

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES  
OF WILD FAUNA AND FLORA



Seventy-eighth meeting of the Standing Committee  
Geneva (Switzerland), 3-8 February 2025

Compliance

Review of Significant Trade in Appendix-II listed species

IMPLEMENTATION OF RECOMMENDATIONS OF THE ANIMALS COMMITTEE

1. This document has been prepared by the Secretariat.
2. The present document concerns the implementation of recommendations of the Animals Committee under Resolution Conf. 12.8 (Rev. CoP18) on *Review of Significant Trade in specimens in Appendix-II species* and is structured in two sections, as follows:
  - a) **Section 1** provides a progress update on the implementation of the Animals Committee recommendations for five fauna species/country combinations that are either due for reporting at the present meeting or for which the Party concerned has provided an update since the Secretariat's last report to the Standing Committee at its 77th meeting (SC77; Geneva, November 2023) in [document SC77 Doc. 35.2 \(Rev. 1\)](#) and
  - b) **Section 2** contains an update on the 14 species/country combinations that were selected following the 19th meeting of the Conference of the Parties (CoP19; Panama, November 2022), at the 32nd meeting of the Animals Committee (AC32; Geneva, June 2023) and retained at the 33rd meeting of the Animals Committee (AC33; Geneva, July 2024).
3. There are four Annexes to the present document:
  - a) **Annex 1** is a summary update of the status of the five species/country combinations discussed in section 1. The table in Annex 1 comprises three columns that contain the following information for each species/country combination concerned: a) Recommendations of the Animals Committee (AC), and previous decisions of the Standing Committee (SC) where these exist; b) a summary of any response received from the range State concerned and views of the Animals Committee and c) the Secretariat's evaluation of the implementation of the recommendations, and its recommended actions to the Standing Committee.
  - b) **Annex 2** is a summary table of the 14 species/country combinations discussed in section 2. The table in Annex 2 comprises two columns that contain the following information: a) the relevant recommendations and timelines, and b) an update on the status of implementation of the recommendations, with the Secretariat's evaluation and recommendations to the Standing Committee.
  - c) **Annex 3** contains detailed comments from the Members of the Animals Committee on the species/country combinations under review. Summaries of the views of the Animals Committee for each species/country combination are included in the tables in Annexes 1 and 2, as appropriate.
  - d) **Annex 4** contains the responses from range States in the language and format as submitted. Short responses received from range States are included in the tables in Annexes 1 and 2, as appropriate.

## Section 1 – Species/country combinations selected prior to CoP19

4. On 12 August 2024, the Secretariat wrote to all range States currently in the Review of Significant Trade (RST) inviting them to submit any new information concerning the implementation of the recommendations of the Animals and Standing Committees by 30 September 2024 if they wished to have their cases reviewed at the present meeting. The Secretariat also drew attention to the preliminary CITES NDF guidance developed under Decision 19.132, which is available on the [non-detriment findings \(NDFs\) page of the CITES Website](#). By 30 October 2024, the Secretariat had received responses from Algeria, Senegal, Togo and Tunisia.
5. On 19 December 2024, the Solomon Islands submitted an NDF for its stockpile of *Tridacna* species. There was insufficient time to review the information received and consult with the Members of the Animals Committee ahead of this meeting. The Secretariat will soon review and consult with them so that the Standing Committee may consider this species/country combination at its 79th meeting (SC79, Samarkand, November 2025).
6. The following five RST fauna species/country combinations are the focus of this section:
  - a) *Anguilla anguilla* / Algeria
  - b) *Anguilla anguilla* / Tunisia
  - c) *Hippocampus algiricus* / Senegal
  - d) *Pandinus imperator* / Togo
  - e) *Varanus ornatus* / Togo
7. In accordance with paragraph 1 k) of Resolution Conf. 12.8 (Rev. CoP18), the Secretariat consulted intersessionally with the Members of the Animals Committee on the relevant species/country combinations, through the Chair, to collect their views on whether the recommendations have been implemented. The views of the Members of the Animals Committee have been taken into consideration in the Secretariat's evaluation in the present document.
8. As per paragraph 2 l) of Resolution Conf. 12.8 (Rev. CoP18), the Secretariat hereby informs the Standing Committee of its evaluation as to whether the recommendations of the Animals Committee and Standing Committee have been implemented by the range State concerned.
9. In accordance with paragraph 1 m) of Resolution Conf. 12.8 (Rev. CoP18), and based on the present report by the Secretariat and the views of the Animals Committee, the Standing Committee is to decide on appropriate actions and make recommendations to the country or countries concerned, keeping in mind that these recommendations should be time-bound, feasible, measurable, proportionate, transparent, and should, if appropriate, promote capacity-building.

### 10. *Anguilla anguilla* / Algeria

#### Background

- a) Trade in *A. anguilla* from Algeria was selected for review at the 29th meeting of the Animals Committee (AC29; Geneva, July 2017) under Resolution Conf. 12.8 (Rev. CoP17) on RST, which was the relevant version of the Resolution in force at the time of selection (see documents [AC29 Doc. 13.3](#) and [AC29 Com 5 \(Rev. by Sec.\)](#)).
- b) At its 30th meeting (AC30; Geneva, July 2018), the Animals Committee reviewed the available information, including a response from Algeria and recommended retention of Algeria for *A. anguilla*. The Committee formulated recommendations to Algeria to address concerns with the implementation of the non-detriment finding required in terms of Article IV of the Convention [see document [AC30 Com. 11 \(Rev. by Sec.\)](#)]. The recommendations are also contained in the first column of the table concerning this species/country combination in Annex 1 to the present document.
- c) The status of the implementation of the Animals Committee recommendations was previously reported by the Secretariat at the 74th meeting of the Standing Committee (SC74; Lyon, March 2022) in

document [SC74 Doc. 30.1](#) and its [addendum](#). Based on these documents, the Committee noted that recommendations a) and b) have been complied with; invited Algeria to submit the scientific justification for the proposed increase in the quota; and commended Algeria for the progress made to date in implementing the remaining recommendations c) to l).

- d) At SC74, the Standing Committee also requested the Secretariat to produce a detailed summary of the information provided by Algeria, Morocco and Tunisia for review by the Animals Committee and the anguillid specialist group of the International Union for Conservation of Nature (IUCN), to be further considered at the 75th meeting of the Standing Committee (SC75; Panama City, November 2022).
- e) On 20 April 2022, the Secretariat wrote to the three Parties concerned inviting them to examine document SC74 Doc. 30.1 and their responses in Annex 4 to that document for accuracy and to provide any supplementary information or updates regarding implementation of relevant recommendations of the Animals Committee, in particular concerning proposed increases in their export quotas. Additional information was not provided by Algeria.
- f) At SC75, the Standing Committee considered document [SC75 Doc. 8](#) and i) instructed Algeria to maintain its current annual export quota for *A. anguilla* of 8,000 kg wild-taken adult eels and 0 glass eels, until it provides a justification for any revised quota, demonstrating how the change is conservative, based on estimates of sustainable offtake that make use of best available scientific information, to the Secretariat and the Chair of the Animals Committee, for their agreement; ii) agreed that recommendations e) and f) have been implemented; iii) commended Algeria for the progress made to date in implementing the remaining recommendations d) and g) to l); and iv) invited Algeria to provide an update on the implementation of the outstanding recommendations three months before the documentation deadline for SC77. Algeria did not respond by the deadline.
- g) At SC77, the Standing Committee considered document [SC77 Doc. 35.2 \(Rev. 1\)](#) and requested Algeria to provide an update on the implementation of the outstanding recommendations by 1 March 2024 for consideration by the Animals Committee at AC33. Algeria provided the Secretariat with additional information prior to AC33.
- h) At AC33, the Animals Committee considered document [AC33 Doc. 14.2](#) and i) agreed that recommendations d), g), h) and k) have been implemented; ii) invited Algeria to liaise with the IUCN anguillid specialist group to assist in the development of an NDF; and iii) invited Algeria to provide an update on the implementation of the outstanding recommendations i), j) and l) by 30 September 2024 for consideration before the 78th meeting of the Standing Committee.

#### Response from range State

- i) On 30 September 2024, Algeria submitted a report entitled “Actualisation sur la mise en oeuvre des recommandations établies lors de la 33ème réunion de la CITES” (*Update on the implementation of the recommendations agreed at the 33rd meeting of the Animals Committee*). The response is summarized in the table in Annex 1 to the present document and presented in full in the language and format received in Annex 4a.

#### Evaluation of implementation of the recommendations

- j) Recommendations a) to c), d) to h) and k) have already been determined to have been implemented.
- k) Based on the above and the evaluation of the Secretariat, the Secretariat determined that Algeria has implemented recommendations i) and j) but it has not yet implemented recommendation l) of the Animals Committee.

#### Recommendation of the Secretariat

- l) The Standing Committee is invited to:
  - i) commend Algeria for the progress made;
  - ii) agree that recommendations i) and j) have been implemented;

- iii) invite Algeria to provide an update on the FAO-General Fisheries Commission for the Mediterranean (GFCM) project to the 34th meeting of the Animals Committee (AC34); and
- iv) invite Algeria to implement recommendation I) through the preparation of a non-detriment finding for *Anguilla anguilla* taking into consideration the preliminary CITES NDF guidance materials and present this to AC34.

## 11. *Anguilla anguilla* / Tunisia

### Background

- a) Trade in *A. anguilla* from Tunisia was selected for review at AC29 under Resolution Conf. 12.8 (Rev. CoP17) on RST, which was the relevant version of the Resolution in force at the time of selection [see documents [AC29 Doc. 13.3](#) and [AC29 Com 5 \(Rev. by Sec.\)](#)].
- b) At AC30, the Animals Committee reviewed the available information, including a response from Tunisia and recommended retention of Tunisia for *A. anguilla*. The Committee formulated recommendations to Tunisia to address concerns with the implementation of NDF required in terms of Article IV of the Convention [see document [AC30 Com. 11 \(Rev. by Sec.\)](#)]. The recommendations are also contained in the first column of the table concerning this species country/combination in Annex 1 to the present document.
- c) The status of the implementation of the Animals Committee recommendations was previously reported by the Secretariat at SC74 in document [SC74 Doc. 30.1](#) and its [addendum](#). Based on these documents, the Committee noted that recommendations a) and b) have been complied with; invited Tunisia to submit the scientific justification for the proposed increase in the quota; and commended Tunisia for the progress made to date in implementing the remaining recommendations c) to I).
- d) At SC74, the Standing Committee also requested the Secretariat to produce a detailed summary of the information provided by Tunisia for review by the Animals Committee and the anguillid specialist group of the International Union for Conservation of Nature (IUCN), to be further considered at SC75.
- e) On 20 April 2022, the Secretariat wrote to Tunisia inviting it to examine document SC74 Doc. 30.1 and their responses in Annex 4 to that document for accuracy and to provide any supplementary information or updates regarding implementation of relevant recommendations of the Animals Committee, in particular concerning proposed increases in their export quotas. Tunisia provided supplementary information to the Secretariat prior to SC75.
- f) At SC75, the Standing Committee considered document [SC75 Doc. 8](#) and i) commended Tunisia for the considerable progress made in implementing recommendations c) to I); ii) instructed Tunisia to maintain its current quota for *A. anguilla* of 90,000 kg of eels, where export is restricted to specimens greater than 30cm in length and 0 glass eels, until it provides a justification for any increased quota, demonstrating how the change is conservative, based on estimates of sustainable offtake that make use of best available scientific information, to the Secretariat and the Chair of the Animals Committee, for their agreement; and iii) invited Tunisia to provide an update on the implementation of the outstanding recommendations three months before the documentation deadline for SC77. Tunisia provided an update to the Secretariat prior to SC77.
- g) At SC77, the Standing Committee considered document [SC77 Doc. 35.2 \(Rev. 1\)](#). Additional information was provided by Tunisia, which is included in [Annex 2e](#) of document SC77 Doc. 35.2 (in the language in which it was received).
- h) At AC33, the Animals Committee: i) agreed that recommendations d) to f) have been implemented; ii) invited Tunisia to liaise with the IUCN anguillid specialist group to assist in the development of an NDF; and iii) invited Tunisia to provide an update on the implementation of the outstanding recommendations g) to I) by 30 September 2024 for consideration before the 78th meeting of the Standing Committee.

### Response from range State

- i) On 30 September 2024, Tunisia submitted a report entitled “Actualisation sur la mise en oeuvre des recommandations établies lors de la 33ème réunion de la CITES” (*Update on the implementation of the recommendations agreed at the 33rd meeting of the Animals Committee*). The response is summarized

in the table in Annex 1 to the present document and presented in full in the language and format received in Annex 4b.

#### Evaluation of implementation of the recommendations

- j) Recommendations a), b), d) to f) have already been determined to have been implemented.
- k) Based on the above, the Secretariat has determined that Tunisia has now implemented recommendations g) to k) but it has not yet implemented recommendation l) of the Animals Committee.

#### Recommendation of the Secretariat

- l) The Standing Committee is invited to:
  - i) commend Tunisia for the progress made;
  - ii) agree that recommendations g) to k) have been implemented;
  - iii) invite Tunisia to provide an update on the FAO-General Fisheries Commission for the Mediterranean (GFCM) project to the 34th meeting of the Animals Committee (AC34); and
  - iv) invite Tunisia to implement recommendation l) through the preparation of a non-detriment finding for *Anguilla anguilla* taking into consideration the preliminary CITES NDF guidance materials and present this to AC34.

## 12. *Hippocampus algiricus* / Senegal

#### Background

- a) The Animals Committee selected *Hippocampus algiricus* for RST as a priority species at its 25th meeting (AC25; Geneva, July 2011) under Resolution 12.8 (Rev. CoP13), which was the relevant version of the Resolution in force at the time of selection ([AC25 Summary record](#)). Senegal was one of a number of range States for the species retained at AC26. Senegal did not provide a response to the consultation by the Secretariat and, at AC27, the Animals Committee retained the species/country combination in RST. It was classified as “urgent concern” based on: concerns about relatively high levels of trade between 2004-2012 mainly in wild bodies; unknown population status, but population declines and a reduction in size of specimens caught observed; specimens in trade primarily sourced from by-catch and the scientific basis for non-detriment findings being unclear. The Animals Committee formulated recommendations that were communicated to Senegal on 2 June 2014. No response was received from Senegal.
- b) At its 66th meeting (SC66; Geneva, January 2016), the Standing Committee recommended that all Parties suspend trade in specimens of *H. algiricus* from Senegal until that country demonstrates compliance with Article IV, paragraphs 2 (a) and 3, for this species, and provides full information to the Secretariat regarding compliance with the recommendations of the Animals Committee. The Secretariat wrote to Senegal on 10 February 2016 to inform them of the Standing Committee’s recommendation.
- c) On several occasions, the Secretariat wrote to Senegal to invite them to provide updates on the implementation of the recommendations, but no response was received.
- d) At SC74, the Standing Committee considered those species/country combinations that have been subject to longstanding trade suspensions (see document [SC74 Doc. 30.2](#)) that had not been reviewed at SC70. The Committee retained the recommendation to suspend trade in *Hippocampus algiricus* from Senegal ([SC74 Summary record](#)).

#### Response from range State

- e) Senegal responded on 26 September 2024 with a letter outlining the challenges it faced in making an NDF for this species, which is a by-catch species. Senegal also confirmed that there is no specific protection for *H. algiricus* in Senegal and that they are not targeted in fisheries. The response is summarized in the table in Annex 1 to the present document and presented in full in the language and format received in Annex 4c.

#### Evaluation of implementation of the recommendations

- f) Recommendation a) has been implemented through the confirmation that there is no specific protection for *H. algiricus* in Senegal and that they are not targeted in fisheries. All other recommendations remain outstanding.

#### Recommendation of the Secretariat

- g) The Standing Committee is invited to:
- i) agree that recommendation a) has been implemented;
  - ii) invite the Secretariat and the Animals Committee to work with Senegal and relevant experts to advise Senegal on the development of an NDF for *H. algiricus*; and
  - iii) urge Senegal to provide an update on the implementation of recommendations b) to g) 90 days before the documentation deadline for AC34.

### 13. *Pandinus imperator* / Togo

#### Background

- a) *Pandinus imperator* (Emperor Scorpion) was included as an urgent case at the 24th meeting of the Animals Committee (AC24; Geneva, April 2009) under Resolution Conf. 12.8 (Rev. CoP13), which was the relevant version of the Resolution in force at the time of selection ([AC24 Summary Record](#)). At AC25, eight range States, including Togo were retained in the review. At AC26, *P. imperator* was categorized as of “possible concern” for Togo, and recommendations were formulated as summarized in Annex 1 to document [AC26 WG7 Doc. 1 \(Rev. 1\)](#).
- b) At its 63rd meeting (SC63; Bangkok, March 2013), the Standing Committee recommended that all Parties suspend trade in specimens of *P. imperator* from Togo until the country demonstrates compliance with Article IV, paragraphs 2 (a) and 3 for this species and provides full information to the Secretariat regarding compliance with the recommendations of the Animals Committee. The recommendation to suspend trade has been valid since 2 May 2013.
- c) The trade suspension has been reviewed and maintained by the Standing Committee at SC66 ([SC66 Summary record](#)) and SC74 ([SC74 Summary record](#)).
- d) On 10 May 2024, Togo submitted an NDF for *Pandinus imperator* to the Secretariat, which was presented in Annex 2 to [document AC33 Doc. 14.2](#) and considered at AC33. Togo proposed to re-open trade in live specimens of this species with a quota of 20,000 specimens per year (based on the information on the CITES website the export quota for wild-taken specimens of the species was 1,000 prior to the recommendation to suspend trade).
- e) At AC33, the Animals Committee recommended the removal of the recommendation to suspend trade in *Pandinus imperator* from Togo under the Review of Significant Trade and accepted an annual export quota of 20,000 live specimens. Before making any increases to this interim quota, the planned changes should be communicated by the range State to the Secretariat and the Chair of the Animals Committee along with a justification of how the change is conservative, based on estimates of sustainable offtake that make use of available scientific information, for their agreement.

