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

Resolution Conf. 17.7 (Rev. CoP19) on *Review of trade in animal specimens reported as produced in captivity*

IMPLEMENTATION OF RESOLUTION CONF. 17.7 (REV. COP19)

1. This document has been prepared by the Secretariat, following consultation with the Members of the Animals Committee through its Chair.

2. Resolution Conf. 17.7 (Rev. CoP19) on *Review of trade in animal specimens reported as produced in captivity* concerns trade in specimens traded under source codes C, D, F or R, as defined in paragraph 3 r) of Resolution Conf. 12.3 (Rev. CoP19) on *Permits and certificates*. The Animals Committee, together with the Standing Committee and in cooperation with the Secretariat, is directed to play a key role in the implementation of Resolution Conf. 17.7 (Rev. CoP19).

3. This document reports on the implementation of Resolution Conf. 17.7 (Rev. CoP19) and is structured in two sections, as follows:

   – **Section 1** provides an update on the progress since the last overview of cases subject to review under Resolution Conf. 17.7 (Rev. CoP19) was presented at the 77th meeting of the Standing Committee (SC77; Geneva, November 2023) in document SC77 Doc. 36.

   – **Section 2** contains actions taken by Parties to implement recommendations made by the Animals Committee and the Standing Committee to ensure compliance with the obligations of Article III and IV and Article VII, paragraph 4 and 5 of the Convention.

Section 1 – Overview

4. The Secretariat last produced a record of the status of the species/country combinations included in the *Review of trade in animal specimens reported as produced in captivity* as outlined in paragraph 3 b) of the Resolution, following the second iteration of the Resolution at the 33rd meeting of the Animals Committee (AC33; Geneva, July 2024; see document AC33 Doc. 15.1). The summary record AC33 SR contains the recommendations of the Animals Committee on the cases considered at AC33.

Outcome of the 77th meeting of the Standing Committee (SC77; Geneva, November 2023)

5. At SC77, the Standing Committee considered document SC77 Doc. 36 in which the Secretariat reported on actions taken by Parties to implement recommendations made by the Animals Committee and Standing Committee in order to ensure compliance with the obligations of Article III and IV and Article VII, paragraph 4 and 5 of the Convention, for the 11 cases that were retained in the review of trade in animal specimens reported as produced in captivity following the 74th and 75th meetings of the Standing committee (SC74, Lyon, March 2022 and SC75; Panama, November 2022). Additionally, at its 32nd meeting (AC32; Geneva, June 2023), the Animals Committee identified 21 species/country combinations for review, using the criteria specified in paragraph 2 a) of Resolution Conf. 17.7 (Rev. CoP19).

6. The Secretariat wrote to all Parties concerned on 19 December 2023 to inform them of the outcomes of the discussions that took place at SC77. For those retained in the review, the Secretariat requested updates by 1 March 2024 so that the matter could be considered at AC33.

Outcome of the 33rd meeting of the Animals Committee (AC33; Geneva, July 2024)

7. The Animals Committee considered documents AC33 Doc. 15.1 and AC33 Doc.15.2 and agreed to remove the following species/country combinations from the review (see summary record AC33 SR, agenda item 15):

    - *Batagur borneoensis* / United States of America
    - *Cheilinus undulatus* / Indonesia
    - *Chlamydotis undulata* / Morocco
    - *Ctenosaura quinquecarinata* / Nicaragua
    - *Ctenosaura similis* / Nicaragua
    - *Gecko gecko* / Indonesia
    - *Hirudo medicinalis* / Azerbaijan
    - *Kinyongia boehmei* / Kenya
    - *Macaca fascicularis* / Indonesia
    - *Nectophrynoides asperginis* / United States of America
    - *Varanus exanthematicus* / Ghana

