</i>;</p> <p>–<u>Viet Nam</u> (timber): [Reports that Secretariat will conduct mission]</p> <p>–<u>India</u> (live Appendix I animals, source C/I, purpose Z): Note information provided by India, the Bolivarian Republic of Venezuela and Mexico;</p> <p>–<u>Suriname</u> (live birds): Request Secretariat to conduct a mission.</p> <ul style="list-style-type: none"> • Provides information on potential new compliance issues and invites SC to: <p>–<u>Cambodia</u> (<i>Macaca fascicularis</i>): Request Secretariat to conduct a mission, urges Parties to ensure that no imports of the species are accepted in violation of the Convention;</p> <p>–<u>Reported from Guyana</u> (live animals): Urge Parties to liaise with Guyana to verify the validity of any export permit or re-export/captive breeding certificate attributed to Guyana.</p> <p>–<u>Trade in oceanic whitetip shark</u> (<i>Carcharhinus longimanus</i>): [Maldives has expressed concern about the legality of trade in this species. The Secretariat suggests that Legal Acquisition Findings (LAFs) are not necessary and that there is no mandate for addressing non-compliance with other international agreements.]</p> <ul style="list-style-type: none"> • Invites SC to agree, for CoP20, to a draft Decision directing SC to consider the scope and application of a recommendation to suspend trade (Annex 1); and amendments to RC14.3 (Rev. CoP19) on CITES Compliance Procedures including a draft template of a compliance action plan (Annex 2).. 	<p>specimens to their respective range States and Germany to halt additional exports. Also see SC78 Doc. 64.</p> <p>–<u>Reported from Guyana</u>: Request Secretariat to provide additional assistance including encouraging importing countries to verify information on imports, and provide SC81 an update on this issue.</p> <p>–<u>Trade in oceanic whitetip shark</u>: SSN requests the SC to:</p> <p>–Note that the majority of cases raised by the Maldives involved trade between two States, not IFS, and LAFs are required for re-export of any specimens, including those taken on the high seas (Article IV para. 5); that Annex 2 of RC 18.7 (Rev CoP19), para. 5(i), on LAFs, states that acquisition of specimens should be consistent with with measures in other treaties and agreements; and</p> <p>–Request further information from all implicated Parties regarding compliance with relevant international agreements and, where appropriate, with LAFs.</p> <ul style="list-style-type: none"> • Amend the draft Decisions in Annex 1 to make clear what the Secretariat is being asked to produce. • Submit a draft Decision to CoP20 directing SC to review the draft template intersessionally in order to allow Parties sufficient opportunity for review.
<p>33.2. Expedited application of Article XIII for West African rosewood (<i>Pterocarpus erinaceus</i>) for all range States</p> <p>SC78 Doc. 33.2</p>	<ul style="list-style-type: none"> • Provides recommendations of PC on inclusion of this species in the Review of Significant Trade (RST) (Annex 1); report on NDFs for this species in Ghana (Annex 2) and report on the final NDF workshop for this species (Annex 3). • Reports on progress made and invites SC to, <i>inter alia</i>: <ul style="list-style-type: none"> –Maintain trade suspensions from: The Gambia, Guinea Bissau, Cameroon, the Central African Republic, Chad, and Togo –Maintain RST recommendations for: Benin, Burkina Faso, the Gambia, Ghana, Guinea Bissau, Mali, Nigeria and Sierra Leone. –Consider and provide views on the proposal that, when Article XII and RST processes are running concurrently, the RST recommendations be included within the Article XIII recommendations to facilitate reporting. 	<ul style="list-style-type: none"> • Regarding <i>P. erinaceus</i>: No comment. • Regarding Article XIII and RST: SSN recommends that the Secretariat provide the RST recommendations in any reporting to SC, but notes that Article XIII recommendations should be made independently of any RST recommendations; the underlying issues are distinct and require different remedies.
<p>33.3. Application of Article XIII in Bangladesh</p>	<ul style="list-style-type: none"> • Reports on Bangladesh’s progress since SC77 Invites SC to maintain the suspension in trade with Bangladesh and revise the recommendations regarding, <i>inter alia</i>, its 	<ul style="list-style-type: none"> • SSN recommends that SC agree to the recommendations.

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<p>SC78 Doc. 33.3</p>	<p>database of all registered pet bird farms and traders, legislation and enforcement, handling of seized specimens.</p>	
<p>33.4. Application of Article XIII in Cameroon</p> <p>SC78 Doc. 33.4</p>	<ul style="list-style-type: none"> • Reports on Cameroon’s progress since SC77. • Invites SC to determine that there are no longer any compliance matters regarding trade in CITES-listed tree species from Cameroon, and encourage Cameroon to continue strengthening the implementation of the Convention regarding specimens of CITES-listed species in transit through Cameroon. 	<ul style="list-style-type: none"> • SSN recommends that SC agree to the recommendations.
<p>33.5. Application of Article XIII in the Democratic Republic of the Congo (DRC)</p> <p>SC78 Doc. 33.5</p>	<ul style="list-style-type: none"> • Reports on DRC’s progress since SC77. • Invites SC to maintain the suspension in trade of <i>Psittacus erithacus</i> (grey parrot) with DRC and revise the recommendations, <i>inter alia</i>, inviting DRC to maintain its moratorium on trade in the species and strengthen efforts to address illegal trade/enforcement in the country. [DRC has a reservation on the listing of <i>P. erithacus</i> in Appendix I.] 	<ul style="list-style-type: none"> • SSN recommends that SC agree to the recommendations and, in addition: <ul style="list-style-type: none"> –Note that illegal trade in <i>P. erithacus</i> continues at very high levels;² –Delete the reference to the making of “scientifically based non-detriment findings (NDF)” in para. 26 a) i) as the Secretariat has not recommended this for other Appendix I species , and experts consider it “inconceivable that a sustainable trade in Grey parrots can be achieved in the foreseeable future”;³ –Expand the suspension in trade to all psittacine species from DRC, as permits for other species are being utilized to traffic <i>P. erithacus</i>⁴; and –Recommend that DRC complete scientifically-based population surveys in addition to noting DRC’s commitment to do so.
<p>33.6. Application of Article XIII in Ecuador and Peru</p> <p>SC78 Doc. 33.6</p>	<ul style="list-style-type: none"> • Reports on progress made by Ecuador and Peru since SC77. Invites SC to, <i>inter alia</i>: <ul style="list-style-type: none"> –Regarding Ecuador and Peru: Ensure legislation meets requirements, appropriately track and monitor vessels, and strengthen enforcement and implementation efforts; and –Regarding Ecuador: Parties continue to suspend trade in <i>Carcharhinus falciformis</i>, <i>Alopias</i> spp. and <i>Isurus</i> spp. until Ecuador establishes export quotas to the satisfaction of the Secretariat and AC Chair. 	<ul style="list-style-type: none"> • SSN recommends that SC agree to the recommendations.
<p>33.7. Application of Article XIII in Guinea</p> <p>SC78 Doc. 33.7</p>	<ul style="list-style-type: none"> • Provides a report on Guinea’s progress since SC77 including actions taken via the Compliance Assistance Program (CAP) in Guinea. • Invites SC to maintain the suspension in trade with Guinea and revise the recommendations to Guinea regarding, <i>inter alia</i>, proceeds from the sale of a <i>Pterocarpus erinaceus</i> 	<ul style="list-style-type: none"> • SSN recommends that SC agree to the recommendations.

² World Parrot Trust, BRIEFING: Illegal trade in wild specimens of Grey parrots (*Psittacus erithacus*) in the Democratic Republic of Congo: Information indicates that during 2024 (Jan-Dec) at least 17,511 Grey parrots were transported to Kinshasa. “2022-2024 had the highest numbers of documented parrot transfers since the species was transferred to Appendix I”.

³ *Ibid.*

⁴ SC78 Doc. 33.5

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<p>33.8. Application of Article XIII in the Lao People's Democratic Republic</p> <p>SC78 Doc. 33.8</p>	<p>pre-Convention stockpile, national legislation, NDFs and enforcement.</p> <ul style="list-style-type: none"> Provides a report on Lao PDR's progress since SC77. Invites SC to maintain the suspension in trade with Lao PDR and revise the recommendations to Lao PDR regarding, <i>inter alia</i>, CITES authorities, enforcement, wildlife farms, tigers, Asian elephants, long-tailed macaques (<i>Macaca fascicularis</i>), <i>Dalbergia</i> spp., and preparation of a Compliance Action Plan. 	<ul style="list-style-type: none"> SSN recommends that SC agree to the recommendations of the Secretariat with the following amendments to paragraph 71j): "takes steps to identify... <i>corbetti</i>) and encourage facilities to engage in coordinated conservation breeding of such animals <u>arrange for the transfer of these specimens to appropriate ex-situ conservation breeding facilities, if identified.</u>"; tiger farms in Lao PDR were set up as purely commercial facilities and are not appropriate for conservation breeding . Regarding <i>M. fascicularis</i>, SSN recommends independent expert scrutiny of any documentation submitted by Lao PDR; Lao PDR should provide the Secretariat information on numbers held in facilities, any seizures or takes from the wild in recent years, and provide scientifically-based, independently verified population data to the Secretariat (for review by AC), before any restrictions on exports are lifted.⁵ SSN also recommends that SC instruct Secretariat to continue to review remaining gaps and inadequacies in Lao PDR's legislation as part of the compliance process, Lao PDR is in Category 1 of the NLP.
<p>33.9. Application of Article XIII in Nigeria</p> <p>SC78 Doc. 33.9</p>	<ul style="list-style-type: none"> Provides a report on Nigeria's progress since SC77 and describes most of it as commendable. Invites SC to revise its recommendations to Nigeria to, <i>inter alia</i>, maintain the suspension on trade in <i>Pterocarpus erinaceus</i>, adopt relevant draft legislation, enhance enforcement, enhance permitting systems and implement control measures for seized specimens. 	<ul style="list-style-type: none"> SSN recommends that SC agree to the recommendations.
<p>33.10. Application of Article XIII in Viet Nam</p> <p>SC78 Doc. 33.10</p>	<ul style="list-style-type: none"> Provides a report on Viet Nam's progress since SC77. Invites SC to: <ul style="list-style-type: none"> Conclude that there is no evidence of compliance issues to be addressed under Article XIII of the Convention concerning Viet Nam; and Recommend improvement in procedures concerning imports, stockpile management (including inventory), and strengthening enforcement to tackle transnational organised wildlife crime through increased intelligence exchange, investigations and prosecutions. 	<ul style="list-style-type: none"> No comment.
<p>33.11 Malagasy palisanders and rosewoods (<i>Dalbergia</i> spp.) and ebonies (<i>Diospyros</i> spp.)</p>	<ul style="list-style-type: none"> Submitted by Madagascar. 	<ul style="list-style-type: none"> SSN recommends that SC note the report.

⁵ IUCN Red List states that population size in Lao PDR is down to 300-500 individuals.