#### Evaluation of implementation of recommendations

- f) With the recommendations from the Animals Committee at AC33, the recommendations under RST are considered to be implemented and *Pandinus imperator* from Togo can be removed from the review. However, Togo should be encouraged to implement a size restriction for specimens of a maximum total length of 10 cm (or maximum body length, excluding the tail, of 5 cm) for live specimens of source code R to be exported, which should be published with the export quota.

#### Recommendation of the Secretariat

- g) The Standing Committee is invited to:

- i) withdraw the recommendation to suspend trade in *Pandinus imperator* from Togo;
- ii) remove *Pandinus imperator* / Togo from RST, subject to the publication of an annual export quota of 20,000 live specimens, including a size restriction of a maximum total length of 10 cm (or maximum body length, excluding the tail, of 5 cm) for live specimens of source code R to be exported, which should be published with the export quota; and
- iii) remind Togo that any increase in the quota above 20,000 live specimens should be communicated to the Chair of the Animals Committee and the Secretariat for their agreement in advance of any trade taking place, with a non-detriment finding, including a justification of how the change is conservative, based on estimates of sustainable offtake that make use of best available scientific information.

#### 14. *Varanus ornatus* / Togo

##### Background

- a) The Animals Committee selected *Varanus ornatus* for review as a priority species at the 27th meeting of the Animals Committee (AC27, Veracruz, May 2014) under Resolution Conf. 12.8 (Rev. CoP13) which was the relevant version of the Resolution in force at the time of selection ([AC27 Summary record](#)). Togo provided a response to the consultation by the Secretariat, but at its 28th meeting (AC28, Tel Aviv, September 2015), the Animals Committee retained the species/country combination in RST based on concerns over high volumes of trade and the basis of the setting of quotas. At AC29, the Animals Committee determined that “action is needed” concerning trade in *V. ornatus* from Togo and formulated recommendations.
- b) The Secretariat wrote to Togo on 22 September 2017 and received a response on 21 December 2017, where Togo notified the Secretariat of a proposed quota of 1,000 wild specimens and 7,000 ranched specimens. These quotas were identical to those that were published every year since 2007, and Togo did not provide any supporting information to justify these quotas.
- c) At its 70th meeting (SC70; Sochi, October 2018), the Standing Committee agreed that these proposed quotas were not sufficiently conservative and requested the Secretariat and the Chair of the Animals Committee to continue to consult with Togo to establish a quota by 1 December 2018, so that the matter could be discussed again at SC71 ([SC70 Summary record](#)).
- d) Following consultations with the Chair of the Animals Committee, the Secretariat wrote to Togo on 21 November 2018 to suggest that, following an analysis of the trade data, conservative quotas of 25 wild specimens and 350 ranched specimens might be deemed appropriate. Togo was invited to confirm these quotas to the Secretariat or to propose alternative quotas that would be accompanied by supporting information to demonstrate that these are considered conservative and based on estimates using the best available scientific information.
- e) Togo responded to the Secretariat on 4 February 2019, proposing the following quotas for *V. ornatus* for 2019: 200 wild specimens and 1,500 ranched specimens. Togo stated that “the species is relatively common in the country’s ecological zone IV and is frequently found in ecological zones III and V”, but did not provide further information. Togo stated that until data on population estimates are produced, the mode of production of ranched specimens, and the current quota, were not considered detrimental to the wild populations of the species.
- f) At SC71, the Standing Committee agreed to remove *Varanus ornatus* from the RST, subject to the publication of export quotas of 25 wild live specimens and 350 ranched live specimens ([SC71 Summary record](#)). The Standing Committee further urged Togo to provide a justification, based on best available scientific information, for any proposed increases to these export quotas to the Secretariat and the Chair of the Animals Committee for their approval.
- g) On several occasions, most recently on 12 August 2024, the Secretariat wrote to Togo to remind them of the SC71 recommendation and ask them to confirm the quotas, but no response was received, so the species/country combination has remained in RST.

### Response from range State

- h) On 30 October 2024, Togo responded with a NDF for *V. ornatus* that was compiled with support under the CITES Compliance Assistance Programme. This NDF determines that an annual quota of 1,500 ranched specimens and 100 wild specimens of *V. ornatus* is not detrimental to the survival of the species. The response is summarized in the table in Annex 1 to the present document and presented in full in the language and format received in Annex 4d.

### Evaluation of implementation of the recommendations

- i) The Secretariat has determined that the recommendations have been partially implemented. The NDF aims to justify quotas of 1,500 ranched specimens and 100 wild specimens, but there are concerns about the application of the simplified assessment. These concerns relate to the thresholds used and the data considered to inform the scores against the criteria relating to annual harvest levels, area of distribution and life-history traits in the simplified assessment. The Secretariat agrees with the assessment by the Members of the Animals Committee in Annex 3 to the present document that a comprehensive assessment is needed to justify the proposed quota increases.

### Recommendation of the Secretariat

- j) The Standing Committee is invited to:
- i) commend Togo for its progress in implementing the recommendations of the Animals and Standing Committees;
  - ii) invite Togo to undertake a comprehensive non-detriment finding assessment to justify their proposed quota; and
  - iii) submit the updated NDF to the Secretariat by 31 July 2025 for consideration by the Animals Committee ahead of the 79th meeting of the Standing Committee.

## **Section 2 – Species/country combinations selected for review following CoP19**

15. This section focuses on the 14 species/country combinations that were selected following CoP19 at AC32 and retained in the Review at AC33, which are listed below.
- a) *Carcharhinus longimanus* / Kenya, Yemen
  - b) *Kinixys homeana* / Ghana
  - c) *Mobula* spp. / Sri Lanka
  - d) *Python regius* / Benin, Ghana, Togo
  - e) *Sphyrna lewini* / Kenya, Mexico, Nicaragua, Sri Lanka, Yemen
  - f) *Sphyrna mokarran* / Mexico
  - g) *Testudo horsfieldii* / Uzbekistan
16. Recommendations were made at AC33 for each species/country combination, for which some deadlines, specifically those related to the establishment of export quotas, have now passed. These recommendations are presented in the [AC33 Summary Record](#) and included in the tables in Annex 2 of the present document.
17. On 12 August 2024, the Secretariat wrote to all range States retained in the Review following AC33 to inform them that the species/country had been retained in the RST and forward the recommendations made by the Animals Committee. The Secretariat also drew attention to the preliminary CITES NDF guidance developed under Decision 19.132, which is available on the [non-detriment findings page of the CITES Website](#).
18. In accordance with paragraph 1 j) of Resolution Conf. 12.8 (Rev. CoP18), which directs the Secretariat to monitor progress against the recommendations, the tables in Annex 2 provide an overview of the 14 fauna species/country combinations for review, including the relevant recommendations and timelines in the first



column, and an update on the status of implementation of the recommendations (including a summary of the response from Togo concerning *Python regius*), with the Secretariat's evaluation and recommendations to the Standing Committee in the second column.

19. In accordance with paragraph 1 m) of Resolution Conf. 12.8 (Rev. CoP18) and based on the present report, the Standing Committee is invited to decide on necessary action and make recommendations to the range States concerned, or to all Parties.

#### Responses from Parties

20. At the time of writing, the Secretariat had received responses from Benin, Ghana, Mexico, Nicaragua, Togo, Uzbekistan and Yemen, the details of which are included in the tables in Annex 2 to the present document. While the majority of Parties responded to confirm export quotas, Togo provided a comprehensive NDF for *Python regius*, which can be found in Annex 4 to the present document, in the language and format received.
21. Trade in *Testudo horsfieldii* from Uzbekistan is also subject to review under Resolution Conf. 17.7 (Rev. CoP19) on *Review of animal specimens reported as produced in captivity*. In its response to the consultation under that process, Uzbekistan provided information that is also relevant to the review of the same species under Resolution Conf. 12.8 (Rev. CoP19) (see [Annex 5e](#) to document SC78 Doc. 35.1).

#### Update on matters referred to SC77

22. Concerning *Falco cherrug* /Jordan, the Animals Committee invited the Secretariat to look into possible instances of illegal trade and report to the Standing Committee at the present meeting. The Secretariat followed up with Jordan and may provide an oral update during the meeting relating to this matter.

#### Recommendations

23. In accordance with paragraph 1 m) of Resolution Conf. 12.8 (Rev. CoP18) and based on the present report and its Annexes, the Standing Committee is invited to consider the following:

##### *With regards to Section 1 and Annex 1 to the present document*

- a) Concerning *Anguilla anguilla* / Algeria,
  - i) commend Algeria for the progress made;
  - ii) agree that recommendations i) and j) have been implemented;
  - iii) invite Algeria to provide an update on the FAO-General Fisheries Commission for the Mediterranean (GFCM) project to the 34th meeting of the Animals Committee (AC34); and
  - iv) invite Algeria to implement recommendation l) through the preparation of a non-detriment finding for *A. anguilla* taking into consideration the preliminary CITES NDF guidance materials and present this to AC34.
- b) Concerning *Anguilla anguilla* / Tunisia,
  - i) commend Tunisia for the progress made;
  - ii) agree that recommendations g) to k) have been implemented;
  - iii) invite Tunisia to provide an update on the FAO-General Fisheries Commission for the Mediterranean (GFCM) project to the 34th meeting of the Animals Committee (AC34); and
  - iv) invite Tunisia to implement recommendation l) through the preparation of a non-detriment finding for *A. anguilla* taking into consideration the preliminary CITES NDF guidance materials and present this to AC34.
- c) Concerning *Hippocampus algiricus* / Senegal,
  - i) agree that recommendation a) has been implemented;

- ii) invite the Secretariat and the Animals Committee to work with Senegal and relevant experts to advise Senegal on the development of a non-detriment finding for *H. algericus*; and
  - ii) urge Senegal to provide an update on the implementation of recommendations b) to g) 90 days before the documentation deadline for AC34.
- d) Concerning *Pandinus imperator* / Togo,
- i) withdraw the recommendation to suspend trade in *Pandinus imperator* from Togo;
  - ii) remove *Pandinus imperator* / Togo from the Review of Significant Trade, subject to the publication of an annual export quota of 20,000 live specimens, including a size restriction of a maximum total length of 10 cm (or maximum body length, excluding the tail, of 5 cm) for live specimens of source code R to be exported, which should be published with the export quota; and
  - iii) remind Togo that any increase in the quota above 20,000 live specimens should be communicated to the Chair of the Animals Committee and the Secretariat for their agreement in advance of any trade taking place, with a non-detriment finding, including a justification of how the change is conservative, based on estimates of sustainable offtake that make use of best available scientific information.
- e) Concerning *Varanus oranatus* / Togo,
- i) commend Togo for its progress in implementing the recommendations of the Animals and Standing Committees;
  - ii) invite Togo to undertake a comprehensive non-detriment finding assessment to justify their proposed quota; and
  - iii) submit the updated non-detriment finding to the Secretariat by 31 July 2025 for consideration by the Animals Committee ahead of the 79th meeting of the Standing Committee.

*With regards to Section 2 and Annex 2 to the present document*

- f) Concerning *Carcharhinus longimanus* / Kenya,
- i) request the Secretariat to publish a zero export quota for *C. longimanus* until Kenya provides information to justify a higher quota to be agreed with the AC Chair; and
  - ii) invite Kenya to provide an update on the implementation of recommendations b) to g) 90 days before the documentation deadline for AC34.
- g) Concerning *Carcharhinus longimanus* / Yemen,
- i) request the Secretariat to publish a zero export quota for *C. longimanus* until Yemen provides information to justify a higher quota to be agreed with the AC Chair; and
  - ii) invite Yemen to provide an update on the implementation of recommendations b) to h) 90 days before the documentation deadline for AC34.
- h) Concerning *Kinixys homeana* / Ghana,
- i) agree that recommendations a) and b) have been implemented; and
  - ii) invite Ghana to provide an update on the implementation of recommendations c) to j) 90 days before the documentation deadline for AC34.
- i) Concerning *Mobula* spp. / Sri Lanka,
- i) request the Secretariat to publish a zero export quota for *Mobula* spp. until Sri Lanka provides information to justify a higher quota to be agreed with the AC Chair; and

- ii) invite Sri Lanka to provide an update on the implementation of recommendations b) to g) 90 days before the documentation deadline for AC34.
- j) Concerning *Python regius* / Benin,
  - i) agree that recommendations a) and b) have been implemented; and
  - ii) invite Benin to provide an update on the implementation of recommendations c) to j) 90 days before the documentation deadline for AC34.
- k) Concerning *Python regius* / Ghana,
  - i) agree that recommendations a) and b) have been implemented; and
  - ii) invite Ghana to provide an update on the implementation of recommendations c) to k) 90 days before the documentation deadline for AC34.
- l) Concerning *Python regius* / Togo,
  - i) acknowledge the progress that Togo has made in the implementation of the Animals Committee recommendations;
  - ii) request Togo to establish, in consultation with the Chair of the Animals Committee and the Secretariat, an interim conservative annual export quota for source codes W and R within 90 days for *Python regius* and communicate the quota to the Secretariat; and
  - iii) invite Togo to provide an update on the implementation of recommendations b) to g) 90 days before the documentation deadline for AC34.
- m) Concerning *Sphyrna lewini* / Kenya,
  - i) request the Secretariat to publish an annual export quota of 50 live specimens for *S. lewini* until Kenya provides information to justify a higher quota to be agreed with the AC Chair; and
  - ii) invite Kenya to provide an update on the implementation of recommendations b) to g) 90 days before the documentation deadline for AC34.
- n) Concerning *Sphyrna lewini* / Mexico,
  - i) agree that recommendations a) and b) have been implemented; and
  - ii) invite Mexico to provide an update on the implementation of recommendations c) to g) 90 days before the documentation deadline for AC34.
- o) Concerning *Sphyrna lewini* / Nicaragua,
  - i) agree that recommendations a) and b) have been implemented; and
  - ii) invite Nicaragua to provide an update on the implementation of recommendations c) to g) 90 days before the documentation deadline for AC34.
- p) Concerning *Sphyrna lewini* / Sri Lanka,
  - i) request the Secretariat to publish a zero export quota for *S. lewini* until Sri Lanka provides information to justify a higher quota to be agreed with the AC Chair; and
  - ii) urge Sri Lanka to provide an update on the implementation of recommendations b) to g) 90 days before the documentation deadline for AC34.

- q) Concerning *Sphyrna lewini* / Yemen,
  - i) request the Secretariat to publish a zero export quota for *S. lewini* until Yemen provides information to justify a higher quota to be agreed with the AC Chair; and
  - ii) invite Yemen to provide an update on the implementation of recommendations b) to g) 90 days before the documentation deadline for SC77.
- r) Concerning *Sphyrna mokarran* / Mexico,
  - i) agree that recommendations a) and b) have been implemented; and
  - ii) invite Mexico to provide an update on the implementation of recommendations c) to f) 90 days before the documentation deadline for AC34.
- s) Concerning *Testudo horsfieldii* / Uzbekistan,
  - i) remove *Testudo horsfieldii* from Uzbekistan from the Review of Significant Trade; and
  - ii) remind Uzbekistan that any increase in the quotas for W or R should be communicated to the Chair of the Animals Committee and the Secretariat for their agreement in advance of any trade taking place, with a non-detriment finding, including a justification of how the change is conservative, based on estimates of sustainable offtake that make use of best available scientific information.