8. The Committee also agreed to retain the following species/country combinations in the review:

    - *Agalychnis callidryas* / Nicaragua
    - *Chlamydotis macqueenii* / Kazakhstan
    - *Dendrobatus auratus* / Nicaragua
    - *Macaca fascicularis* / Cambodia
    - *Macaca fascicularis* / Philippines
    - *Macaca fascicularis* / Viet Nam
    - *Oophaga pumilio* / Nicaragua
    - *Testudo graeca* / Jordan
    - *Testudo horsfieldii* / Uzbekistan
    - *Testudo kleinmanni* / Egypt
    - *Testudo kleinmanni* / Syrian Arab Republic

9. In accordance with paragraph 1 j) of Resolution Conf. 17.7 (Rev. CoP19), for those species/country combinations where trade is not considered to be in compliance with Article III and IV of the Convention, as well as Article VII, paragraphs 4 and 5, the Animals Committee, in consultation with the Secretariat, formulated draft recommendations directed to the relevant country which are time-bound, feasible, measurable, proportionate, transparent, and aimed at ensuring long-term compliance which, where appropriate, aim to promote capacity-building and enhance the ability of the country to implement relevant provisions of the Convention. These recommendations can be found in the AC33 Summary Record

10. The Secretariat wrote to all Parties concerned on 12 August 2024 to inform them of the outcomes of the discussions that took place at AC33. For those retained in the review, the Secretariat requested updates by 30 September 2024 so that the matter could be considered at SC78. In Section 2 of the present document, the Secretariat reports on actions taken by Parties to implement recommendations by the Animals Committee and the Standing Committee.

11. The Animals Committee agreed to propose to the Conference of the Parties the following amendment to paragraph 2 h) of Resolution Conf. 17.7 (Rev. CoP19) on *Review of trade in animal specimens reported as produced in captivity*: (new text is underlined)

> *The Secretariat shall also commission, if requested by the Animals Committee, a short review of the species concerned, in consultation with relevant countries and specialists, to compile and summarise known information relating to the breeding biology and captive husbandry, as well as on the conservation status and threats to the species in the respective countries of origin of the founder stock to facilitate an assessment of any impacts, if relevant, of removal of founder stock from the wild.*

12. At AC33, the Animals Committee also agreed to submit the following draft decision to the Standing Committee for consideration at its 78th meeting.

Directed to the Secretariat

20.AA Subject to external funding and available Secretariat resources, the Secretariat shall develop, test and maintain a Captive Breeding tracking and management database as an essential tool for the effective implementation and transparency of the process under Resolution Conf. 17.7 (Rev. CoP19) on *Review of animal specimens reported as produced in captivity*.

13. Details of the 44 cases of species/country combinations that have been selected for the review of trade in animal specimens reported as produced in captivity during the two iterations to date are presented in tables in Annex 1 [Table 1 – Species selected by the Animals Committee for the review at AC29 (post CoP17) and Table 2 – Species selected by the Animals Committee for the review at AC32 (post CoP19)], arranged alphabetically by taxon. A table of the 14 current ongoing cases, arranged alphabetically by Party, is presented in Annex 2 to this document.

Section 2 – Implementation of the recommendations from the Animals Committee

14. In this section, the Secretariat reports on actions taken by Parties to implement recommendations made by the Animals Committee and Standing Committee in order to ensure compliance with the obligations of Article III and VI as well as Article VII, paragraph 4 and 5 of the Convention, for the 14 cases that were retained in the review of trade in animal specimens reported as produced in captivity following SC74, SC75 and SC77.

15. Concerning three of these cases, which were retained in the review from the first iteration of Resolution Conf. 17.7 (Rev. CoP18) in July 2017, the Secretariat wrote to Benin, Mali and Togo on 27 August 2024 concerning trade in *Centrochelys sulcata* inviting them to provide an update by 30 September 2024 so that these cases can be considered at SC78. At the time of writing, no response or new information had been received from Benin, Mali or Togo. The Standing Committee may wish to urge these Parties to provide a response to the Secretariat by 31 July 2025 so that the matter can be considered at SC79, noting that failure to provide a response may potentially result in a recommendation to suspend trade in *Centrochelys sulcata* at SC79.

