

IUCN position paper for CITES CoP20

Convention on International Trade in Endangered Species of Wild Fauna and Flora

Twentieth meeting of the Conference of the Parties (CoP20)

24 November to 5 December 2025, Samarkand, Uzbekistan

Summary of Key Messages

IUCN hereby presents views and recommendations on selected issues and agenda items of CoP20 for Parties' consideration.

CITES Strategic Vision (Agenda item 13)

- ✓ IUCN supports the draft decisions in CoP20 Doc. 13 and welcomes efforts to align the CITES Strategic Vision 2021–2030 with the Kunming-Montreal Global Biodiversity Framework (GBF), recognising that improved coherence between CITES and CBD will strengthen implementation and reduce the reporting burden on Parties.
- ✓ IUCN encourages Parties to adopt the indicators developed under the CITES Strategic Vision and to consider their integration into national biodiversity monitoring frameworks. IUCN also encourages Parties to review and consider additional indicators relevant to Objective 1.4 of the Strategic Vision as they are developed.

Role of CITES in reducing risk of future zoonotic disease emergence associated with international wildlife trade (Agenda item 15)

- ✓ IUCN supports the draft activities outlined in CoP20 Doc. 15.1 and 15.2, recognising the important role of CITES in mitigating zoonotic disease risks linked to international wildlife trade.
- ✓ IUCN encourages Parties to adopt One Health approaches, including joint training and enhanced collaboration between wildlife, domestic animal, and public health authorities, particularly between CITES and WOA. Parties are also invited to consult IUCN/ WOA guidance on wildlife disease risk analysis and surveillance.

Cooperation with Multilateral Environmental Agreements and other international organizations (Agenda item 16.1)

- ✓ IUCN highlights recent Resolutions and Recommendations from the 2025 IUCN World Conservation Congress that align with CITES CoP20 agenda items. These include motions on wildlife trafficking, sustainable use and illegal trade in succulent plants. IUCN encourages Parties and the Secretariat to pursue collaborative actions that advance shared conservation objectives, and to take into account relevant IUCN policy developments and technical guidance that support science-based decision-making.

Cooperation with the Global Strategy for Plant Conservation (Agenda item 16.2)

- ✓ IUCN welcomes CITES's role in supporting the Kunming-Montreal Global Biodiversity Framework, especially on plant conservation and invasive species (Target 6). Trade can contribute to biological invasions, and IUCN supports CITES's efforts to manage these risks through regulation.

Engagement of Indigenous Peoples and local communities (Agenda item 27)

- ✓ IUCN welcomes the discussion in relation to engagement of Indigenous Peoples and local communities in Doc. 27 to strengthen Indigenous Peoples and local communities' engagement in CITES, including publishing non-binding guidance on consulting Indigenous Peoples and local communities for Appendix amendments. IUCN encourages Parties to use this guidance.

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Livelihoods (Agenda item 29)

- ✓ IUCN recognises the importance of supporting the livelihoods and well-being of Indigenous Peoples and local communities. IUCN welcomes the revised framing of the six strategies and encourages Parties to apply them as voluntary guidance documents.

Integrating human rights, livelihoods, and food security into the implementation of CITES (Agenda item 30)

- ✓ IUCN continues to recognise the importance of the ongoing implementation of Resolution Conf. 16.6 (Rev. CoP18) on CITES and Livelihoods, which encourages the empowerment of Indigenous Peoples and local communities. IUCN welcomes the establishment of a dedicated working group to consider how this agenda item can draw on good practices from other UN processes, including mechanisms that facilitate Indigenous Peoples and local communities participation.

Non-detriment findings (Agenda item 50)

- ✓ IUCN welcomes progress on NDFs since CoP19 and affirms the value of The IUCN Red List of Threatened Species (the IUCN Red List) in supporting CITES implementation. IUCN and UNEP-WCMC continue to develop an NDF Support Tool to improve risk assessments. IUCN supports the draft Decisions and strategy proposed by the Committees to guide field testing and future updates.

Identifying information on species at risk of extinction affected by international trade (Agenda item 72)

- ✓ IUCN welcomes draft decisions enabling updates to be provided on species at risk of extinction affected by international trade derived from the IUCN Red List via a dedicated CITES website.