RECOMMENDATIONS OF THE ANIMALS COMMITTEE FOR A SELECTION SPECIES SELECTED FOR THE REVIEW OF SIGNIFICANT TRADE FOLLOWING COP15 AND COP16 AND PREVIOUS DECISIONS OF THE STANDING COMMITTEE WHERE THESE EXIST; RESPONSES FROM THE RANGE STATES CONCERNED AND VIEWS OF THE ANIMALS COMMITTEE; AND EVALUATION OF IMPLEMENTATION OF THE RECOMMENDATIONS BY THE SECRETARIAT, FOLLOWING CONSULTATION WITH THE ANIMALS COMMITTEE MEMBERS, AND RECOMMENDED ACTIONS

Recommendations of the AC, and previous decisions of the SC where these exist	Response from the range State and views of the Animals Committee	Evaluation of implementation of the recommendations; and recommended actions
<b><i>Anguilla anguilla</i> (European eel) - selected following CoP17</b>		
<p><b>Algeria</b></p> <p>Short term actions</p> <p><u>Within 90 days (12 February 2019):</u></p> <p>a) Establish interim conservative export quotas (suggested to be reduced to 67 percent of present trade and a zero quota for live glass eels) within 60 days for each category of specimens in trade (such as fingerlings/elvers, live, and meat), and communicate the quotas to the Secretariat for publication on the website.</p> <p>b) No exports should occur until the quota has been published on the Secretariat's website.</p> <p>c) Before making any increases to the interim quota, the planned changes should be communicated by the Management Authority of Algeria, Morocco or Tunisia to the Secretariat and Chair of the Animals Committee along with</p>	<p>Following the notification from the CITES Secretariat regarding the state of implementation of the recommendations established by the CITES Animals Committee during its 33rd meeting, this report provides an update on the implementation of recommendations i), j), and l) concerning the European eel (<i>Anguilla anguilla</i>).</p> <p>Concerning the implementation of recommendations (i), (j), and (l), Algeria states that it has contributed to the work of the FAO-GFCM expert groups on eels, established since 2020 under the GFCM European Eel Research Program. The first phase (2020–2022) identified various sites and habitats (lagoons, rivers, estuaries, and lakes) as well as information on the environment and the species' ecology. Socioeconomic dimensions, such as capture levels, have also been collected.</p> <p>The second phase (2023–2024) involves developing a long-term management plan to ensure species conservation and preserve the heritage of Mediterranean coastal communities. Efforts include strengthening data collection and refining criteria for better structuring the existing database on habitats.</p> <p>Algeria reports that stock evaluations revealed low recruitment rates compared to previous years, confirming ICES recruitment index findings.</p>	<p><u>Evaluation of implementation of the recommendations</u></p> <p>Algeria has implemented recommendations i) and j). Recommendation l) remains outstanding.</p> <p><u>Recommended actions</u></p> <p><b>The Standing Committee is invited to:</b></p> <p>i) <b>commend Algeria for the progress made;</b></p> <p>ii) <b>agree that recommendations i) and j) have been implemented;</b></p>

Recommendations of the AC, and previous decisions of the SC where these exist	Response from the range State and views of the Animals Committee	Evaluation of implementation of the recommendations; and recommended actions
<p>a justification of how the change is conservative, based on estimates of sustainable offtake that make use of best available scientific information, for their agreement.</p> <p>Long term actions</p> <p><u>Within 2 years (14 November 2020):</u></p> <p>d) Evaluate current harvest management measures and implement harvest measures to ensure sustainability</p> <p>(for example:</p> <ul style="list-style-type: none"> <li>- size/selective harvest</li> <li>- open/closed seasons</li> <li>- harvest seasons</li> <li>- harvest maximums</li> <li>- restrictions to harvest frequency, sites or time of day</li> <li>- control of number of harvesters</li> <li>- types and methods of harvest)</li> </ul> <p>e) Clarify and standardize the terms and units used in reporting trade. Ensure that appropriate terms and units are recorded on permits for trade. Standardized terms and appropriate units are found in the most recent version of the Guidelines for the preparation and submission of CITES annual reports, which is referenced in Resolution Conf. 11.17 (Rev. CoP17) on <i>national reports</i>, and distributed by the Secretariat by notification.</p>	<p>Estimated escapement rates (current biomass/B0) ranged between 9% and 11%, highlighting poor silver eel escapement and low future recruitment.</p> <p>Concerning recommendation i), on the development and implementation of coordinated national and/or local management plans (that include harvest management considerations), Algeria reports that it has implemented the following Harvest Management Measures:</p> <ul style="list-style-type: none"> <li>• A seasonal fishing ban, closing eel fishing activities for five consecutive months each year (from May 1 to September 30) under Executive Decree No. 06-372 of October 19, 2006.</li> <li>• The fishing of silver eels and glass eels is strictly prohibited, except for purposes related to aquaculture.</li> <li>• Recreational eel fishing is entirely banned.</li> </ul> <p>The report states that maximum allowable catches are established per exploitation site to regulate and limit eel harvests. It mentions that these quotas are a part of the broader management framework to ensure sustainable exploitation of eel populations, but it does not provide specific details on how these quotas are determined or the exact quantities allocated to each site.</p> <p>Algeria states that it assessed 33 management measures implemented across Mediterranean nations. Ten were adopted for application, including seven related to exploitation, two to biology, and one to habitat conservation. Evaluations were conducted using the ESAM (Eel Stock Assessment Model).</p> <p>Based on scientific advisory input, the long-term management measures proposed include:</p> <ul style="list-style-type: none"> <li>• Sustainable habitat restoration by 2029.</li> <li>• Establishing a network of protected areas, including fisheries-restricted zones.</li> <li>• Prohibiting glass eel fishing with specific exceptions under robust scientific monitoring.</li> </ul>	<p>iii) invite Algeria to provide an update on the FAO-GFCM project to AC34; and</p> <p>iv) invite Algeria to implement recommendation I) through the preparation of a non-detriment finding for <i>Anguilla anguilla</i> following the new CITES NDF guidance materials and submit this by 1 March 2026 for consideration at AC34.</p>

Recommendations of the AC, and previous decisions of the SC where these exist	Response from the range State and views of the Animals Committee	Evaluation of implementation of the recommendations; and recommended actions
<p>f) Ensure that permits issued for the species clearly and accurately indicate the source of the specimens.</p> <p>g) Undertake science-based studies on status of the species (e.g. population size/density, trends, distribution) including an evaluation of the threats to the species for use as the basis for NDFs</p> <p>h) Develop/Implement an ongoing science-based population monitoring program that is used in conjunction with an adaptive management program for the species (see harvest management measures and trade controls, below), for use in making NDFs</p> <p>i) Develop and implement coordinated national and/or local management plans (that include harvest management considerations) with aims to achieve, within defined time limits, escapement targets as a contribution to stock recovery; clear monitoring requirements; management is adaptive (regular review of harvest records, of impact of harvesting, adjustment of harvest instructions as necessary), harvest restrictions based on monitoring results; management plans should be submitted for independent peer review by a suitable external body (e.g., WGEEL)</p> <p>j) Initiate robust monitoring programs, with input from WGEEL, to provide time series population data and/or recruitment and escapement indices to support development and implementation of</p>	<ul style="list-style-type: none"> <li>• Seasonal fishing bans aligned with eel migration periods.</li> <li>• Banning recreational eel fishing.</li> <li>• Enhancing traceability and implementing stricter controls.</li> <li>• Gradually transitioning to species-specific monitoring.</li> <li>• Improving data collection and reporting.</li> <li>• Establishing a public GFCM database on national implementation efforts.</li> <li>• Conducting a three-year interim review to measure effectiveness.</li> </ul> <p>Concerning management plans, Algeria reports that it is participating in a regional long-term management plan for the European eel, coordinated by the General Fisheries Commission for the Mediterranean (GFCM). This plan includes:</p> <ul style="list-style-type: none"> <li>○ Habitat restoration.</li> <li>○ Establishing protected areas, such as fisheries-restricted areas (FRAs).</li> <li>○ Implementing fishing bans during migration periods to protect silver eels.</li> </ul> <ul style="list-style-type: none"> <li>• A key focus is the development of a database to track national implementation efforts and ensure transparent management.</li> </ul> <p>Recommendation j)</p> <p>Concerning the development of robust monitoring programs, with input from WGEEL, to provide time series population data and/or recruitment and escapement indices, Algeria reports the following improvements in scientific monitoring and data collection:</p> <ul style="list-style-type: none"> <li>○ Ongoing studies to assess stock health, capture data, and environmental impacts on eel populations.</li> <li>○ The program uses models like ESAM (Eel Stock Assessment Model) to evaluate stock status and escapement rates.</li> <li>○ Monitoring efforts are supported through the SeaMed4Fish program initiated in January 2024. This program focuses on</li> </ul>	

Recommendations of the AC, and previous decisions of the SC where these exist	Response from the range State and views of the Animals Committee	Evaluation of implementation of the recommendations; and recommended actions
<p>the management plans and to inform NDF assessments</p> <p>k) Algeria / Morocco / Tunisia are encouraged to outline any capacity building needs the party may have to support the implementation of Article IV, and submit to the Secretariat, e.g., providing training for CITES authorities (e.g., CITES Virtual College, NDF workshops in a country or region)</p> <p><u>Final recommendation</u></p> <p>l) Upon completion of other recommendations, the Management Authority of Algeria, Morocco and Tunisia should provide the scientific basis by which it has established that exports from their country are not detrimental to the survival of the species and are compliant with Article IV, paragraphs 2(a), 3 and 6(a) of the Convention. Particular focus should be given to how the actions Algeria, Morocco or Tunisia has taken or will take address the concerns/problems identified in the Review of Significant Trade process.</p> <p><b>Outcome of Standing Committee and Animals Committee meetings:</b></p> <p><b>At SC74</b>, the Committee noted that recommendations a) and b) have been complied with; invited Algeria to submit the scientific justification for the proposed increase in the quota; and commended Algeria for the progress made to date in implementing the remaining recommendations c) to l).</p>	<p>biological data collection and the development of a biological sampling plan for eels.</p> <p>Recommendation l)</p> <p>Concerning the scientific basis by which it has established that exports from their country are not detrimental, Algeria states that it participated in a CITES webinar on non-detrimental findings and continues liaising with IUCN experts for practical application guidance.</p> <p><u>Additional information:</u></p> <p>Algeria states that it has implemented recommendations (d), (g), (h), and (k) concerning eels and continues efforts for the sustainable management of eel stocks, notably through improved monitoring and collection of scientific data on catches and commercialization. The National Research and Development Center for Fisheries and Aquaculture, through its experimental stations, has carried out various studies during the intersession related to stock assessment.</p> <p>The CITES trade data indicates trade taking place to Algeria in 2022 and 2023, as reported by Algeria.</p> <p>Finally, Algeria seeks further capacity-building support for:</p> <ul style="list-style-type: none"> <li>• Training in mark-recapture methods for silver eel escapement studies.</li> <li>• Recruitment assessment of glass eels.</li> <li>• Otolith reading across eel life stages.</li> <li>• Using electric fishing for stock monitoring.</li> <li>• Training on EDA and lagoon population dynamics models.</li> </ul> <p><u>Views of the Animals Committee</u></p> <p>The members of the Animals Committee are of the view that Algeria has made good progress in the implementation of the recommendations</p>	



Recommendations of the AC, and previous decisions of the SC where these exist	Response from the range State and views of the Animals Committee	Evaluation of implementation of the recommendations; and recommended actions
<p><b>At SC75</b>, the Committee i) instructed Algeria to maintain its current annual export quota for <i>A. anguilla</i> of 8,000 kg wild-taken adult eels and 0 glass eels, until it provides a justification for any revised quota, demonstrating how the change is conservative, based on estimates of sustainable offtake that make use of best available scientific information, to the Secretariat and the Chair of the Animals Committee, for their agreement; ii) agreed that recommendations e) and f) have been implemented; iii) commended Algeria for the progress made to date in implementing the remaining recommendations d) and g) to l); and iv) invited Algeria to provide an update on the implementation of the outstanding recommendations three months before the documentation deadline for SC77.</p> <p><b>At AC33</b>, the Animals Committee: i) agreed that recommendations d), g), h) and k) have been implemented; ii) invited Algeria to liaise with the IUCN anguillid specialist group of the to assist in the development of an NDF; and iii) invited Algeria to provide an update on the implementation of the outstanding recommendations i), j) and l) by 30 September 2024 at the latest for consideration before the 78th meeting of the Standing Committee.</p>	<p>formulated by the AC. The collaboration within the GFCM research will support Tunisia in the fulfillment of the outstanding recommendations. In particular, the submission of an NDF is still outstanding. The members are therefore of the view that the species/country combination <i>Anguilla anguilla</i>/Algeria should be kept in the process until a robust NDF has been presented.</p>	
<p><b><i>Anguilla anguilla</i> (European eel) - selected following CoP17</b></p>		
<p><b>Tunisia</b></p> <p>Short term actions</p> <p><u>Within 90 days (12 February 2019):</u></p>	<p>Concerning recommendation g) Tunisia notes that the European eel (<i>Anguilla anguilla</i>) represents a unique stock whose management, for Mediterranean countries, is under the authority of the General Fisheries Commission for the Mediterranean (GFCM), which coordinated, over three years (2021-2023), a research program to collect data and information on management and protection measures for the recovery of the stock, as well</p>	<p><u>Evaluation of implementation of the recommendations</u></p> <p>Tunisia has implemented recommendations g) to k).</p>

Recommendations of the AC, and previous decisions of the SC where these exist	Response from the range State and views of the Animals Committee	Evaluation of implementation of the recommendations; and recommended actions
<p>a) Establish interim conservative export quotas (suggested to be reduced to 67 percent of present trade and a zero quota for live glass eels) within 60 days for each category of specimens in trade (such as fingerlings/elvers, live, and meat), and communicate the quotas to the Secretariat for publication on the website.</p> <p>b) No exports should occur until the quota has been published on the Secretariat's website.</p> <p>c) Before making any increases to the interim quota, the planned changes should be communicated by the Management Authority of Algeria, Morocco or Tunisia to the Secretariat and Chair of the Animals Committee along with a justification of how the change is conservative, based on estimates of sustainable offtake that make use of best available scientific information, for their agreement.</p> <p>Long term actions</p> <p><u>Within 2 years (14 November 2020):</u></p> <p>d) Evaluate current harvest management measures and implement harvest measures to ensure sustainability</p> <p>(for example:</p> <ul style="list-style-type: none"> <li>- size/selective harvest</li> <li>- open/closed seasons</li> <li>- harvest seasons</li> <li>- harvest maximums</li> <li>- restrictions to harvest frequency, sites or time of day</li> <li>- control of number of harvesters</li> </ul>	<p>as on eel fisheries, their habitats and the biological and ecological characteristics of local stocks including in Tunisia.</p> <p>The final report of the program is entitled: "European eel in the Mediterranean Sea - Outcomes of the GFCM Research program. Studies and Reviews No. 103 (General Fisheries Commission for the Mediterranean). Rome, FAO" and is available online at: <a href="https://openknowledge.fao.org/items/8a76a969-5a12-4d57-a3f2-568870938bc7">https://openknowledge.fao.org/items/8a76a969-5a12-4d57-a3f2-568870938bc7</a></p> <p>Concerning recommendations h) to j) on the establishment of a scientific monitoring program, a sustainable management plan, and a robust monitoring program, Tunisia notes that the National Institute of Marine Sciences and Technologies (INSTM), strategic and decision-making support in Tunisia, is involved in the issuance of NDFs on the European eel, <i>Anguilla anguilla</i>. It has thus set up a scientific monitoring program for the status of the species stock (recruitment of juveniles, escape of adults, structure of the sedentary population of yellow eels). This "MedSea4Fish" research program funded by the GFCM will start in October 2024. For more details, refer to the program website at the following address: <a href="https://www.fao.org/gfcm/activities/fisheries/cooperation/medsea4fish">https://www.fao.org/gfcm/activities/fisheries/cooperation/medsea4fish</a></p> <p>This research program includes among other components:</p> <p>Action 4: Data collection on the European eel (<i>Anguilla anguilla</i>)</p> <p>The field work consists of carrying out fishing campaigns, depending on the weather conditions, to study:</p> <ul style="list-style-type: none"> <li>• recruitment (glass eels): at least 2 weeks between the new moon and the entire recruitment season (September to March) using a glass eel fyke net and/or a passive trap.</li> <li>• sedentary stock (yellow eels): at least 1 week per month during the entire period using traps and longlines.</li> <li>• escape to the sea (silver eels): at least 2 weeks between the new moon and the entire migration season (November to March) using fyke nets.</li> </ul> <p>Tunisia hopes that this program will extend over several years in order to provide us with time series of demographic data and recruitment and</p>	<p>Recommendation l) remains outstanding.</p> <p><u>Recommended actions</u></p> <p><b>The Standing Committee is invited to:</b></p> <ul style="list-style-type: none"> <li>i) commend Tunisia for the progress made;</li> <li>ii) agree that recommendations g) to k) have been implemented;</li> <li>iii) invite Tunisia to provide an update on the FAO-General Fisheries Commission for the Mediterranean (GFCM) project to the 34th meeting of the Animals Committee (AC34); and</li> <li>iv) invite Tunisia to implement recommendation l) through the preparation of a non-detriment finding for <i>Anguilla anguilla</i> taking into consideration the preliminary CITES NDF guidance materials and present this to AC34.</li> </ul>

Recommendations of the AC, and previous decisions of the SC where these exist	Response from the range State and views of the Animals Committee	Evaluation of implementation of the recommendations; and recommended actions
<p>- types and methods of harvest)</p> <p>e) Clarify and standardize the terms and units used in reporting trade. Ensure that appropriate terms and units are recorded on permits for trade. Standardized terms and appropriate units are found in the most recent version of the Guidelines for the preparation and submission of CITES annual reports, which is referenced in Resolution Conf. 11.17 (Rev. CoP17) on <i>national reports</i>, and distributed by the Secretariat by notification.</p> <p>f) Ensure that permits issued for the species clearly and accurately indicate the source of the specimens.</p> <p>g) Undertake science-based studies on status of the species (e.g. population size/density, trends, distribution) including an evaluation of the threats to the species for use as the basis for NDFs</p> <p>h) Develop/Implement an ongoing science-based population monitoring program that is used in conjunction with an adaptive management program for the species (see harvest management measures and trade controls, below), for use in making NDFs</p> <p>i) Develop and implement coordinated national and/or local management plans (that include harvest management considerations) with aims to achieve, within defined time limits, escapement targets as a contribution to stock recovery; clear monitoring requirements; management is adaptive (regular review of</p>	<p>escape indices that will be used, together with a management plan, to issue NDFs.</p> <p>Tunisia also recalls that it has a National Management Plan for eel developed in 2009.</p> <p>Concerning recommendation k) on capacity building needs, Tunisia expresses its wish to take advantage of the assistance offered by the IUCN Anguillid Specialist Group for advice and support in the revision of national NDFs (Non-Detriment Findings). The Scientific Authority wishes to strengthen the capacities of its researchers working on European eel in relation to Article IV of the CITES Convention, in particular through:</p> <ol style="list-style-type: none"> <li>1. Continuing education: <ul style="list-style-type: none"> <li>• Organizing workshops on the biology, ecology, and conservation methods of European eel, with a focus on the requirements of CITES Article IV.</li> <li>• Participating in CITES-specific certification programs for researchers, covering regulatory aspects, quota management, and non-deterioration analyses.</li> </ul> </li> <li>2. Strengthening tools and technologies: <ul style="list-style-type: none"> <li>• Providing specialized software for population analysis and data management, including modeling tools to predict the impact of trade on eel populations.</li> <li>• Creating or improving databases to monitor European eel populations, export quotas, and trade trends.</li> </ul> </li> <li>3. Innovative monitoring and surveillance: <ul style="list-style-type: none"> <li>• Using innovative techniques including acoustic telemetry and RFID tagging to track eel movements in real time. This would help to better understand their migratory patterns and identify critical areas for their survival.</li> <li>• Using drones and satellites to monitor eel habitats and detect environmental changes that could affect populations.</li> </ul> </li> </ol> <p>Concerning export quotas, Tunisia maintains a provisional export quota of 90 tonnes for live, frozen, or refrigerated eels with a minimum length of 30 cm. A zero quota is enforced for live glass eels (juvenile eels) to prevent</p>	