16. For the remaining 11 cases that were selected at AC32 ahead of SC78, in accordance with paragraph 2 o) of Resolution Conf. 17.7 (Rev. CoP19) on *Review of trade in animal specimens reported as produced in captivity*, the Members of the Animals Committee were invited to provide their comments on the implementation of the Resolution to inform the review by the Standing Committee at the present meeting. The comments of the Members of the Animals Committee have been taken into consideration in the Secretariat's assessment and recommendations. The details of the Animals Committee's comments are presented in Annex 4.

17. The tables in Annex 3 contain the following information for the 11 species/country combinations to be reviewed by SC78 that were selected at AC32, arranged in alphabetical order by species:

Heading = Species / country combination concerned

Column 1 = Recommendations from AC32 (where AC33 recommended asking the same questions again, those questions are included as a note[1])

Column 2 = Summary of response from the Party concerned

[1] *See Annex of document AC30 Doc. 13.1 for details of questions.*

Column 3 = Assessment and recommendation of Secretariat, following consultation with the Animals Committee

Responses from Parties

18. At the time of writing, the Secretariat received responses from Cambodia, Egypt, Jordan, Nicaragua, the Philippines, the Syrian Arab Republic, Uzbekistan and Viet Nam. A summary of the responses received from Parties are provided in the tables in Annex 3, while more comprehensive responses can be found in Annexes 5a to 5f to the present document, in the language and format received.

19. Concerning *Macaca fascicularis* / Cambodia, the United States of America reached out to the Secretariat and the Chair of the Animals Committee, and shared information on investigations conducted by authorities in the United States of America regarding *Macaca fascicularis* exported from Cambodia (also see document SC78 Doc. 38.1, paragraphs 10-11), including an analysis of the possible production rates from the captive-breeding facilities, based on the information it had previously obtained from Cambodia. The information was made available to the Members of the Animals Committee for consideration in their deliberations and to Cambodia.

Conclusions of the Secretariat on implementation of recommendations

20. Based on the information available, the Secretariat recommends that the Standing Committee recommend that all Parties suspend trade in the following species/country combination:

    - *Macaca fascicularis* / Cambodia

21. The Secretariat recommends that the following species/country combinations be retained in the review until such time as they address the recommendations of the Standing Committee as contained in paragraph 25 below:

    - *Agalychnis callidryas* / Nicaragua
    - *Centrochelys sulcata* / Benin
    - *Centrochelys sulcata* / Mali
    - *Centrochelys sulcata* / Togo
    - *Chlamydotis macqueenii* / Kazakhstan
    - *Dendrobatus auratus* / Nicaragua
    - *Macaca fascicularis* / Philippines
    - *Macaca fascicularis* / Viet Nam
    - *Oophaga pumilio* / Nicaragua
    - *Testudo graeca* / Jordan
    - *Testudo horsfieldii* / Uzbekistan
    - *Testudo kleinmanni* / Egypt
    - *Testudo kleinmanni* / Syrian Arab Republic

Other matters referred from SC77

22. Concerning *Macaca fascicularis* from Viet Nam, the Animals Committee agreed to raise concerns to the Standing Committee in relation to the inspection process and the source of the information used in the response from Viet Nam. Concerning *Testudo kleinmanni* from Egypt, the Animals Committee agreed to inform the Standing Committee of the fact that none of the breeding facilities in Egypt have been registered in compliance with Resolution Conf. 12.10 (Rev. CoP15) on *Registration of operations that breed Appendix-I animal species in captivity for commercial purposes*.

23. At SC77, the Standing Committee requested the Secretariat to develop guidance for situations where the founding stock was acquired before the species was listed on CITES or before the Party concerned joined the Convention and report to SC78. The Secretariat's guidance on this issue can be found in document SC78 Doc. 47 on *Legal acquisition findings*.

24. As requested by the Standing Committee at SC77, the Secretariat is reaching out to the Parties in Table 7 of Annex 2 to document SC77 Doc. 36 to inquire about the source codes used and any reporting inconsistencies and will report orally to the present meeting on any issues that arise.