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<p>SC78 Doc. 33.11</p>	<ul style="list-style-type: none"> Invites SC to note this report on progress made regarding stockpile management, traceability systems, inventories of seized wood and meeting of the related advisory group. 	
<p>33.12. Totoabas (<i>Totoaba macdonaldi</i>)</p>		
<p>33.12.1. Report of the Secretariat</p> <p>SC78 Doc. 33.12.1</p>	<ul style="list-style-type: none"> Provides current Decisions (Annex 1), SC77 recommendations (Annex 2), draft Decisions for CoP20 (Annex 3), Missions to Mexico, USA and China (Annexes 4-6), study on vaquita and totoaba (Annex 7), Mexico's report on implementation of its compliance action plan (CAP) (Annex 8), and Secretariat's conclusions on Mexico's progress (Annex 9). Invites SC to, <i>inter alia</i>, request China, Mexico and the USA to take into consideration the recommendations resulting from the Secretariat's missions; and Mexico to report progress to SC79. Invites SC to submit draft Decisions to CoP20 that, <i>inter alia</i>: <ul style="list-style-type: none"> Request USA to strengthen information and intelligence gathering, including intelligence-driven investigations, on individuals facilitating transit of totoaba specimens and their <i>modus operandi</i>, and to target their activities; to take action, including strict inspections, to address trafficking via commercial seafood shipments; and report to SC81; Request China to strengthen information and intelligence gathering, implement intelligence-driven investigations, arrests and prosecutions, and report to SC81; and Request Mexico to fully implement the 2020 Agreement; ensure that the Zero Tolerance Area and Vaquita Refuge are gillnet free; improve and expand development and use of alternative fishing gear; further strengthen intelligence gathering and analysis; and report to SC81. Direct SC to review reporting from Mexico, China and USA and make recommendations. 	<p>SSN recommends that the SC:</p> <ul style="list-style-type: none"> Conclude that Mexico has failed to fully implement the CAP by the agreed deadlines, including failing to: 1) implement robust vessel inspections; 2) prevent illegal fishing in the Vaquita Refuge; 3) enforce laws against illegal fishers and violators of the 2020 Agreement; 4) install monitoring systems on all vessels; and 5) develop an effective program to implement and promote alternative fishing gear; Recommend a trade suspension against Mexico pursuant to RC 14.3 (Rev. CoP19) pending full implementation of the 2020 Agreement and CAP. Urge: China to design and implement an immediate campaign to reduce demand for totoaba swim bladders; China and the USA to utilize intelligence-driven investigations to apprehend illegal traffickers using clandestine markets and/or online trading platforms. Approve the draft Decisions (Annex 3) with the following amendments to 20.DD: <ul style="list-style-type: none"> Add a new subparagraph h): <u>"continue to conduct a visual vaquita survey annually while also regularly deploying hydroacoustic buoys both within the ZTA and outside the ZTA in areas of historic vaquita presence within the Vaquita Refuge to determine current distribution"</u>; Amend existing subparagraph h) by redesignating it as i) SSN notes that there may be fewer than 10 vaquita left (2024 visual survey) and that 2024 acoustic data confirmed their presence in the Vaquita Refuge where rampant illegal fishing continues.
<p>33.12.2. Report of the Trilateral Enforcement Contact Group</p> <p>SC78 Doc. 33.12.2</p>	<ul style="list-style-type: none"> Prepared by Mexico as Chair of the group. Invites SC to note report on inaugural meeting. 	<ul style="list-style-type: none"> SSN recommends that SC note the report but express concern over the lack of meaningful progress of the group.
<p>33.13. National ivory action plan (NIAPs) process</p>		
<p>33.13.1. Report of the Secretariat</p> <p>SC78 Doc. 33.13.1</p>	<ul style="list-style-type: none"> Provides a report on Implementation of NIAPS (Annex) and reports from individual Parties. Invites SC to, <i>inter alia</i>, <ul style="list-style-type: none"> Agree to consider application of appropriate measures on Parties in categories A and B after SC78; and 	<ul style="list-style-type: none"> SSN recommends that SC adopt the recommendations of the Secretariat, with the following changes: <ul style="list-style-type: none"> Direct Secretariat to continue monitoring illegal ivory trade relating to Cambodia and Malaysia in accordance

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	<p>–Agree to a series of recommendations to individual Parties including: Category A: DRC, Nigeria, Togo, Viet Nam; Category B: Cambodia, Gabon, Malaysia, Mozambique; and Category C: Angola, Cameroon, Congo, Lao PDR, Qatar.</p>	<p>with RC 10.10 (Rev. CoP19) and bring any matters of concern to the attention of the SC; –Reject the recommendation urging all Parties included in the process to achieve their goals by SC81. This is an unrealistic deadline; some Parties achieved less than 50% of their NIAP by SC78. Exit from the process should not be the primary goal at the expense of effective legislative and enforcement improvements to tackle ivory and other wildlife trafficking; –Urge all Parties, particularly those in Categories A and B and Angola, to strengthen international law enforcement cooperation pursuant to RC 11.3 (Rev. CoP19); and –Consider appropriate measures at SC81 if category A and B Parties, especially those that have been in the process for a decade without making adequate progress in implementation, in accordance with Step 4 paragraph f) of the guidelines and RC. 11.3 (Rev. CoP19).</p>
<p>33.13.2. Review of the NIAPs Process</p> <p>SC78 Doc. 33.13.2</p>	<ul style="list-style-type: none"> • Provides the executive summary of the Review (Annex 2), the full Review (Annex 3), and proposed amendments to the Guidelines to the NIAP Process contained in Annex 3 to RC 10.10 (Rev. CoP19). • Amendments include, <i>inter alia</i>: <ul style="list-style-type: none"> --If new poaching or trafficking matters so require, Secretariat shall recommend to SC that the Party update its NIAP to incorporate new critical actions and that the Party update its NIAP within 60 days; and –Party’s assessment of its eligibility to leave the NIAP process is subject to acceptance by the Secretariat (who will provide the rationale for any recommendation). • Invites SC to note the documents and submit the amendments to CoP20. 	<ul style="list-style-type: none"> • SSN recommends that SC accept the proposed amendments to Step 1 and Step 2 and propose additional amendments incorporating suggested language from the Review: <ul style="list-style-type: none"> –Step 3 e): ...following the meeting of the Standing Committee. <u>In formulating recommendations regarding necessary NIAP updates for consideration by the Standing Committee, the Secretariat should take into consideration sources of information including:</u> <ol style="list-style-type: none"> i) <u>whether a Party has remained in Category A across two successive ETIS reports since its NIAP was accepted or last updated</u> ii) <u>whether a Party’s Category rises between two ETIS reports</u> iii) <u>whether a Party has been implicated in one or more large scale ivory seizures during an intersessional period.</u> iv) <u>Negative PIKE and elephant population trends, in consultation with the IUCN Specialist Groups.</u> –New paragraph f) <u>The Secretariat shall make recommendations to the Standing Committee when a Party’s NIAP timeframe has been exceeded, and request the Party to update relevant NIAP activities 60 days ahead of the next Standing Committee, as appropriate.</u> • Propose further amendments to Step 4 and Step 5: <ul style="list-style-type: none"> –Step 4c): The Secretariat will evaluate the reports, based on the self-assessments <u>and other available information such as ETIS and Annual Illegal Trade Reports,</u> and in cooperation... regular meetings, <u>and</u> make recommendations ...on the NIAP webpage <u>as soon as they are received.</u>

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		<p>–Step 4 d): The Secretariat will determine ...<u>indicators agreed at Step 2 3) vi) of the guidelines, to assess ...</u></p> <p>–Step 5 c): In formulating recommendations for consideration by the <u>Standing Committee</u> in accordance ... and appropriate, <u>with a view to assess the achievement of the actions and the impact of the actions taken of a NIAP against set milestones and indicators agreed under Step 2 3) vi) of the guidelines:</u></p> <ul style="list-style-type: none"> Propose an additional draft decision directed to Parties and Observers: <u>Decision 20.XX: Recognising the value and effectiveness of technical support to NIAP Parties in increasing reporting rates and reporting quality as outlined in the NIAP Review and SC78 Doc.33.13.2. Parties and other stakeholders are encouraged to contribute resources to enable the Secretariat to conduct technical missions to NIAP Parties which seek assistance for training on NIAP guidelines, templates and reporting obligations.</u>
34. Review of Significant Trade (RST) in specimens of Appendix-II species stopping point		
<p>34.1. Overview</p> <p>SC78 Doc. 34.1</p>	<ul style="list-style-type: none"> Provides a list of country/species currently in the RST (Annex) and reports that Secretariat is currently revising the online courses on the CITES Virtual College which includes a specific module on RST. Invites SC to note this report, volunteer case studies for the virtual college and delete related Decisions. 	<ul style="list-style-type: none"> SSN recommends that SC adopt the recommendations of the Secretariat.
<p>34.2. Implementation of the recommendations of the Animals Committee</p> <p>SC78 Doc. 34.2</p>	<ul style="list-style-type: none"> Provides country/species combinations and recommendations to SC (Annexes 1 and 2), comments from AC Members (Annex 3), and responses from range States (Annex 4). Invites SC to adopt recommendations regarding: <i>Anguilla anguilla, Hippocampus algiricus, Pandinus imperator, Varanus ornatus, Carcharhinus longimanus, Kinixys homeana, Mobula spp., Python regius, Sphyrna lewini, Sphyrna mokarran, Testudo horsfieldii.</i> 	<ul style="list-style-type: none"> SSN recommends that SC adopt the recommendations of the Secretariat, except for: <ul style="list-style-type: none"> –<i>P. regius</i> : Benin, Ghana, Togo: given the many outstanding issues of trade; the suggested quotas are not conservative; –<i>S. lewini</i> : Kenya: oppose export quota of 50 live specimens; species is Critically Endangered and has a poor survival rate in captivity; and –<i>S. lewini and S. mokarran</i> : Mexico: oppose any quotas; species are Critically Endangered.
<p>34.3. Implementation of the recommendations of the Plants Committee</p> <p>SC78 Doc. 34.3</p>	<ul style="list-style-type: none"> Provides country/species combinations and recommendations to SC (Annex 1). Invites SC to adopt recommendations regarding: <i>Pericopsis elata, Guibourtia tessmannii, Aquilaria malaccensis, A. malaccensis, Dalbergia melanoxylon, and D. retusa.</i> 	<ul style="list-style-type: none"> No comment.
35. Resolution Conf. 17.7 (Rev. CoP19) on Review of trade in specimens reported as produced in captivity		

ISSUE	PROPOSED ACTION	SSN RECOMMENDATION
<p>35.1. Implementation of Resolution Conf. 17.7 (Rev. CoP19)</p> <p>SC78 Doc. 35.1</p>	<ul style="list-style-type: none"> • Prepared by Secretariat with AC through its Chair. • Provides progress on the Review since CoP17 (Annex 1); species currently in the Review (Annex2); and update of species in the review selected at AC32 (Annex 3). • Invites SC to note these and adopt recommendations regarding <i>Centrochelys sulcata</i>, <i>Agalychnis callidryas</i>, <i>Chlamydotis macqueenii</i>, <i>Dendrobatus auratus</i>, <i>Macaca fascicularis</i>, <i>Oophaga pumilio</i>, <i>Testudo graeca</i>, <i>Testudo horsfieldii</i> and <i>Testudo kleinmanni</i>. • Invites SC to: <ul style="list-style-type: none"> –Agree to the recommendations; –Submit amendments to RC 17.7 (Rev. CoP19) that, when Secretariat commissions review of a species, to also provide information on the conservation status and threats to the species in the respective countries of origin of the founder stock; and –Submit a Decision directing Secretariat to develop a Captive Breeding tracking and management database for the Review. 	<ul style="list-style-type: none"> • SSN recommends that SC submit the amendment and draft Decision; and adopt the recommendations provided for the individual species.
<p>35.2. Review of Resolution Conf. 17.7 (Rev. CoP19)</p> <p>SC78 Doc. 35.2</p>	<ul style="list-style-type: none"> • Prepared by the Secretariat in consultation with AC Chair. • Notes AC conclusion is that there is no need to review and streamline RC 17.7 (Rev. CoP19) and RC 12.8 (Rev. CoP18) because the two processes are different in scope, purpose and methodology. • Invites SC to agree to AC recommendation. 	<ul style="list-style-type: none"> • SSN recommends that SC agree to the recommendation.
<p>36. Possession of specimens of species included in Appendix I</p> <p>SC78 Doc. 36</p>	<ul style="list-style-type: none"> • Invites SC to: <ul style="list-style-type: none"> –Submit amendments to RC 8.4 (Rev. CoP15) on <i>National laws for implementation of the Convention</i> (Annex) that, <i>inter alia</i>, direct Secretariat to identify Parties whose national legislation does not provide them with the authority to penalize <i>possession</i> of illegally traded specimens, in addition to trade of such specimens; and –Remind Parties with national legislation in Categories 2 and 3 of this change; and encourage Parties in Category 1 to identify loopholes in their legislation regarding possession of illegally traded specimens. 	<ul style="list-style-type: none"> • SSN recommends that SC agree to the recommendations.
<p>37. Review of Resolution Conf. 11.3 (Rev. CoP19) on Compliance and enforcement</p> <p>SC78 Doc. 37</p>	<ul style="list-style-type: none"> • Submitted by the Co-Chairs of the related SC working group. Invites SC to submit amendments to the RC that recommend that Parties consider higher standards for professional bodies; and, regarding lack of response from Parties to a request for information from the Secretariat, require a justification for a lack of response at three months. • Also invites SC to consider whether this work is complete or to draft new Decisions to allow for consideration of marine species, stocks and stockpiles, One Health and electronic systems following CoP20. 	<ul style="list-style-type: none"> • SSN recommends that SC submit a draft Decision to allow for consideration of the additional topics and agree to the amendments to RC 11.3 (Rev. CoP19), with the exception of those in para 23(b). • SSN recommends that Parties be given three months to respond to Secretariat queries regarding Art. XIII. A six month period is too long; compliance matters require higher prioritisation, and the Secretariat needs sufficient time to review and respond to Party communications, and (if needed) prepare any documents for SC.
<p>38. Enforcement matters</p>		