Recommendations of the AC, and previous decisions of the SC where these exist	Response from the range State and views of the Animals Committee	Evaluation of implementation of the recommendations; and recommended actions
<p>harvest records, of impact of harvesting, adjustment of harvest instructions as necessary), harvest restrictions based on monitoring results; management plans should be submitted for independent peer review by a suitable external body (e.g., WGEEL)</p> <p>j) Initiate robust monitoring programs, with input from WGEEL, to provide time series population data and/or recruitment and escapement indices to support development and implementation of the management plans and to inform NDF assessments</p> <p>k) Algeria / Morocco / Tunisia are encouraged to outline any capacity building needs the party may have to support the implementation of Article IV, and submit to the Secretariat, e.g., providing training for CITES authorities (e.g., CITES Virtual College, NDF workshops in a country or region)</p> <p><u>Final recommendation</u></p> <p>l) Upon completion of other recommendations, the Management Authority of Algeria, Morocco and Tunisia should provide the scientific basis by which it has established that exports from their country are not detrimental to the survival of the species and are compliant with Article IV, paragraphs 2(a), 3 and 6(a) of the Convention. Particular focus should be given to how the actions Algeria, Morocco or Tunisia has taken or will take address the concerns/problems identified in the Review of Significant Trade process.</p>	<p>overexploitation of recruitment. It is clear from the CITES trade data for direct trade for commercial purposes that Tunisia has consistently stayed within this quota.</p> <p><u>Views of the Animals Committee</u></p> <p>The AC members are of the view that Tunisia has made good progress in the implementation of the recommendations formulated by the AC. The collaboration within the GFCM research will support Tunisia in the fulfillment of the outstanding recommendations. In particular, the submission of an NDF is still outstanding. The members are therefore of the view that the species/country combination <i>Anguilla anguilla</i>/Tunisia should be kept in the process until a robust NDF has been presented.</p>	

Recommendations of the AC, and previous decisions of the SC where these exist	Response from the range State and views of the Animals Committee	Evaluation of implementation of the recommendations; and recommended actions
<p><b>Outcome of Standing Committee and Animals Committee meetings:</b></p> <p>At SC75, the Standing Committee considered document SC75 Doc. XX and: i) commended Tunisia for the considerable progress made to date in implementing recommendations c) to l); ii) instructed Tunisia to maintain its current quota for <i>A. anguilla</i> of 90,000 kg of eels, where export is restricted to specimens greater than 30cm in length and 0 glass eels, until it provides a justification for any increased quota, demonstrating how the change is conservative, based on estimates of sustainable offtake that make use of best available scientific information, to the Secretariat and the Chair of the Animals Committee, for their agreement; and iii) invited Tunisia to provide an update on the implementation of the outstanding recommendations three months before the documentation deadline for SC77.</p> <p><b>At AC33</b>, the Animals Committee: i) agreed that recommendations d) to f) have been implemented; ii) invited Tunisia to liaise with the IUCN anguillid specialist group to assist in the development of an NDF; and iii) invited Tunisia to provide an update on the implementation of the outstanding recommendations g) to l) by 30 September 2024 at the latest for consideration before the 78th meeting of the Standing Committee.</p>		

Recommendations of the AC, and previous decisions of the SC where these exist	Response from the range State and views of the Animals Committee	Evaluation of implementation of the recommendations; and recommended actions
<b><i>Hippocampus algiricus</i> (West African Seahorse) – selected following CoP15</b>		
<p><b>SENEGAL</b></p> <p>Senegal (SN) (Urgent Concern)</p> <p>Within six months (by 2 January 2015) the Management Authority should:</p> <p>a) Clarify what legal protection is afforded to <i>H. algiricus</i> in Senegal and provide information to the Secretariat on controls or regulation of fishing activity that might otherwise detrimentally impact on seahorse populations;</p> <p>b) Provide available information to the Secretariat on the distribution, abundance, threats and conservation status of, and any current management measures in place for <i>H. algiricus</i> in Senegal; and</p> <p>c) Provide justification for, and details of, the scientific basis by which, it has been established that the quantities of <i>H. algiricus</i> exported from Senegal will not be detrimental to the survival of the species and in compliance with Article IV, paragraphs 2 (a) and 3 taking into account any potential unregulated and/or illegal offtake and trade.</p> <p>d) Initiate measures to ensure that descriptions on all CITES permits are standardized such that trade is only permitted at species level and that, in compliance with Resolution Conf. 12.3 , XIV, trade ceases to be reported or permitted at higher taxon levels (genus or family) and is</p>	<p>Senegal responded in a letter dated 26 September 2024 concerning the species <i>Hippocampus algiricus</i>, drawing attention to the following shortcomings and information:</p> <ul style="list-style-type: none"> <li>- their biology is not well understood in Senegal;</li> <li>- their numbers are not known;</li> <li>- they are not specifically protected by either official law or local regulation (customary law or local convention);</li> <li>- seahorse fishing is very marginal in Senegal, as it is not targeted (individuals are caught accidentally);</li> <li>- their market value is unknown to most Senegalese fishermen;</li> <li>- they are not consumed in Senegal;</li> <li>- only one national exporter has applied for a CITES permit for <i>Hippocampus algiricus</i>.</li> </ul> <p>Senegal also inform that since 2019, no CITES permit has been issued for the export of <i>Hippocampus algiricus</i> in Senegal., and prior to this the quantities officially exported over 10 years (from 2008 to 2018) were 3615.34 kg, giving an average of 361.534 kg/year.</p> <p>Senegal states that ignorance of their value, their non-use by the Senegalese, the non-existence of specialized fishermen and the fact that their catch is only accidental have not made it easy to estimate their catch, according to the results of a study by a PhD Student from the University of British Columbia, Vancouver, Canada.</p>	<p><u>Evaluation of implementation of the recommendations</u></p> <p>Recommendation a) has been implemented through the confirmation that there is no specific protection for <i>H. algiricus</i> in Senegal and that they are not targeted in fisheries. All other recommendations remain outstanding.</p> <p><u>Recommended actions</u></p> <p><b>The Standing Committee is invited to:</b></p> <p><b>(i) agree that recommendation a) has been implemented;</b></p> <p><b>(ii) invite the Secretariat and the Animals Committee to work with Senegal and relevant experts to advise Senegal on the development of an NDF for <i>H. algiricus</i>; and</b></p> <p><b>(ii) urge Senegal to provide an update on the implementation of recommendations b) to g) 90 days before the documentation deadline for AC34.</b></p>

Recommendations of the AC, and previous decisions of the SC where these exist	Response from the range State and views of the Animals Committee	Evaluation of implementation of the recommendations; and recommended actions
<p>recorded with accurate units (kg or individuals). Within one year the Management Authority should:</p> <p>e) Provide information from studies (existing or new) that assess variation in the spatial and temporal abundance of <i>H. algericus</i> to enable areas of high seahorse density to be identified, as the basis for considering area restrictions on nonselective fishing gear that obtains <i>H. algericus</i> as by-catch, and provide a report to the Secretariat;</p> <p>Within 2 years (by 2 June 2016) the Management Authority should:</p> <p>f) Establish a detailed monitoring program of landings of <i>H. algericus</i> at representative sites, taking into account different gear types and means of extraction and recording catch and effort metrics and provide a report to the Secretariat;</p> <p>g) Implement additional measures, including spatial and/or temporal restrictions on fishing activities, to support non-detriment findings for <i>H. algericus</i>, in compliance with Article IV.2.a and IV.3.</p> <p><b>Outcome of Standing Committee and Animals Committee meetings:</b></p> <p><b>At SC66,</b> the Standing Committee recommended that all Parties suspend trade in specimens of <i>H. algericus</i> from Senegal until that country demonstrates compliance with Article IV,</p>	<p>For this reason, Senegal indicates that a study to estimate by-catch and a follow-up program are still necessary.</p> <p>In view of these results and the by-catch nature of the species, Senegal believes that consultations can be held with the CITES Secretariat and the group of experts specializing in this species, with a view to lifting the suspension and allowing export, albeit with a precautionary quota.</p> <p><u>Views of the Animals Committee</u></p> <p>The Animals Committee members did not provide any comments.</p>	

Recommendations of the AC, and previous decisions of the SC where these exist	Response from the range State and views of the Animals Committee	Evaluation of implementation of the recommendations; and recommended actions
<p>paragraphs 2 (a) and 3, for this species, and provides full information to the Secretariat regarding compliance with the recommendations of the Animals Committee.</p> <p><b>At SC74</b>, the Standing Committee retained the recommendation to suspend trade in <i>Hippocampus algiricus</i> from Senegal. The recommendation has remained in place since then.</p>		
<b><i>Pandinus imperator</i> (Emperor scorpion) – selected following CoP14</b>		
<p><b>Togo (TG)</b> Possible concern</p> <p>Within 90 days, the Management Authority should:</p> <p>a) Inform the Secretariat that Togo will maintain an annual export quota at a level not higher than the current published export quota (1000 wild and 16,500 ranched specimens) and as a precautionary measure, maintain the current size restriction of a maximum total length of 10 cm (or maximum body length, excluding the tail, of 5 cm) of live specimens of source code R to be exported which should be published with the export quota; and</p> <p>b) Provide the CITES Secretariat with detailed information on the control measures used to differentiate between ranched and wild-caught specimens to ensure that the authorized exports of ranched specimens are not augmented by mis-declared wild specimens.</p>	<p>Togo provided an NDF for <i>Pandinus imperator</i> in the form of a simplified assessment (see Annex 2 of <a href="#">AC33 Doc. 14.2</a>). Togo proposed to reopen trade in live specimens of this species, with a quota limit of 20,000 specimens per year, regardless of the source declared by breeding farms. Before the recommendation to suspend trade came into force the annual export quota was 16,500 ranched specimens.</p> <p>At AC33, the Animals Committee recommended the removal of the recommendation to suspend trade in <i>Pandinus imperator</i> from Togo under the Review of Significant Trade and accepted an annual export quota of 20,000 specimens. Before making any increases to this interim quota, the planned changes should be communicated by the range State to the Secretariat and Chair of the Animals Committee along with a justification of how the change is conservative, based on estimates of sustainable offtake that make use of available scientific information, for their agreement.</p>	<p><u>Evaluation of implementation of the recommendations</u></p> <p>a) With the recommendations from the Animals Committee at AC33, the recommendations under RST are considered to be implemented and <i>Pandinus imperator</i> from Togo can be removed from the review. However, Togo should be encouraged to implement a size restriction for specimens of a maximum total length of 10 cm (or maximum body length, excluding the tail, of 5 cm) for live specimens of source code R to be exported, which should be published with the export quota.</p> <p><u>Recommended actions</u></p> <p><b>The Standing Committee is invited to:</b></p>



Recommendations of the AC, and previous decisions of the SC where these exist	Response from the range State and views of the Animals Committee	Evaluation of implementation of the recommendations; and recommended actions
<p>Within 2 years the Management Authority should:</p> <p>c) Conduct a national status assessment, including an evaluation of threats to the species; and advise the Secretariat of the details and any management measures in place (highlighting where new management measures have been introduced to take into account any new information available on the status of the species in Togo);</p> <p>d) Establish revised annual export quotas (if appropriate) for wild taken and ranched specimens based on the results of the assessment; and</p> <p>e) Provide a justification for, and explanation of, the scientific basis by which it is determined that these quota(s) would not be detrimental to the survival of the species in the wild and are in compliance with Article IV, paragraphs 2 (a) and 3.</p> <p><u>Recommendations of the Standing Committee</u></p> <p>At <b>SC63</b>, the Standing Committee recommended that all Parties suspend trade in specimens of <i>Pandinus imperator</i> from Togo until that country demonstrates compliance with Article IV, paragraphs 2 (a) and 3 for this species and provides full information to the Secretariat regarding compliance with the recommendations of the Animals Committee.</p>		<p>a) <b>withdraw the recommendation to suspend trade in <i>Pandinus imperator</i> from Togo;</b></p> <p>b) <b>remove <i>Pandinus imperator</i> / Togo from the review of significant trade, subject to the publication of an annual export quota of 20,000 live specimens, including a size restriction of a maximum total length of 10 cm (or maximum body length, excluding the tail, of 5 cm) for live specimens of source code R to be exported, which should be published with the export quota; and</b></p> <p><b>remind Togo that any increase in the quota above 20,000 live specimens should be communicated to the Chair of the Animals Committee and the Secretariat for their agreement in advance of any trade taking place, with a non-detriment finding, including a justification of how the change is conservative, based on estimates of sustainable offtake that make use of best available scientific information.</b></p>

Recommendations of the AC, and previous decisions of the SC where these exist	Response from the range State and views of the Animals Committee	Evaluation of implementation of the recommendations; and recommended actions
At <b>SC66</b> , <b>SC70</b> and <b>SC74</b> the Standing Committee retained the recommendation to suspend trade.		
<b><i>Varanus ornatus</i> (Ornate monitor) - selected following CoP16</b>		
<p>TOGO</p> <p>Short term action (by 21 December 2017)</p> <p>a) Review and revise, within 90 days, in consultation with the Secretariat and the Chair of the Animals Committee, the export quota for both wild and ranched sourced specimens of the species and communicate the quota to the Secretariat.</p> <p>b) No exports should occur until the quota has been published on the Secretariat's website.</p> <p>c) The export quota should be justified as conservative based on estimates of sustainable offtake that make use of best available scientific information.</p> <p>d) Before making any increases to the interim quota (including increases from a zero export quota), the planned changes should be communicated by the Management Authority of Togo to the Secretariat and Chair of the Animals Committee along with a justification of how the change is conservative, based on estimates of sustainable offtake that make use of best available scientific information, for their agreement.</p>	<p>On 30 October 2024, Togo submitted an NDF using the simplified assessment template from the new CITES NDF guidance.</p> <p>In the NDF, Togo explained that this species has long been confused with <i>V. niloticus</i> and has been recently re-established by the work of Böhme &amp; Ziegler (1997). Its presence in Togo was also reported by Bayless (2002). The taxonomic confusion of this species has meant that the specimens were for a long time exported in international trade under the name <i>V. niloticus</i>. The quota regularly defined for this species in Togo is 1,500 specimens for ranching "R" and 100 specimens for wild "W". The data available on the WCMC website on international trade in species listed in the CITES Appendices confirm Togo's quota proposals. At no time has this quota been reached in the last ten years. In Togo, specimens of this species are mainly produced by four livestock farms.</p> <p>The mode of production of live specimens of this species of monitor lizard is identical to that of other reptile species in Togo, in particular monitor lizards and pythons. It consists of collecting pregnant females from sites chosen in agreement with the populations of the localities concerned and the CITES Management Authority (Ineich 2006 and Segniagbeto 2016). These females are kept in captivity for fairly short periods that cover just the egg-laying phase. However, nowadays, it is mainly the eggs that are collected, leaving the females directly at the collection site. This method is much more cost-effective and avoids the stress of captivity for adult females. This method of operation assumes that no specimens are taken directly from the wild to supply the ranch areas. The assessment of <i>Varanus ornatus</i> under the non-detriment finding shows that the species is subject to harvest and management practices that meet the standards set by CITES and do not cause significant harm to wild populations in Togo.</p>	<p><u>Evaluation of implementation of the recommendations</u></p> <p>At SC71, the Standing Committee agreed to remove <i>Varanus ornatus</i> from Togo from RST subject to an export quota of 25 wild live specimens and 350 ranched live specimens. The NDF aims to justify quotas of 1,500 ranched specimens and 100 wild specimens, but there are concerns about the determination of the indicator values and it is suggested that a comprehensive assessment is needed to justify the proposed quota increases.</p> <p><u>Recommended actions</u></p> <p><b>The Standing Committee is invited to:</b></p> <p>i) <b>commend Togo for its progress in implementing the recommendations of the Animals and Standing Committees;</b></p> <p>ii) <b>invite Togo to undertake a comprehensive NDF</b></p>