Recommendations

25. The Standing Committee is invited to:

    a) note the status of implementation of the cases selected for the two iterations of the review under Resolution 17.7 (Rev. CoP19) and the list of 14 current ongoing cases provided in Annexes 1 and 2 respectively;

    b) concerning *Centrochelys sulcata* from Benin, Mali and Togo, urge Benin, Mali and Togo to provide a response to the Secretariat by 31 July 2025 so that the matter can be considered at SC79, noting that failure to provide a response may potentially result in a recommendation to suspend trade in *Centrochelys sulcata* at SC79;

    c) concerning *Agalychnis callidryas* from Nicaragua:

        i) retain *Agalychnis callidryas* from Nicaragua in the review, until it provides:

            A. further clarifications on when the prohibition on taking this species from the wild came into force; when the three registered facilities were established; whether there are additional captive-breeding facilities that do not export and how they sourced their founder stock; and

            B. information on the current stock, production and mortality rates; and

        ii) encourage Nicaragua to provide a response to the Secretariat by 30 January 2026 so that the matter can be considered at AC34;

    d) concerning *Chlamydotis macqueenii* from Kazakhstan:

        i) retain *Chlamydotis macqueenii* from Kazakhstan in the review, until it responds to the Animals Committee's questions; and

        ii) encourage Kazakhstan to provide a response to the Secretariat by 30 January 2026 so that the matter can be considered at AC34;

    e) concerning *Dendrobatus auratus* from Nicaragua:

        i) retain *Dendrobates auratus* from Nicaragua in the review, until it provides:

            A. further clarifications on when the prohibition on taking this species from the wild came into force; when the three registered facilities were established; whether there are additional captive-breeding facilities that do not export and how they sourced their founder stock; and

            B. information on the current stock, production and mortality rates; and

        ii) encourage Nicaragua to provide a response to the Secretariat by 30 January 2026 so that the matter can be considered at AC34;

    f) concerning *Macaca fascicularis* from Cambodia:

        i) recommend that all Parties suspend trade in specimens of *Macaca fascicularis* from Cambodia until such time as it:

            A. provides clarification on how breeding stocks are replaced and if they are experiencing a reduction in reproductive output when breeding with F1 and subsequent generations;

            B. provides information to address the main observations that productivity in 5 of the 6 registered facilities is disproportionately high relative to what is considered as biologically possible; and

C. indicates what measures have been implemented to ensure that laundering of wild specimens does not occur through any of the facilities;

ii) encourage Cambodia to implement proper logbook keeping, including all births and deaths as well as relations (pedigree), and preferably combined with genetic parenthood tests, where appropriate, in order to monitor reproduction rates and to identify cases of potential incorrect application of source code C; and

iii) encourage Cambodia to provide a response to the Secretariat by 30 January 2026 so that the matter can be considered at AC34;

g) concerning *Macaca fascicularis* from the Philippines:

i) retain *Macaca fascicularis* from the Philippines in the review, until it clarifies whether:

A. the collection quota of 8,000 wild individuals is a one-off or an annual quota;

B. the collection is done under a wildlife permit; and

C. how it has been determined that these offtakes are not detrimental to the survival of the species in the wild; and

ii) encourage the Philippines to provide a response to the Secretariat by 30 January 2026 so that the matter can be considered at AC34;

h) concerning *Macaca fascicularis* from Viet Nam:

i) retain *Macaca fascicularis* from Viet Nam in the review, until it provides clarification on the following:

Regarding satellite farms (additional domestic breeding facilities that supply stocks to the four facilities that export M. fascicularis*):*

A. the number of additional domestic breeding facilities (satellite farms) in Viet Nam apart from the four that are specifically mentioned in the response to the questions posed by the Animals Committee;

B. the capacity of these satellite farms in terms of volume of off-spring produced,

C. information relating to when they were established and if the founder stock were sourced from the wild (if before 2006);

