



Division of Scientific Authority

U.S. Fish and Wildlife Service

20th MEETING OF THE CONFERENCE OF THE PARTIES TO CITES

Samarkand, Uzbekistan, 24 November - 05 December 2025

PROVISIONAL U.S. POSITIONS

As of Nov 28, 2025

Species proposals **highlighted in yellow** are U.S. submissions or co-sponsorships



Species found in U.S. or U.S. Territories

To view all proposals, go to: <https://cites.org/eng/cop/20/amendment-proposals>

Higher taxa	Species (and common name)	Proposal and Proponents	Illustration	Proposal	Provisional US Position
Fauna (Animals)					
Chordata					
Mammalia (MAMMALS)					
ARTIODACTYLA					
Bovidae	<i>Damaliscus pygargus pygargus</i> (Bontebok)	CoP20 Prop. 1 South Africa		Delete from Appendix II	Tentatively supports the proposal to delete the bontebok (<i>Damaliscus pygargus pygargus</i>) from Appendix II of CITES in accordance with Resolution Conf. 9.24 (Rev. CoP17), pending additional information from South Africa to alleviate concerns noted below. The United States recognizes the conservation success of South Africa's efforts to recover the bontebok population, once on the brink of extinction. While we find that when considering the natural range of the bontebok, this subspecies continues to meet the criteria for inclusion in Appendix II based on the best available biological and trade information, we also acknowledge that South Africa has several safeguards in place to sustainably manage the bontebok while allowing for limited international trade. We do note, however, that a metapopulation management plan has not been fully developed, adopted, implemented, and evaluated. Such a plan would be important to address two of the primary threats to this taxon – small, fragmented populations and low genetic diversity. It is also unclear if South Africa has considered if the deletion of the bontebok from Appendix II would stimulate more trade demand on the taxon within its natural range and how any increase might impact the population.
Bovidae	<i>Gazella dorcas</i> (Dorcas Gazelle)	CoP20 Prop. 2 Benin, Burkina Faso, Côte d'Ivoire, European Union, Liberia, Mali, Mauritania, Niger, Nigeria, Senegal, Sudan, Tunisia		Include in Appendix II	Tentatively supports, pending further information from other range States, the inclusion of <i>Gazella dorcas</i> in Appendix II. Based on the best available information at this time, <i>Gazella dorcas</i> would appear to meet criterion B in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17) for its inclusion in Appendix II. Illegal trade is documented and known to occur locally, across borders, and online; outside of Chad, the populations of the species are fragmented, small and in decline; and the species has already seen a 30% decline globally <u>with</u> the current levels of protection from CITES (i.e., the species' Appendix-III listing since 1976). Therefore, it reasonably can be inferred or projected, that additional CITES regulation of trade in the species (i.e., through the issuance of a non-detriment finding) is required to ensure that the harvest of specimens from the wild is not reducing the wild population to a level at which its survival might be threatened by continued harvesting or other influences (i.e., stochastic events).

Bovidae	<i>Saiga tatarica</i> (Saiga, Saiga Antelope, Steppe saiga)	CoP20 Prop. 3 Kazakhstan		Amend the annotation by adding the wording "except for specimens from the population <i>Saiga tatarica</i> of Kazakhstan"	Commends Kazakhstan on the incredible recovery of their saiga population; current estimates are at approximately 3.9 million individuals (pre-calving 2025). The U.S. supports with amendment Kazakhstan's proposal to amend the annotation in Appendix II to allow zero export quota for wild specimens traded for commercial purposes, except for specimens from the population in Kazakhstan. We recognize and appreciate Kazakhstan's thoughtful sustainable management and development of a comprehensive marking and traceability system for its domestic stock of saiga horn intended for international trade. While Kazakhstan has made commendable progress in developing internal control systems, further clarity is needed on how international trade would function in practice, particularly in other range States and consumer countries; there is uncertainty regarding how consumer countries would implement and enforce their own registration systems. If importer countries are unable or unwilling to bear the costs of implementing such systems, this could undermine enforcement, create loopholes, and enable the laundering of illegally sourced horns. The U.S. could support amended language to the annotation, similar to what has been done for other species' annotations regarding similar trade (e.g. marking requirements, reporting of an annual quota, and possibly the requirements of trading partners).
Giraffidae	<i>Giraffa camelopardalis</i> (Giraffe)	CoP20 Prop. 4 Namibia, South Africa, United Republic of Tanzania, Zimbabwe		Delete the populations of Angola, Botswana, Eswatini, Malawi, Mozambique, Namibia, South Africa and Zimbabwe from Appendix II	Supports removal of the <i>Giraffa camelopardalis</i> populations of Angola, Botswana, Eswatini, Malawi, Mozambique, Namibia, South Africa and Zimbabwe from Appendix II. Based on the best available information at this time, these giraffe populations do not meet the criteria in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17) for their continued inclusion in Appendix II. In addition, the precautionary measures set out in paragraph A 4 of Annex 4 to Resolution Conf. 9.24 (Rev. CoP17) appear to be met. We acknowledge that there may be difficulty in differentiating between giraffe species and subspecies due to their similarity of appearance. However, given the very limited reported trade in giraffe specimens and products from the populations that occur outside of southern Africa, we do not believe that removing these southern African giraffe populations from Appendix II would create significant enforcement or identification problems. To mitigate any enforcement difficulties for other giraffe populations, we urge each of the Parties with reservations to the giraffe listing to withdraw their reservations, and, if the proposal is adopted, to withdraw the reservations before the amendment goes into effect.

Bovidae	<i>Okapia johnstoni</i> (Okapi)	CoP20 Prop. 5 Democratic Republic of the Congo		Include in Appendix I	Supports the proposal to include the okapi (<i>Okapia johnstoni</i>) in Appendix I, because the species meets the biological criteria found in Resolution Conf. 9.24 (Rev. CoP17), Annex 1, based on the best available scientific information. We find that the current status of <i>O. johnstoni</i> meets criteria A(i) and B(iv) , as indicated in the proposal, for inclusion in Appendix I. The current status of <i>O. johnstoni</i> also arguably meets additional biological criteria found in Resolution Conf. 9.24 (Rev. CoP17), Annex 1, namely criteria A(v), B(iii), and C(ii).
CARNIVORA					
Hyaenidae	<i>Hyaena hyaena</i> (Striped Hyaena, Striped hyena)	CoP20 Prop. 6 Israel, Tajikistan		Include in Appendix I	Undecided on transfer of striped hyena (<i>Hyaena hyaena</i>) from Appendix III to Appendix I . Pending any additional information, we find that the species does not meet the biological criteria in Resolution Conf. 9.24 (Rev. CoP17), Annex 1 for inclusion in Appendix I, based on the best available scientific information. The species would meet the biological listing criteria found in Resolution Conf. 9.24 (Rev. CoP17), Annex 2a, based on the best available scientific information, and the United States may support transfer of the species from Appendix III to Appendix II , if the proponents amend their proposal to reduce its scope, and with support from range countries.
Otariidae 	<i>Arctocephalus townsendi</i> (Guadalupe Fur Seal, Lower Californian Fur Seal)	CoP20 Prop. 7 Mexico, United States of America		Transfer from Appendix I to Appendix II	Support – U.S. Co-Proposal
Phocidae 	<i>Monachus tropicalis</i> (Caribbean Monk seal, West Indian Monk Seal)	CoP20 Prop. 8 Mexico, United States of America		Delete from Appendix I	Support – U.S. Co-Proposal
PERISSODACTYLA					