Recommendations of the AC, and previous decisions of the SC where these exist	Response from the range State and views of the Animals Committee	Evaluation of implementation of the recommendations; and recommended actions
<p><b>Outcome of Standing Committee and Animals Committee meetings:</b></p> <p><b>At SC70</b>, the Standing Committee requested the Secretariat and the Chair of the Animals Committee to continue to consult with Togo to establish a quota by 1 December 2018, so that the matter can be discussed again at SC71.</p> <p><b>At SC71</b>, the Standing Committee agreed to remove <i>Varanus ornatus</i> from the Review of Significant Trade, subject to the publication of export quotas of 25 wild live specimens and 350 ranched live specimens. The Standing Committee further urged Togo to provide a justification, based on best available scientific information, for any proposed increases to these export quotas to the Secretariat and the Chair of the Animals Committee for their approval.</p>	<p>The results obtained indicate a total score of 4 points, awarded on the basis of the following criteria:</p> <p>Annual harvest level: The harvest remains moderate with a quota of 1,500 specimens from ranching farms and 100 specimens from the wild. The volume of exports has always been below these quotas over the past ten years, reflecting compliance with the limits set for this species.</p> <p>Range: <i>Varanus ornatus</i> has an extensive distribution across ecological zones IV, II and V in Togo, mainly in specific ecosystems of forests, mangroves and swamps. This distribution, although localized, seems sufficient to support the current export quotas without any significant negative impact.</p> <p>Life history: The species has a moderate reproductive rate, with rearing practices that avoid direct extraction from the wild. Eggs are mainly collected, and gravid females are released into their habitat, thus minimizing the risk to natural populations.</p> <p>Conservation status and illegal trade: Although <i>Varanus ornatus</i> is less abundant than other monitor lizard species in West Africa, it is listed in Appendix II of CITES and regulated by an export quota. No significant signs of illegal trade have been observed, and the conservation status to date appears to be of "Least Concern" (IUCN).</p> <p>Togo concludes that this assessment highlights that current harvesting and exploitation practices of <i>Varanus ornatus</i> in Togo, in particular ranching methods and quota controls, do not threaten the natural populations of the species. The quotas defined are in line with the state of conservation and the capacity of the populations to withstand the harvest. To preserve this balance, it is recommended to maintain regular assessments in order to adjust quotas according to changes in populations and commercial practices, while continuing monitoring and research efforts for sustainable management of the species.</p>	<p><b>assessment to justify their proposed quota; and</b></p> <p>iii) <b>submit the updated NDF to the Secretariat by 31 July 2025 for consideration by the Animals Committee ahead of the 79th meeting of the Standing Committee.</b></p>

Recommendations of the AC, and previous decisions of the SC where these exist	Response from the range State and views of the Animals Committee	Evaluation of implementation of the recommendations; and recommended actions
	<p><u>Views of the Animals Committee</u></p> <p>The members were of the view that in the use of the simplified assessment, as elaborated at the NDF Workshop in Kenya in 2023, by Togo to assess the species, some criteria were not correctly assessed. First, an older version of the thresholds for the attribution of scores to the template was used. Furthermore, the interpretation of the data available could be questioned, such that other scores might have been more precautionary. In summary, the members felt that a comprehensive assessment would be needed to justify any increase of the current quota.</p>	

UPDATE ON IMPLEMENTATION OF RECOMMENDATIONS DIRECTED TO RANGE STATES RETAINED  
IN THE REVIEW PROCESS AT AC33

The following recommendations, directed to the range States retained in the review process, are based on the principles outlined in Annex 3 of Resolution Conf. 12.8 (Rev. CoP18) and the guidance on the formulation of recommendations contained in Annex 4 to document CoP17 Doc. 33 at AC33. The deadlines for the implementation of the short term actions have passed and are reported on in the tables below.

1. *Carcharhinus longimanus* / Kenya

Recommended Action from AC33	Update and evaluation of implementation of the recommendations, with actions recommended by the Secretariat
<p>The Management Authority of Kenya shall report to the Secretariat on the implementation of the following:</p> <p><u>Short-term Actions (10 November 2024)</u></p> <ul style="list-style-type: none"> <li>a) Establish an annual zero export quota within 90 days for <i>Carcharhinus longimanus</i> and communicate the quota to the Secretariat.</li> <li>b) No exports should occur until the quota has been published on the Secretariat's website.</li> <li>c) Before making any increases to this quota, the planned changes should be communicated by the range State to the Secretariat and Chair of the Animals Committee along with a justification of how the change is conservative, based on estimates of sustainable offtake that make use of available scientific information, for their agreement.</li> </ul> <p><u>Long-term Actions (12 August 2027)</u></p> <ul style="list-style-type: none"> <li>d) Undertake science-based studies on the status of the species (e.g. delineation of stocks, population estimates, trends, distribution) including an evaluation of the threats to the species for use as the basis for NDFs.</li> <li>e) Develop NDFs, in consultation with fisheries agencies, which are time-bound (no more than 5 years) for all stocks of <i>Carcharhinus longimanus</i> where catch for export occurs, which could, inter alia, include the following elements:</li> </ul>	<p><u>Update and evaluation</u></p> <p>Kenya has not confirmed the establishment of an annual zero export quota, therefore the short term recommendations have not been implemented.</p> <p><u>Actions recommended by the Secretariat</u></p> <p><b>The Standing Committee is invited to:</b></p> <ul style="list-style-type: none"> <li><b>i) request the Secretariat to publish a zero export quota for <i>C. longimanus</i> until Kenya provides information to justify a higher quota to be agreed with the AC Chair; and</b></li> <li><b>ii) invite Kenya to provide an update on the implementation of recommendations b) to g) 90 days before the documentation deadline for AC34.</b></li> </ul>

Recommended Action from AC33	Update and evaluation of implementation of the recommendations, with actions recommended by the Secretariat
<p>A) consideration of each stock as a separate management unit for conservation and harvest purposes, paying particular attention to any RFMO measures, as appropriate, in place;</p> <p>B) adaptive management, with a review period of no more than 5 years, to take into consideration signals from the stock;</p> <p>C) a precautionary approach, where a cautionary offtake is initially considered, and revised with further information;</p> <p>D) all sources of mortality within the stock.</p> <p>f) Establish an export quota proportionate to the harvest quota with a clear justification.</p> <p><u>Long-term Actions (12 August 2027)</u></p> <p>g) Upon completion of other recommendations, provide the scientific basis by which it has established that exports are not detrimental to the survival of the species and are compliant with Article IV, paragraphs 2(a), 3 and 6(a) of the Convention. Particular focus should be given to how the actions the range State has taken, or will take, address the concerns/problems identified in the Review of Significant Trade process.</p>	

**2. *Carcharhinus longimanus* / Yemen**

Recommended Action from AC33	Update and evaluation of implementation of the recommendations, with actions recommended by the Secretariat
<p>The Management Authority of Yemen shall report to the Secretariat on the implementation of the following:</p> <p><u>Short-term Actions (10 November 2024)</u></p> <p>a) Establish an annual zero export quota within 90 days for <i>Carcharhinus longimanus</i> and communicate the quota to the Secretariat.</p>	<p><u>Update and evaluation</u></p> <p>Yemen has not confirmed the establishment of an annual zero export quota, therefore the short term recommendations have not been implemented.</p> <p><u>Actions recommended by the Secretariat</u></p>

Recommended Action from AC33	Update and evaluation of implementation of the recommendations, with actions recommended by the Secretariat
<p>b) No exports should occur until the quota has been published on the Secretariat's website.</p> <p>c) Before making any increases to this quota, the planned changes should be communicated by the range State to the Secretariat and Chair of the Animals Committee along with a justification of how the change is conservative, based on estimates of sustainable offtake that make use of available scientific information, for their agreement.</p> <p><u>Long-term Actions (12 August 2027)</u></p> <p>d) Undertake science-based studies on the status of the species (e.g. delineation of stocks, population estimates, trends, distribution) including an evaluation of the threats to the species for use as the basis for NDFs.</p> <p>e) Develop NDFs, in consultation with fisheries agencies, which are time-bound (no more than 5 years) for all stocks of <i>Carcharhinus longimanus</i> where catch for export occurs, which could, inter alia, include the following elements:</p> <p>f) consideration of each stock as a separate management unit for conservation and harvest purposes, paying particular attention to any RFMO measures, as appropriate, in place;</p> <p>A) adaptive management, with a review period of no more than 5 years, to take into consideration signals from the stock;</p> <p>B) a precautionary approach, where a cautionary offtake is initially considered, and revised with further information;</p> <p>C) all sources of mortality within the stock.</p> <p>g) Establish an export quota proportionate to the harvest quota with a clear justification.</p> <p><u>Long-term Actions (12 August 2027)</u></p> <p>h) Upon completion of other recommendations, provide the scientific basis by which it has established that exports are not detrimental to the survival of the species and are compliant with Article IV, paragraphs 2(a), 3 and 6(a) of the Convention. Particular focus should be given to how the actions the range State</p>	<p><b>The Standing Committee is invited to:</b></p> <p><b>(i) request the Secretariat to publish a zero export quota for <i>C. longimanus</i> until Yemen provides information to justify a higher quota to be agreed with the AC Chair; and</b></p> <p><b>(ii) invite Yemen to provide an update on the implementation of recommendations b) to h) 90 days before the documentation deadline for AC34.</b></p>

Recommended Action from AC33	Update and evaluation of implementation of the recommendations, with actions recommended by the Secretariat
has taken, or will take, address the concerns/ problems identified in the Review of Significant Trade process.	

### 3. *Kinixys homeana* / Ghana

Recommended Action from AC33	Update and evaluation of implementation of the recommendations, with actions recommended by the Secretariat
<p>The Management Authority of Ghana shall report to the Secretariat on the implementation of the following</p> <p><u>Short-term Actions (10 November 2024)</u></p> <ul style="list-style-type: none"> <li>a) Establish an annual zero export quota within 90 days for <i>Kinixys homeana</i> and communicate the quota to the Secretariat.</li> <li>b) No exports should occur until the quota has been published on the Secretariat's website.</li> <li>c) Before making any increases to this quota, the planned changes should be communicated by the range State to the Secretariat and Chair of the Animals Committee along with a justification of how the change is conservative, based on estimates of sustainable offtake that make use of available scientific information, including levels of domestic and illegal trade for their agreement.</li> </ul> <p><u>Long-term Actions (12 August 2027)</u></p> <ul style="list-style-type: none"> <li>d) Develop and implement an ongoing science-based population monitoring program that is used in conjunction with an adaptive management program for the species, for use in making of NDFs.</li> <li>e) Develop and implement coordinated national and/or local management plans (that include harvest management considerations), with clear monitoring requirements; management is adaptive (regular review of harvest records; of impact of harvesting, including for the domestic bushmeat trade; adjustment of harvest instructions as necessary), harvest restrictions, including size limits, based on monitoring results.</li> <li>f) Undertake qualitative monitoring of the scale and trends of all exports (increasing, stable or decreasing) for use in making NDFs.</li> </ul>	<p><u>Update and evaluation</u></p> <p>In a letter dated 12 Sept 2024, Ghana confirmed that based on the recommendations from AC33 that it has decided to implement a zero quota for <i>Kinixys homeana</i> as a short-term measure until a robust NDF is conducted. This zero quota was published on the CITES website on 12 September 2024</p> <p><u>Actions recommended by the Secretariat</u></p> <p><b>The Standing Committee is invited to:</b></p> <ul style="list-style-type: none"> <li>(i) agree that recommendations a) and b) have been implemented; and</li> <li>(ii) invite Ghana to provide an update on the implementation of recommendations c) to j) 90 days before the documentation deadline for AC34.</li> </ul>



Recommended Action from AC33	Update and evaluation of implementation of the recommendations, with actions recommended by the Secretariat
<p>g) Provide training for CITES authorities and conservation staff.</p> <p>h) Develop identification methods and materials</p> <p><u>Long-term Actions (12 August 2027)</u></p> <p>i) Upon completion of other recommendations provide the scientific basis by which it has established that exports are not detrimental to the survival of the species and are compliant with Article IV, paragraphs 2(a), 3 and 6(a) of the Convention. Particular focus should be given to how the actions the range State has taken, or will take, address the concerns/problems identified in the Review of Significant Trade process.</p> <p>j) Develop science-based export quotas using standardised terms and units used in reporting trade export quotas as found in the most recent version of the guidelines for the preparation of CITES annual reports.</p>	

**4. *Mobula* spp. / Sri Lanka**

Recommended Action from AC33	Update and evaluation of implementation of the recommendations, with actions recommended by the Secretariat
<p>The Management Authority of Sri Lanka shall report to the Secretariat on the implementation of the following:</p> <p><u>Short-term Actions (10 November 2024)</u></p> <p>a) Establish an annual zero export quota within 90 days for <i>Mobula</i> spp. and communicate the quota to the Secretariat.</p> <p>b) No exports should occur until the quota has been published on the Secretariat's website.</p> <p>c) Before making any increases to this quota, the planned changes should be communicated by the range State to the Secretariat and Chair of the Animals Committee along with a justification of how the change is conservative, based on estimates of sustainable offtake that make use of available scientific information, for their agreement.</p> <p><u>Long-term Actions (12 August 2027)</u></p>	<p><u>Update and evaluation</u></p> <p>Sri Lanka has not confirmed the establishment of an annual zero export quota, therefore the short term recommendations have not been implemented.</p> <p><u>Actions recommended by the Secretariat</u></p> <p><b>The Standing Committee is invited to:</b></p> <p><b>(i) request the Secretariat to publish a zero export quota for <i>Mobula</i> spp. until Sri Lanka provides information to justify a higher quota to be agreed with the AC Chair; and</b></p> <p><b>(ii) invite Sri Lanka to provide an update on the implementation of recommendations b) to g) 90 days before the documentation deadline for AC34.</b></p>

Recommended Action from AC33	Update and evaluation of implementation of the recommendations, with actions recommended by the Secretariat
<p>d) Undertake science-based studies on the status of the species (e.g. delineation of stocks, population estimates, trends, distribution) including an evaluation of the threats to the species for use as the basis for NDFs.</p> <p>e) Develop NDFs, in consultation with fisheries agencies, which are time-bound (no more than 5 years) for all stocks of <i>Mobula</i> spp. where catch for export occurs, which could, inter alia, include the following elements:</p> <p>A) consideration of each stock as a separate management unit for conservation and harvest purposes, paying particular attention to any RFMO measures, as appropriate, in place;</p> <p>B) adaptive management, with a review period of no more than 5 years, to take into consideration signals from the stock;</p> <p>C) a precautionary approach, where a cautionary offtake is initially considered, and revised with further information;</p> <p>D) all sources of mortality within the stock.</p> <p>f) Establish an export quota proportionate to the harvest quota with a clear justification.</p> <p><u>Long-term Actions (12 August 2027)</u></p> <p>g) Upon completion of other recommendations, provide the scientific basis by which it has established that exports are not detrimental to the survival of the species and are compliant with Article IV, paragraphs 2(a), 3 and 6(a) of the Convention. Particular focus should be given to how the actions the range State has taken, or will take, address the concerns/problems identified in the Review of Significant Trade process.</p>	

5. *Python regius* / Benin

Recommended Action from AC33	Update and evaluation of implementation of the recommendations, with actions recommended by the Secretariat
<p>The Management Authority of Benin shall report to the Secretariat on the implementation of the following:</p> <p><u>Short-term Actions (10 November 2024)</u></p> <ul style="list-style-type: none"> <li>a) Establish, in consultation with the Secretariat and the Chair of the Animals Committee, an interim conservative annual export quota for source codes W and R within 90 days for <i>P. regius</i> and communicate the quota to the Secretariat.</li> <li>b) No exports should occur until the quota has been published on the Secretariat's website.</li> <li>c) The export quota should be justified as conservative based on estimates of sustainable offtake that make use of available scientific information.</li> <li>d) Before making any increases to this quota, the planned changes should be communicated by the range State to the Secretariat and Chair of the Animals Committee along with a justification of how the change is conservative, based on estimates of sustainable offtake that make use of available scientific information, for their agreement.</li> </ul> <p><u>Long-term actions (12 August 2027)</u></p> <ul style="list-style-type: none"> <li>e) Develop and implement an ongoing science-based population monitoring program that is used in conjunction with an adaptive management program for the species, for use in making of NDFs</li> <li>f) Develop and implement coordinated national and/or local management plans (that include harvest management considerations), with clear monitoring requirements; management is adaptive (regular review of harvest records; of impact of harvesting; adjustment of harvest instructions as necessary), harvest restrictions, based on monitoring results</li> <li>g) Undertake qualitative monitoring of the scale and trends of all exports (increasing, stable or decreasing) for use in making NDFs.</li> <li>h) Provide training for CITES authorities and conservation staff.</li> <li>i) Develop identification methods and materials.</li> </ul> <p><u>Long-term Actions (12 August 2027)</u></p>	<p><u>Update and evaluation</u></p> <p>Benin submitted quotas for <i>Python regius</i> of 200 wild specimens and 32,000 ranched specimens, which were published on 14 April 2024 and updated on 19 December 2024.</p> <p><u>Actions recommended by the Secretariat</u></p> <p><b>The Standing Committee is invited to:</b></p> <p><b>(i) agree that recommendations a) and b) have been implemented; and</b></p> <p><b>(ii) invite Benin to provide an update on the implementation of recommendations c) to j) 90 days before the documentation deadline for AC34.</b></p>

Recommended Action from AC33	Update and evaluation of implementation of the recommendations, with actions recommended by the Secretariat
<p>j) Upon completion of other recommendations, provide the scientific basis by which it has established that exports are not detrimental to the survival of the species and are compliant with Article IV, paragraphs 2(a), 3 and 6(a) of the Convention. Particular focus should be given to how the actions the range State has taken, or will take, address the concerns/problems identified in the Review of Significant Trade process.</p> <p>k) Develop science-based export quotas using standardised terms and units used in reporting trade export quotas as found in the most recent version of the guidelines for the preparation of CITES annual reports.</p>	