ISSUE	PROPOSED ACTION	SSN RECOMMENDATION
<p>38.1. Report of the Secretariat</p> <p>SC78 Doc. 38.1</p>	<ul style="list-style-type: none"> • Provides a report on recent enforcement efforts and issues. Invites SC to, <i>inter alia</i>, – Incorporate Decisions relating to corruption into RCs (19.77 in RC 17.6 (Rev. CoP19) (Annex 1) and Decision 19.78 in RC 11.3 (Rev. CoP19) (Annex 2)); and – Agree to draft Decisions regarding regional studies on wildlife crime linked to the Internet (Annex 3). 	<ul style="list-style-type: none"> • SSN recommends that SC agree to the recommendations. • SSN is concerned by statements indicating that the CITES Illegal Trade Database might be discontinued when funding is not available. SC should direct Secretariat to prioritize securing funding for core tasks such as this one.
<p>38.2. International Consortium on Combatting Wildlife Crime (ICCWC)</p> <p>SC78 Doc. 38.2</p>	<ul style="list-style-type: none"> • Provides an update on related activities. • Reports that funds required to fully implement the workplan for the ICCWC Strategic Action Plan for 2023-2026 amount to USD 30 million. The number and scale of activities to be delivered will be adjusted according to the available funding. • Invites SC to, <i>inter alia</i>, note the report and encourage Parties to engage with ICCWC. 	<ul style="list-style-type: none"> • SSN recommends that SC agree to the recommendations.
<p>38.3. Task Force on illegal trade in specimens of CITES-listed tree species</p> <p>SC78 Doc. 38.3</p>	<ul style="list-style-type: none"> • Invites SC to: <ul style="list-style-type: none"> – Renew Decision 19.89 regarding the outcome document of the CITES task force meeting on illegal trade in specimens of listed tree species, and – Submit draft Decisions (Annex) that, <i>inter alia</i>, direct Secretariat to organize a workshop on illegal trade in timber species, provide training and provide recommendations to SC. 	<ul style="list-style-type: none"> • SSN recommends that SC agree to the recommendations.
<p>39. Wildlife crime enforcement support in West and Central Africa</p>		
<p>39.1. Report of the intersessional working group</p> <p>SC78 Doc. 39.1</p>	<ul style="list-style-type: none"> • Prepared by Chair of the related SC working group. • Invites SC to, <i>inter alia</i>, agree to draft Decisions that, <i>inter alia</i>, encourage donors to make additional funding available for enforcement, and Secretariat to organize a forum on how Parties can access funds in support of their efforts to implement CITES and combat wildlife crime. 	<ul style="list-style-type: none"> • SSN recommends that SC agree to the recommendations.
<p>39.2. Report of the Secretariat</p> <p>SC78 Doc. 39.2</p>	<ul style="list-style-type: none"> • Provides an update on related activities. • Invites SC to: <ul style="list-style-type: none"> – Agree to draft Decision (Annex) that directs Secretariat to work with its ICCWC partners to continue providing targeted support to Parties in West and Central Africa, to combat wildlife crime; and – Delete remaining related Decisions as they have been implemented or are already incorporated in RC 11.3 (Rev. CoP19) on <i>Compliance and enforcement</i>. 	<ul style="list-style-type: none"> • SSN recommends that SC: <ul style="list-style-type: none"> – Reject Secretariat’s recommendations to delete Decisions 18.90 (Rev. CoP19), 19.84, and 19.85. These Decisions have not been implemented: only six Parties reported on their implementation and limited information has been provided regarding collaboration and communication to tackle illegal wildlife trade affecting West and Central Africa. – Renew and update Decisions 18.90 (Rev. CoP19), 19.84, and 19.85 – Renew Decisions 19.87 and 19.88 with an additional requirement for the Secretariat to request INTERPOL and the World Customs Organization (and other relevant ICCWC members) to gather data and report on the

ISSUE	PROPOSED ACTION	SSN RECOMMENDATION
<p>40. Illegal trade in cheetahs (<i>Acinonyx jubatus</i>)</p> <p>SC78 Doc. 40</p>	<ul style="list-style-type: none"> • Provides summary of feedback from Notification on illegal trade in cheetahs. • Invites SC to: Note the limited responses received; note need for support to Somalia and Yemen, and submit draft Decisions (Annex) that, <i>inter alia</i>, encourage Parties to implement the recommendations in the CITES Big Cat Task Force outcome document. 	<p>number of information reports submitted by each Party (Decision 19.84 paragraphs a) and b)) and report to SC81.</p> <ul style="list-style-type: none"> • SSN recommends that SC adopt the draft Decisions, but note that: <ul style="list-style-type: none"> –Regrettably, no responses from consumer countries were received, significantly undermining the ability of Parties to make informed decisions regarding cheetah trafficking; –Since CoP19, cheetah trafficking continues at high levels and enforcement continues to be poor; and –Most cheetah confiscated on their main trafficking route out of Africa belong to the northeast subspecies, a potential candidate for ‘Critically Endangered’ status under IUCN.⁶
<p>41. Marine turtles (<i>Cheloniidae</i> spp. and <i>Dermochelyidae</i> spp.)</p> <p>SC78 Doc. 41</p>	<ul style="list-style-type: none"> • Submitted by Chair of related SC working group. • Invites SC to agree to amendments to RC 19.5 on <i>Conservation of and trade in marine turtles</i> (Annex) that include, <i>inter alia</i>, substantive improvements in recommendations to address illegal trade and capacity building, and directs Secretariat to bring any significant changes in the illegal trade of marine turtles to the attention of the SC. 	<ul style="list-style-type: none"> • SSN recommends that SC agree to the amendments.
<p>42. CITES Big Cats Task Force</p> <p>SC78 Doc. 42</p>	<ul style="list-style-type: none"> • Invites SC not to pursue, at this time, the development of a resolution on illegal trade in all big cats species as there is limited support to do so. • Invites SC to submit draft Decisions (Annex) to report on implementation of the CITES Big Cats Task Force outcome document;⁷ Secretariat to report to SC and SC to make recommendations. 	<ul style="list-style-type: none"> • SSN recommends that SC agree to the recommendations and draft Decisions with the following amendment to 20.BB: ‘The Secretariat shall report to the <u>81st and 82nd Standing Committee meetings</u> on the implementation of Decision 20.AA, together with any recommendations it may have’.
<p>43. Asian big cats (<i>Felidae</i> spp.)</p>		
<p>43.1. Report of the Secretariat</p> <p>SC78 Doc. 43.1</p>	<ul style="list-style-type: none"> • Provides summaries of reports from Parties regarding: conservation status of and measures for leopard (<i>Panthera pardus</i>) and tiger (<i>Panthera tigris</i>);⁸ enforcement efforts for Asian big cats,⁹ and Asian big cats in captivity (Decision 14.69). Also provides CITES Decisions related to Asian big cats (Annex). • Invites SC to: <ul style="list-style-type: none"> –Note the information provided; –Recommend deletion of Decisions 18.100, 18.101, 18.103 	<ul style="list-style-type: none"> • SSN believes that the report does not sufficiently analyze the conservation status of and illegal trade in leopards, and fails to provide country-specific recommendations. • Decisions proposed for deletion refer to concerns in CoP18 Doc. 71.1 which have not been addressed. Implementation of these decisions has been affected by poor response from Parties. • SC should agree to the recommendations, but additionally recommend that:

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	<p>(Rev. CoP19), 18.105, 18.106, and 19.109, stating that they are incorporated in RC 12.5 (Rev. CoP19) on <i>Conservation of and trade in tigers and other Appendix-I Asian big cat species</i>, the CITES Big Cats Task Force outcome document and the draft decisions proposed in SC78 Doc.42; and</p> <p>–Also recommend deletion of Decisions 18.107 (Rev. CoP19) and 18.109 (Rev. CoP19), as they have been implemented.</p>	<p>–Asian leopard range States report on national conservation status, threats, poaching and seizure incidents and any legal domestic markets for commercial trade in leopard specimens, per RC 12.5 (Rev. CoP19) and related Decisions; and</p> <p>–CoP20 considers a regular, externally-funded review mechanism on implementation of RC 12.5 (Rev. CoP19) and associated Decisions, taking into account Party reports including illegal trade reports, the UNODC World WISE database, and reports by relevant experts.</p>
<p>43.2. Asian big cats in captivity</p> <p>SC78 Doc. 43.2</p>	<ul style="list-style-type: none"> • Provides SC77 recommendations on this issue (Annex 1), report from Czechia (Annex 3), and responses from US and China (Annexes 4 and 5). • Invites SC to note these reports, agree to recommendations to China and USA; agree to delete Decisions 18.102 (Rev. CoP19), 18.108 (Rev. CoP19) and 18.109 (Rev. CoP19); and submit draft Decisions (Annex 2) that, <i>inter alia</i>, direct Parties with facilities that breed large numbers of tigers and facilities housing large numbers of tigers to consider a specific management approach described, and report as required by RC 12.5 (Rev. CoP19). 	<ul style="list-style-type: none"> • SSN notes that the Secretariat: <ul style="list-style-type: none"> –Reports China’s captive tiger population as 2,744 tigers in 36 facilities. SC70 Doc. 51 Annex 2 (Rev. 1) reported China’s population as 6057 individuals in 209 facilities. SC should seek clarity re this decline; –Reports that there is no legal requirement prohibiting breeding, but refers to a statement that a May 2024 Notification includes suspension of permits for captive breeding of terrestrial wild animals such as tigers; –For both the USA and China, include observations on the stockpile security and financial viability of facilities in China, has based its observations on visits to a small proportion of tiger facilities; and –Has not proposed country-specific recommendations for USA and China, the countries with by far the highest population of captive tigers, to restrict breeding to levels supporting conservation or to prohibit establishment of new facilities, as SC has recommended for Thailand, Vietnam and Lao PDR. • SSN recommends that SC agree to the recommendations, but amend paragraph g) of draft Decision 20AA to read: <p>“report on the implementation of this approach <u>and in the case of the relevant countries, report on the implementation of the country-specific recommendations made by the Standing Committee at SC77 and 78</u> in their response to the Notification to the Parties issued by the Secretariat on Asian big cats (Felidae spp.) to facilitate reporting ...on Conservation of and trade in tigers and other Appendix-I Asian big cat species.”</p> • SSN recommends that SC: <ul style="list-style-type: none"> –Urge China and USA to: <ul style="list-style-type: none"> i) restrict breeding in and importation into captive facilities to levels supportive only of conserving wild tigers; –Urge China to:

ISSUE	PROPOSED ACTION	SSN RECOMMENDATION
		i) prohibit establishment of new facilities keeping captive tigers, with only narrow exemptions; and ii) restrict the parts and derivatives for which possession is authorized to prevent these specimens from entering illegal trade; --Urge USA to: i) continue to report on implementation of the <i>Big Cat Public Safety Act</i> as part of its reports on implementation of RC 12.5 (Rev. CoP19) and related decisions.
44. Jaguars (<i>Panthera onca</i>)		
44.1. Report of the intersessional working group SC78 Doc. 44.1	<ul style="list-style-type: none"> Submitted by Chair of the working group. Provides recommendations to range States, and transit and destination countries. Invites SC to note report and consider preparing a specific draft resolution on jaguars. 	<ul style="list-style-type: none"> SSN recommends that SC encourage range States to submit a draft Resolution to CoP20 utilizing elements provided in this document.
44.2. Report of the Secretariat SC78 Doc. 44.2	<ul style="list-style-type: none"> Provides an update on related activities, draft ToR for work on jaguars (Annex 1), a <i>Situational analysis of Jaguars</i> (Annex 2), and a draft <i>Programme of Work for a range-wide Jaguar initiative</i> (Annex 3). Invites SC to: note report, advise if the draft in Annex 3 could serve as a building block for the development of an Intergovernmental Platform, seek feedback on Annex 2, and ask Secretariat to incorporate its recommendations in report to CoP20. 	<ul style="list-style-type: none"> SSN recommends that SC agree to the recommendations and also consider formation of an in-session working group to prepare draft Decisions for CoP20.
45. Rhinoceroses (<i>Rhinocerotidae</i> spp.) SC78 Doc. 45	<ul style="list-style-type: none"> Provides current Decisions (Annex 1), responses from Parties (Annex 2), and reporting on Angola, Botswana, China, Malaysia, Mozambique, Namibia, Qatar, South Africa, United Arab Emirates, Viet Nam. Reports, <i>inter alia</i>, that: --No reports were received from China, Mozambique, Namibia (Mozambique submitted information in its NIRAP report; see Doc. 33.13.1); --229 rhinoceroses were poached in South Africa during the first six months of 2024; --There is no record of seizures in Viet Nam involving rhinoceros specimens from South Africa (2022 - July 2024); --28 rhinoceroses were poached in Namibia in the period up to 1 April 2024 (press release); --Due to the Secretariat's workload, Decision 19.120 could not be implemented to date; a CITES Rhinoceros Enforcement Task Force (Task Force) meeting will be convened during the first half of 2025. Invites SC to, <i>inter alia</i>: --Encourage Angola, Namibia and Viet Nam to strengthen efforts to address rhino trafficking; 	SSN recommends that SC: <ul style="list-style-type: none"> Request South Africa to provide details to the Secretariat in its report to CoP20 on any plans, including private sector initiatives, to establish a domestic commercial rhino horn market and industry, including how this would avoid increasing demand, illegal killing and enforcement complications. Remind Parties of their demand reduction obligations for rhino parts and derivatives (RC 9.14 (Rev. CoP19)). Recommend that CoP20 renew Decision 18.116. Request reports from China and Mozambique on implementation of Decision 19.118, and from Namibia on its implementation of SC77 recommendation d) to SC79. If enforcement concerns persist, then SC may wish to consider this an Article XIII matter requiring appropriate actions under RC 14.3 (Rev. CoP19) on <i>Compliance measures</i>. Request Angola and UAE to submit information on implementation of SC77 recommendation d) and Decision 19.119, to the Secretariat for CoP20 report.

ISSUE	PROPOSED ACTION	SSN RECOMMENDATION
	<ul style="list-style-type: none"> –Request countries to scale up efforts to collect samples from seized horn; and –Recommend deletion of Decisions 19.121/19.122 that direct SC and Secretariat to make recommendations to Parties and CoP. 	<ul style="list-style-type: none"> • Support Secretariat’s recommendations in para. 70 with the following amendments to recommendations a) and b): –a): Add at end of (a): ... <u>and report on any activities conducted in this regard to the Secretariat for inclusion in its report to CoP20.</u>” –b): “encourage Angola, <u>Namibia</u> and Viet Nam to strengthen their engagement ... affecting them <u>and report on any activities conducted in this regard to the Secretariat for inclusion in its report to CoP20.</u>” • Invite South Africa to share information on how results from RhODIS analyses of samples of rhino horn seized abroad contribute to law enforcement efforts, including details on how the samples may inform intelligence-led investigations, and on any enforcement successes to which such samples contributed, and report this information to the Rhinoceros Enforcement Task Force. • Request USA and Namibia to share information with the Secretariat for reporting to CoP20 on transfer of live rhinos in 2024, including details on destinations and intended use, noting that the relevant annotation restricts such trade to in-situ conservation in the species’ natural range.
<p>46. Tortoises and freshwater turtles (Testudines spp.)</p> <p>SC78 Doc. 46</p>	<ul style="list-style-type: none"> • Notes that Madagascar has made little progress in advancing a conservation strategy for its four critically endangered species (<i>Astrochelys radiata</i>, <i>A. yniphora</i>, <i>Pyxis arachnoides</i> and <i>P. planicauda</i>), and invites SC to submit draft Decisions (Annex) that, <i>inter alia</i>, request Madagascar to report to AC on its global action plan for these species and to SC on related enforcement activities, including review of legislation and information exchange with Parties that seize these species. 	<ul style="list-style-type: none"> • SSN recommends that SC agree to the draft Decisions.
<p>47. Legal acquisition findings</p> <p>SC78 Doc. 47</p>	<ul style="list-style-type: none"> • Provides an update on related work. • Invites SC to, <i>inter alia</i>: <ul style="list-style-type: none"> --Submit draft Decisions (Annex 1) directing Parties to provide feedback on the rapid guide for making legal acquisition findings’ and the Secretariat to continue to organize related capacity-building workshops; --Submit amendments to RC 18.7 (Rev. CoP19) on <i>Legal acquisition findings</i> (Annex 2); and --Request Secretariat to make available, draft guidance on the chain of custody required for demonstrating the legal acquisition of the parental breeding stock (Annex 3). 	<ul style="list-style-type: none"> • SSN recommends that SC adopt the draft Decisions and amendments, but agree that the draft guidance on chain of custody be reviewed by SC over the next intersessional period in order to provide Parties and observers sufficient time for review and prepare draft Decisions for CoP20 to that effect.
<p>48. Non-detriment findings for specimens of Appendix-II species taken from areas beyond national jurisdiction (BBNJ)</p>	<ul style="list-style-type: none"> Submitted by AC. • Provides recommendations of AC (para. 7) for consideration of AC; and additional issues raised at the workshop (para. 9). • Invites SC to note AC recommendations and see draft Decisions in SC78 Doc. 49. 	<ul style="list-style-type: none"> • SSN recommends that SC take note of AC report and the recommendation in paragraph 7. However, the questions posed by AC in paragraph 8 should be answered in the document on frequently asked questions and responses to introduction from the sea and not in RC 14.6 (Rev. CoP16).

ISSUE	PROPOSED ACTION	SSN RECOMMENDATION
<p>SC78 Doc. 48</p>		
<p>49. Introduction from the sea (IFS)</p> <p>SC78 Doc. 49</p>	<ul style="list-style-type: none"> • Provides update on implementation of related Decisions. • Invites SC to: <ul style="list-style-type: none"> –Note this document; and –Submit draft Decisions that, <i>inter alia</i>, direct SC with assistance from Secretariat to draft a revision of RC 14.6 (Rev. CoP16) on <i>Introduction from the sea</i>, to integrate recommendations in SC78 Doc. 48, other elements related to implementation, and the BBNJ Agreement.¹⁰ 	<ul style="list-style-type: none"> * SSN recommends that SC <ul style="list-style-type: none"> –Adopt Decision 20.AA to monitor and support implementation of RC 14.6 (Rev. CoP16); and –Reject 20.BB to revise RC 14.6 (Rev. CoP16) as unnecessary; reports from Parties at the two technical workshops in April 2024 demonstrate that issuance of IFS certificates and import/export permits does not pose unique challenges.
<p>50. Purpose-of-transaction codes</p> <p>SC78 Doc. 50</p>	<ul style="list-style-type: none"> • Submitted by Chair of the related SC working group. Invites SC to: <ul style="list-style-type: none"> –Consider proposed definition of code ‘P’; –Agree that purpose-of-transaction code ‘T’ should be used for all CITES movements unless another purpose-of-transaction code clearly predominates; and –Agree to submit draft Decisions (Annex) that, <i>inter alia</i>, direct SC intersessional working group to continue the discussions on purpose codes ‘Q’, ‘B’, ‘G’, and ‘S’. 	<ul style="list-style-type: none"> • SSN recommends that SC agree to the recommendations (including that code T be used as a default) with amendments to purpose code P, for greater clarity on the use of ‘trade’: <p>‘For the non-commercial movement of personal property of the person trading <u>importing/exporting/re-exporting</u> the specimen, not intended for commercial trade use after the import/export/reexport...or otherwise transferred <u>by any means involving a commercial transaction</u> outside the individual’s State of usual residence.... in accordance with Resolution Conf. 16.8 (Rev. CoP17) on Frequent cross-border non-commercial movements of musical instruments or for cross border movement of personally owned live animals in accordance with Resolution Conf. 10.20 on Frequent cross-border movement of personally owned live animals.’</p>
<p>51. Electronic systems and information technology</p> <p>SC78 Doc. 51</p>	<ul style="list-style-type: none"> • Submitted by Secretariat in consultation with the Chair of the related SC working group. • Provides an update on related activities. • Invites SC to note progress and,; <ul style="list-style-type: none"> –Submit draft Decisions (Annex 1) that direct Parties, SC and Secretariat to undertake a slate of activities including, <i>inter alia</i>, SC to finalize the study on the information used by different Parties in a risk-based approach for CITES trade controls (re: 2D bar codes); provide capacity building to Parties on electronic permit systems; work with Parties to advance use of advance the use of 2D bar codes; and SC to monitor Parties’ pilot projects on possible alternatives to the physical endorsement of CITES permits/certificates; and –Agree agree on the Guidelines on the use of two-dimensional (2D) barcodes on CITES permits/certificates 	<ul style="list-style-type: none"> • No comment.
<p>52. Risk assessment and analysis for border control of CITES-listed species</p>	<ul style="list-style-type: none"> • Reports that: the Secretariat has initiated a study and the development of a guidance on risk assessment and inspections 	<ul style="list-style-type: none"> • SSN recommends that the Secretariat publish a notification seeking input on the draft guidance from stakeholders to ensure as much participation as possible

¹⁰ United Nations Convention on the Law of the Sea on the Conservation and Sustainable Use of Marine Biological Diversity of Areas beyond National Jurisdiction.