Rhinocerotidae	<i>Ceratotherium simum simum</i> (Southern Square-lipped Rhinoceros, Southern White Rhinoceros)	CoP20 Prop. 9 Namibia		Amend the annotation of the population of <i>Ceratotherium simum simum</i> of Namibia listed in Appendix II For the exclusive purpose of allowing international trade in: a) live animals for <i>in-situ</i> conservation only; b) hunting trophies; and c) trade in rhino horn stocks owned by the Government and the Private Landowners originating in the State (excluding seized rhinoceros horn and rhinoceros horns of unknown origin); subject to the following: i) only stocks registered with the Government; ii) only horns with RHODIS certificates; iii) only to trading partners that have been verified by the Secretariat, in consultation with the Standing; Committee, to have sufficient national legislation and domestics trade controls; and iv) not before the Secretariat has verified prospective importing countries and the registered stocks. All other specimens shall be deemed to be specimens of species included in Appendix I, and trade in them shall be regulated accordingly.	Strongly opposes the proposed amendments to Annotation A9 for the population of Southern white rhinoceros (<i>Ceratotherium simum simum</i>) from Namibia as drafted in new paragraph c) to allow commercial trade in rhinoceros horn, and opposes the proposed amendments to trade in live animals as drafted in paragraph a). However, the United States could support the proposed amendments in new paragraph b) regarding hunting trophies as consistent with Annex 4 of Resolution Conf. 9.24 (Rev. CoP17) on <i>Criteria for amendment of Appendices I and II</i>.
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Rhinocerotidae	<i>Diceros bicornis</i> (Black Rhinoceros, Hook-lipped Rhinoceros)	CoP20 Prop. 10 Namibia		Transfer the population of <i>Diceros bicornis bicornis</i> of Namibia from Appendix I to Appendix II with the following annotation: For the exclusive purpose of allowing trade in registered rhinoceros horn, whole or pieces subject to the following: i) only registered Government-owned stock, originating in the State (excluding seized rhinoceros horn and rhinoceros horns of unknown origin); ii) only horns with RHODIS certificates; iii) only to trading partners that have been verified by the Secretariat, in consultation with the Standing Committee, to have sufficient national legislation and domestic trade controls; iv) not before the Secretariat has verified prospective importing countries and the registered stocks; and v) the proceeds of this trade are used exclusively for rhinoceros conservation and community development programmes within or adjacent to the rhinoceros range. All other specimens shall be deemed to be specimens of species included in Appendix I and the trade in them shall be regulated accordingly.	Strongly opposes the transfer of the population of black rhinoceros (<i>Diceros bicornis bicornis</i>) of Namibia from Appendix I to Appendix II with an annotation for the exclusive purpose of allowing trade in registered rhinoceros horn, whole or pieces, subject to specific conditions. Based on the supporting statement and information contained in the report on <i>African and Asian Rhinoceroses – Status, Conservation and Trade</i> (document CoP20 Doc. 84, Annex 3), <i>Diceros bicornis</i> continues to meet criterion A in Resolution Conf. 9.24 (Rev. CoP17) Annex 1 for its inclusion in Appendix I —the wild population is small, and is characterized by a high vulnerability to either intrinsic or extrinsic factors (the species is highly vulnerable to drought, poaching and illegal trade). The United States is also unable to determine the precautionary measures set out in paragraph A 2 a) ii) or iii) of Annex 4 to Resolution Conf. 9.24 (Rev. CoP17) are adequately met to address the anticipated risks to the species.
Pilosa					
Megalonychidae	<i>Choloepus didactylus</i> <i>Choloepus hoffmanni</i> (Hoffmann's Two-toed Sloth, Hoffmann's Two-fingered Sloth)	CoP20 Prop. 11 Brazil, Costa Rica, Panama		Include in Appendix II	Supports the inclusion of <i>Choloepus hoffmanni</i> in Appendix II as it meets the criteria outlined in Annex 2a, criterion B of Resolution Conf. 9.24 (Rev. CoP17); additionally, the U.S. supports <i>Choloepus didactylus</i> in Appendix II, as it meets both the criteria outlined in Annex 2a, criterion B and Annex 2b, criterion A in Resolution Conf. 9.24 (Rev. CoP17).