Conservation of amphibians (Agenda item 75)

- ✓ IUCN highlights the non-CITES listed amphibian species identified as in international trade and globally threatened on the IUCN Red List and stands ready to support Parties, the Secretariat, and Animals Committee in implementing the draft decisions.

Elephants (Agenda item 76.4)

- ✓ IUCN welcomes renewed EU funding for the MIKE Programme (2025–2029), including support to the IUCN SSC African Elephant Specialist Group. IUCN encourages Parties and donors to mobilise further resources to sustain MIKE's work across elephant range States.

Pangolins (Agenda items 79.1 & 79.2)

- ✓ IUCN notes with concern all eight pangolin species remain threatened, largely due to illegal trade and habitat loss. IUCN urges continued action and support for assessing pangolin populations and national action plans. under Resolution Conf. 17.10.
- ✓ IUCN also backs draft Decisions to refine conversion parameters for enforcement and encourages financial and technical support for their development.

Rhinoceroses (Agenda item 84)

- ✓ IUCN welcomes reduced poaching and signs of recovery for some rhinoceros species, but notes ongoing concerns for Javan and Sumatran rhinos. IUCN supports enhanced cooperation, improved trade monitoring, and retention of Decision 18.116, and encourages transparency in reporting and further donor support.

Resolving the implementation of the CoP12 decision that the Convention applies to fungi (*correction of the cross-references in the draft decisions*) (Agenda item 101 Rev. 1)

- ✓ IUCN welcomes growing recognition of fungi in CITES and supports practical guidance for implementation. IUCN's SSC fungal expert groups stand ready to assist with taxonomy, species identification, and capacity-building. IUCN supports an intersessional working group and alignment with other international initiatives.

Considering the 'look-alike' criterion Annex 2B A of Resolution Conf. 9.24 (Rev. CoP17) on Criteria for amendment of Appendices I and II (Agenda item 102)

- ✓ IUCN notes the proposal to review the 'look-alike' criterion in Resolution Conf. 9.24. IUCN welcomes draft decisions to gather Party experiences, conduct case studies, and develop practical guidance to help guide the interpretation and application of the criteria.

Proposals to amend Appendices I and II (Agenda item 114)

- ✓ IUCN draws the attention of CITES Parties to the IUCN/TRAFFIC Analyses of Proposals when assessing the proposed amendments to the CITES Appendices. IUCN also recommends that Parties consult the relevant IUCN SSC Specialist Groups members who will be present at CoP20, for their input and scientific evaluation of these proposals.
- ✓ IUCN highlights the importance of The IUCN Red List of Threatened Species in key CITES processes, including as informing and evaluating the listing proposals.

CITES Strategic Vision (Agenda item 13)

IUCN supports the draft decisions in CoP20 Doc. 13 and welcomes the continued efforts to align the CITES Strategic Vision 2021–2030 with the Kunming-Montreal Global Biodiversity Framework (GBF). Strengthening coherence between CITES and CBD is essential to ensure effective implementation of biodiversity-related commitments and to reduce the reporting burden on Parties.

IUCN welcomes the instruction for the CITES Secretariat to contribute to the GBF monitoring framework by sharing relevant data on Strategic Vision indicators with the CBD Secretariat, if requested. This will help demonstrate the contribution of CITES to the implementation of GBF Targets, particularly Target 5 related to sustainable use and trade of wild species that are threatened with extinction.

As a member of the Collaborative Partnership on Sustainable Wildlife Management (CPW), IUCN is actively contributing to the development of a Sustainable Use of Wild Species indicator for the GBF. In addition, IUCN's Species Survival Commission (SSC) and Commission on Environmental, Economic and Social Policy (CEESP) Sustainable Use and Livelihoods Specialist Group (SULi) have developed, and are expanding, a Sustainable Use of Species database to support this effort.

IUCN encourages Parties to adopt the indicators developed under the CITES Strategic Vision and to consider their integration into national biodiversity monitoring frameworks. Furthermore, IUCN supports the recommendation for Parties to use information gathered for non-detriment findings (NDFs) in their reporting to the CBD, as this will enhance the quality and consistency of national-level implementation. IUCN also encourages Parties to review and consider additional indicators relevant to Objective 1.4 of the Strategic Vision as they are developed, such as the Red List Index headline indicator the KMGBF, to ensure continued alignment with global biodiversity monitoring efforts.