ISSUE	PROPOSED ACTION	SSN RECOMMENDATION
<p>SC78 Doc. 52</p>	<p>for CITES trade controls; Secretariat will discuss the study/guidance with interested Parties in an online meeting; guidance will be presented to SC81 for endorsement.</p> <ul style="list-style-type: none"> • Invites SC to note progress and encourage Parties to participate. 	<p>from Parties that may find the timing or nature of an online meeting challenging.</p>
<p>53. Stocks and stockpiles</p> <p>SC78 Doc. 53</p>	<ul style="list-style-type: none"> • Proposes: <ul style="list-style-type: none"> - A definition of “stockpile” based on intersessional comments from Parties and Observers; - That the term “stock” not be used to refer to stockpiles; and - Amendment of several Resolutions to align with the proposed changes. 	<ul style="list-style-type: none"> • SSN recommends that SC agrees to the proposed definition, with the following amendments: <ul style="list-style-type: none"> –“Specimens included in permanent collections held by museums, scientific institutions <u>for non-commercial purposes</u>, or individuals as <u>personal or household effects</u>, are excluded from the definition”. Individuals should be exempted for holding personal and household effects, and not for large stockpiles; –Delete “accumulated” as it implies a gradual acquisition or ongoing collection of specimens, and Parties may seize or acquire such specimens only once; –Add at end of the definition that Appendix I specimens from stockpiles should not be used commercially in addition to not entering or re-entering illegal trade.
<p>54. Stocks and stockpiles (elephant ivory)</p> <p>SC78 Doc. 54</p>	<ul style="list-style-type: none"> • Reports that, <i>inter alia</i>, <ul style="list-style-type: none"> --Many Parties either do not declare their government ivory stockpiles or do not declare them every year; –RC 14.3 (Rev. CoP19) on <i>CITES compliance procedures</i> indicates that only the provisions associated with the NIAP process can be considered as part of compliance procedures; and -Secure management of non-ivory stockpiles has also become increasingly important for other CITES-listed specimens. • Invites SC to, <i>inter alia</i>, submit to CoP20: <ul style="list-style-type: none"> –Amendments to RC 10.10 (Rev. CoP19) (Annex 1); –Draft Decisions to CoP20 directing Secretariat to provide training support to Parties for the secure management of stockpiles of all CITES-listed specimens, and inform Secretariat on any lessons learned; and –Delete current related Decisions. 	<ul style="list-style-type: none"> • SSN recommends that SC: <ul style="list-style-type: none"> – <u>Support the amendments to RC 10.10</u> (Rev. CoP19) with an additional amendment on capacity building to ensure ivory stockpiles are inventoried, secured, and when appropriate, disposed of <u>non-commercially</u>; –<u>Renew</u> Decisions 18.184 (Rev. CoP19) a) and 18.185 (Rev. CoP19); –Clarify that persistent non-reporting <i>can</i> be addressed under RC 14.3 para 29); –Propose a Decision directing the Secretariat to cross-check information on Parties that have not submitted inventories of ivory stockpiles in accordance with RC 10.10 but have reported seizures to ETIS or in annual illegal trade reports, and include this information in the Secretariat’s report on disposal of ivory stockpiles; –Strengthen recommendation a) in para 28) to “encourage Parties, in particular <u>Parties in the NIAP process, Parties where ivory seizures or confiscations were reported to ETIS and African</u> elephant range States to step up their efforts” to submit inventories of ivory stockpiles in accordance with RC 10.10. -Add Decisions to Annex 2 urging Parties to inventory and report on stockpiles of all CITES-listed species and for the Secretariat to report on their status.
<p>55. Transport of live specimens</p>	<ul style="list-style-type: none"> • Reports that Secretariat will manage access for IATA digital single-user licenses for the 2025 edition of the Live Animal 	<ul style="list-style-type: none"> • SSN recommends that SC: <ul style="list-style-type: none"> –Welcome the procurement of licenses for the IATA LARs for distribution: and

ISSUE	PROPOSED ACTION	SSN RECOMMENDATION
<p>SC78 Doc. 55</p>	<p>Regulations (purchased at a reduced price) to facilitate access to developing country Parties.</p> <ul style="list-style-type: none"> • Invites SC to agree that the related Decision has been implemented. 	<p>–Recommend further review and revision of RC 10.21 (Rev. CoP 19) on <i>Transport of Live Specimens</i>, and the associated non-air transport guidelines, taking into account the effective and practical solutions for reducing pathogen spillover risk and opportunities for collaboration developed by the AC intersessional working group (Annex 1 of SC78 Doc 15), including a recommendation to ‘continue to work on improving standards and protocols for transport of live animals and veterinary samples’.</p>
<p>56. Rapid movement of wildlife diagnostic samples and musical instruments</p> <p>SC78 Doc. 56</p>	<ul style="list-style-type: none"> • Submitted by Chair of the related SC working group. • Invites SC to submit draft Decisions that, <i>inter alia</i>, <ul style="list-style-type: none"> –Direct Secretariat to seek feedback from the Parties on their experiences on movement of these items, develop webpages on these issues, along with simplified guidance materials on rapid-movement of both wildlife diagnostic samples and musical instruments; and –Direct SC to review the simplified guidance before posting to the CITES website. 	<ul style="list-style-type: none"> • SSN recommends that SC agree to the recommendations.
<p>57. Specimens produced through biotechnology</p> <p>SC78 Doc. 57</p>	<ul style="list-style-type: none"> • Reports that only one response was received to a related Notification and invites SC to renew the related Decisions to report to CoP21. 	<ul style="list-style-type: none"> • SSN recommends that SC agree to the recommendation.
<p>58. Disposal of confiscated specimens</p> <p>SC78 Doc. 58</p>	<ul style="list-style-type: none"> • Invites SC to: <ul style="list-style-type: none"> –Submit two amendments of Annex 1 to RC 17.8 (Rev. CoP19) on <i>Disposal of illegally traded and confiscated specimens of CITES-listed species</i> to recommend that, <i>inter alia</i>, transfers of confiscated specimens will not increase illegal, irregular or otherwise undesired trade in the species, and those involved in the confiscation cannot obtain the animals. –Maintain Decisions 19.169, 19.171 and 19.173 that, <i>inter alia</i>, direct Secretariat to continue to make helpful related information available to the Parties. --Delete Decisions 19.170, 19.172, and 19.174. 	<ul style="list-style-type: none"> • SSN recommends that SC: <ul style="list-style-type: none"> –Note concern that transferring confiscated specimens to commercial breeding centers could incentivize illegal trade to supplement such operations, and/or prevent the making of legal acquisition findings by facilities registered under RC 12.10; –Recommend a new Decision urging Parties to develop and implement national action plans or equivalent processes using the guidelines in Annex 3 of RC 17.8 (Rev. CoP19), submit them to Secretariat for sharing on the dedicated page of the CITES website, and report on their implementation; – Retain Decisions 19.170 and 19.172.
<p>59. Labelling system for trade in caviar</p> <p>SC78 Doc. 59</p>	<ul style="list-style-type: none"> • Submitted by Chair of related SC working group. • Provides report on <i>Benefits and drawbacks of QR codes as part of the universal labelling system for trade in and identification of caviar under CITES</i>. • Invites SC to: note report; encourage Parties interested to use the QR codes to carry out a pilot test and report results to SC81; and delete related Decisions. 	<ul style="list-style-type: none"> • No comment.
<p>60. Trade in stony corals</p> <p>SC78 Doc. 60</p>	<ul style="list-style-type: none"> • Invites SC to submit amendments to: RC 11.10 (Rev. CoP15) on Trade in stony corals (Annex 1 (revises related definitions)), RC 9.6 (Rev. CoP19) on Trade in readily recognizable parts and derivatives (Annex 4), and the Guidelines for the 	<ul style="list-style-type: none"> • No comment.

ISSUE	PROPOSED ACTION	SSN RECOMMENDATION
	preparation and submission of CITES annual reports and Guidelines for the preparation and submission of the CITES annual illegal trade report (Annex 2). <ul style="list-style-type: none"> • Invites SC to submit draft Decisions (Annex 3) to CoP20. 	
61. Resolution Conf. 12.10 (Rev. CoP15) on Registration of operations that breed Appendix-I animal species in captivity for commercial purposes		
61.1. Review of Resolution Conf. 12.10 (Rev. CoP15) SC78 Doc. 61.1	<ul style="list-style-type: none"> • Submitted by Chair of the related SC working group. • Provides amendments to RC 12.10 (Rev. CoP15) on <i>Registration of operations that breed Appendix-I animal species in captivity for commercial purposes</i> (Annex) that, <i>inter alia</i>: <ul style="list-style-type: none"> -CITES register should specify, <i>inter alia</i>, products produced for or excluded from export, and origin of breeding stock; -If Party believes a facility is not complying with original registration, it can raise concerns with SC; and -Resolves that Management and Scientific Authorities will collaborate in confirming that the facility makes a meaningful contribution to the conservation needs of the species. 	<ul style="list-style-type: none"> • SSN recommends that SC submit the amendments to CoP20. SC, rather than the registering Party, should have the authority to determine whether a registered facility should be allowed to produce specific types of products. SSN recommends that SC support the suggestion that deliberations and determinations by SC be limited to 'documented concerns with legality, sustainability, or traceability'.
61.2. Implementation of paragraph 5 j) of Resolution Conf. 12.10 (Rev. CoP15) SC78 Doc. 61.2	<ul style="list-style-type: none"> • Paragraph j) of RC 12.10 (Rev. CoP15) reads: "the Management Authority shall satisfy itself that the ... operation will make a continuing meaningful contribution according to the conservation needs of the species concerned". Provides an analysis of responses to this requirement on registration applications (Annex). • Invites SC to:, <i>inter alia</i>: <ul style="list-style-type: none"> –Amend RC 12.10 Rev. CoP15) to require the management Authority to collaborate with the Scientific Authority to ensure that registration requirements are fulfilled; and –Agree to a list of materials for Parties to use in satisfying this requirement including a list of "seven conservation strategies" received to date that include, <i>inter alia</i>, reduction of the pressure on wild populations, contribution to the genetic diversity of the captive-bred population, financial contribution to a conservation fund, and public awareness. 	<ul style="list-style-type: none"> • SSN recommends that SC agree to the recommendations but notes, regarding the "seven conservation strategies": <ul style="list-style-type: none"> –"None of the seven strategies established a direct link to the conservation of wild populations.... and that there is not enough information to know whether the strategies outlined have indeed been implemented and even more important, if they are measurable and if there are suitable indicators to do so" (Mexico at AC33); –There has never been an evaluation of how, whether and to what extent breeding operations contribute to the conservation of wild populations of Appendix I species; and • SSN recommends that SC amend the lead paragraph of Recommendation b) to read: "<u>Request Parties to require that operations seeking registration provide details on their use of the following guidance, including specific data, as part of implementation of the requirement stated in paragraph 5 j) of RC 12.10 (Rev. CoP15) that Management Authorities shall satisfy itself that the captive-breeding operation will make a continuing meaningful contribution to the conservation needs of the species concerned, and report these details to the Secretariat.</u>"
61.3. Registration of the operation Radiatas Paradise (Spain) breeding <i>Astrochelys radiata</i>	<ul style="list-style-type: none"> • Withdrawn. 	<ul style="list-style-type: none"> • No comment.