PRIMATES					
Cercopithecidae	<i>Cercocebus chrysogaster</i> (Golden-bellied Mangabey)	CoP20 Prop. 12 Democratic Republic of the Congo		Transfer from Appendix II to Appendix I	Supports the proposal to transfer the golden-bellied mangabey (<i>Cercocebus chrysogaster</i>) from Appendix II to Appendix I, because the species meets the biological criteria found in Resolution Conf. 9.24 (Rev. CoP17), Annex 1, based on the best available scientific information. We find that the current status of <i>C. chrysogaster</i> meets criteria B(i), B(iii), B(iv), C(i), and C(ii) , as indicated in the proposal, for inclusion in Appendix I.
PROBOSCIDEA					
Elephantidae	<i>Loxodonta africana</i> (African Elephant, African Savannah Elephant)	CoP20 Prop. 13 Namibia		To allow Namibia to trade in registered stocks of raw ivory (whole tusks and pieces) of Namibian origin, owned by the Government of the Republic of Namibia, for commercial purposes with trading partners that have been verified by the CITES Secretariat as having sufficient national legislation and domestic trade controls. This ensures that ivory imported from Namibia will not be re-exported and will be managed following all requirements of Resolution Conf. 10.10 concerning domestic manufacturing and trade. Furthermore, to enable Namibia to achieve full Appendix II status for its elephants, as provided for in Article IV of the Convention, thereby permitting the regulated and legal trade in Namibian elephant products, including ivory	Strongly opposes the document recommendation to allow Namibia to trade in raw ivory for commercial purposes. We are also concerned that the proposal failed to provide the text of amendments within 150 days of the meeting to either add language to or delete language from the Appendices, and therefore may not be appropriately considered at the present meeting. The United States is unable to determine the precautionary measures set out in paragraph A 2) a) ii) or iii) of Annex 4 to Resolution Conf. 9.24 (Rev. CoP17) are adequately met to address the anticipated risks to the species. Given the continuous high levels of elephant poaching and illegal ivory trade, the United States believes it is premature to resume commercial trade in ivory at this time. Instead, the United States believes that efforts relating to commercial trade in ivory and stockpile management should be focused on the draft Decisions outlined in document <u>CoP20 Doc. 76.7</u> .
Elephantidae	<i>Loxodonta africana</i> (African Elephant, African Savannah Elephant)	CoP20 Prop. 14 Botswana, Cameroon, Côte d'Ivoire, Namibia, Zimbabwe		Amend annotation A10 pertaining to the elephant populations of Botswana, Namibia, South Africa and Zimbabwe to harmonize the conditions of trade in live African elephants (deleted text reflected as <u>strike-through</u> and text inserted <u>underlined</u>): For the exclusive purpose of allowing: a) trade in hunting trophies for non-commercial purposes; b) trade in live animals to appropriate and acceptable destinations, as defined in Resolution Conf. 11.20 (Rev. CoP18), for Botswana and Zimbabwe and for in situ conservation programmes for Namibia and South Africa; c) trade in hides;	Generally supportive of the proposed amendments to Annotation A10 and we applaud the efforts of the African elephant range States to reach a consensus outcome. The United States was pleased to provide funding to help support the CITES Dialogue Meeting for African elephant range States. With respect to the amendments to Annotation A10, we seek clarifications and conforming amendments to address typographical errors.

				d) trade in hair; e) trade in leather goods for commercial or non-commercial purposes for Botswana, Namibia and South Africa and for non-commercial purposes for Zimbabwe; f) trade for non-commercial purposes in individually marked and certified ekipas incorporated in finished jewellery for non-commercial purposes for Namibia and ivory carvings for non-commercial purposes for Zimbabwe; g) trade in registered raw ivory (for Botswana, Namibia, South Africa and Zimbabwe, whole tusks and pieces) subject to the following: i) only registered government-owned stocks, originating in the State (excluding seized ivory and ivory of unknown origin); ii) only to trading partners that have been verified by the Secretariat, in consultation with the Standing Committee, to have sufficient national legislation and domestic trade controls to ensure that the imported ivory will not be re-exported and will be managed in accordance with all requirements of Resolution Conf. 10.10 (Rev. CoP18) concerning domestic manufacturing and trade; iii) not before the Secretariat has verified the prospective importing countries and the registered government-owned stocks; iv) raw ivory pursuant to the conditional sale of registered government-owned ivory stocks agreed at CoP12, which are 20,000 kg (Botswana), 10,000 kg (Namibia) and 30,000 kg (South Africa); v) in addition to the quantities agreed at CoP12, government-owned ivory from Botswana, Namibia, South Africa and Zimbabwe registered by 31 January 2007 and verified by the Secretariat may be traded and dispatched, with the ivory in paragraph g) iv) above, in a single sale per destination under strict supervision of the Secretariat; vi) the proceeds of the trade are used exclusively for elephant conservation and community conservation and	
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				development Programmes within or adjacent to the elephant range; and vii) the additional quantities specified in paragraph g) v) above shall be traded only after the Standing Committee has agreed that the above conditions have been met; and h) no further proposals to allow trade in elephant ivory from populations already in Appendix II shall be submitted to the Conference of the Parties for the period from CoP14 and ending nine years from the date of the single sale of ivory that is to take place in accordance with provisions in paragraphs g) i), g) ii), g) iii), g) vi) and g) vii). In addition, such further proposals shall be dealt with in accordance with Decisions 16.55 and 14.78 (Rev. CoP16). On a proposal from the Secretariat, ‡The Standing Committee can decide to cause this trade to cease partially or completely in the event of non-compliance by exporting or importing countries, or in the case of proven detrimental impacts of the trade on other elephant populations. All other specimens shall be deemed to be specimens of species included in Appendix I and the trade in them shall be regulated accordingly.	
Aves					
CORACIIFORMES					
Bucerotidae	<i>Bycanistes</i> spp. <i>Ceratogymna</i> spp.	CoP20 Prop. 15 Cameroon, Congo, Gabon, Niger, Nigeria, Senegal, Sierra Leone, Togo		Include in Appendix II	Supports the proposal to include the genus <i>Ceratogymna</i> and the genus <i>Bycanistes</i> in Appendix II, because we have determined based on the best available information that they meet the criteria found in Resolution Conf. 9.24 (Rev. CoP17), Annex 2a (criterion B) and Annex 2b (criterion A), as indicated in the proposal.

FALCONIFORMES					
Accipitridae	<i>Gyps africanus</i> <i>Gyps rueppelli</i> (White-backed Vulture) (Ruppell's Vulture)	CoP20 Prop. 16 Benin, Burkina Faso, Burundi, Cameroon, Chad, Congo, Gambia, Guinea, Niger, Nigeria, Senegal, Sierra Leone, Togo		Transfer from Appendix II to Appendix I	Supports the inclusion of <i>Gyps africanus</i> and <i>Gyps rueppelli</i> in Appendix I. Based on the best available information, both <i>Gyps africanus</i> and <i>Gyps rueppelli</i> meet criteria C i) and ii) in Annex 1 to Resolution Conf. 9.24 (Rev. CoP17) for its inclusion in Appendix I and is affected by trade.
Falconidae 	<i>Falco peregrinus</i> (Duck Hawk, Peregrine, Peregrine Falcon)	CoP20 Prop. 17 Canada, United States of America		Transfer from Appendix I to Appendix II	Support – U.S. Co-Proposal
PASSERIFORMES					
Emberizidae	<i>Sporophila angolensis</i> <i>Sporophila atrirostris</i> <i>Sporophila crassirostris</i> <i>Sporophila funerea</i> <i>Sporophila maximiliani</i> (Great-billed seed-finch)	CoP20 Prop. 18 Brazil		Include <i>Sporophila maximiliani</i> in Appendix I and include <i>Sporophila angolensis</i> , <i>Sporophila atrirostris</i> , <i>Sporophila crassirostris</i> , <i>Sporophila funerea</i> and <i>Sporophila nuttingi</i> in Appendix II	Supports the inclusion of <i>Sporophila maximiliani</i> in Appendix I. Based on the best available information, <i>Sporophila maximiliani</i> meets criteria A i) and ii), B i) and iv) and C i) and ii) in Annex 1 to Resolution Conf. 9.24 (Rev. CoP17) for its inclusion in Appendix I and is affected by trade. In addition, the United States tentatively supports the inclusion of the species <i>Sporophila angolensis</i> , <i>Sporophila atrirostris</i> , <i>Sporophila crassirostris</i> , <i>Sporophila funerea</i> and <i>Sporophila nuttingi</i> in Appendix II because they meet criterion A in Annex 2b of Resolution Conf. 9.24 (Rev. CoP17) for their inclusion in Appendix II.

