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**PROPOSAL**

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From: Secretary-General of the European Commission, signed by Ms Martine DEPREZ, Director

date of receipt: 24 September 2025

To: Ms Thérèse BLANCHET, Secretary-General of the Council of the European Union

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Subject: ANNEX 1 to the Proposal for a COUNCIL DECISION on the position to be taken on behalf of the European Union at the 20th meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES CoP20) (Samarkand, Uzbekistan, 24 November – 5 December 2025)

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Delegations will find attached document COM(2025) 533 – Annex 1.

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Encl.: COM(2025) 533 - Annex 1

## ANNEX I

### **Union Position on key issues to be discussed at the 20th meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)**

**(Samarkand, Uzbekistan, 24 November – 5 December 2025)**

#### **A. GENERAL CONSIDERATIONS**

1. The Union considers the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) a key international convention for biodiversity conservation and against wildlife trafficking.
2. The Union should adopt an ambitious position for the 20th meeting of the Conference of the Parties to CITES (CoP20), in line with relevant Union policies and international commitments, in particular the targets relating to wildlife under Sustainable Development Goal 15, the Global Biodiversity Framework under the Convention on Biological Diversity, the CITES Strategic Vision and UN General Assembly Resolution 79/313 on tackling illicit trafficking in wildlife. The Union's position should also serve to attain the objectives set out at Union level through the EU Biodiversity Strategy for 2030, the revised EU action plan against wildlife trafficking<sup>1</sup>, the Union approach to promote trade and sustainable development, and the European Green Deal.
3. The priorities for the Union at CITES CoP20 should be:
  - to regulate international trade in endangered animal and plant species that are subject to unsustainable levels of trade, pursuing a science-based approach; and
  - to strengthen the response by the international community to wildlife trafficking.
4. At CITES CoP20, the Union should ensure that the EU's status and rights as a Party to the Convention remain fully respected in line with its provisions.
5. The Union's position should take account of the contribution that CITES mechanisms can make towards improving species' conservation status and acknowledge the work done by those countries that have implemented effective conservation measures.
6. The number of listings and the complexity of CITES procedures to implement them have increased substantially. The Union should ensure that the decisions taken at CITES CoP20 focus on the core issues of the Convention. The Union should ensure that the decisions taken maximise the efficiency of CITES, by minimising unnecessary administrative burden and by achieving practical, cost-effective and workable solutions to issues concerning implementation, enforcement and monitoring.
7. Many decisions adopted at CITES CoP20 will be implemented by the CITES Standing Committee, which is the main CoP subsidiary body. The Union's position for CITES CoP20 should therefore also guide the Union's approach at the 79th and

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<sup>1</sup> [Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions - Revision of the EU action plan against wildlife trafficking.](#)

80th meetings of the Standing Committee, which take place directly before and after CoP20.

## **B. SPECIFIC ISSUES**

8. Fifty-one proposals for amending the CITES Appendices have been tabled for consideration at CITES CoP20. Eight of these proposals have been submitted by the Union as the main proponent or as co-proponent, and their adoption should naturally also be supported by the Union.
9. The Union's position on all proposals should be based on the conservation status of the species concerned and on the impact that trade has or may have on the status of that species. To this end, the most relevant and robust scientific evidence should be taken into consideration in line with Resolution Conf. 9.24 on the criteria for amendment of Appendices I and II.
10. The views of the range states of the species concerned by the proposals should receive particular attention. In setting out its position, the Union should acknowledge the essential contributions of those who live in close connection with and depend on wildlife for their livelihoods, cultural practices and local economies. Their knowledge, stewardship and direct involvement in the sustainable use and conservation of biodiversity are important for the effective implementation of CITES and the achievement of its objectives.
11. The Union considers that, as a general rule, support should be given to proposals to amend CITES Appendices where these are the result of work by the CITES Animals and Plants Committees and the Standing Committee. The assessment of the proposals by the CITES Secretariat and IUCN/TRAFFIC<sup>2</sup> and, for commercially exploited marine species, the Food and Agriculture Organization's (FAO) eighth dedicated Expert Advisory Panel should also be taken into account once available.
12. As agreed in Council Decision 2025/1314 of 23 June 2025<sup>3</sup>, the Union advocates the inclusion of:
  - *Pelophylax epeiroticus*, *Pelophylax shqipericus*, *Pelophylax ridibundus* and *Pelophylax lessonae* (water frogs) in Appendix II (with 18 months delay in entry into force);
  - *Anguilla* spp. (freshwater eels) in Appendix II (with 18 months delay in entry into force);
  - *Centrophoridae* (gulper sharks) in Appendix II;
  - *Holothuria lessoni* (golden sandfish) in Appendix II;
  - *Actinopyga echinites*, *Actinopyga lecanora*, *Actinopyga mauritiana*, *Actinopyga miliaris*, *Actinopyga palauensis* and *Actinopyga varians* (sea cucumbers) in Appendix II; and
  - *Commiphora wightii* (Indian bdellium) in Appendix II.

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<sup>2</sup> The International Union for Conservation of Nature (IUCN) and TRAFFIC specialise in wildlife trade issues and provide a thorough assessment of proposals to amend CITES Appendices before each CoP.

<sup>3</sup> [Council Decision \(EU\) 2025/1314 of 23 June 2025 on the submission, on behalf of the European Union, of proposals for amendments to the appendices to the Convention on International Trade in Endangered Species of Wild Fauna and Flora \(CITES\) and on the position to be taken on behalf of the European Union at the 20th meeting of the Conference of the Parties to that Convention.](#)

The Union has also decided to co-sponsor and will advocate for the proposal by Panama to transfer *Carcharhinus longimanus* (oceanic whitetip shark) from Appendix II to Appendix I, and the proposal by Brazil to list *Galeorhinus galeus* (tope shark) and *Mustelus* spp. (smoothhounds) in Appendix II.

13. On the proposal concerning the listing of *Anguilla* spp., the position of the Union should be to support the adoption of the strongest possible measures aimed at safeguarding *Anguilla anguilla* (European eel) and other species of the genus *Anguilla* from further decline due to unsustainable trade, taking into account complementarities and synergies between the different measures under consideration by the CoP.
14. The Union notes that a significant number of listing proposals submitted by Parties concern endemic species, which are particularly vulnerable due to their limited geographic distribution and often small population sizes. Recognising the heightened conservation challenges these species face, the Union supports the inclusion of such species in the CITES Appendices as far as possible, where the proposals are in line with the CITES listing criteria and the precautionary approach.
15. The Union's position on proposals related to wildlife trafficking should reflect the Union's comprehensive approach to preventing wildlife trafficking by addressing its root causes, strengthening legal and policy frameworks to address wildlife trafficking, enforcing existing rules effectively, and fostering global partnerships to address wildlife trafficking, as outlined in the revised EU action plan against wildlife trafficking.
16. The Union should also encourage initiatives that help to increase the capacities of relevant authorities and share information and best practices, in order to better implement CITES and improve cooperation between source, transit and destination countries.
17. The Union notes that several proposals have been tabled by Parties in relation to trade in elephant ivory and rhino horn. The Union considers that the conditions for reauthorising this trade are not met and does not support proposals for CoP20 to re-open it. For domestic markets, the Union should continue to support proportionate and effective measures based on the best available evidence, within the scope of the Convention.
18. The Union notes that the expansion of CITES to include additional species has significantly increased the volume and complexity of activities under the Convention, placing growing demands on the CITES Secretariat, committees and Parties. At the same time, funding has not kept pace with this increased workload. These developments should be duly taken into account by the Union when determining its priorities for CoP20 and in discussions on the future budget of the CITES Secretariat.