ISSUE	PROPOSED ACTION	SSN RECOMMENDATION
<p>62. Review of CITES provisions related to trade in specimens of animals and plants not of wild source</p> <p>SC78 Doc. 62</p>	<ul style="list-style-type: none"> • Prepared by Co-Chairs of the related SC working group. Reports on efforts of the working group. Invites SC to submit to CoP20, draft Decisions that, <i>inter alia</i>, direct Secretariat to organize a technical workshop on the review of trade in specimens of both CITES-listed animal and plants not of wild source in order to address, inter alia, <ul style="list-style-type: none"> –Possible amendments to RC 10.16 (Rev. CoP19) and RC 12.10 (Rev. CoP19), and –Key elements that may contribute to the uneven application of Article VII, paragraphs 4 and 5. 	<p>SSN recommends that SC reject the draft Decisions and bring these discussions to a close:</p> <ul style="list-style-type: none"> • Little progress has been made on these issues due to disagreement whether to ease trade requirements for specimens traded as non-wild and/or limit application of the system for registering operations breeding Appendix-I animal species for commercial purposes (Article VII, paragraphs 4 and 5). • It is unlikely that a workshop would lead to solutions. There is no agreement on the need to make amendments to RC 10.16 (Rev. CoP19) or RC 12.10 (Rev. CoP19). SC77 called on Parties “to restrict imports for primarily commercial purposes of captive-bred specimens of Appendix-I species to those produced by operations included in the CITES Register, and to reject any permit or certificate granted under Article VII, paragraph 4, if the specimens concerned do not originate from a registered facility” (se Doc.31.1). • Trade in such specimens involves problems and risks, there is no evidence that easing trade requirements would benefit conservation.
<p>63. Identifying information on species at risk of extinction affected by international trade</p> <p>SC78 Doc. 63</p>	<ul style="list-style-type: none"> • Prepared by the Chair of the intersessional working group. • Provides observations and recommendations of the working group, including that RC 19.2 on <i>Capacity-building</i> be amended to invite Parties to update the CITES website with relevant studies on species that are or may be affected by international trade, are at risk of extinction and are either not yet regulated under CITES or may receive insufficient CITES regulation. • Invites SC to, <i>inter alia</i>, submit the recommendations to the CoP20 and replace Decisions 19.196-19.188 with the draft decisions in the Annex, • Queries whether SC should “communicate the amendment to RC 19.2 on <i>Capacity-building</i> included in paragraph 7 to CoP20 for its consideration.” 	<ul style="list-style-type: none"> • SSN recommends that SC support the draft Decisions in Annex 1 with the following amendments: <ul style="list-style-type: none"> –Decision 20.AA: The Secretariat shall, subject to external resources:...b) develop a dedicated page with a link to a restricted section on the CITES website accessible to Parties to make the following information ...available to Parties <u>and stakeholders:</u> <ol style="list-style-type: none"> <u>the methodology developed by UNEP-WCMC, IUCN, and Oxford University along with other methodologies used for identifying and/or selecting species at risk of extinction that are or may be affected by international trade that might merit consideration to be included in the CITES Appendices;</u> <u>resulting information or analyses ...</u> –Decision 20.DD para b): ...b) consider any other actions or mechanisms that may be necessary to <ol style="list-style-type: none"> <u>identify species at risk of extinction and threatened by international trade that are or may be affected by international trade, including those that are not yet regulated under CITES or may receive insufficient CITES regulation;</u> <u>provide technical support and drafting capacity to Parties in the preparation of listing proposals; and</u>

ISSUE	PROPOSED ACTION	SSN RECOMMENDATION
		<p>c. provide any recommendations <u>recommend amendments to Resolution Conf 19.2 on Capacity Building establishing such actions or mechanisms</u> relating to paragraphs a) and b)</p>
<p>64. Spix's macaw (<i>Cyanopsitta spixii</i>)</p> <p>SC78 Doc. 64</p>	<ul style="list-style-type: none"> • Submitted by Brazil. • The Spix's macaw is endemic to Brazil and Extinct in the Wild; primary cause is trapping for trade plus habitat loss; all birds held outside of Brazil were illegally acquired. • Provides background on the transfers of Spix's Macaws from Germany not in keeping with Notification to the Parties No. 2001/052, reportedly for profit, and misuse of purpose code B for commercial activities. • Invites SC to, <i>inter alia</i>: report on the EU's full implementation of RC 12.10 (Rev. CoP15) at CoP20; revise definition of source code "B" to prevent misuse, and establish an in-session working group that develops recommendations to CoP20 to address issues of non-compliance of operations holding this species and return of specimens to Brazil. 	<ul style="list-style-type: none"> • SSN recommends that SC: <ul style="list-style-type: none"> –Agree to Brazil's recommendations; and –Urge Germany to provide complete information on all transfers made both within and outside the EU, the purposes of these transactions, income generated from any sales, loans or "donations" and any measures taken against potential non-compliance issues. • SSN is concerned that: <ul style="list-style-type: none"> –118 Spix have been transferred from the German facility holding the majority of Spix to private entities between 2019 and 2023, including for purposes of "re-financing";¹¹ –Transfers risk increasing of demand and illegal trade in these highly valuable birds; trade in illegally acquired birds and their offspring undermine CITES; and –The vast majority of birds are now 'outside' Brazil's conservation programme, with transfers taking place outside the recommendations contained in Notification no. 2001/052, and are not available for reintroduction into the wild.
<p>65. Elephants (<i>Elephantidae</i> spp.)</p>		
<p>65.1. Report on the implementation of Resolution Conf. 10.10 (Rev. CoP19)</p> <p>SC78 Doc. 65.1</p>	<ul style="list-style-type: none"> • Provides report on illegal killing and trade of elephants (Annex 1). • Invites SC to note <i>inter alia</i>: <ul style="list-style-type: none"> –Downward PIKE trend in Africa; –Increase in the number and total weight of ivory seizures reported compared to 2022; –Due to budgetary issues, Secretariat will not be able to maintain the same level of support to MIKE sites as in previous years; and –New pilot project to expand monitoring to other CITES-listed species in elephant range States; species to be determined <p>Also invites SC to agree to the proposed changes to the ETIS data collection form.</p>	<ul style="list-style-type: none"> • SSN recommends that SC: <ul style="list-style-type: none"> –Support the changes to the ETIS reporting form in Annex 1d; –Urge funding for MIKE and ETIS as noted in para 67(d); –Express concerns about the increased number and total weight of ivory seizures in 2023 compared to 2022 and implications for elephant status; and –Note the EU's pilot project to expand monitoring and reporting at MIKE sites to other CITES-listed species.
<p>65.2. Implementation of the priority recommendations from the review of the ETIS programme</p> <p>SC78 Doc. 65.2</p>	<ul style="list-style-type: none"> • Provides information on implementation of priority recommendations of the ETIS review (Annex 1); ETIS Data Validation (Annex 2); improvements made on modelling methods (Annex 3); and analysis to improving the analytical framework for ETIS (Annex 4). • Invites SC to, <i>inter alia</i>.,: 	<p>No comment.</p>

¹¹ SC77 Doc.33.8

ISSUE	PROPOSED ACTION	SSN RECOMMENDATION
	<ul style="list-style-type: none"> –Note progress made; --Agree to the protocol for ETIS data validation; --Consider the application of network models to ETIS data for CoP20 report; and –Submit draft Decisions that, <i>inter alia</i>, direct Secretariat to review the ToR of the MIKE-ETIS Technical Advisory Group and propose amendments; explore the feasibility of an integrated analysis using the MIKE, ETIS and African Elephant Database data; and examine the relationship between ivory stockpiles and illegal ivory trade based on aggregated stockpile data. 	
<p>65.3. ETIS categorization of Parties</p> <p>SC78 Doc. 65.3</p>	<p>Provides draft criteria for the categorization of Parties (para. 9), an overview of methodologies for the evaluation of Parties (Annex 1) and Categorization of Parties (Annex 2). Invites SC to:</p> <ul style="list-style-type: none"> –Agree to criteria to recommend to CoP20 for adoption; –Agree to additional (contextualized) information (para. 10) also to be used; and –Agree the process (para. 13) as part of the consultation process with Parties identified in the ETIS reports in the implementation of Step 1 b) and c) of the NIAP process. 	<p>No comment.</p>
<p>65.4. Domestic ivory markets</p> <p>SC78 Doc. 65.4</p>	<ul style="list-style-type: none"> • Provides report on illegal killing and trade of elephants (Annex 1). • Invites SC to note <i>inter alia</i>: <ul style="list-style-type: none"> –Downward PIKE trend in Africa; –Increase in the number and total weight of ivory seizures reported compared to 2022; –Due to budgetary issues, Secretariat will not be able to maintain the same level of support to MIKE sites as in previous years; and –New pilot project to expand monitoring to other CITES-listed species in elephant range States; species to be determined <p>Also invites SC to agree to the proposed changes to the ETIS data collection form.</p>	<ul style="list-style-type: none"> • SSN recommends that SC: <ul style="list-style-type: none"> –Support the changes to the ETIS reporting form in Annex 1d; –Urge funding for MIKE and ETIS as noted in para 67(d); –Express concerns about the increased number and total weight of ivory seizures in 2023 compared to 2022 and implications for elephant status; and –Note the EU’s pilot project to expand monitoring and reporting at MIKE sites to other CITES-listed species.
<p>65.5. Exchange of information between the annual illegal trade report and ETIS</p> <p>SC78 Doc. 65.5</p>	<ul style="list-style-type: none"> • Prepared by Chair of related SC working group. • Invites SC to submit amendments to RC 10.10 (Rev. CoP19) on <i>Trade in elephant specimens</i> and RC 11.17 (Rev. CoP19) on National reports to ensure that data is shared with both ETIS and the CITES Illegal Trade Database. • Invites SC to note additional issues that were raised that might benefit from discussion including reporting deadlines, data validation, cost-efficiency, etc... 	<p>No comment.</p>
<p>65.6. Trade in Asian elephants (<i>Elephas maximus</i>)</p> <p>SC78 Doc. 65.6</p>	<ul style="list-style-type: none"> • Provides: <ul style="list-style-type: none"> –Information regarding the implementation of related Decisions 18.226 (Rev. CoP19), 19.107 and 19.108; 	<ul style="list-style-type: none"> • SSN recommends that SC: <ul style="list-style-type: none"> –Reject the recommendation to delete Decisions 18.226, 19.107 and 19.108 as these have not been fully implemented;

ISSUE	PROPOSED ACTION	SSN RECOMMENDATION
	<p>–List of key elements to be considered regarding registering, marking and tracing systems for captive Asian elephants (Annex 1);</p> <p>–Draft Decisions that direct Secretariat to provide training on identification of Asian elephant specimens, and develop a factsheet regarding what constitutes a “captive bred” Asian elephant (Annex 2); and</p> <p>–Report that only three Parties submitted reports in response to Notification No. 2024/76.</p> <ul style="list-style-type: none"> • Invites SC to: <p>–Encourage range States to include the elements in Appendix I in their controls;</p> <p>–Request Secretariat to monitor trade in Asian elephant specimens and bring matters of concern to SC;</p> <p>–Submit the draft Decision to CoP20 and Delete Decisions 18.226 (Rev. CoP19), 19.107 and 19.108.</p>	<p>–Reject the recommendation that the Secretariat will monitor the trade in Asian elephant specimens as this would place the Secretariat under further capacity and resource constraints and can not replace the reporting requirements in 18.226;</p> <p>–Direct Secretariat to continue dialogue with range States regarding the need for a regional database noting that response rates were disproportionately low for South Asia and as such not fully representative;</p> <p>–Strengthen provisions relating to the disposal of carcasses (Annex I), and mandate provision of information relating to their disposal and location, to prevent laundering of parts and products; and</p> <p>–Encourage affected Parties to scale up activities to address illegal online trade, including using support available through INTERPOL (see RC. 11.3 (Rev. CoP19)).</p> <ul style="list-style-type: none"> • SSN recommends that SC renew Decisions 18.226, 19.107 and 19.108 with amendments; <p>–Decision 18.226: <u>Asian elephant range States and other All-Parties involved in...are encouraged to:</u></p> <ol style="list-style-type: none"> a) undertake...their parts and derivatives, <u>including on online markets, ...;</u> d) <u>reconsider and</u> collaborate in the development ... <p>–Decision 19.107: Amend:</p> <ol style="list-style-type: none"> b) <u>acknowledging the incomplete understanding of the illegal trade threats to Asian elephants, subject to the availability of external funding and 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, commission a systematic study of the illegal trade in Asian elephant specimens; and</u> c) report any information provided in response to Decision 19.107 paragraph a) <u>and on the implementation of Decision 19.107 paragraph b, as well as the findings and recommendations concerning trade in Asian elephants and their parts and derivatives as appropriate, to the Standing Committee and the results of the study in Decision 19.107 paragraph b) and make recommendations to the Standing Committee at its 81st meeting.</u> <p>–Decision 19.108: Revise to report to SC81 and CoP21.</p>