Reptilia					
SAURIA					
Anguidae	<i>Caribicus warreni</i> (Hispaniolan Giant Galliwasp, Haitian Giant Galliwasp)	CoP20 Prop. 19 Dominican Republic		Include in Appendix I	Support the inclusion of the Hispaniolan giant galliwasp (<i>Caribicus warreni</i>) in Appendix I of CITES. <i>C. warreni</i> qualifies for inclusion in Appendix I in accordance with Article II, paragraph 1 of the Convention, satisfying Criterion A i) and ii) of Annex 1 of Resolution Conf. 9.24 (Rev. CoP17). The best available scientific information indicates that the regulation of trade in this species is required because the wild population is considered to be threatened with extinction due to (i) an observed, inferred, or projected decline in the number of individuals, and (ii) each subpopulation being very small.
Gekkonidae	<i>Phyllurus amnicola</i> (Mount Elliot Leaf-tailed Gecko, Mount Elliot Broad-tailed Gecko)	CoP20 Prop. 20 Australia		Include in Appendix II	Support the proposal to include <i>Phyllurus amnicola</i> (Mount Elliot leaf-tailed gecko) in Appendix II of CITES because we have determined that both criteria A and B of Resolution Conf. 9.24 (Rev. CoP17), Annex 2(a), have been met based on the best available scientific information. The U.S. recognizes that escalated demand and trade value in international markets where records show <i>P. amnicola</i> has been detected in commercial markets since at least 2008, with prices escalating from \$10–\$85 USD per animal to \$1,500–\$2,400 USD by 2017–2018, demonstrating that unregulated trade poses a significant and growing threat to the population in the wild.
Gekkonidae	<i>Phyllurus caudiannulatus</i> (Ringed Thin-tail Gecko)	CoP20 Prop. 21 Australia		Include in Appendix II	Support the proposal to include <i>Phyllurus caudiannulatus</i> (ringed thin-tail gecko) in Appendix II of CITES because we have determined that both criteria A and B of Resolution Conf. 9.24 (Rev. CoP17), Annex 2(a), have been met based on the best available scientific information. Inclusion of this species in Appendix II will help mitigate threats associated with trade and ensure legal and sustainable trade.
Iguanidae	<i>Amblyrhynchus</i> spp. (Marine Iguana, Galápagos Marine Iguana)	CoP20 Prop. 22 Ecuador		Transfer from Appendix II to Appendix I	Support the transfer of the Galapagos marine iguana (<i>Amblyrhynchus cristatus</i>), with its 11 subspecies, to Appendix I in accordance with Article II, paragraph 1 of the Convention. The U.S. notes both Notification to the Parties No. 2025/063 and CoP20 Doc. 73 in which Ecuador states that it has never allowed or authorized the export of live <i>Amblyrhynchus</i> spp. or <i>Conolophus</i> spp. for commercial or personal purposes and that, nevertheless, these species have appeared in international trade. The U.S. recognizes that, at the full species level, <i>A. cristatus</i> remains locally abundant on some of the islands where it occurs and that since its inclusion in Appendix II in 1975, impacts from international trade have been minimal. However, <i>A. cristatus</i> is composed of 11 subspecies, as recognized in the updated standard reference proposed for Iguanid lizard nomenclature in document CoP20 Doc. 110, and each of the individual subspecies meets the criteria for inclusion in Appendix I.

Iguanidae	<i>Conolophus</i> spp. (Galápagos Land Iguana, Common Land Iguana)	CoP20 Prop. 23 Ecuador		Transfer from Appendix II to Appendix I	Support transfer of Galapagos land iguanas (<i>Conolophus</i> spp.), including <i>Conolophus marthae</i> (pink iguana), <i>Conolophus pallidus</i> (Santa Fe land iguana), and <i>Conolophus subcristatus</i> (Galapagos land iguana), to Appendix I in accordance with Article II, paragraph 1 of the Convention, as the species each meet the criteria in Annex 1 of Resolution Conf. 9.24 (Rev. CoP17) [specifically, <i>Conolophus marthae</i> meets criteria A ii), iii), and v), and B i), and iii). <i>Conolophus pallidus</i> meets criteria A ii) and iii), B i) and iv), and C i). <i>Conolophus subcristatus</i> meets criteria A i) and iii), B i) and iv), and C i).], based on the best available biological and trade information. The U.S. notes both Notification to the Parties No. 2025/063 and CoP20 Doc. 73 in which Ecuador states that it has never allowed or authorized the export of live <i>Amblyrhynchus</i> spp. or <i>Conolophus</i> spp. for commercial or personal purposes, but nevertheless, these species have appeared in international trade.
SERPENTES					
Viperidae	<i>Bitis harena</i> <i>Bitis parviocula</i> (Ethiopian Mountain Adder, Ethiopian Viper) (Bale Mountains Adder)	CoP20 Prop. 24 Ethiopia		Include in Appendix I	Support inclusion of the endemic Ethiopian mountain adder (<i>Bitis parviocula</i>) and the endemic Bale Mountains adder (<i>Bitis harena</i>) in Appendix I in accordance with Article III of the Convention and the criteria in Annex 1 of Resolution Conf. 9.24 (Rev. CoP17). Specifically, <i>B. parviocula</i> meets criteria A i) and iii), B i) and iv), and C ii), and <i>B. harena</i> meets criteria A i) ii) iii) and v), B i) iii) and iv), and C ii), based on the best available biological and trade information. The U.S. acknowledges that there is uncertainty around whether <i>B. harena</i> occurs in international trade. However, given the strong morphological similarities between <i>B. parviocula</i> and <i>B. harena</i> , the confusion that occurs in differentiating them, and the extremely small geographic range and associated vulnerabilities to population declines, <i>B. harena</i> may be affected by trade, and may become threatened with extinction if trade is not strictly regulated, in accordance with Article II of the Convention.
Viperidae 	<i>Crotalus</i> spp. <i>Sistrurus</i> spp. (Rattlesnakes)	CoP20 Prop. 25 Bolivia (Plurinational State of), Mexico		Include in Appendix II	Opposes inclusion of <i>Crotalus lepidus</i> and <i>C. ravus</i> in Appendix II, in accordance with Article II, paragraph 2(a) of the Convention, and the remainder of the genera <i>Crotalus</i> spp. and <i>Sistrurus</i> spp. in Appendix II, in accordance with Article II, paragraph 2(b) of the Convention. Based on the best available information at this time, <i>Crotalus lepidus</i> and <i>C. ravus</i> do not appear to meet criterion B in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17) for inclusion in Appendix II. Without information for both species' current population size and trend, and a clearer picture of their levels of offtake (both legal and illegal), it is difficult to conclude that regulation of trade is needed to ensure that harvest of specimens from the wild is not reducing their wild populations to levels at which their survival might be threatened by continued harvesting or other influences. As a result, <i>Crotalus</i> spp. and <i>Sistrurus</i> spp. would not meet criterion A in Annex 2b of Resolution Conf. 9.24 (Rev. CoP17) for inclusion in Appendix II.