Finally, IUCN urges Parties to strengthen cooperation and coordination among focal points of biodiversity-related conventions and other partners at the national level. This will foster synergies and improve the effectiveness of conservation actions related to wildlife trade and reporting.

Role of CITES in reducing risk of future zoonotic disease emergence associated with international wildlife trade (Agenda item 15)

IUCN supports the draft activities proposed in Document 15.1 and 15.2 and the role of CITES in reducing risk of future zoonotic disease emergence associated with international wildlife trade. IUCN encourages Parties to contribute to these activities, noting the benefits from such work contributes to the mitigation of zoonotic diseases risk as well as species conservation.

IUCN encourages Parties to fully adopt One Health approaches through undertaking joint training, and strengthening exchanges and collaborations between wildlife, domestic animal and public health authorities, specifically between CITES and World Organisation for Animal Health (WOAH) entities.

IUCN invites Parties to consider IUCN's publications on [Wildlife Disease Risk Analysis](#) and [General Guidelines for Surveillance of Diseases, Pathogens and Toxic Agents in Free-ranging Wildlife](#) published in collaboration with WOAH.

Cooperation with Multilateral Environmental Agreements and other international organizations (Agenda item 16.1)

IUCN would like to bring to the attention of the CITES Parties and Secretariat recent IUCN Resolutions and Recommendations relevant to the Convention, in particular to CITES CoP20 agenda items. Possible collaborative actions should be explored to achieve combined conservation outcomes.

- ✓ Addressing Wildlife Trafficking and the Seizure of Live Wild Animals ([IUCN WCC 2025 Motion 058](#)) and International Consortium on Combating Wildlife Crime ([Agenda item 16.4](#)).
- ✓ Updating the IUCN Policy on the Sustainable Use of Wild Living Resources ([IUCN WCC 2025 Motion 066](#)) and Cooperation with Multilateral Environmental Agreements and other international organizations ([Agenda item 16.1](#)).
- ✓ Advancing the Sustainable Management, Use and Trade of Wild Species ([IUCN WCC 2025 Motion 082](#)) and CITES Strategic Vision (Agenda item 13).
- ✓ IUCN policy on synthetic biology in relation to nature conservation ([IUCN WCC 2025 Motion 087](#)) and Specimens produced through biotechnology ([Agenda item 62](#)).
- ✓ Urgent Action to Prevent Illegal Succulent Plant Trade ([IUCN WCC 2025 Motion 083](#)) and Cooperation with the Global Strategy for Plant Conservation ([Agenda item 16.2](#)).
- ✓ Return to the annual frequency of the ordinary and technical meetings of the Convention for the Conservation and

Management of the Vicuña ([IUCN WCC 2025 Motion 050](#)) and Review of species-specific conservation measures for Appendix I-listed mammals ([Agenda item 68](#)).

- ✓ The need for urgent conservation action to secure the remaining population of Javan and Sumatran rhinoceros in Indonesia (*Rhinoceros sondaicus* and *Dicerorhinus sumatrensis*) ([IUCN WCC 2025 Motion 109](#)) and Rhinoceroses (*Rhinocerotidae* spp.) ([Agenda item 84](#)).
- ✓ Implementing international efforts to combat the sale of illegal wildlife products online ([IUCN WCC 2020 Res 040](#)) and International Consortium on Combating Wildlife Crime ([Agenda item 16.4](#)).
- ✓ Engaging the private sector to combat wildlife trafficking ([IUCN WCC 2020 Res 054](#)) and demand reduction to combat illegal trade ([Agenda item 31](#)).
- ✓ Combatting the illegal trade in lion body parts and derivatives ([IUCN WCC 2020 Res 059](#)) and African lions (*Panthera leo*) (updates to paragraph 13 and Annex 1) ([Agenda item 80](#)).
- ✓ Action against Asian songbird trafficking ([IUCN WCC 2020 Res 103](#)) and Songbird trade and conservation management (*Passeriformes* spp.) ([Agenda item 83](#)).
- ✓ Promoting human, animal and environmental health, and preventing pandemics through the One Health approach and by addressing the drivers of biodiversity loss ([IUCN WCC 2020 Res 135](#)) and One Health and CITES: Human and animal health risks from wildlife trade ([Agenda item 15.2](#)).