ISSUE	PROPOSED ACTION	SSN RECOMMENDATION
<p>65.7. Trade in mammoth ivory</p> <p>SC78 Doc. 65.7</p>	<ul style="list-style-type: none"> • Provides a report on information regarding the trade in mammoth ivory and its potential impact and contribution to the illegal trade in elephant ivory and poaching, and related references (Annex). • Reports that “it seems that including mammoth ivory in CITES Appendix II ... might even be counterproductive”, and that “inclusion of an extinct species in the CITES Appendices falls outside the CITES mandate”. • Invites SC to, <i>inter alia</i>, note this document, Parties to monitor ivory markets to prevent laundering and that related Decisions be deleted. 	<ul style="list-style-type: none"> • SSN recommends that SC: <ul style="list-style-type: none"> --Reject conclusions by the Secretariat that including mammoth ivory in CITES Appendix II might be counterproductive and that extinct species cannot be included in the CITES Appendices. On the latter issue, RC 9.24 suggests that extinct species may be listed when precautionary criteria are met and at CoP2 the Parties agreed to insert “p.e.” in the Appendices to denote any species that may possibly be extinct; and --Remind the Secretariat that the Parties, not the Secretariat, are responsible for interpreting the Convention.
<p>65.8. CITES dialogue meeting for African elephant range States</p> <p>SC78 Doc. 65.8</p>	<ul style="list-style-type: none"> • Prepared by SC Chair, in consultation with Vice Chair and Dialogue Meeting Vice Chairs with support of Secretariat. • Invites SC to welcome the results of the meeting set out in the communiqué (Annex 2), including amendments to Annotation A10 and preparatory meetings hosted by the African Union Commission (AUC) prior to the CoP document deadline to ‘strengthen regional coordination and unity’. • Invites SC to submit draft Decisions (Annex 1) to CoP that, <i>inter alia</i>, direct Secretariat to: develop TOR for, and to convene a technical workshop for, African elephant range States to consider mechanisms for sustainable management of elephants and ivory stockpiles, including non-commercial disposal and ‘other means’, to mobilise resources to support conservation and management of elephants; and SC to consider the results and make recommendations to CoP21. 	<ul style="list-style-type: none"> • SSN recommends that, with regard to the Communiqué, SC clarify that: <ul style="list-style-type: none"> --All trade in live elephants from Appendix II populations falls under para. b) of Annotation A10, not Appendix I, and is subject to the definition of ‘appropriate and acceptable destinations’ in RC 11.20 (Rev. CoP18); --Exports of ivory carvings from Zimbabwe will still be considered non-commercial; --That the objective of the AUC-hosted meetings is ‘regional <i>coordination</i>’ (as identified by the AUC in its Note Verbale), rather than as ‘unity’, which is unrealistic and inappropriate given different views among range States; and --Suggest that any meeting and/or workshop be open to other Parties, experts and Observers. • SC should amend the draft Decisions to: <ul style="list-style-type: none"> --Clarify that the purpose of the workshop is sustainable financing for ‘<i>conservation</i> and management of elephants and management of ivory stockpiles’, not ‘<i>sustainable management</i>’; --Clarify that ‘non-commercial’ refers to <i>both</i> ‘disposal of ivory stockpiles’ <i>and to</i> ‘other means’, in order to exclude commercial trade. Reference to ‘mechanisms for sustainable management, including non-commercial disposal of ivory stockpiles, and other means (emphasis added)’ may leave open the possibility of future ivory sales, culling, further hunting and capture; --Ensure that SC oversee convening of the workshop and consultant hire, and that ToR for both are reviewed by SC81; and --Ensure that experts, Observers and other Parties are invited to the workshop to ensure balance, transparency and availability of all information.

ISSUE	PROPOSED ACTION	SSN RECOMMENDATION
<p>66. Great apes (Hominidae spp.): Report on the implementation of RC 13.4 (Rev. CoP18)</p> <p>SC78 Doc. 66</p>	<ul style="list-style-type: none"> • Provides an update on recent related activities, a summary of ongoing GRASP/SAG¹² activities (Annex 1) and a summary of seized great ape specimens (2016-2023) (Annex 2). • Invites SC to note this report, encourage Parties to report seizures at the species level, and encourage range States to address this issue as part of their West Africa Wildlife Crime Strategy (WAWCS) as well as national crime plans and strategies. 	<ul style="list-style-type: none"> • SSN recommends that SC agree to the recommendations. • SSN notes that the CITES Trade Database records gross exports of approximately 500 live great apes (all purposes/sources) from 2016-2023. • SSN urges SC to: <ul style="list-style-type: none"> –Recommend that the Secretariat, in cooperation with GRASP/SAG, report to AC34 and SC81 on any of these transactions that may not be in accord with CITES requirements. SSN notes the confiscation in December by Turkey of a young gorilla originating in Nigeria destined for Thailand. –Review the present document with SC77.Doc.42 (Liberia) regarding the re-establishment of a great ape enforcement task force and CoP19. Inf.36.1 (USA)
<p>67. Pangolins (Manis spp.)</p>		
<p>67.1. Report of the Animals Committee</p> <p>SC78 Doc. 67.1</p>	<ul style="list-style-type: none"> • Submitted by AC Chair. • Invites SC to support AC recommendations for Parties to use conversion parameters (para. 12) for <i>M. gigantea</i>, <i>M. javanica</i>, <i>M. pentadactyla</i>, <i>M. tetradactyla</i> and <i>M. tricuspis</i>; encourage the use of specific <i>identification materials</i>; and <i>Submit draft Decisions that</i>, inter alia, direct Secretariat to further develop conversion parameters for all pangolin species; and AC to review the parameters and make recommendations to SC. 	<ul style="list-style-type: none"> • SSN recommends that SC agree to the recommendations.
<p>67.2. Report of the Secretariat</p> <p>SC78 Doc. 67.2</p>	<ul style="list-style-type: none"> • Provides an update to the implementation of Decisions 18.238, 18.239, 19.200, 19.201, 19.202, 19.203 and 19.204. 	<ul style="list-style-type: none"> • SSN recommends that SC: <ul style="list-style-type: none"> –Retain Decision 18.238 as the existing language in paragraph 10 of RC 17.10 (Rev. CoP19) does not include a reporting requirement, and responses from Parties have been limited; –Support the amendment of RC 17.10 (Rev. CoP19) to align pangolin stockpile reporting with that of elephant ivory and rhinoceros horn stockpile reporting, as presented in the annex of SC78 Doc 67.2; –Urge Parties, especially those which have had significant illegal trade and seizure activity in recent years, to report to the Secretariat in line with Decisions 19.201 and 19.202; and –Support the Secretariat’s development of time-bound and measurable recommendations for Parties to implement RC 17.10 (Rev. CoP19), for consideration at CoP20.
<p>68. Saiga antelopes (Saiga spp.)</p>		

¹² Great Apes Survival Partnership (GRASP) and the Section on Great Apes (SGA) of the International Union for Conservation of Nature (IUCN) Species Survival Commission (SSC) Primate Specialist Group.

ISSUE	PROPOSED ACTION	SSN RECOMMENDATION
<p>68.1. Report by Kazakhstan</p> <p>SC78 Doc. 68.1</p>	<ul style="list-style-type: none"> • Provides total for the country's saiga stockpile (42,161 horns) and population estimates; seizures have increased; in 2023-2024, 43,503 saiga were culled with meat sold to local communities. • Invites SC to, <i>inter alia</i>, encourage Parties to report on trade and stocks; recommend Secretariat to prepare draft Decisions for CoP20; and establish an intersessional working group on the species to review related information and documents, and potentially prepare a resolution on <i>Saiga</i> spp. 	<ul style="list-style-type: none"> • SSN recommends that SC support the recommendations, and amend recommendation b) so that it is submitted as a draft Decision to CoP20.
<p>68.2. Report of the Secretariat</p> <p>SC78 Doc. 68.2</p>	<ul style="list-style-type: none"> • Provides a report on trade in <i>Saiga</i> spp. noting that since the adoption of the annotation on <i>Saiga</i> spp. at CoP18 of a zero export quota for wild specimens traded for commercial purposes, there has been a decline in export/import of saiga. • Invites SC to note this document and invite Secretariat to draft Decisions for CoP20 based on the outcome of the fifth meeting of the CMS Saiga MOU signatories (MOS5) to be held 12-14 March 2025 in Kazakhstan. 	<ul style="list-style-type: none"> • SSN recommends that SC agree to these recommendations.
<p>69. Eels (<i>Anguilla</i> spp.)</p>		
<p>69.1. Report of the intersessional working group</p> <p>SC78 Doc. 69.1</p>	<ul style="list-style-type: none"> • Submitted by Chair of the related SC working group. • Invites SC to: <ul style="list-style-type: none"> –Submit draft Decisions (Annex 1) to CoP20 that, <i>inter alia</i>, request select range States to report on trade in eels; direct Secretariat to develop a web page on eels; and direct AC to review risks/benefits of reintroducing seized, live European eels to the wild; and –Submit draft Resolution on <i>Trade, conservation and management of anguillid eel species (Anguilla</i> spp.) (Annex 2). 	<ul style="list-style-type: none"> • SSN recommends that SC agree to the recommendations.
<p>69.2. Report of the Secretariat</p> <p>SC78 Doc. 69.2</p>	<ul style="list-style-type: none"> • Provides information on illegal trade in <i>A. anguilla</i>, including data on seizures. • Invites SC to note this document and delete related Decisions. 	<ul style="list-style-type: none"> • SSN recommends that SC agree to the recommendations.
<p>70. Sharks and rays (Elasmobranchii spp.)</p>		
<p>70.1. Report of the intersessional working group</p> <p>SC78 Doc. 70.1</p>	<ul style="list-style-type: none"> • Invites SC to, <i>inter alia</i>: <ul style="list-style-type: none"> –Consider and submit amendments to the rapid guide (Annex) found in RC. 18.7 (Rev. CoP19) on <i>Legal acquisition findings</i>; –Submit draft Decisions (Annex) that, <i>inter alia</i>, recommend the Secretariat issue a Notification inviting information on experiences in implementing CITES provisions for shark and ray species; and –Encourage the Secretariat to explore opportunities for information exchange between fisheries researchers, CITES permitting authorities, and CITES enforcement authorities. 	<ul style="list-style-type: none"> • SSN recommends that SC form a Working Group to analyze the Recommendations on pages 4-5, and support Option 1 in Table 3 on page 12.

ISSUE	PROPOSED ACTION	SSN RECOMMENDATION
<p>70.2. Report of the Animals Committee</p> <p>SC78 Doc. 70.2</p>	<ul style="list-style-type: none"> • Submitted by AC Chair. • Provides (Annexes 1-4): Current related Decisions; AC33 recommendations; <ul style="list-style-type: none"> —Draft Decisions from AC regarding, <i>inter alia</i>, reporting on NDFs, a repository of images of shark parts, and capacity building assistance; and —Draft Decision from AC Chair inviting Secretariat to consider the feasibility of adapting the existing RST process for sharks and rays. • Invites SC to note the recommendations and submit the draft Decisions to CoP20. 	<ul style="list-style-type: none"> • SSN recommends that SC support the draft decisions in Annexes 3 and 4.
<p>70.3. Report of the Secretariat</p> <p>SC78 Doc. 70.3</p>	<ul style="list-style-type: none"> • Provides current related Decisions (Annex 1), overview of trade (Annex 2), Party responses on NDFs, LAFs and stockpiles, and updates on capacity building, liaising with RFMOs, mismatch on reported trade, collaboration with FAO, etc. • Invites SC to, <i>inter alia</i>: <ul style="list-style-type: none"> –Note progress; –Consider options for reporting by a Party with specimens caught in the Exclusive Economic Zones (EEZ) of another Party (para. 25 b)) and two options for the inclusion of the eNDF tool on the CITES website (para. 31); –Submit draft Decisions (para. 34) directing Secretariat to follow up on mismatches in trade reporting; and –Delete Decisions 19.222, 19.223 and 19.224 	<ul style="list-style-type: none"> • SSN recommends that SC form a Working Group to analyze the Recommendations on page 9.
<p>71. Seahorses (<i>Hippocampus</i> spp.)</p>		
<p>71.1. Report of the Animals Committee</p> <p>SC78 Doc. 71.1</p>	<ul style="list-style-type: none"> • Submitted by AC Chair and Secretariat. • Provides outcomes of discussion from AC33 (Annex) and specific recommendations to SC including, <i>inter alia</i>, guidance for legal acquisition findings, the use of non-selective fishing gear, ways to include data collection for seized seahorse specimens, and toolkits for enforcement and prosecutorial bodies. • Invites SC to note document, and consider AC33 recommendations and related responses of the Secretariat. 	<ul style="list-style-type: none"> • SSN recommends that SC note the document, and adopt the AC33 recommendations, which highlight efforts needed to address critical information and management gaps necessary to enhance the sustainability of trade in these species.
<p>71.2. Report of the Secretariat</p> <p>SC78 Doc. 71.2</p>	<ul style="list-style-type: none"> • Reports on the progress of preparing a report on trade in dried seahorses. • Invites SC to submit revised Decisions on seahorses (Annex) in order to continue this work. 	<ul style="list-style-type: none"> • SSN recommends that SC submit the Decisions to CoP20.
<p>72. Products containing specimens of Appendix-II orchids (<i>Orchidaceae</i> spp.)</p> <p>SC78 Doc. 72</p>	<ul style="list-style-type: none"> • Invites SC to consider a study on edible orchids (Annex 1), responses to Notification no. 2024/013 (Annex 2), and submit draft Decisions (Annex 3) to CoP20 that, <i>inter alia</i>, direct Secretariat to undertake an overview of orchid taxa affected by wild harvest and impacts of exempting artificially propagated 	<ul style="list-style-type: none"> • No comment.