TESTUDINES					
Testudinidae	<i>Kinixys homeana</i> (Home's Hinged-backed Tortoise, Home's Hinged Tortoise)	CoP20 Prop. 26 Cameroon, Guinea, Nigeria, Togo		Transfer from Appendix II to Appendix I	Supports the proposal to transfer the Home's hinge-back tortoise (<i>Kinixys homeana</i>) from Appendix II to Appendix I because we have determined that the proposal meets the following criteria in Annex 1 of Resolution Conf. 9.24 (Rev. CoP17): Criterion A i) and v), Criterion B iv), and Criterion C i). The species meets these Appendix I biological criteria based on recent surveys in Cote d'Ivoire, Ghana, Togo, Nigeria, and Cameroon, where there is strong evidence of significant population declines throughout the species' range. There is evidence of significant decline even within protected areas (e.g., Côte d'Ivoire and Nigeria), with extirpation suspected at previously known sites. Moreover, according to the 2019 IUCN Red List assessment , <i>K. homeana</i> has experienced a decline of suitable habitat by at least 90% in the last 45 years.
Amphibia					
ANURA					
Ranidae	<i>Pelophylax epeiroticus</i> <i>Pelophylax lessonae</i> <i>Pelophylax ridibundus</i> <i>Pelophylax shqipericus</i>	CoP20 Prop. 27 European Union, Israel, North Macedonia		Include in Appendix II (Entry into effect of the inclusion in Appendix II would be delayed by 18 months, i.e. until 5 June 2027.)	Tentatively supports , pending further information from other range States, the proposal to transfer <i>Pelophylax epeiroticus</i> , <i>P. ridibundus</i> and <i>P. shqipericus</i> in CITES Appendix II because the proposal satisfies Criterion B in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17), and for reasons of similarity, inclusion of <i>P. lessonae</i> in Appendix II because the proposal satisfies Criterion A in Annex 2b of Res. Conf. 9.24 (Rev. CoP17). The U.S. recognizes the uncertainty around species-specific volumes of <i>P. epeiroticus</i> , <i>P. ridibundus</i> and <i>P. shqipericus</i> in trade. However, there is little doubt that all three species are in international trade and that specimens are heavily sourced from wild collection. The U.S. tentatively supports adoption of Annex 1 of the proposal as the CITES Nomenclature Standard Reference for the <i>Pelophylax</i> genus.
Elasmobranchii					
CARCHARHINIFORMES					
Carcharhinidae	<i>Carcharhinus longimanus</i> (Oceanic whitetip shark, Whitetip oceanic shark, White-tipped shark, Whitetip shark)	CoP20 Prop. 28 Argentina, Bahamas, Brazil, Comoros, Dominican Republic, Ecuador, European Union, Fiji, Gabon, Honduras, Lebanon, Oman, Panama, Samoa, Senegal, Seychelles, Sri Lanka, Sudan, Togo, United Kingdom of Great Britain and Northern Ireland		Transfer from Appendix II to Appendix I	Supports the proposal to transfer oceanic whitetip shark (<i>Carcharhinus longimanus</i>) from Appendix II to Appendix I. The best available scientific information suggests the oceanic white tip meets the criteria for Appendix I in accordance with Resolution Conf. 9.24 (Rev. CoP17), Annex 1, paragraph C.

Triakidae 	<i>Galeorhinus galeus</i> <i>Mustelus</i> spp.	CoP20 Prop. 29 Brazil, Ecuador, European Union, Panama, Senegal		Include in Appendix II	Supports the proposal to include <i>G. galeus</i> , <i>M. schmitti</i> , and <i>M. mustelus</i> in Appendix II in accordance with Article II paragraph 2(a). The United States also supports the proposal to include all other species in the genus <i>Mustelus</i> (smoothhounds) in Appendix II, in accordance with Article II paragraph 2(b) of the Convention.
MYLIOBATIFORMES					
Mobulidae 	Mobulidae spp.	CoP20 Prop. 30 Bahamas, Belize, Brazil, Comoros, Dominican Republic, Ecuador, Fiji, Gabon, Jamaica, Maldives, Panama, Samoa, Senegal, Seychelles, Sudan, Togo		Transfer from Appendix II to Appendix I	Supports the proposal to transfer the family Mobulidae (nine mobulid species - <i>M. alfredi</i> , <i>M. birostris</i> , <i>M. tarapacana</i> , <i>M. mobular</i> , <i>M. munkiana</i> , <i>M. thurstoni</i> , <i>M. eregoodoo</i> , <i>M. kuhlii</i> , and <i>M. hypostoma</i>) from Appendix II to Appendix I. The best available scientific information suggests mobula rays meet the criteria for inclusion in Appendix I in Res. Conf. 9.24 (Rev. CoP17), Annex 1, paragraph C (i & ii).
ORECTOLOBIFORMES					
Rhincodontidae 	<i>Rhincodon typus</i> (Whale Shark)	CoP20 Prop. 31 Argentina, Bahamas, Bangladesh, Belize, Comoros, Dominican Republic, Ecuador, Fiji, Gabon, Maldives, Panama, Philippines, Samoa, Senegal, Seychelles, Sri Lanka, Togo		Transfer from Appendix II to Appendix I	Position pending
RHINOPRISTIFORMES					