Cooperation with the Global Strategy for Plant Conservation (Agenda item 16.2)

IUCN welcomes CITES's potential contributions to the Kunming-Montreal Global Biodiversity Framework, particularly in relation to plant conservation and species-level trade regulation. CoP20 Doc. 16.2 highlights how CITES activities align with the Framework's targets, including Target 6, which addresses the need to eliminate, reduce, and mitigate the impacts of invasive alien species on biodiversity and ecosystems. IUCN recognises that trade in certain species can facilitate biological invasions and supports the role of CITES in helping to manage these risks through its regulatory mechanisms.

Engagement of Indigenous Peoples and local communities (Agenda item 27)

IUCN recognises that Indigenous Peoples and local communities hold unique knowledge systems and practices that are vital to the sustainable use and

conservation of wildlife. Their meaningful engagement in CITES processes can strengthen the legitimacy, equity, and effectiveness of decision-making.

IUCN welcomes the discussion in relation to engagement of Indigenous Peoples and local communities as per CoP20 Doc. 27, particularly the recommendation to consider publishing the non-binding Guidance on consulting Indigenous Peoples and local communities on proposals to amend the Appendices. IUCN welcomes the invitation for Parties to use this Guidance in the lead-up to CoP21 and share their experiences. IUCN emphasises that such guidance should remain voluntary and flexible, recognising that national legal and governance frameworks differ.

Livelihoods (Agenda item 29)

IUCN recognises the importance of supporting the livelihoods and well-being of Indigenous Peoples and local communities engaged in the use and trade of wild species, consistent with the objectives of sustainable use and equitable benefit sharing. IUCN welcomes the revised terminology of the six strategies, now framed as *strategies for facilitating the participation of Indigenous Peoples and local communities in legal and sustainable trade in CITES-listed species*, along with an invitation to Parties to make use of them as voluntary guidance documents.

Integrating human rights, livelihoods, and food security into the implementation of CITES (Agenda item 30)

IUCN continues to recognise the importance of the ongoing implementation of Resolution Conf. 16.6 (Rev. CoP18) on CITES and Livelihoods, which encourages the empowerment of Indigenous Peoples and local communities.

IUCN reaffirms the importance of human rights, livelihoods, and food security as foundational to effective and equitable conservation. While CITES plays a critical role in regulating international trade in species, broader socio-economic considerations are more appropriately addressed during the implementation.

IUCN welcomes the establishment of a dedicated working group to consider how this agenda item can draw on good practices from other UN processes, including mechanisms that facilitate Indigenous Peoples and local communities participation.

Non-detriment findings (Agenda item 50)

IUCN welcomes the progress since the previous nineteenth Conference of the Parties (CoP19) regarding Non-Detriment Findings (NDFs). IUCN affirms the critical role of the IUCN Red List of Threatened Species in supporting the implementation of CITES through NDFs, as referenced across the suite of NDF modules provided on the CITES NDF webpage. Furthermore, IUCN and UNEP-WCMC are continuing the joint development of an NDF Support Tool aimed at streamlining the way in which the level of risk for trade in a specific species is determined, through consistent application and integration of key biodiversity data sources. These important resources underpin efforts to ensure that international trade in wild species is compatible with both their conservation and sustainable use.

IUCN supports the document submitted by the Animals and Plants Committees and welcomes the inclusion of draft Decisions designed to test and improve the guidelines developed during the 2023 Nairobi workshop. The proposed strategy and feedback mechanism offer a valuable framework for guiding field implementation and informing future revisions to the CITES NDF guidance.

Identifying information on species at risk of extinction affected by international trade (Agenda item 72)

IUCN welcomes the draft decisions in this document. Their adoption would provide a mechanism through which updates to The IUCN Red List of Threatened Species could be shared with the CITES Parties to inform decision-making in the Convention via the new, dedicated CITES website.

IUCN, in collaboration with the University of Oxford, UNEP-WCMC and other partners, have recently developed a mechanism to identify species that are likely threatened by international trade on The IUCN Red List of Threatened Species for this purpose. The analyses are available [here](#), and are repeatable, and quick, meaning that future iterations of the results could be shared with the Parties at a convenient time during the intersessional period or at CoPs to inform decision-making.