D. whether these satellite farms only breed to supply exporting facilities; and

E. whether these satellite farms are registered and inspected in the same manner as the four facilities breeding for export and whether they follow the same rules (including logbook keeping);

Regarding all facilities keeping and breeding M. fascicularis referred to by Viet Nam:

F. measures implemented to ensure that laundering of wild specimens does not occur through any of the facilities; and

ii) encourage Viet Nam to provide a response to the Secretariat by 30 January 2026 so that the matter can be considered at AC34;

i) concerning *Oophaga pumilio* from Nicaragua:

i) retain *Oophago pumilio* from Nicaragua in the review, until it provides:

A. further clarifications on when the prohibition on taking this species from the wild came into force; when the three registered facilities were established; whether there are additional captive-breeding facilities that do not export and how they sourced their founder stock; and

B. information on the current stock, production and mortality rates; and

ii) encourage Nicaragua to provide a response to the Secretariat by 30 January 2026 so that the matter can be considered at AC34;

j) concerning *Testudo graeca* from Jordan:

i) retain *Testudo graeca* from Jordan in the review, until it provides details of:

A. the current breeding stock and production rates, and

B. the shift in source codes and the ages and sizes of animals exported; and

ii) encourage Jordan to provide a response to the Secretariat by 30 January 2026 so that the matter can be considered at AC34;

k) concerning *Testudo horsfieldii* from Uzbekistan:

i) retain *Testudo horsfieldii* from Uzbekistan in the review, until it provides clarifications on:

A. the productivity of each breeding facility/nursery; and

B. the founder stock of each facility, including when each one was established and what supplementation from the wild has occurred; and

ii) encourage Uzbekistan to:

A. consider paragraph 21 in Resolution Conf. 14.7 (Rev. CoP15) on *Management of nationally established export quotas* that provides guidance on *Quotas not fully utilized in a particular year;* and

B. provide a response to the Secretariat by 30 January 2026 so that the matter can be considered at AC34;

l) concerning *Testudo kleinmanni* from Egypt:

i) retain *Testudo kleinmanni* from Egypt in the review, until further clarifications on the non-detriment finding for the establishment of the founder stock are provided;

ii) request the Secretariat to publish a zero-quota for trade in *T. kleinmanni* for commercial purposes (all source codes);

iii) request Egypt to register its breeding facilities for *T. kleinmanni* if it intends to export this Appendix-I species for commercial purposes; and

iv) encourage Egypt to provide a response to the Secretariat by 30 January 2026 so that the matter can be considered at AC34;

m) concerning *Testudo kleinmanni* from the Syrian Arab Republic,

i) retain *Testudo kleinmanni* from the Syrian Arab Republic in the review, until it provides clarification on:

A. the identification of the species (*Testudo kleinmanni* or *Testudo graeca*, the latter of which is native to the Syrian Arab Republic);

B. the founder stock (information relating to legal acquisition and non-detriment findings, if it is confirmed to be *Testudo kleinmanni*);

C. supplementation from the wild, if applicable; and

D. annual production and retention rates;

ii) request the Syrian Arab Republic to register its breeding facilities for *T. kleinmanni* if it intends to export this Appendix-I species for commercial purposes; and

iii) encourage the Syrian Arab Republic to provide a response to the Secretariat by 30 January 2026 so that the matter can be considered at AC34;

n) review and agree to submit the Animals Committee's proposed amendment to paragraph 2 h) of Resolution Conf. 17.7 (Rev. CoP19) on *Review of trade in animal specimens reported as produced in captivity* as outlined in paragraph 11 to CoP20 (also shown below for convenience):

The Secretariat shall also commission, if requested by the Animals Committee, a short review of the species concerned, in consultation with relevant countries and specialists, to compile and summarise known information relating to the breeding biology and captive husbandry, as well as on the conservation status and threats to the species in the respective countries of origin of the founder stock to facilitate an assessment of any impacts, if relevant, of removal of founder stock from the wild.

o) review and agree to submit the draft decision in paragraph 12 to CoP20 (also shown below for convenience):

Directed to the Secretariat

20.AA Subject to external funding and available Secretariat resources, the Secretariat shall develop, test and maintain a Captive Breeding tracking and management database as an essential tool for the effective implementation and transparency of the process under Resolution Conf. 17.7 (Rev. CoP19) on *Review of animal specimens reported as produced in captivity*.