Glaucostegidae	<i>Glaucostegus</i> spp.	CoP20 Prop. 32 Bangladesh, Benin, Brazil, Burkina Faso, Burundi, Cabo Verde, Central African Republic, Comoros, Congo, Gabon, Guinea, Guinea-Bissau, Maldives, Mali, Niger, Nigeria, Sierra Leone, Sudan, Togo		Add the following annotation "A zero annual export quota for wild-taken specimens traded for commercial purposes"	Support the proposal, pending consultation with range States. Giant guitarfish are not native to the United States, yet there appears to be a lack of implementation of inclusion of these species in Appendix II by several range countries, as called for in Article IV of the Convention. Thus, maintenance of the <i>Glaucostegus</i> spp. in Appendix II with the inclusion of the annotation of "a zero annual export quota for wild-taken specimens traded for commercial purposes" would be an acceptable precautionary approach to address unsustainable harvest and trade issues and preventing need for inclusion of these species in Appendix I in the near future.
Rhinidae	Rhinidae spp. (Wedgefishes)	CoP20 Prop. 33 Bangladesh, Benin, Brazil, Burkina Faso, Burundi, Central African Republic, Comoros, Congo, Gabon, Gambia, Guinea, Guinea-Bissau, Maldives, Mali, Niger, Nigeria, Senegal, Sierra Leone, Sudan, Togo		Add the following annotation "A zero annual export quota for wild-taken specimens traded for commercial purposes"	Support the proposal, pending consultation with range States. Wedgefish are not native to the United States, yet there appears to be a lack of implementation of inclusion of these species in Appendix II by several range countries, as called for in Article IV of the Convention. Thus, maintenance of the Rhinidae spp. in Appendix II with the inclusion of the annotation of "a zero annual export quota for wild-taken specimens traded for commercial purposes" would be an acceptable precautionary approach to address unsustainable harvest and trade issues and preventing need for inclusion of these species in Appendix I in the near future.
SQUALIFORMES					

Centrophoridae 	Centrophoridae spp. (Gulper Sharks)	CoP20 Prop. 34 Brazil, Comoros, Dominican Republic, Ecuador, European Union, Lebanon, Nigeria, Senegal, Syrian Arab Republic, United Kingdom of Great Britain and Northern Ireland		Include in Appendix II	The United States supports this proposal. Both species have undergone population declines of >80% in significant parts of their range of distribution due to overexploitation to meet demand for their highly valued liver oil in international trade. Gulper sharks are also difficult to visually distinguish from one another as whole animals due to significant morphological similarity among species, and when considering morphological changes that occur from juvenile to adult stages within the same species. Additionally, internationally traded specimens (liver oil, meat and fins) are often indistinguishable across different species. Thus, for reasons of similarity, the remaining species in the family Centrophoridae would meet criterion A in Annex 2b of Resolution Conf. 9.24 (Rev. CoP17) for their inclusion in Appendix II. Gulper sharks are also difficult to visually distinguish from one another as whole animals due to significant morphological similarity among species, and when considering morphological changes that occur from juvenile to adult stages within the same species. Additionally, internationally traded specimens (liver oil, meat and fins) are often indistinguishable across different species. Thus, for reasons of similarity, the remaining species in the family Centrophoridae would meet criterion A in Annex 2b of Resolution Conf. 9.24 (Rev. CoP17) for their inclusion in Appendix II.
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Actinopteri (FISHES)					
ANGUILLIFORMES					
Anguillidae	<i>Anguilla</i> spp.	CoP20 Prop. 35 European Union, Honduras		Include in Appendix II (Entry into effect would be delayed by 18 months, i.e. until 5 June 2027.)	Opposes: The United States continues to have concerns about the international trade in <i>Anguilla</i> species, particularly the American eel, given recent investigations conducted by U.S. Fish and Wildlife Service's Office of Law Enforcement that have shed light on illicit trade activities in these ecologically, economically and culturally important species. On July 29, 2025, the Secretariat received a request from the Dominican Republic to amend the CITES Appendices and include American eel, <i>Anguilla rostrata</i>, in Appendix III. On October 9, 2025, the Secretariat issued <u>No. 2025/117</u> indicating that the amendment as requested by the Dominican Republic to include American eel in Appendix III will take effect on January 7, 2026 (90 days after the date of the notification). Given this development, while American eel appear to satisfy Criterion B in Annex 2a and Criterion A of Annex 2b in Resolution Conf. 9.24 (Rev. CoP17) for inclusion in Appendix II, we believe inclusion of the species in Appendix III, coupled with adoption of a strong Resolution on anguillid eels (CoP20 Doc. 87), should be sufficient to ensure continued sustainable use and legal trade in these species, and prevent the need to include it in Appendix II. CITES documentation and successful implementation of an Appendix III listing and the measures called for in the Resolution will also prevent adverse impacts to other CITES-listed eels from any look-alike concerns, particularly for European eel, while also addressing challenges faced by FWS Office of Law Enforcement. Therefore, the United States does not support inclusion of the American eel in Appendix II at this time. If, however, the remainder of the proposal is adopted by the Conference of the Parties, the United States recommends the listing include the parenthetical annotation "(Except the species <i>Anguilla rostrata</i>, which is included in Appendix III)".
Echinodermata					
HOLOTHURIIDA (SEA CUCUMBERS)					
Holothuriidae	<i>Actinopyga echinites</i> <i>Actinopyga lecanora</i> <i>Actinopyga mauritiana</i> <i>Actinopyga miliaris</i> <i>Actinopyga palauensis</i> <i>Actinopyga varians</i>	CoP20 Prop. 36 European Union		Include in Appendix II	Tentatively supports this proposal. Based on the best available scientific information, <i>Actinopyga echinites</i>, <i>A. mauritiana</i>, <i>A. miliaris</i> and <i>A. varians</i> do appear to meet criterion B in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17) for their inclusion in Appendix II. Additionally, <i>A. lecanora</i> and <i>A. palauensis</i> would meet criterion A in Annex 2b of Resolution Conf. 9.24 (Rev. CoP17) for their inclusion in Appendix II for reasons of similarity.