**6. *Python regius* / Ghana**

Recommended Action from AC33	Update and evaluation of implementation of the recommendations, with actions recommended by the Secretariat
<p>The Management Authority of Ghana shall report to the Secretariat on the implementation of the following:</p> <p><u>Short-term Actions (10 November 2024)</u></p> <p>a) Establish, in consultation with the Secretariat and the Chair of the Animals Committee, an interim conservative annual export quota for source codes W and R within 90 days for <i>Python regius</i> and communicate the quota to the Secretariat.</p> <p>b) No exports should occur until the quota has been published on the Secretariat's website.</p> <p>c) The export quota should be justified as conservative based on estimates of sustainable offtake that make use of available scientific information.</p> <p>d) Before making any increases to this quota, the planned changes should be communicated by the range State to the Secretariat and Chair of the Animals Committee along with a justification of how the change is conservative, based on estimates of sustainable offtake that make use of available scientific information, for their agreement.</p> <p><u>Long-term Actions (12 August 2027)</u></p> <p>e) Develop and implement an ongoing science-based population monitoring program that is used in conjunction with an adaptive management program</p>	<p><u>Update and evaluation</u></p> <p>Regarding <i>Python regius</i>, Ghana proposed annual quotas of 26,200 specimens (i.e. 25,000 ranches, 1,000 wild-taken, and 200 captive-bred). These proposed quotas were agreed by the Chair of the AC and published on the CITES website on 7 October 2024.</p> <p><u>Actions recommended by the Secretariat</u></p> <p><b>The Standing Committee is invited to:</b></p> <p><b>(i) agree that recommendations a) and b) have been implemented; and</b></p> <p><b>(ii) invite Ghana to provide an update on the implementation of recommendations c) to k) 90 days before the documentation deadline for AC34.</b></p>

Recommended Action from AC33	Update and evaluation of implementation of the recommendations, with actions recommended by the Secretariat
<p>for the species, for use in making of NDFs</p> <p>f) Develop and implement coordinated national and/or local management plans (that include harvest management considerations), with clear monitoring requirements; management is adaptive (regular review of harvest records; of impact of harvesting; adjustment of harvest instructions as necessary), harvest restrictions, based on monitoring results</p> <p>g) Undertake qualitative monitoring of the scale and trends of all exports (increasing, stable or decreasing) for use in making NDFs.</p> <p>h) Provide training for CITES authorities and conservation staff.</p> <p>i) Develop identification methods and materials</p> <p><u>Long-term Actions (12 August 2027)</u></p> <p>j) Upon completion of other recommendations, provide the scientific basis by which it has established that exports are not detrimental to the survival of the species and are compliant with Article IV, paragraphs 2(a), 3 and 6(a) of the Convention. Particular focus should be given to how the actions the range State has taken, or will take, address the concerns/problems identified in the Review of Significant Trade process.</p> <p>k) Develop science-based export quotas using standardised terms and units used in reporting trade export quotas as found in the most recent version of the guidelines for the preparation of CITES annual reports.</p>	

## 7. *Python regius* / Togo

Recommended Action from AC33	Update and evaluation of implementation of the recommendations, with actions recommended by the Secretariat
<p>The Management Authority of Togo shall report to the Secretariat on the implementation of the following:</p> <p><u>Short-term Actions (10 November 2024)</u></p> <p>a) Establish, in consultation with the Secretariat and the Chair of the Animals Committee, an interim conservative annual export quota for source codes W and R within 90 days for <i>Python regius</i> and communicate the quota to the Secretariat.</p>	<p><u>Update</u></p> <p>A comprehensive assessment was compiled by Togo on 11 November 2024.</p> <p>Togo states that populations of <i>Python regius</i> are relatively common in Togo. The species also has a distribution throughout the country. In the south, five major areas for the collection of live specimens have been</p>

Recommended Action from AC33	Update and evaluation of implementation of the recommendations, with actions recommended by the Secretariat
<p>b) No exports should occur until the quota has been published on the Secretariat's website.</p> <p>c) The export quota should be justified as conservative based on estimates of sustainable offtake that make use of available scientific information.</p> <p>d) Before making any increases to this interim quota, the planned changes should be communicated by the range State to the Secretariat and Chair of the Animals Committee along with a justification of how the change is conservative, based on estimates of sustainable offtake that make use of available scientific information, for their agreement.</p>	<p>identified: the Lake Togo area (Abobo, Lébé, Kpome, Sevagan, Togoville, Vogan Bame), the Bas Mono area (Afagnan, Agome Glozou, Agome Seva, Botonou, Aveve, Adame, Agbanakin), the Tsévié Tabligbo area (Adangbe, Gati, Gblinvié, Tsékpo, Zafi, Kouvé, Gboto, Sedome, Lakata, Mare Afito), the Azahoun Tovégan Kati area (Ando Kpome, Azahoun, Tovegan, Kati, Kologan, Kpando, Avetonou) and the Amou Mono area (Kpové, Tetetou, Tohoun, Tado, Ahassoume, Kpekpleme, Nangbeto). The specimens exploited in international trade from Togo are mostly produced by farmers in the localities of the different areas of abundance of the populations of the species. In addition, the life cycle of the species allows producers to organize the rearing of adult specimens even in rural areas.</p>
<p><u>Long-term Actions (12 August 2027)</u></p> <p>e) Develop and implement an ongoing science-based population monitoring program that is used in conjunction with an adaptive management program for the species, for use in making of NDFs</p> <p>f) Develop and implement coordinated national and/or local management plans (that include harvest management considerations), with clear monitoring requirements; management is adaptive (regular review of harvest records; of impact of harvesting; adjustment of harvest instructions as necessary), harvest restrictions, based on monitoring results</p> <p>g) Undertake qualitative monitoring of the scale and trends of all exports (increasing, stable or decreasing) for use in making NDFs.</p> <p>h) Provide training for CITES authorities and conservation staff.</p> <p>i) Develop identification methods and materials.</p>	<p>Despite this system of production of live specimens of the ball python from Togo, it was possible to identify several wild individuals during the fieldwork, particularly in the Amou Mono forest, the Togodo Protected Areas Complex and in the small forest units along the Mono. However, current assessments show that hunters or farmers often exploit the same populations for different production systems. There is very little diversification of these production areas. What should be noted is that breeding farms, after obtaining the hatchlings, release pregnant females into the wild, sometimes not into the original habitats. This probably caused genetic mixing within the different populations. Recent work by Auliya et al. (2020) revealed a lack of distinct subdivision of the different populations of the ball python in Togo, probably due to anthropogenic mixing of populations associated with commercial wildlife activities in recent decades.</p>
<p><u>Long-term Actions (12 August 2027)</u></p> <p>j) Upon completion of other recommendations, provide the scientific basis by which it has established that exports are not detrimental to the survival of the species and are compliant with Article IV, paragraphs 2(a), 3 and 6(a) of the Convention. Particular focus should be given to how the actions the range State has taken, or will take, address the concerns/problems identified in the Review of Significant Trade process.</p> <p>k) Develop science-based export quotas using standardised terms and units used in reporting trade export quotas as found in the most recent version of the guidelines for the preparation of CITES annual reports.</p>	<p><i>Python regius</i> is not a species on the IUCN Red List. On the basis of the data available in this assessment, in particular with regard to the mode of production, Togo is of the opinion that trade is not detrimental. Togo recommends that the current annual quota for the species be maintained from Togo, i.e. 62,500 ranched specimens and 1500 specimens wild specimens. Togo identifies the need to strengthen control at the land borders with neighboring countries (Benin, Ghana), to set up a system of monitoring and control of production on livestock</p>

Recommended Action from AC33	Update and evaluation of implementation of the recommendations, with actions recommended by the Secretariat
	<p>farms, to develop a management plan for the trade in python specimens in order to guarantee the sustainability of this trade.</p> <p><u>Views of the Animals Committee</u></p> <p>The members congratulate Togo for its efforts in the setting up of an NDF to justify the current export quotas. However, the biological data on the population status and its dynamics presented are in the view of the AC not sufficient to justify these quotas. Furthermore, they also raise several issues around the management and trade in this species from Togo. In particular, the different forms of production and their management is not clear and the responsibilities and actions in order to control the trade could be improved. Togo is also encouraged to develop an adaptive management plan in the medium to long term. There are also concerns and questions in relation to the correct use of source codes for the different production methods. In summary, the members of the AC do feel that until these questions are solved, a more conservative quota should be set than the current numbers.</p> <p><u>Evaluation of implementation of recommendations</u></p> <p>Togo has made good progress in implementing the recommendations of the Animals Committee, though concerns remain that the NDF produced is not sufficiently robust scientifically. The Animals Committee members have made some detailed comments (see Annex 4) concerning this species/country combination, which Togo may find useful in terms of additional guidance on making an NDF for <i>P. regius</i>.</p> <p><u>Actions recommended by the Secretariat</u></p> <p><b>The Standing Committee is invited to:</b></p> <p><b>i) acknowledge the progress that Togo has made in the implementation of the Animals Committee recommendations;</b></p> <p><b>ii) request Togo to establish, in consultation with the Chair of the Animals Committee and the Secretariat, an interim conservative</b></p>

Recommended Action from AC33	Update and evaluation of implementation of the recommendations, with actions recommended by the Secretariat
	<p>annual export quota for source codes W and R within 90 days for <i>Python regius</i> and communicate the quota to the Secretariat; and</p> <p>iii) invite Togo to provide an update on the implementation of recommendations b) to g) 90 days before the documentation deadline for AC34.</p>

#### 8. *Sphyrna lewini* / Kenya

Recommended Action from AC33	Update and evaluation of implementation of the recommendations, with actions recommended by the Secretariat
<p>The Management Authority of Kenya shall report to the Secretariat on the implementation of the following:</p> <p><u>Short-term Actions (10 November 2024)</u></p> <ol style="list-style-type: none"> <li>a) Establish a conservative annual export quota of 50 live specimens, within 90 days, for <i>Sphyrna lewini</i> and communicate the quota to the Secretariat.</li> <li>b) No exports should occur until the quota has been published on the Secretariat's website.</li> <li>c) Before making any increases to this quota, the planned changes should be communicated by the range State to the Secretariat and Chair of the Animals Committee along with a justification of how the change is conservative, based on estimates of sustainable offtake that make use of available scientific information, for their agreement.</li> </ol> <p><u>Long-term Actions (12 August 2027)</u></p> <ol style="list-style-type: none"> <li>d) Undertake science-based studies on the status of the species (e.g. delineation of stocks, population estimates, trends, distribution) including an evaluation of the threats to the species for use as the basis for NDFs.</li> </ol>	<p><u>Update and evaluation</u></p> <p>Kenya has not confirmed the establishment of an annual zero export quota, therefore the short term recommendations have not been implemented.</p> <p><u>Actions recommended by the Secretariat</u></p> <p><b>The Standing Committee is invited to:</b></p> <p><b>(i) request the Secretariat to publish an annual export quota of 50 live specimens for <i>S. lewini</i> until Kenya provides information to justify a higher quota to be agreed with the AC Chair; and</b></p> <p><b>(ii) invite Kenya to provide an update on the implementation of recommendations b) to g) 90 days before the documentation deadline for AC34.</b></p>



Recommended Action from AC33	Update and evaluation of implementation of the recommendations, with actions recommended by the Secretariat
<p>e) Develop NDFs, in consultation with fisheries agencies, which are time-bound (no more than 5 years) for all stocks of <i>Sphyrna lewini</i> where catch for export occurs, which could, inter alia, include the following elements:</p> <p>A. consideration of each stock as a separate management unit for conservation and harvest purposes, paying particular attention to any RFMO measures, as appropriate, in place;</p> <p>B. adaptive management, with a review period of no more than 5 years, to take into consideration signals from the stock;</p> <p>C. a precautionary approach, where a cautionary offtake is initially considered, and revised with further information;</p> <p>D. all sources of mortality within the stock.</p> <p>f) Establish an export quota proportionate to the harvest quota with a clear justification.</p> <p><u>Long-term Actions (12 August 2027)</u></p>	
<p>g) Upon completion of other recommendations, provide the scientific basis by which it has established that exports are not detrimental to the survival of the species and are compliant with Article IV, paragraphs 2(a), 3 and 6(a) of the Convention. Particular focus should be given to how the actions the range State has taken, or will take, address the concerns/problems identified in the Review of Significant Trade process.</p>	

**9. *Sphyrna lewini* / Mexico**

Recommended Action from AC33	Update and evaluation of implementation of the recommendations, with actions recommended by the Secretariat
	<u>Update and evaluation</u>

Recommended Action from AC33	Update and evaluation of implementation of the recommendations, with actions recommended by the Secretariat
<p>The Management Authority of Mexico shall report to the Secretariat on the implementation of the following:</p> <p><u>Short-term Actions (10 November 2024)</u></p> <ul style="list-style-type: none"> <li>a) Establish a conservative annual export quota of 50% of volumes published for 2024, within 90 days, for <i>Sphyrna lewini</i> and communicate the quota to the Secretariat.</li> <li>b) No exports should occur until the quota has been published on the Secretariat's website.</li> <li>c) Before making any increases to this quota, the planned changes should be communicated by the range State to the Secretariat and Chair of the Animals Committee along with a justification of how the change is conservative, based on estimates of sustainable offtake that make use of available scientific information, for their agreement.</li> </ul> <p><u>Long-term Actions (12 August 2027)</u></p> <ul style="list-style-type: none"> <li>d) Develop NDFs, in consultation with fisheries agencies, which are time-bound (no more than 5 years) for all stocks of <i>Sphyrna lewini</i> where catch for export occurs, which could, inter alia, include the following elements: <ul style="list-style-type: none"> <li>A. any RFMO measures, as appropriate, in place;</li> <li>B. adaptive management, with a review period of no more than 5 years, to take into consideration signals from the stock;</li> <li>C. a precautionary approach, where a cautionary offtake is initially considered, and revised with further information;</li> <li>D. all sources of mortality within the stock;</li> </ul> </li> <li>e) rebuilding plan.</li> <li>f) Establish an export quota proportionate to the harvest quota with a clear justification.</li> </ul>	<p>In a letter dated 9 July, Mexico confirmed its conservative export quotas. A quota of 979,300 kg was published on 22 July 2024 for source codes W and X for all commercial trade from the Pacific and 1031160 kg for all commercial trade from the Atlantic, noting that any change to these quotas should be communicated to the Secretariat and the Chair of the Animals Committee along with a justification.</p> <p><u>Actions recommended by the Secretariat</u></p> <p><b>The Standing Committee is invited to:</b></p> <p><b>(i) agree that recommendations a) and b) have been implemented; and</b></p> <p><b>(ii) invite Mexico to provide an update on the implementation of recommendations c) to g) 90 days before the documentation deadline for AC34.</b></p>

Recommended Action from AC33	Update and evaluation of implementation of the recommendations, with actions recommended by the Secretariat
<p><u>Long-term Actions (12 August 2027)</u></p> <p>g) Upon completion of other recommendations, provide the scientific basis by which it has established that exports are not detrimental to the survival of the species and are compliant with Article IV, paragraphs 2(a), 3 and 6(a) of the Convention. Particular focus should be given to how the actions the range State has taken, or will take, address the concerns/problems identified in the Review of Significant Trade process.</p>	

**10. *Sphyrna lewini* / Nicaragua**

Recommended Action from AC33	Update and evaluation of implementation of the recommendations, with actions recommended by the Secretariat
<p>The Management Authority of Nicaragua shall report to the Secretariat on the implementation of the following:</p> <p><u>Short-term Actions (10 November 2024)</u></p> <p>a) Establish an annual zero export quota within 90 days for <i>Sphyrna lewini</i> and communicate the quota to the Secretariat.</p> <p>b) No exports should occur until the quota has been published on the Secretariat's website.</p> <p>c) Before making any increases to this quota, the planned changes should be communicated by the range State to the Secretariat and Chair of the Animals Committee along with a justification of how the change is conservative, based on estimates of sustainable offtake that make use of available scientific information, for their agreement.</p> <p><u>Long-term Actions (12 August 2027)</u></p> <p>d) Undertake science-based studies on the status of the species (e.g. delineation of stocks, population estimates, trends, distribution) including an evaluation of the threats to the species for use as the basis for NDFs.</p>	<p><u>Update and evaluation</u></p> <p>A zero export quota was published on 14 November 2024 for source codes W and X for all commercial trade, noting that any change to this quota should be communicated to the Secretariat and the Chair of the Animals Committee along with a justification.</p> <p><u>Actions recommended by the Secretariat</u></p> <p><b>The Standing Committee is invited to:</b></p> <p><b>(i) agree that recommendations a) and b) have been implemented; and</b></p> <p><b>(ii) invite Nicaragua to provide an update on the implementation of recommendations c) to g) 90 days before the documentation deadline for AC34.</b></p>

Recommended Action from AC33	Update and evaluation of implementation of the recommendations, with actions recommended by the Secretariat
<p>e) Develop NDFs, in consultation with fisheries agencies, which are time-bound (no more than 5 years) for all stocks of <i>Sphyrna lewini</i> where catch for export occurs, which could, inter alia, include the following elements:</p> <p>A) consideration of each stock as a separate management unit for conservation and harvest purposes, paying particular attention to any RFMO measures, as appropriate, in place;</p> <p>B) adaptive management, with a review period of no more than 5 years, to take into consideration signals from the stock;</p> <p>C) a precautionary approach, where a cautionary offtake is initially considered, and revised with further information;</p> <p>D) all sources of mortality within the stock.</p> <p>f) Establish an export quota proportionate to the harvest quota with a clear justification.</p> <p>g) Upon completion of other recommendations, provide the scientific basis by which it has established that exports are not detrimental to the survival of the species and are compliant with Article IV, paragraphs 2(a), 3 and 6(a) of the Convention. Particular focus should be given to how the actions the range State has taken, or will take, address the concerns/ problems identified in the Review of Significant Trade process.</p>	

