



Council of the
European Union

Brussels, 17 November 2025
(OR. en)

Interinstitutional File:
2025/0295(NLE)

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LIMITE

ENV 1125
WTO 100

LEGISLATIVE ACTS AND OTHER INSTRUMENTS

Subject: Annex to 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)

ANNEX 1

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 CoP20) (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 (CITES CoP20), in line with relevant Union policies and international commitments, in particular the UN Sustainable Development Goals, the Kunming Montreal Global Biodiversity Framework adopted by 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 trafficking¹, the Union approach to promote trade and sustainable development, and the European Green Deal.

¹ 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 (COM(2022) 581).

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 status and rights of the Union as a Party to CITES 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 CITES. The Union should ensure that the decisions taken maximise the efficiency of CITES, by minimising any 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 80th meetings of the Standing Committee, which take place directly before and after CITES CoP20.

B. Specific issues

8. Fifty-one proposals to amend the CITES Appendices have been tabled for consideration at CITES CoP20. Eight of those 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 for amendments to the CITES Appendices 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 to CITES.
10. The views of the range states of the species concerned by the proposals should receive particular attention. Amongst others, they are the primary vehicle to convey the contributions of those living in close connection with wildlife, whose knowledge, stewardship and actions in conservation and sustainable use 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 that are brought forward by the CITES Animals and Plants Committees and the Standing Committee. The assessment of the proposals by the CITES Secretariat and IUCN/TRAFFIC² and, for commercially exploited marine species, the Food and Agriculture Organization's (FAO) eighth dedicated Expert Advisory Panel should also be taken into account.
12. In Council Decision (EU) 2025/1314³, the Union advocates the inclusion of:
- *Pelophylax epeiroticus*, *Pelophylax shqipericus*, *Pelophylax ridibundus* and *Pelophylax lessonae* (water frogs) in Appendix II to CITES (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;

² 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.

³ 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 (OJ L, 2025/1314, 30.6.2025, ELI: <http://data.europa.eu/eli/dec/2025/1314/oj>).

- *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.

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

13. Concerning *Anguilla* spp. (freshwater eels), 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 as well as illegal trade, taking into account complementarities and synergies between the different measures and decisions under consideration by the Conference of the Parties.
14. 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.

15. 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.
 16. The Union notes that several proposals have been tabled by Parties in relation to international commercial 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 reopen this trade. For domestic elephant ivory and rhino horn markets, the Union should continue to support proportionate and effective measures based on the best available evidence, within the scope of CITES.
 17. The Union notes that the expansion of CITES to amend the Appendices and include additional species or amend their listing status has significantly increased the volume and complexity of activities under CITES, 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 CITES CoP20 and in discussions on the future budget of the CITES Secretariat.
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