Holothuriidae	<i>Holothuria lessona</i> (Golden Sandfish)	CoP20 Prop. 37 European Union		Include in Appendix II	Supports this proposal to include <i>Holothuria lessona</i> in Appendix II. Based on the best available scientific information and trade data, this species satisfies Criterion B of Annex 2a of Resolution Conf. 9.24 (Rev. CoP17).
Arachnida (SCORPIONS AND SPIDERS)					
ARANEAE					
Theraphosidae	<i>Acanthoscurria chacoana</i> <i>Acanthoscurria insubtilis</i> <i>Acanthoscurria musculosa</i> <i>Acanthoscurria theraphosoides</i> <i>Avicularia hirschii</i> <i>Avicularia rufa</i> <i>Avicularia avicularia</i> <i>Catumiri argentinense</i> <i>Cyriocosmus berate</i> <i>Cyriocosmus perezilesi</i> <i>Grammostola rosea</i> <i>Haplotremus albipes</i> <i>Holothele longipes</i> <i>Pamphobeteus antinous</i> <i>Umbyquyra acuminatum</i>	CoP20 Prop. 38 Argentina, Bolivia (Plurinational State of), Panama		Include in Appendix II	Supports the proposal to include 15 species of tarantulas in Appendix II of CITES. We have determined based on the best available scientific information that <i>Grammostola rosea</i> meets criterion B for inclusion in Appendix II in Annex 2a to Resolution Conf. 9.24 (Rev. CoP17). We have also determined that the additional 14 species in the proposal meet criterion A for inclusion in Appendix II in Annex 2b to Resolution Conf. 9.24 (Rev. CoP17).
Gastropoda (SNAILS AND CONCHES)					
LEPETELLIDA					

Haliotidae	<i>Haliotis midae</i> (South African Abalone, Midas Ear Abalone)	CoP20 Prop. 39 South Africa		Include the population of South Africa with the annotation "dried specimens only"	Opposes the inclusion of South African abalone, <i>Haliotis midae</i> , in Appendix II with the annotation "dried specimens only", as proposed. We share the Secretariat's assessment and recommendation to reject the proposal, because the proposal would be contrary to the Convention, Article I (b), and amendment of the proposal to correct this issue would broaden its scope after the 150-day deadline contrary to Article XV and the Rules of Procedure.
Flora (Plants)					
Araliaceae 	<i>Panax quinquefolius</i> (American Ginseng, American Ginseng Root, Canadian Ginseng, Dwarf-Groundroot, Five-Fingers, Ginseng, Man's Health, Occidental Ginseng, Red Berry, Sang, Tartar Root)	CoP20 Prop. 40 United States of America		Amend annotation #3 to exempt finished products packaged and ready for retail trade of thin-sliced roots derived from artificially propagated of <i>Panax quinquefolius</i>	Support – U.S. Proposal
Arecaceae	<i>Jubaea chilensis</i> (Chilean palm)	CoP20 Prop. 41 Chile		Include in Appendix I	Supports the inclusion in Appendix I as it meets the trade criteria, and the biological criteria outlined in Annex 1 of Resolution Conf. 9.24 (Rev. CoP17). This is a long-lived species with a slow growth rate and population dynamics suggest the population will continue to decrease over time, especially since the population is old with senescent individuals, few juveniles, and a relatively low rate of recruitment.
Asparagaceae	<i>Beaucarnea glassiana</i> <i>Beaucarnea hookeri</i> (Ponytail Palm, Elephant-foot Tree, Bottle Palm)	CoP20 Prop. 42 Mexico, Switzerland		Include in Appendix II as part of the listing of the genus <i>Beaucarnea</i> spp.	Tentatively supports the proposal, which arose from a nomenclatural review under Resolution Conf. 12.11 (Rev. CoP19) that found certain non-CITES taxa had been transferred to a CITES-listed genus. The Plants Committee, at its 27th meeting, invited Mexico to determine whether these endemic species meet the criteria for inclusion in the Appendices. Based on the best available biological and trade information, the species meets the 'look-alike' criterion under Annex 2b, paragraph A of Resolution Conf. 9.24 (Rev. CoP17), in accordance with Article II, paragraph 2 (b) of the Convention, and may also qualify for inclusion in Appendix II under criterion A of Annex 2a under Resolution Conf. 9.24 (Rev. CoP17) in accordance with Article II 2 paragraph a), based on its vulnerability. However, look-alike justification under Annex 2 b put forward in the proposal is sufficient to support their inclusion in Appendix II.

Burseraceae	<i>Commiphora wightii</i> (Indian Bdellium, Guggul)	CoP20 Prop. 43 European Union		Include in Appendix II	Undecided on the inclusion of <i>Commiphora wightii</i> in Appendix II, pending input from the range States to better understand its population status, harvest pressures, and conservation measures in place, and further consultations to determine whether an annotation would be appropriate for the species if included in Appendix II. It appears that <i>Commiphora wightii</i> meets the criteria for Appendix II, under Annex 2 a, Criterion B, and that regulation of trade is needed to prevent wild populations from being threatened by overharvesting for its gum, with limited cultivated alternatives. Trade continues in resin, extracts, powders, and finished products, much of it wild-sourced from Pakistan. Wild harvest in India has been curtailed and it is illegal to export raw material wild-harvested in India. Habitat degradation, slow regeneration, and local overexploitation further threaten survival. Oleo-resin and extracts are difficult to distinguish from related species that are not included in CITES, which will complicate enforcement. Given the look-alike issues with other taxa that would not be protected under CITES, and the lack of clear information on how identification would be carried out at the borders, the proposal for inclusion of this species may be premature, as effective implementation and enforcement are uncertain. The draft Decisions in document CoP20 Doc. 94 might provide a more practical approach to addressing concerns about gum-producing species at this time. Should the proposal go forward, an annotation would appear to be appropriate.
Euphorbiaceae	<i>Euphorbia bupleurifolia</i> (Cycad Spurge, Pinecone Euphorbia)	CoP20 Prop. 44 South Africa		Transfer from Appendix II to Appendix I	Supports transferring <i>Euphorbia bupleurifolia</i> from Appendix II to Appendix I as it meets the criteria outlined in Resolution Conf. 9.24 (Rev. CoP17). In particular it meets criterion A (wild population is small) and (i) an observed decline in the number of individuals and quality of habitat, (ii) each subpopulation is very small, (v) high vulnerability to either intrinsic or extrinsic factors; Criterion B (wild population has restricted distribution) and (i) fragmentation or occurrence at very few locations, (iv) an observed decrease in individuals and recruitment; and Criterion C (marked decline in population size) and (i) an observed ongoing decline, in addition to (ii) an inferred or projected decline due to increased levels of exploitation, decreasing recruitment, and a high vulnerability to intrinsic factors.