**11. *Sphyrna lewini* / Sri Lanka**

Recommended Action from AC33	Update and evaluation of implementation of the recommendations, with actions recommended by the Secretariat
<p>The Management Authority of Sri Lanka shall report to the Secretariat on the implementation of the following:</p> <p><u>Short-term Actions (10 November 2024)</u></p> <p>a) Establish an annual zero export quota within 90 days for <i>Sphyrna lewini</i> and</p>	<p><u>Update and evaluation</u></p> <p>Sri Lanka has not confirmed the establishment of an annual zero export quota, therefore the short term recommendations have not been implemented.</p>

Recommended Action from AC33	Update and evaluation of implementation of the recommendations, with actions recommended by the Secretariat
<p>communicate the quota to the Secretariat.</p> <p>b) No exports should occur until the quota has been published on the Secretariat's website.</p> <p>c) Before making any increases to this quota, the planned changes should be communicated by the range State to the Secretariat and Chair of the Animals Committee along with a justification of how the change is conservative, based on estimates of sustainable offtake that make use of available scientific information, for their agreement.</p> <p><u>Long-term Actions (12 August 2027)</u></p> <p>d) Undertake science-based studies on the status of the species (e.g. delineation of stocks, population estimates, trends, distribution) including an evaluation of the threats to the species for use as the basis for NDFs.</p> <p>e) Develop NDFs, in consultation with fisheries agencies, which are time-bound (no more than 5 years) for all stocks of <i>Sphyrna lewini</i> where catch for export occurs, which could, inter alia, include the following elements:</p> <p>A. consideration of each stock as a separate management unit for conservation and harvest purposes, paying particular attention to any RFMO measures, as appropriate, in place;</p> <p>B. adaptive management, with a review period of no more than 5 years, to take into consideration signals from the stock;</p> <p>C. a precautionary approach, where a cautionary offtake is initially considered, and revised with further information;</p> <p>D. all sources of mortality within the stock.</p> <p>f) Establish an export quota proportionate to the harvest quota with a clear justification.</p> <p><u>Long-term Actions (12 August 2027)</u></p> <p>g) Upon completion of other recommendations, provide the scientific basis by which it has established that exports are not detrimental to the survival of the species and are compliant with Article IV, paragraphs 2(a), 3 and 6(a) of the Convention. Particular focus should be given to how the actions the range</p>	<p><u>Actions recommended by the Secretariat</u></p> <p><b>The Standing Committee is invited to:</b></p> <p><b>(i) request the Secretariat to publish a zero export quota for <i>S. lewini</i> until Sri Lanka provides information to justify a higher quota to be agreed with the AC Chair; and</b></p> <p><b>(ii) urge Sri Lanka to provide an update on the implementation of recommendations b) to g) 90 days before the documentation deadline for AC34.</b></p>

Recommended Action from AC33	Update and evaluation of implementation of the recommendations, with actions recommended by the Secretariat
State has taken, or will take, address the concerns/problems identified in the Review of Significant Trade process.	

## 12. *Sphyrna lewini* / Yemen

The Management Authority of Yemen shall report to the Secretariat on the implementation of the following:

Recommended Action from AC33	Update and evaluation of implementation of the recommendations, with actions recommended by the Secretariat
<p><u>Short-term Actions (10 November 2024)</u></p> <ul style="list-style-type: none"> <li>a) Establish an annual zero export quota within 90 days for <i>Sphyrna lewini</i> and communicate the quota to the Secretariat.</li> <li>b) No exports should occur until the quota has been published on the Secretariat's website.</li> <li>c) Before making any increases to this quota, the planned changes should be communicated by the range State to the Secretariat and Chair of the Animals Committee along with a justification of how the change is conservative, based on estimates of sustainable offtake that make use of available scientific information, for their agreement.</li> </ul> <p><u>Long-term Actions (12 August 2027)</u></p> <ul style="list-style-type: none"> <li>d) Undertake science-based studies on the status of the species (e.g. delineation of stocks, population estimates, trends, distribution) including an evaluation of the threats to the species for use as the basis for the issuance of certification to the effect that the competent scientific institution has advised that the export will not be detrimental to the survival of the species.</li> <li>e) Develop such certification, in consultation with fisheries agencies, which are time-bound (no more than 5 years) for all stocks of <i>Sphyrna lewini</i> where catch for export occurs, which could, inter alia, include the following elements: <ul style="list-style-type: none"> <li>A. consideration of each stock as a separate management unit for conservation and harvest purposes, paying particular attention to any RFMO measures, as appropriate, in place;</li> </ul> </li> </ul>	<p><u>Update and evaluation</u></p> <p>Yemen has not confirmed the establishment of an annual zero export quota, therefore the short term recommendations have not been implemented.</p> <p><u>Actions recommended by the Secretariat</u></p> <p><b>The Standing Committee is invited to:</b></p> <p><b>(i) request the Secretariat to publish a zero export quota for <i>S. lewini</i> until Yemen provides information to justify a higher quota to be agreed with the AC Chair; and</b></p> <p><b>(ii) invite Yemen to provide an update on the implementation of recommendations b) to g) 90 days before the documentation deadline for SC77.</b></p>

Recommended Action from AC33	Update and evaluation of implementation of the recommendations, with actions recommended by the Secretariat
<p>B. adaptive management, with a review period of no more than 5 years, to take into consideration signals from the stock;</p> <p>C. a precautionary approach, where a cautionary offtake is initially considered, and revised with further information;</p> <p>D. all sources of mortality within the stock.</p> <p>f) Establish an export quota proportionate to the harvest quota with a clear justification.</p> <p><u>Long-term Actions (12 August 2027)</u></p> <p>g) Upon completion of other recommendations, provide the scientific basis by which it has established that exports are not detrimental to the survival of the species and are compliant with Article X of the Convention and Resolution Conf. 9.5 (Rev. CoP16). Particular focus should be given to how the actions the range State has taken, or will take, address the concerns/problems identified in the Review of Significant Trade process.</p>	

**13. *Sphyrna mokarran* / Mexico**

Recommended Action from AC33	Update and evaluation of implementation of the recommendations, with actions recommended by the Secretariat
<p>The Management Authority of Mexico shall report to the Secretariat on the implementation of the following:</p> <p><u>Short-term Actions (10 November 2024)</u></p> <p>a) Establish a conservative annual export quota of 50% of volumes published for 2024, within 90 days for <i>Sphyrna mokarran</i> and communicate the quota to the Secretariat.</p> <p>b) No exports should occur until the quota has been published on the Secretariat's website.</p>	<p><u>Update and evaluation</u></p> <p>In a letter dated 9 July, Mexico confirmed its conservative export quotas. A quota of 14,550 kg was published on 22 July 2024 for source codes W and X for all commercial trade from the Pacific and 185,490 kg for all commercial trade from the Atlantic, noting that any change to these quotas should be communicated to the Secretariat and the Chair of the Animals Committee along with a justification.</p> <p><u>Actions recommended by the Secretariat</u></p>

Recommended Action from AC33	Update and evaluation of implementation of the recommendations, with actions recommended by the Secretariat
<p>c) Before making any increases to this quota, the planned changes should be communicated by the range State to the Secretariat and Chair of the Animals Committee along with a justification of how the change is conservative, based on estimates of sustainable offtake that make use of available scientific information, for their agreement.</p> <p><u>Long-term Actions (12 August 2027)</u></p> <p>d) Develop NDFs, in consultation with fisheries agencies, which are time-bound (no more than 5 years) for all stocks of <i>Sphyrna mokarran</i> where catch for export occurs, which could, inter alia, include the following elements:</p> <p>A. any RFMO measures, as appropriate, in place;</p> <p>B. adaptive management, with a review period of no more than 5 years, to take into consideration signals from the stock;</p> <p>C. a precautionary approach, where a cautionary offtake is initially considered, and revised with further information;</p> <p>D. all sources of mortality within the stock;</p> <p>e) Establish export quota proportionate to the harvest quota with a clear justification.</p> <p><u>Long-term Actions (12 August 2027)</u></p> <p>f) Upon completion of other recommendations, provide the scientific basis by which it has established that exports are not detrimental to the survival of the species and are compliant with Article IV, paragraphs 2(a), 3 and 6(a) of the Convention. Particular focus should be given to how the actions the range State has taken, or will take, address the concerns/problems identified in the Review of Significant Trade process.</p>	<p><b>The Standing Committee is invited to:</b></p> <p><b>(i) agree that recommendations a) and b) have been implemented; and</b></p> <p><b>(ii) invite Mexico to provide an update on the implementation of recommendations c) to f) 90 days before the documentation deadline for AC34.</b></p>



14. *Testudo horsfieldii* / Uzbekistan

Recommended Action	Update and evaluation of implementation of the recommendations, with actions recommended by the Secretariat
<p>The Management Authority of Uzbekistan shall report to the Secretariat on the implementation of the following:</p> <p><u>Short-term Actions (10 November 2024)</u></p> <ul style="list-style-type: none"> <li>a) Establish an annual zero export quota for sources codes W and R within 90 days for <i>Testudo horsfieldii</i> and communicate the quota to the Secretariat.</li> <li>b) No exports should occur until the quota has been published on the Secretariat's website.</li> <li>c) Before making any increases to this quota, the planned changes should be communicated by the range State to the Secretariat and Chair of the Animals Committee along with a justification of how the change is conservative, based on estimates of sustainable offtake that make use of available scientific information, for their agreement.</li> <li>d) Clarify why there were high levels of exports of wild-sourced specimens reported in 2020 and 2021 (years in which harvest from the wild was reported to have stopped)</li> <li>e) Provide information on the level of offtake from the wild to supplement captive breeding operations</li> </ul>	<p><u>Update and evaluation</u></p> <p>Uzbekistan was requested to establish an annual zero export quota for W and R. At the time of the consultation with the members of the Animals Committee these quotas had not been notified to the Secretariat. Uzbekistan subsequently notified the Secretariat that it proposed zero export quotas for W, R and C These quotas were published on 16 December 2024.</p> <p>Concerning recommendation d), Uzbekistan explained that the exports in 2020 of 14,458 are the balance of previous quotas. As for the 109 wild tortoises exported in 2021, this is the remainder of the export quota for 2020. Concerning quotas not fully utilized in a particular year, Uzbekistan should be reminded of paragraph 21 in Resolution Conf. 14.7 (Rev. CoP15) on <i>Management of nationally established export quotas</i> that provides guidance on <i>Quotas not fully utilized in a particular year</i>.</p> <p>The Secretariat notes that Uzbekistan has requested the publication of a quota of 53,159 specimens of <i>T. horsfieldii</i> (F1 generation, born in captivity). It is proposed that the export of specimens under source code F should be considered under Resolution Conf. 17.7 (Rev. CoP19).</p> <p><u>Views of the Animals Committee</u></p> <p>The AC members were of the view that once recommendation a) has been fulfilled, the species/country combination may be released from the process. Should Uzbekistan wish to continue or resume exporting animals under source code R, then clarification is needed what exactly the production process is from which animals are coded as 'R', and possibly a different code may be applicable, or UZ will need to provide a detailed NDF for its R operations before permitting exports.</p> <p><u>Evaluation of implementation of recommendations</u></p> <p>Recommendations a), b) and d) have been implemented. Recommendation e) is also being addressed under Resolution Conf.</p>

Recommended Action	Update and evaluation of implementation of the recommendations, with actions recommended by the Secretariat
	<p>17.7 (Rev. CoP19). The recommendations under RST for <i>Testudo horsfieldii</i> /Togo only refer to trade in source codes W and R. Proposed trade in specimens born in captivity (F) will be considered further under the ongoing review of this species/country combination under Resolution Conf. 17.7 (Rev. Cop19).</p> <p><u>Actions recommended by the Secretariat</u></p> <p><b>The Standing Committee is invited to:</b></p> <p><b>i) remove <i>Testudo horsfieldii</i> from Uzbekistan from the review of significant trade; and</b></p> <p><b>ii) remind Uzbekistan that any increase in the quotas for W or R should be communicated to the Chair of the Animals Committee and the Secretariat for their agreement in advance of any trade taking place, along with a non-detriment finding, including a justification of how the change is conservative, based on estimates of sustainable offtake that make use of best available scientific information,.</b></p>

DETAILED COMMENTS FROM MEMBERS OF THE ANIMALS COMMITTEE  
IN RELATION TO THE RESPONSES OF PARTIES  
REQUESTED UNDER RESOLUTION CONF. 12.8 (REV. COP18)

**Tunisia – European eel (*Anguilla anguilla*)**

- Recommendations a) to c) have been fulfilled with the publication of an export quota of 90 tonnes for specimens >30 cm in length and a zero export quota for glass eels. Tunisia claims that Recommendations d) to f) have also been fulfilled and it is noted that according to statistics in the trade database, the quota of 90 tonnes of eel >30 cm in length has not been exceeded since the quota was lowered from 135 tonnes in 2018.
- The outcomes of the research programme of the General Fisheries Commission for the Mediterranean referred to under recommendation g) is very comprehensive as a single-species study, and provides a wealth of material for developing NDFs and long-term population monitoring programmes, such as the one that Tunisia was due to start in October 2024. The response from Tunisia notes under recommendation h) that this new monitoring programme will “provide us with time series of demographic data and recruitment and escapement indices that will be used, in conjunction with a management plan, to issue ACNPs [=NDFs]. It seems that Tunisia has not yet produced any formal NDF for this reduced quota.
- Tunisia has actively engaged in the GFCM research and has kept within the lowered quotas (and zero quota for glass eels), but until the new monitoring programme has run for a number of years a question mark will hang over whether the export quota of 90 tonnes per annum is sustainable. Given that in 2018 and 2019 the actual Tunisian landings reported in the GFCM study were 164 t and 128 t respectively, both well above the export quota and even further above the volumes reported on the CITES Trade Database, the apparent domestic use of a large portion of the catch must be considered in any NDF.
- Regarding recommendation g) Tunisia referred to the report “European eel in the Mediterranean Sea – Outcomes of the GFCM Research programme.” from 2023 that was already available before the AC33 decided to invite Tunisia to provide an update on implementation of recommendation g). While the report includes numerous useful information, it does not specifically includes information on recent studies on the status of the species in Tunisia as requested under recommendation g).
- Regarding recommendation h) to j) it can be acknowledged that Tunisia will start/ has started a research program in October 2024, acknowledging that the program has not gained results yet and it remains unclear how results would be linked to adaptive management strategies for the species. While Tunisia stated they have a management plan in place since 2009, they did not further specify to what extent it is in line with or would need to be amended to be in line with the aspects mentioned under recommendation i). It is also suggested that the management plan be reviewed by an external expert.
- Overall, it can be acknowledged that Tunisia is member of the WGEEL and is making good progress to comply with recommendations g) to l), while they are not fully implemented yet, specifically the scientific basis by which it will be established that exports from Tunisia are not detrimental has not been provided yet. Tunisia should therefore not yet released from process at this stage.

**Algeria – European eel (*Anguilla anguilla*)**

- Most recommendations have been fulfilled with the publication since 2020 of an annual export quota of 8 tonnes for wild-taken adults and a zero export quota for glass eels. According to statistics in the trade database, the quota of 8 tonnes of adult has not been exceeded since the quota was established in 2020; i.e., 2.4 t in 2022 and 4.0 t in 2023.
- The outcomes of the research programme of the General Fisheries Commission for the Mediterranean (GFCM) provides a wealth of material for developing NDFs and long-term population monitoring programmes, and Algeria noted in their response that they participated in a webinar NDF training session but are in the process of making contact with the IUCN Anguillid Specialist Group to seek assistance in developing an NDF.

- Several studies were undertaken recently including an assessment of the status of stocks, which indicated a low recruitment rate compared to previous years.
- Algeria currently ensures compliance with the GFCM recommendation by: a closure of fishing between May and September, a ban on silver eel and glass eel fishing, except for farming purposes; maximum fishing quantities are set by the operating sites; a recreational fishing ban; other regulations.
- However, it doesn't seem that Algeria has already adopted a national/ local management plans taking into account the aspects under recommendation i), yet. Acknowledging the scientific studies undertaken by Algeria and contribution to GFCM research program and that Algeria is member of the WGEEL, it cannot be established that robust monitoring to provide time series population data and/or recruitment and escapement indices to support development and implementation of the management plans and inform NDF assessments were implemented yet.
- It can be highly welcomed that Algeria has already initiated the necessary procedures to contact the IUCN Anguillid Specialist Group to facilitate the development of an NDF, which is however not yet provided.
- Some of the regulatory measures in place in Algeria do not seem to go far enough - e.g., the recommendation is to implement a total ban on glass eel fishing to protect recruitment, but Algeria has a ban on silver eel and glass eel fishing except for farming purposes. Many other recommendations are not included in Algeria's regulatory mechanisms.
- It seems that the production of an NDF is the main outstanding action, and so it is suggested that Algeria is removed from the RST process once they have furnished the Secretariat and AC Chair with a satisfactory NDF showing that their (modest compared with Tunisia) international trade is sustainable. It is noted that the information provided could be consolidated within a management plan or future NDF.

