



United States Department of the Interior



FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

In Reply Ref. to:
DSA\CITES\CoP20\US Response to Notification
2025/091

September 25, 2025

CITES Secretariate
International Environmental House
11 Chemin des Anémones
CH-1219 Châtelaine-Geneve
Switzerland

Dear Secretary General Higuero:

This letter provides the United States' response to Notification to the Parties No.2025-091, which requests comments from the Parties on the proposals submitted to the Secretariate for amendment of Appendices I and II of the Convention for consideration at the 20th meetings of the Conference of the Parties. If you have any questions concerning the information we have provided, please feel free to contact me at thomas_leuteritz@fws.gov.

Sincerely

Acting Chief, Division of Scientific Authority

Enclosure

*Regarding U.S. Technical Comments on CoP20 Prop 1 *Damaliscus pygargus pygargus**

The United States would like to note that while the proposal indicates that bontebok are easily distinguished from the closely related blesbok, they can in fact be difficult to distinguish from each other due to overlapping variation, which is further complicated by hybridization. The United States seeks more information about the degree of hybridization both within and outside the natural range of bontebok and

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whether (and to what extent) current population estimates for the bontebok include hybrids.

The United States also seeks clarification and additional information on the following:

1. The United States seeks more information about when some of the safeguards that were discussed in the proposal will be developed and fully implemented – specifically, the national online species population database and the coordinated meta-population plan.
2. Noting that the proposal states that identified hybrids must be kept in isolation and that they cannot be translocated alive and must be culled, the United States seeks clarification on whether identified hybrids (or parts of hybrids) are allowed to enter trade.

Regarding U.S. Technical Comments on CoP20 Prop 2. *Gazella dorcas*

In accordance with Annex 6 A. of Resolution Conf. 9.24 (Rev. CoP17), the proposal does not specify which of the criterion in Annex 2a of the Resolution (i.e., criterion A and/or criterion B of Annex 2a) are satisfied.

Regarding U.S. Technical Comments on CoP20 Prop 6 *Hyaena hyaena*

The United States would like to know if any additional information can be provided about the current *H. hyaena* population status and trend, either globally, or within any additional range countries.

Regarding U.S. Technical Comments on CoP20 Prop 13. *Loxodonta africana*

The proposal does not provide the specific amendment(s) to the Appendix II listing of the African elephant population of Namibia (such as to annotation A10, etc.) that Namibia is seeking with this proposal.

Regarding U.S. Technical Comments on CoP20 Prop 16 *Gyps africanus* and *Gyps rueppelli*

In accordance with Annex 6 A. of Resolution Conf. 9.24 (Rev. CoP17), the proposal does not specify which of the criterion in Annex 1 of the Resolution (i.e., criterion A, B and/or C, and/or its subparts, of Annex 1) are satisfied.

Regarding U.S. Technical Comments on CoP20 Prop 38 15 species within nine genera of Theraphosidae

The United States would like to note that the References and Annexes to this document appear to be missing, and they would be helpful in further evaluating the proposal. Information on consultations is also missing, and it is unclear if consultations were not conducted or if this was an unintentional omission.

The proponents recommend 14 tarantula species within the genera *Acanthoscurria*, *Avicularia*, *Catumiri*, *Cyriocosmus*, *Haplotremus*, *Holothele*, *Pamphobeteus* and *Umbyquyra* in accordance with Article II,

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Annex 2b of the Convention, and indicate that this is because of their resemblance to *Grammostola rosea* (proposed to include in Appendix II of CITES as meeting criteria in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17)). However, in accordance with Annex 6 A. of Resolution Conf. 9.24 (Rev. CoP17), the proposal does not specify which of the criterion in Annex 2a of the Resolution (i.e., criterion A and/or criterion B of Annex 2a) are satisfied. In addition, the United States seeks clarification and additional information on the following:

1. The United States seeks more information about the relative quantities of adults vs. juveniles/hatchlings of these species that are in trade.
2. The United States seeks additional information about the similarities of these species to each other at different life stages (e.g., descriptions, illustrations).
3. The United States seeks additional information about the similarities of these species to other congeners and other theraphosids, and any methods that can be used to distinguish the species proposed for inclusion in Appendix II of CITES.