Leguminosae	<i>Afzelia bipindensis</i> (Red Doussié)	CoP20 Prop. 45 Burundi, Cameroon, Central African Republic, Congo, Democratic Republic of the Congo, Equatorial Guinea, Gabon		Delete the populations of Cameroon, the Central African Republic, Congo, the Democratic Republic of the Congo, Equatorial Guinea and Gabon from Appendix II	Tentatively opposes removal of Central African populations of <i>Afzelia bipindensis</i> from Appendix II because the species continues to meet listing criteria under Res. Conf. 9.24 (Rev. CoP17). The proposal provides no species-specific data demonstrating the species is not vulnerable to extinction or that harvest is sustainable. Implementation of NDFs and science-based export quotas remains limited, trade data are sparse, and claims of strict regulations and robust traceability are unsubstantiated. <i>Afzelia bipindensis</i> cannot be reliably distinguished in trade from other <i>Afzelia</i> species. Commercial pressure persists, regional forest monitoring is incomplete, and traceability needs strengthening. Consequently, the species continues to qualify for Appendix II under CITES Article II.2 and Res. Conf. 9.24 (Rev. CoP17). Adoption of the present proposal would create a split-listing, which are contrary to CITES guidance (Res. Conf. 9.24 (Rev. CoP17) and should be avoided where possible in view of the enforcement problems it creates. The United States is among the importers of <i>Afzelia</i> species, particularly <i>A. africana</i> , which is not the subject of the present proposal.
Leguminosae	<i>Paubrasilia echinata</i> (Brazil Wood, pernambuco wood)	CoP20 Prop. 46 Brazil		Transfer from Appendix II to Appendix I	Retain in Appendix II, with an amended annotation, potentially including a zero quota for wild-sourced specimens, and advance draft decisions on voluntary marking systems and stockpile registration will strengthen traceability and monitoring (CoP20 Doc. 97). It is unclear whether the proposal meets Appendix-I criteria. The latest IUCN Red List notes no reliable data on population size, trends, distribution, or abundance, even in known reserves. Yet the proposal cites this source to assert an estimate of 10,000 adult trees and an 84% decline. Illegal trade persists, but it stems largely from gaps in domestic regulation and enforcement, according to CoP20 Doc. 97. An Appendix-I listing would not address these internal challenges or the need to verify legal sourcing of new bows produced for sale or transfer. By contrast, retaining the species in Appendix II with a strengthened annotation and combined with enhanced traceability and compliance measures, provides a proportionate approach that supports sustainable use, strengthens monitoring, and helps conserve wild populations without imposing unnecessary trade restrictions.

Leguminosae	<i>Pterocarpus soyauxii</i> (African Padauk, African Padouk, Barwood, African Coral Wood)	CoP20 Prop. 47 Burundi, Cameroon, Central African Republic, Congo, Democratic Republic of the Congo, Equatorial Guinea, Gabon from Appendix II		Delete the populations of Angola, Cameroon, the Central African Republic, Congo, the Democratic Republic of the Congo, Equatorial Guinea and Gabon from Appendix II	<u>Tentatively opposes</u> the removal of the Central African populations of <i>Pterocarpus soyauxii</i> from Appendix II. While the proposal asserts that the species is stable and well-represented in protected areas, significant uncertainties remain regarding population estimates, trade pressure, and management controls. The species continues to meet Appendix II criteria because it is targeted for international trade and is difficult to distinguish from other <i>Pterocarpus</i> species, creating look-alike concerns. Estimates of population size are uncertain because the methods used do not reflect the size at which the species reaches maturity, and there are no published global or national Red List assessments to verify stability. While non-detriment findings and export quotas exist for some range countries, there are discrepancies between reported harvest volumes and quotas, raising questions about traceability and sustainable management. The proposal does not adequately address how Central African populations would be distinguished from other populations or species, and split-listing is generally discouraged.
Liliaceae	<i>Aloe bergeriana</i> <i>Aloe jeppeae</i> <i>Aloe subspicata</i> <i>Aloe welwitschii</i>	CoP20 Prop. 48 South Africa, Switzerland, Zimbabwe		Amend the listing of Aloe spp. in Appendix II to also include the four species previously treated in the non-listed genus <i>Chortolirion</i> , but now included in Aloe section Chortolirion, namely Aloe bergeriana, Aloe jeppeae, Aloe subspicata, and Aloe welwitschia	<u>Supports</u> the inclusion of four species previously treated in the non-listed genus, <i>Chortolirion</i> , which are now included in <i>Aloe</i> in the genus level listing of <i>Aloe</i> spp. in Appendix II in accordance with Criterion A in Annex 2b of Resolution Conf. 9.24 (Rev. CoP17) and paragraph 2 f) of Resolution 12.11 (Rev. CoP19) on Standard Nomenclature. These four species are similar to other CITES-listed small bulbous grass aloe species, making non-flowering bulbs difficult to differentiate in trade, justifying their inclusion in Appendix II in accordance with Annex 2b of Resolution Conf. 9.24 (Rev. CoP17).
Podocarpaceae	<i>Podocarpus parlatorei</i> (Parlatore's Podocarp, Pino blanco)	CoP20 Prop. 49 Argentina		Transfer from Appendix I to Appendix II	<u>Tentatively opposed</u> to the transfer of <i>Podocarpus parlatorei</i> from Appendix I to Appendix II, based on the lack of scientific data to demonstrate that the species no longer meets Appendix I criteria. This species was selected for Periodic Review and, while we commend Argentina for undertaking this work, the proposal did not follow the Periodic Review process—it was not reviewed by the Plants Committee through the established intersessional procedures. Critically, although Bolivia was consulted, no reply was received and the proposal lacks information to assess the species' status within Bolivia, meaning these results cannot be considered a range wide evaluation of the species. Given the absence of scientifically robust, range-wide data, the United States is unable to determine that <i>Podocarpus parlatorei</i> no longer meets the criteria for Appendix I and therefore does not support its downlisting. We recommend the species continue through the Periodic Review process so a full assessment can be considered in the next intersessional period.

Portulacaceae	<i>Avonia quinaria</i>	CoP20 Prop. 50 South Africa		Transfer from Appendix II to Appendix I	Supports transferring <i>Avonia quinaria</i> from Appendix II to Appendix I as it meets the criteria outlined in Resolution Conf. 9.24 (Rev. CoP17). In particular, it meets criterion C (marked decline in population size), and it has (i) an observed ongoing decline, in addition to (ii) an inferred or projected decline due to increased levels of exploitation, decreasing recruitment, and a high vulnerability to intrinsic factors.
Euphorbiaceae, liliaceae	<i>Aloe ferox</i> <i>Euphorbia</i> <i>antisiphilitica</i>	CoP20 Prop. 51 United Kingdom of Great Britain and Northern Ireland		Amend annotation #4 as follows: f) finished products <u>packaged and ready for retail trade</u> of <i>Aloe ferox</i> and <i>Euphorbia antisiphilitica</i> packaged and ready for retail trade ;	Supports transferring <i>Avonia quinaria</i> from Appendix II to Appendix I as it meets the criteria outlined in Resolution Conf. 9.24 (Rev. CoP17). In particular, it meets criterion C (marked decline in population size), and it has (i) an observed ongoing decline, in addition to (ii) an inferred or projected decline due to increased levels of exploitation, decreasing recruitment, and a high vulnerability to intrinsic factors.