It should be noted that for species categorised as 'likely threatened by international trade' in these analyses, this does not imply that the species are necessarily threatened by international trade at the global level or that international trade constitutes a major threat to the species or that this threat applies ubiquitously across the species' geographic range or over time. If further iterations of these analyses

do inform future decision making in CITES, IUCN encourages the Parties to consider these qualifications during deliberations and in the decision-making process.

Conservation of amphibians (Amphibia spp.) (Agenda item 75)

IUCN welcomes CoP20 Doc. 75 and particularly notes the high number of amphibian species identified in international trade that are not currently listed in the CITES Appendices, of which several are globally assessed as threatened on The IUCN Red List of Threatened Species.

IUCN stands ready to support Parties, the CITES Secretariat and Animals Committee in implementing the draft decisions.

Elephants (Elephantidae spp.) (Agenda item 76.4)

IUCN acknowledges the vital support of donors to the MIKE Programme and further welcomes the renewed funding commitment from the European Union for the period 2025–2029, particularly its support to the IUCN SSC African Elephant Specialist Group (AfESG) for the African Elephant Database and related activities. IUCN encourages CITES Parties and donors to mobilise additional resources to ensure the fulfilment of MIKE's vital work across elephant range States.

Pangolins (*Manis* spp.) (Agenda item 79.1 and 79.2)

IUCN highlights with concern that all eight pangolin species remain threatened, facing high to extremely high risk of extinction according to the IUCN Red List of Threatened Species assessments ([see Annex 3 of CoP20 Doc. 79.1](#)). These threats are driven primarily by illegal international trade, local and subnational use, and ongoing habitat loss. IUCN emphasises the urgent need for more robust and standardised population assessments across all pangolin species. Guidance to support such assessments is available from the IUCN SSC Pangolin Specialist Group, alongside additional resources on population monitoring and conservation planning.

IUCN encourages CITES Parties to strengthen implementation of Resolution Conf. 17.10 (Rev. CoP19) through the development and execution of targeted national pangolin action plans. These plans should prioritise scientifically sound population assessments, evidence-based demand reduction strategies focused on consumer behaviour change, and improved reporting on illegal trade. Coordinated action from source landscapes

to consumer markets is essential to reduce exploitation pressures and support effective enforcement. IUCN stands ready to support Parties in applying best practice approaches to pangolin conservation and trade regulation.

IUCN supports the proposed draft decisions in CoP20 Doc. 79.2 to further develop and refine conversion parameters for all pangolin species, particularly for *Manis culionensis*, *M. crassicaudata*, and *M. temminckii*, to strengthen law enforcement and judicial processes relating to pangolins. These parameters are essential for accurately estimating the number of individuals represented in pangolin scale seizures and for improving species-level identification in forensic and regulatory contexts.

IUCN encourages Parties and relevant stakeholders to provide financial and technical support for the continued development of these parameters. The updated data presented in the report represent a significant advance, but further work is needed to address sampling limitations and intra-species variability.

IUCN also encourages Parties and other stakeholders to implement *in situ* pangolin conservation and management programmes, including population assessments using appropriate methodologies.

Rhinoceroses (Rhinocerotidae spp.) (Agenda item 84)

IUCN commends the continued decline in poaching rates for African rhinoceros species and welcomes signs of population recovery for the greater one-horned rhinoceros in Asia. However, the overall African rhinoceros population remains static compared to CoP19, with white rhinoceros numbers at their lowest in a decade due to a combination of impacting factors including drought. The reported poaching of 26 Javan rhinoceroses and the precarious status of Sumatran rhinoceroses remain urgent conservation concerns. IUCN supports the calls for sustained international cooperation to safeguard Asia's remaining rhinoceros populations.

The [IUCN-TRAFFIC status report](#) highlights persistent illegal trade routes and enforcement gaps, underscoring the need for more focused and collaborative action. IUCN encourages Parties to enhance data transparency, particularly regarding horn stockpiles and seizure records, and to adopt improved analytical methods for tracking trade trends, as outlined in Annexure 4 of the document. With a significant proportion of Africa's rhinoceroses managed privately and widespread use of dehorning, consistent reporting is essential. IUCN appreciates the contributions from donors that enabled the preparation of this report and supports

continued efforts to monitor and address illegal trade, while endorsing the retention of Decision 18.116 to maintain momentum in enforcement and conservation.