ISSUE	PROPOSED ACTION	SSN RECOMMENDATION
	specimens or certain derivatives and/or finished products from CITES regulations.	
<p>73. Brazil wood (<i>Paubrasilia echinata</i>) (Annex 2 to be published in early January 2025)</p> <p>SC78 Doc. 73</p>	<ul style="list-style-type: none"> Invites SC to provide feedback on the first draft of a study to evaluate options for a traceability system for <i>P. echinata</i> (pernambuco) bows produced, acquired, or transported (Annexes 1 and 2), and agree to submit draft Decisions to CoP20 that, <i>inter alia</i>, direct Parties to provide Secretariat with information on voluntary marking or identification systems developed for bows, and registration of bows and wood stockpiles; Brazil to share information with Secretariat on plantation-grown stocks; Secretariat to report to SC. 	<ul style="list-style-type: none"> No comment.
<p>74. Trade in medicinal and aromatic plant species (MAP)</p> <p>SC78 Doc. 74</p>	<ul style="list-style-type: none"> Reports on progress and provides draft Decisions (Annex 1) and draft Resolution on Medicinal and aromatic plant species that PC will submit to CoP20 (Annex 2). Invites SC to invite Secretariat to, after consultation with PC Chair, submit a final report on CITES-listed MAP species in international trade report to CoP20. 	<ul style="list-style-type: none"> No comment.
<p>75. An assessment of the practicalities of the CoP12 decision that the Convention should apply to fungi</p> <p>SC78 Doc. 75</p>	<ul style="list-style-type: none"> Submitted by the United Kingdom. Notes that RC 12.11 (Rev. CoP19) on <i>Standard Nomenclature</i> para. 1 states that “The Conference of the Parties to the Convention, agrees that species of fungi are covered by the Convention”. Invites SC to provide its views on whether issues relating to fungi should be discussed in AC or PC; whether outside expertise may be needed, and whether this might be covered by external funding. 	<ul style="list-style-type: none"> SSN recommends that SC submit a Decision directing Secretariat to prepare an Information Document on international trade in fungi and its conservation implications and implications for CITES, and that further discussion on this issue should await the availability of this document.
<p>76. Annotations</p> <p>SC78 Doc. 76</p>	<ul style="list-style-type: none"> Submitted by Chair of related SC working group. Invites SC to (regarding annotations): <ul style="list-style-type: none"> –#14: Note lack of consensus on identification of exhausted agarwood powder; –#11/#12: Request feedback from range States of <i>Aniba rosaeodora</i> and <i>Bulnesia sarmientoi</i> to proposed amendments to address ‘extracts’; –#4: Agree to proposed minor amendment; and –Agree to amendments to RC 10.13 (Rev. CoP18) on <i>Implementation of the convention for tree species</i> (Annexes 1 and 2) to clarify that references to Harmonized System codes refer to the language of the definition adopted by CITES, and not to the Harmonized System code that applies. 	<ul style="list-style-type: none"> SSN recommends that SC agree to the recommendations.
<p>77. Annotation #15 (Annex 2 to be published in early January)</p> <p>SC78 Doc. 77</p>	<ul style="list-style-type: none"> Provides draft report on implementation of annotation #15 for <i>Dalbergia</i> and <i>Guibourtia</i> species listed in Appendix II (Annexes 1 and 2). Invites SC to provide feedback on the report and request Secretariat to revise the report in response. 	<ul style="list-style-type: none"> SSN recommends that SC implement these recommendations.

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<p>78. Orchid specimens exempted through annotation #4 g)</p> <p>SC78 Doc. 78</p>	<ul style="list-style-type: none"> Invites SC to: note that the main implementation challenge for the exemption in annotation #4 g) is verifying whether the specimens used in finished cosmetics products had been artificially propagated; encourage Parties to clearly label exempted products; and agree to the draft Decision (Annex 1) to continue work on this issue. 	<ul style="list-style-type: none"> SSN recommends that SC implement these recommendations.
<p>79. Implications of the transfer of a species from one Appendix to another</p> <p>SC78 Doc. 79</p>	<ul style="list-style-type: none"> Invites SC to: Consider draft guidance and best practices related to periods of transition and possible transitory measures (Annex); and Request Secretariat to take into account any comments made by SC and then post guidance to CITES website. 	<ul style="list-style-type: none"> SSN recommends that SC consider the draft guidance, making edits as necessary to align the text with the provisions of the Convention and relevant resolutions, including RC 12.3 (Rev. CoP19).
<p>80. Information system for trade in specimens of CITES-listed tree species</p> <p>SC78 Doc. 80</p>	<ul style="list-style-type: none"> Provides an update on Secretariat efforts to commission a study exploring the feasibility and requirements for developing an information system (Decisions 18.317 (Rev. CoP19) and 19.265) on trade in CITES-listed tree species, and conservation and socio-economic benefits of such trade. Reports that Secretariat updated the ToR and because of the technical aspects of the study, will divide it in two parts: research on data necessary and collecting data, and design of the information system. Invites SC to renew the related Decisions. 	<ul style="list-style-type: none"> SSN is concerned that it is unclear how the proposed information system would feed into current CITES workstreams, or would be more useful than analysis of data in the CITES trade database similar to outputs for the Review of Significant Trade. SSN recommends exclusion of socio-economic benefits from the analysis: <ul style="list-style-type: none"> –Consideration of socio-economic issues is outside the CITES mandate, and should not be a consideration when making NDFs or listing decisions; and –The analysis appears to emphasize benefits of trade only and not negative impacts on traded species, other species that depend on related habitat, or IPLCs. SSN is concerned that the revised ToR have not been provided.
<p>81. Informal review mechanism for existing and proposed annotations</p> <p>SC78 Doc. 81</p>	<ul style="list-style-type: none"> Reports that “there appears to be limited support” for a new informal review mechanism. Invites SC to, <i>inter alia</i>: <ul style="list-style-type: none"> –Agree, at CoP, to hold debate on any proposals with a # annotation prior to the two-day break, provide annotations in writing and adjourn debates on annotations for additional consideration; and –Agree to draft Decisions (Annex 1) directing Secretariat to issue a Notification requesting Parties and observers to identify any implementation issues relating to annotations and report to SC; SC to formulate recommendations. 	<ul style="list-style-type: none"> SSN recommends that SC take note of Secretariat's identification of existing opportunities and ways of handling proposed and existing annotations but reject the Decisions proposed in Annex I, given other priorities and the financial and personnel resource constraints of the Secretariat. Parties may raise implementation issues at SC meetings Committee whenever they arise.
<p>82. Nomenclature of Appendix-III listings</p> <p>SC78 Doc. 82</p>	<ul style="list-style-type: none"> Submitted by nomenclature specialists of PC/AC. Invites SC to agree to proposed amendments to RC 9.25 (Rev. CoP18) on <i>Implementation of the Convention for species in Appendix III</i> (Annex 1) and RC 12.11 (Rev. CoP19) on <i>Standard nomenclature</i> (Annex 2), in order to clarify CITES processes regarding the nomenclature of species listed or proposed for listing in Appendix III. 	<ul style="list-style-type: none"> SSN recommends that SC agree to the amendments.
<p>83. Higher taxon listings in the Appendices</p>	<ul style="list-style-type: none"> Submitted by nomenclature specialists of PC/AC. 	<ul style="list-style-type: none"> SSN recommends that SC: <ul style="list-style-type: none"> –Agree to the amendments to RC 12.11; and

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<p>SC Doc. 83</p>	<ul style="list-style-type: none"> Invites SC to agree to amendments to RC 12.11 (Rev. CoP19) on <i>Standard nomenclature</i> (para. 11) in order to clarify when converting a list of species to a higher taxon, as recommended in Annex 3 to RC 9.24, and vice versa can be done through the RC12.11 process rather than requiring a formal listing proposal subject to reservations. 	<ul style="list-style-type: none"> Support the conclusion that conversion to a higher taxon listing can be done through the RC 12.11 process where there is no substantive difference in coverage and the scope and intent of the original Proposals are retained. If the amendments are agreed to, SSN supports deleting Decisions 19.272 and 19.273.
<p>84. Taxonomy and nomenclature of African elephants (<i>Loxodonta</i> spp.)</p> <p>SC Doc. 84</p>	<ul style="list-style-type: none"> Reports that AC33 agreed to a change in the nomenclature reference for African elephants, recognizing two species—<i>Loxodonta africana</i> and <i>L.cyclotis</i>. Invites SC to consider the options of how to reflect this change in the Appendices: <ul style="list-style-type: none"> Option A: Listing two separate species (<i>L. africana</i> and <i>L. cyclotis</i>) in the Appendices (including Annotation A10 for those populations in Appendix II); Option B: Listing at the genus level—<i>Loxodonta</i> spp. (including Annotation A10 for those populations in Appendix II); or Option C: Genus level listing in Appendix I and annotated species listing (<i>L. africana</i>) in Appendix II. Invites SC to adopt amendments to RC 10.10 (Rev. COP19) on <i>Trade in elephant specimens</i> to identify and report the species in relation to seized ivory and a Decision to consult the MIKE-ETIS TAG (Annex) whether PIKE analysis on the species level is feasible. 	<ul style="list-style-type: none"> SSN recommends that SC agree to Option B, as the science is unambiguous that listing the genus does not alter the scope of CITES protections and this: <ul style="list-style-type: none"> Is in line with RC 9.24 Annex 3; Was preferred by SC77; Is consistent with the Parties' original intent in listing African elephants; Ensures continuity of reporting on ivory stockpiles, ETIS and MIKE; and Eases the burden for Parties with respect to both species. With regard to the suggested changes to RC 10.10 (Rev. CoP19) and the Draft Decision: SC should consider the risk that skewed data may result from such analysis, given the limited number of MIKE sites, and that analysis relying on few samples in mixed shipments may not always be able to identify if both species are included.
<p>85. Any other business</p>	<ul style="list-style-type: none"> No document. 	<ul style="list-style-type: none"> No comment.
<p>86. Determination of the time and venue of the 79th and 80th meetings</p>	<ul style="list-style-type: none"> No document. 	<ul style="list-style-type: none"> No comment.
<p>87. Closing remarks</p>	<ul style="list-style-type: none"> No document. 	<ul style="list-style-type: none"> No comment.



Species Survival Network

info@ssn.org

SSN.org