#### **Togo – Ornate monitor (*Varanus ornatus*)**

- It is good to see that Togo has used the generic “Simplified Assessment Template (SAT)” from Module 13 of the NDF guidance developed at the Nairobi NDF workshop to justify a quota of 1,500 specimens; however, there are some concerns about how it has been applied.
- The numerical thresholds used for annual harvest levels and area of occupancy are supposed to be “sensible”, i.e., the instructions say to “*define sensible threshold values for each criterion based on the best information available*”. It seems very difficult to establish what numerical thresholds are “sensible” and so it seems convenient that the overall score for this species in Togo was 04.
- The latest version approved by the workshop would set the maximum threshold for low volume trade at 500 specimens. This would in the case of *V. ornatus* translate into a scoring of two points and a total score of five instead of four, which would lead to a different conclusion, meaning that a Comprehensive Assessment (which applies if the score is 05 or higher) would be needed.
- It seems that the threshold for the “annual harvest level” criterion for the lowest category was chosen based on the annual export quota rather than on biological grounds. A shift in the upper limit of the “low” annual harvest level from 2000 specimens a year to 1000 would have resulted in the score being raised to 05. Nevertheless, the text says that the species is “heavily hunted for its meat”, but this is not considered as part of the <2000 specimens in the SAT when it should have been. I suspect that the score for the harvest criterion should have been 02, possibly even 03, depending on what “heavily hunted” means.
- For the area thresholds, the text in Section 4 says that “*the species distribution area in Togo covers the entire country*” yet in Section 6 they say “*Its distribution area covers only ecological zones IV, II and V of the country while the distribution of the other two [monitor] species covers the entire country*”. These three ecological zones combined cover c.25,000 km<sup>2</sup> of Togo. To stay over the 20,000 km<sup>2</sup> threshold used for a low score of 01, the species would have to occupy 80% of these three ecological zones; however, the species is also found outside of Togo and this should somehow be taken into consideration in the scoring system.
- It is concerning that the IUCN Status criterion and the Illegal Trade criterion have been merged into a single criterion in Section 6 which scored 00. It seems that very little weight is given to the conservation status of the species in the instructions for SAT in Module 13: “*if the status of the species is threatened*”

or unknown give a maximum score of 1 point". The species *Varanus ornata* as a whole has not been evaluated for the IUCN; however, the species is classified as "Vulnerable" in neighbouring Benin. In this simplified NDF, the conservation status is assumed to be "Least Concern" and thus scoring 00 (even when it is incorrectly combined in the assessment with the illegal trade score).

- The Illegal Trade criterion is not discussed apart from several mentions elsewhere in the NDF that the species is "hunted heavily". The instructions for SAT in Module 13 say "if illegal trade is known to be occurring, but levels are unknown give a maximum score of 1 point". If the species is hunted heavily for its meat, some account for this must be included either under the Annual Harvest Level criteria or under the Illegal Trade criterion.
- In its NDF, Togo states that usually gravid females are collected. In the next sentence they mention that nowadays only eggs are collected, but continues with mentioning specific areas where gravid females are collected. Also the chapter on "Life History" elaborates more on how gravid females are collected and kept. So it is a bit unclear to what extent gravid females are still collected, which is not in line with the definition of source code "R". If this is the practice, rather source code W should be used and a quota should be established accordingly. If code R is used, measures should be taken to ensure that it refers to specimens collected as eggs or juveniles (such as by inspections of facilities where no mature females should be present).
- According to Togo the species is less abundant than the other two monitor lizard species in Togo, but still relatively abundant, noting that it is currently under scientific debate whether *V. ornatus* is a valid species or rather a subspecies or ecotype of *V. niloticus*.
- The life history was assessed as moderate based on clutch sizes between 20-60 eggs, which is in line with published data (e.g. Auliya and Koch 2020). Auliya and Koch (2020) further report that the species may lay two clutches per year and likely matures with two years. Considering an average clutch size of 25 eggs, about 60 females might need to be collected to reach an export quota for 1500 specimens to be exported under "R", meaning that the actual harvest is much lower than the number of exported specimens. Togo mentions about seven areas, where collection of females currently takes place. In general, those figures appear not very concerning. Nevertheless, it would make a difference if reproductive females will be released back to the wild in good state at the place where they were collected (as said by Togo), or if they were taken out of the wild population without being transferred back and need to be replaced with new reproductive females from the wild each year.
- The adoption of a size limit (around 25 cm SVL, considering an approximate hatchling size of 12 cm SVL) for export could be a potential management intervention as outcome of the NDF to prevent that mature females are exported and to accept the quota proposed, taking into account the lack of comprehensive and recent data on the species status in the country.
- It further seems that the terms "harvest quota" and "export quota" are mixed. In case it is still the practice that gravid females are collected it would make a difference if the harvest quota would be 1500 females, or if the export quota would relate to 1500 hatchlings from those females, which would relate to a much lower harvest rate. So, a clarification on the current practice is needed.
- The NDF did not provide population data, trend or abundance data, or survey results for the species; information regarding regulations in Togo regarding the species (such as harvesting, collection, trade, ranching, etc.); whether or not (and if so, how much) any offspring produced in ranching operations are returned to the wild; rates of mortality. This information is essential if Togo propose to modify actual quotas. Without such information, it's difficult to sustain if the conservation status of the population is Least concern (and there is no IUCN Red List assessment of the species).
- In addition, the practice of bringing pregnant females from the wild into captivity for a short period time, is discussed but not explained to the point of how that activity affects the wild population (i.e., rates of injury or mortality of the female, is it detrimental, etc.), and females taken from the wild would not meet the definition of source code R. In some cases, eggs are also harvested without further considerations of impacts on the population. We encourage Togo to provide more information on these activities.
- It is recommended that Togo remain in the RST process and complete the Comprehensive Assessment Template, or a similar, more thorough, NDF approach, taking into account and explaining what "heavily harvested" means, and by establishing trade-independent monitoring methods to better ensure that the international trade is sustainable. Given that several Parties have now used the SAT process, the AC

perhaps needs to look at the criteria and provide better instructions on how they are used to ensure sustainability of international trade, including by taking into account other pressures on the species involved, and developing trade-independent monitoring programmes to measure this.

### **Togo – Royal or Ball python (*Python regius*)**

- Togo appears to have followed the Module 13 guidelines from the Nairobi workshop as they had done for *Varanus ornata* and must have assessed that this species scored 05 points or higher which meant that it warranted a comprehensive NDF assessment.
- The material supplied includes good detail of the status of royal / ball python within their country and management measures in place, but does not explain why the current trade levels are considered to be sustainable. This is the reptile species most frequently traded internationally out of West Africa, with Togo being the major exporter in the region, and the United States the major importer.
- The majority of specimens are ranched by collecting eggs from the wild, and then hatching them and rearing the offspring in captive facilities, or by collecting gravid females from the wild and holding them until they have laid their eggs in captivity. Sometimes this is done in facilities made by the hunters who then supply the main exporting captive facilities with resultant young snakes. Many of the females and a portion of the hatchlings are returned to the wild to help to maintain wild populations, which is likely a useful conservation measure in terms of maintaining population numbers; however, Auliya et al (2020: *Nature Conservation* 38: 37–59) have raised concerns that this may have led to genetic pollution of wild populations and disrupted natural patterns of genetic structuring and local adaptation – the NDF incorrectly interprets this practice as contributing to the maintenance of genetic structures.
- According to Species+, the annual export quota for Togo has been set at 62,500 specimens from ranching and 1500 specimens from the wild since 2007, and it is noted that these quota are now much higher than those for neighbouring Ghana (1000 wild, 2500 ranched (though it was 60,000 up to 2023) and 200 captive) and Benin (200 wild and 32,000 ranched).
- Table 1 in section 3 of the NDF gives annual trade data for the 10-year period 2013-2022, but it does not distinguish between ranched and wild sourced specimens. The table shows that exports reported by Benin exceeded the combined quota of 64,000 specimens in the three successive years 2020, 2021 and 2022, and importer reported trade also exceeded quota in 2013. The Trade Database records from importing Parties show in excess of 1500 wild-sourced specimens in 03 of the last 06 years, including 2019 when 5169 live wild-caught specimens were reported. I realise that the records in the CITES Trade Database are, unfortunately, very difficult to interpret and reconcile, but the situation may be worse than indited above if you add up the annual maxima of importer-reported or exporter-reported data. For example, over the entire period 2007-2022, while the existing annual export quota for Togo were in place, Canada reported importing a total of 159 live animals (in 2008 and 2009 only), yet Togo reported exports to Canada of 3166 live *Python regius*, 3156 ranched and 10 from wild sources, spread over all but two (2011 and 2015) of the 16 years. Some of these irregularities are noted as a problem in the NDF, and not all are attributable to Togo, such as the likely lack of reporting of trade by some importing Parties.
- Section 9 on Annual Harvest for Trade does not mention the findings of D’Cruze et al. (2020: *Nature Conservation* 38: 13-36) who reported that of 58 python hunters/ traders interviewed, 40% hunted royal / ball pythons in neighbouring Ghana and/or Benin; however, this potentially significant illegal cross-border trade/ laundering is hinted at by a recommendation in Section 16 that the Management Authority needs to strengthen control at land borders with neighbouring countries. The level of cross-border movement of specimens may increase as a result of the annual export quota for ranched specimens from Ghana having been reduced from 60,000 specimens to 2000. It is also noted in Section 15 that there is illegal trafficking of adult python specimens to Nigeria through Benin intended for consumption.
- In Section 12, it is concerning that the IUCN Red List assessment by D’Cruze et al. (2022) stated that “declines have been reported in most West African range States, there are no mechanisms in place to ensure that harvest is sustainable or systematic monitoring, and regulation of trade and enforcement of existing harvest restrictions are considered inadequate”. D’Cruze et al. (2020: *Nature Conservation* 38: 13-36) reported that 75% of 58 python hunters/ traders interviewed considered that there were fewer royal / ball pythons than there were 05 years earlier compared with 7% who thought that there were more.

- Given the anecdotal observations above that the population is declining (i.e. current harvest/ export levels are not sustainable) in the absence of any independent systematic population monitoring or regulation of hunting, together with the illegal importation/ laundering of eggs and/ or gravid females from neighbouring countries, the conclusion that “*the current quota of the species from Togo be maintained, namely 62,500 specimens in “R” sources and 1,500 specimens in W sources per year*” is very debatable.
- It is concerning that these quotas have been seriously exceeded in recent years, not all of which is likely due to exporters using previous, non-cancelled, permits; this might explain excess exports in one year, but not for three years in a row. It needs to be ensured that quotas that were not used entirely should not be transferred to the next year.
- The recommendations in Section 17 are sound, but some independent and systematic monitoring of the population needs to be included in any management plan to ensure that exports are sustainable, and the Scientific Authority needs to be involved in developing any management plan that aims to be sustainable.
- Togo states that specimens are produced via “ranching”, which involves the collection of gravid females, that are to be released back to the wild. However, this practice is not strictly in line with the definition for R (and also not for F), noting though that the impact on wild population is still different to trade in wild-caught adult specimens. However, such specimens should be labelled W, if not taken as eggs or juveniles. It has to be further noted that the term “captive-breeding” should not be used in this context, as no breeding according to the definition in Res. Conf. 10.16 is taking place.
- Likewise, Togo states that today most local hunters are collecting eggs from incubating females, which would result in higher hatching rates, “healthier eggs” compared to eggs obtained from the collection of gravid females. The practice of collecting only the eggs can be regarded as more sustainable and also fully in line with the Resolution on ranching and this practice should be highly encouraged and adherence should be ensured. For example, could regular inspections check that no adult females are found in the facilities.
- Interestingly, the report also mentions that today a number of specimens for trade would originate from small breeders in different areas. It was noted that the stock of females was obtained from the wild, while specimens are being kept for longer periods to regularly produce offspring. It was calculated that based on the number of available breeding females and considering average clutch size and hatch rate, the quota of 65,000 could be reached by offspring from those breeders. This offspring should however be labelled source code “F” then. Furthermore, management measures should be established to ensure that such specimens indeed were produced in these facilities and not derived from gravid females being collected.
- The report did not mention the presence of mature males in those facilities, which would be required for breeding (F1) in captivity. In order to accept source code F also here management measures should set up to verify if breeding is taking place, which includes the presence of males.
- The adoption of a size limit of 15 cm that already applies to “ranching” specimens would be useful along with potential quotas for all source codes to ensure that mature individuals are not traded.
- Whatever system is used, Togo should, when working towards implementation of the long-term recommendations, ensure that source codes are correctly applied and establish wild offtake is non-detrimental.
- In that sense it can be highly welcomed that Togo presented results of recent density estimates for all five areas where most harvest takes place and also where the “breeding farms” are located. These numbers suggest that the species is still abundant in these areas, assuming that a certain offtake for breeding purposes or ranching may not be detrimental to the species. However, in the present report it is a bit difficult to comprehend the results and methods in table 2. For example, it says that for lake Togo the density on 5 km was 0.5, which would relate to a capture of 2.5 specimens. A repetition of this type of monitoring might be a useful part for the long-term actions under v) and vi) when developing population monitoring as basis for adaptive management.
- Based on the data provided and acknowledging that *P. regius* is a generalist species with a wide distribution, thriving in diverse habitats maturing with 28-32 month and laying in average 8 eggs that a certain offtake can be considered non-detrimental to the survival of the species. Overall, it can be

acknowledged that Togo is making progress towards making a robust NDFs for the species, noting the need to establish an adaptive management with measures to ensure adherence also with respect to application of source codes.

- Togo should be encouraged to work towards ranching in line with the Resolution Conf. 11.16 (Rev. CoP15) and also captive-breeding could be further promoted rather than collection of gravid females, noting the potential need for further capacity building activities in this respect. In a short term, the adoption of size limits for exports of all source codes might be a further safeguard ensuring sustainability.
- -Some additional comments were noted on the NDF as follows:
  - The information provided lacks population size and trend data (though reported to be widespread). The only abundance value is presented through a Kilometric Abundance Index (5 sites, totaling no more than 50 linear kilometers, with abundances of 0.9–0.9 ind/km). Details of the method used, dates, considerations, representativeness of the sampling, etc., are unknown.
  - Unclear how the release of gravid females collected for their eggs is monitored or regulated.
  - No management plan is in place.
  - No monitoring of the production of specimens among collectors and breeding farms is mentioned.
- It is recommended that the Togo – *Python regius* combination should remain in the RST process until a better assessment of the level of illegal cross-border trade is given, we see export volumes keep within quota, and a systematic population monitoring programme is in place which will determine if the current level of trade is sustainable.
- A member suggested that Togo establish, in consultation with the Secretariat and the Chair of the Animals Committee, an interim conservative annual export quota for source codes W and R for *Python regius* and communicate the quota to the Secretariat. The export quota should be justified as conservative based on estimates of sustainable offtake that make use of available scientific information (recommendation iii). This interim conservative export quota should be published and retained, until additional information is obtained.
- In addition, given concerns regarding ranching facilities/production systems and potential misapplication of source codes for trade in *Python regius* from Togo, the AC may want to recommend to look at *Python regius*/Togo within the process of Review of trade in animal specimens reported as produced in captivity, in accordance with Resolution Conf. 17.7 (Rev. CoP18).

### **Uzbekistan /*Testudo horsfieldii***

- As of 13 December 2024, no export quota has been reported on the Export Quota database by Uzbekistan for *Testudo horsfieldii* since 2022.
- On page 13 of Uzbekistan's documentation, it is noted "The CITES Management Authority of Uzbekistan hopes to eliminate the seizure [note: 'capture' or 'collection'?] of wild tortoises. There is an intention to increase the number of ranching, captive bred and farmed species [note: presumably 'specimens' is meant], with subsequent introduction of 10% into habitats annually." – this appears consistent with a zero W quota but not a zero R quota. However, Uzbekistan's definition of 'R' on page 1 does not correspond to the CITES definition of Ranching, and clarification of what UZ means with production system R is desirable.
- The documentation submitted by Uzbekistan combines information both on captive production (Res.Conf.17.7) and Wild and Ranching sources (Res.Conf.12.8); on page 13 it is explained that the 2020 and 2021 exports were the remaining balance of W quotas of earlier years. However, looking at the CITES trade database, there are records of \*exporter-declared\* trade volumes of W tortoises that greatly exceed the 2020 and 2021 numbers on page 13 (Trade database: 2020: >21,500, 2021: 7401), and the trade database shows exporter-declared W- and R-sourced exports continuing well into 2022 (W: 500 to DE, 3000 to IT, 200 to NL; R: 500 to DE, 500 to GB, 500 to IT, 600 to KP (typo for KR, which reported corresponding import numbers?), 300 to NL, 7125 to US).



- On pages 2-3 of Uzbekistan's report, the sources of animals obtained as additional breeding stock are listed, but not the quantities. One could assume that all seized animals are added as breeding stock, which would amount to some 38,000 animals. This is probably more supplementary stock than needed.
- After Uzbekistan submits a zero quota to the Secretariat for sources W and R and this is published on the CITES website, and assuming that Uzbekistan will not continue to issue export permits using these source codes for the species, the species combination *Testudo horsfieldii* – Uzbekistan may be removed from the Review of Significant Trade.
- Should Uzbekistan wish to continue or resume exporting animals under source code R, then clarification is needed what exactly the production process is from which animals are coded as 'R', and possibly a different code may be applicable, or UZ will need to provide a detailed NDF for its R operations before permitting exports.