Regarding U.S. Technical Comments on CoP20 Prop 39 *Haliotis midae*

It is not legally allowed under the Convention to include an animal species in Appendix II with the annotation "dried specimens only" to exclude other readily recognizable parts or derivatives, or to exclude the whole animal (per Art. I (b), Interpretation Section paragraph 7, and Res. Conf. 11.21). Article I, paragraph b) of the Convention defines "specimen" to mean "(i) any animal or plant, whether alive or dead; (ii) in the case of an animal: for species included in Appendices I and II, any readily recognizable part or derivative thereof; and for species included in Appendix III, any readily recognizable part or derivative thereof specified in Appendix III in relation to the species." An annotation specifying the parts and derivatives to be covered by the inclusion of the animal species in the Appendices can only be associated with a species included in Appendix III. For animal species included in Appendix I or II, the whole animal (live or dead) as well as any readily recognizable part or derivative is covered by the inclusion of the species in Appendix I or II. When a species is included in Appendix I, II or III, the whole, live or dead, animal or plant is always included. In addition, all parts and derivatives thereof are also included in the same Appendix unless, for animal species listed in Appendix III and plant species listed in Appendix II or III, the species is annotated with the symbol # followed by a number to indicate that only specific parts and derivatives are included. The proponent may wish to consider whether they wish to proceed with their proposal by withdrawing the invalid annotation, or to consider an Appendix III listing. Appendix III listings announced prior to CoP20 would be able to come into effect when CoP20 proposals come into effect 90 days after the meeting (or at any time at least 90 days after they issue their notification, per Art. XVI and Res. Conf. 9.25).

Regarding U.S. Technical Comments on CoP20 Proposal 46 – *Paubrasilia echinata*

The proposal cites an estimated 10,000 adult individuals (CNCFlora, 2024) and a population decline of 84% over the past three generations (De Lima et al., 2024). Population decline is inferred largely on the basis of habitat loss, but the methodology behind these estimates is not provided. Clarification would be helpful on the following points:

1. The scientific basis for the estimated population size and decline figures.
2. The density or abundance estimates used to infer population decline on the basis of habitat loss.
3. Whether any censuses or monitoring have been conducted in the reserves to inform estimates of mature individuals, density or abundance.
4. The scientific sources and methods for annual habitat loss figures, and how these were used to

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infer population decline, as described in Annex 5 of Resolution Conf. 9.24.

Additionally, Guimarães (2025) is cited extensively in the proposal regarding trade, illegal logging, and bow-making. A copy of this publication would be valuable for technical review and further understanding of the data and analyses referenced.

We offer the following observations pertaining to the implementation of Resolution Conf. 16.8 (Frequent Cross-Border Non-Commercial Movements of Musical Instruments). The proposal suggests that the musical instrument sector could continue to use the streamlined permitting process for Musical Instrument Certificates. However, this Resolution applies only to Appendix II and III specimens, as well as pre-Convention Appendix I, II, and III specimens.

Technical Correction from the State of Maine: Maine Glass Eel Landings 2023-2024

In addition to the US Government's comments above we have a clarification from the State of Maine that was probably submitted to you previously under separate cover from the Association of Fish and Wildlife Agencies (AFWA) but we provide it here again as a courtesy.

CoP20 Proposal 35 includes inaccurate information regarding Maine landings during the 2023 and 2024 fishing years. The proposal claims Maine exceeded its glass eel quota in 2023 and 2024. Maine has never exceeded its glass eel quota of 9,688 pounds. Commercial glass eel landings were 9,498.27 pounds in 2023 and 9,631.99 pounds in 2024, both less than the Maine annual glass eel quota. The CoP20 Proposal 35 Table 3 total landings include both the Maine glass eel state quota and the Maine glass eel aquaculture quota, which allows an additional 200 pounds of glass eel harvest for domestic aquaculture within Maine.