Resolving the implementation of the CoP12 decision that the Convention applies to fungi (correction of the cross-references in the draft decisions) (Agenda item 101 (Rev. 1))

IUCN welcomes the increasing recognition of the ecological importance of fungi and the threats they face from international trade, as highlighted in CoP20 Doc. 101 (Rev. 1). We commend the Parties and observers who contributed to the discussions at the 78th meeting of the Standing Committee (SC78) and in subsequent written submissions. These contributions reflect a growing consensus on the need for practical guidance to support the effective implementation of CITES provisions for fungi.

The IUCN SSC Fungal Conservation Committee, Cup-fungi, Truffles and Allies Specialist Group and Aquatic Fungi Specialist Group comprises global experts in fungal taxonomy, ecology, conservation, and trade. These groups combined expertise to advise on fungal taxonomy and nomenclature will be integral in supporting the identification of candidate species for listing, contributing to the development of Resolution text and technical guidance, and assisting in capacity-building efforts for Parties.

IUCN supports the establishment of an intersessional working group under the Plants Committee and stands ready to provide scientific and technical advice on fungi-related issues, potentially through the 28th meeting of the Plants Committee (PC28).

Furthermore, IUCN stresses the importance of aligning CITES efforts with other international initiatives, such as the CBD, ensuring a harmonized approach with existing mandates.

Considering the 'look-alike' criterion Annex 2B A of Resolution Conf. 9.24 (Rev. CoP17) on Criteria for amendment of Appendices I and II (Agenda item 102)

IUCN welcomes the UK's proposal and supports the adoption of the draft decisions outlined in CoP20 Doc. 102. The review of how the 'look-alike' criterion in Annex 2b A of Resolution Conf. 9.24 (Rev. CoP17) is interpreted and applied is both timely and necessary.

IUCN has noted a growing trend in proposals to list species based on similar appearances (“look-alikes”) to those currently listed in the Appendices, irrespective of whether international trade regulation is required to ensure the conservation of the species.

IUCN also recognises that similar issues can arise in the context of higher-taxon listings and species grouped together following taxonomic revisions. These revisions may result in the inclusion of species that resemble or sound similar to those already listed, despite limited evidence that such additions are necessary to ensure effective regulation of trade in the original taxa. In many cases, these newly associated species do not share the same trade dynamics or conservation concerns, raising questions about the appropriateness and proportionality of their inclusion under the Convention.

IUCN therefore welcomes the UK’s initiative to review and clarify the interpretation of the look-alike criterion. IUCN supports the proposed draft decisions to collect Party experiences, undertake targeted case studies, and develop practical guidance that ensures listings are proportionate and scientifically justified.

Proposals to amend Appendices I and II (Agenda item 114)

IUCN recommends Parties refer to the IUCN/TRAFFIC Analyses of Proposals to amend the CITES Appendices which highlights relevant information on which the Parties can base their decisions.

For CITES to remain a credible instrument for conserving species affected by trade, the decisions of the Parties must be based on the best available scientific and technical information. IUCN draws attention to the Analyses as these technical reviews provide an objective assessment of each amendment proposal against the requirements of the Convention as agreed by Parties and laid out in the listing criteria elaborated in Resolution Conf. 9.24 (Rev. CoP17) and other relevant Resolutions and Decisions.

IUCN invites Parties to access the Analyses, which can be downloaded through the IUCN website ([IUCN/ TRAFFIC Analyses of Proposals CITES | IUCN](#)), as the full report in English and summary formats in English, French, Spanish and Chinese.

IUCN highlights the importance of The IUCN Red List of Threatened Species in key CITES processes, such as informing and evaluating listing proposals. In the IUCN/TRAFFIC Analyses of Proposals 228 species were proposed, of which 81% (184) had a Red List threat assessment.

Furthermore, Red List assessments play a key role in the mechanisms established by CITES to monitor trade levels and flag up cases of potentially unsustainable trade or other possible implementation issues. They can be useful for informing the development of appropriate regulatory measures, as well as informing day-to-day decision-making by Parties on permit applications and non-detriment findings. The IUCN Red List also serves as a headline indicator for Goal A of the Kunming-Montreal Global Biodiversity Framework, reinforcing its relevance in tracking progress toward halting biodiversity loss.