PROGRESS IN THE IMPLEMENTATION OF THE
REVIEW OF TRADE IN ANIMAL SPECIMENS REPORTED AS PRODUCED IN CAPTIVITY

Key: AC = Animals Committee; SC = Standing Committee

Table 1: Species selected by the Animals Committee for the review at AC29 (post CoP17) arranged in alphabetical order by species.

Taxon selected	Reference document(s)	Status of review
Agalychnis callidryas	AC30 Com. 7. (Rev) AC30 Summary Record	Removed for **Nicaragua** at AC30.
Cacatua alba	SC77 Doc. 36 SC77 Summary Record	Removed for **Indonesia** at SC77.
Centrochelys sulcata	SC77 Doc. 36 SC77 Summary Record	Ongoing for **Benin, Mali and Togo.** Removed for **Guinea** and **Sudan** at SC77. Removed for **Ghana** following SC77 with the publication of a maximum size limit of 15cm straight carapace length with its export quota.
Geochelone elegans	SC77 Doc. 36 SC77 Summary Record	Removed for **Jordan** at SC77.
Hippocampus comes	SC77 Doc. 36 SC77 Summary Record	Removed for **Viet Nam** at SC77.
Lorius lorus	AC30 Com. 7 (Rev) AC30 Summary Record	Removed for **South Africa** at AC30.
Macaca fascicularis	AC30 Com. 7 (Rev) AC30 Summary Record	Removed for **Cambodia** at AC30.
Oophaga pumilio	SC74 Doc. 55 SC74 Summary Record	Removed for **Nicaragua** and **Panama** at SC74.
Ornithoptera croesus	SC74 Doc. 55 SC74 Summary Record	Removed for **Indonesia** at SC74.
Ptyas mucosus	AC30 Com. 7 (Rev) AC30 Summary Record	Removed for **Indonesia** at AC30.
Testudo hermanni	SC77 Doc. 36 SC77 Summary Record	Removed for **North Macedonia** at SC77.
Trachyphyllia geoffroyi	AC30 Com. 7 (Rev) AC30 Summary Record	Removed for **Indonesia** at AC30.
Tridacna crocea	AC30 Com. 7 (Rev) AC30 Summary Record	Removed for **Micronesia (Federated States of)** at AC30.
Varanus exanthematicus	SC77 Doc. 36 SC77 Summary Record AC30 Com. 7 (Rev) AC30 Summary Record	Removed for **Ghana** at AC33. Removed for **Togo** at AC30.
Varanus timorensis	SC74 Doc. 55 SC74 Summary Record	Removed for **Indonesia** at SC74.
Vulpes zerda	SC77 Doc. 36 SC77 Summary Record	Removed for **Sudan** at SC77.

Table 2: Species selected by the Animals Committee for the review at AC32 (post CoP19) arranged in alphabetical order by species.

Taxon selected	Reference document(s)	Status of review
Agalychnis callidryas	AC32 Doc. 15.1 AC32 SR	Ongoing for **Nicaragua** See document AC33 Doc. 15.2
Batagur borneoensis	AC32 Doc. 15.1 AC32 SR AC33 Doc 15.2	Removed for the **United States of America** at AC33
Cheilinus undulatus	AC32 Doc. 15.1 AC32 SR AC33 Doc 15.2	Removed for **Indonesia** at AC33
Chlamydotis macqueenii	AC32 Doc. 15.1 AC32 SR	Ongoing for **Kazakhstan** See document AC33 Doc. 15.2
Chlamydotis undulata	AC32 Doc. 15.1 AC32 SR AC33 Doc. 15.2	Removed for **Morocco** at AC33
Ctenosaura quinquecarinata	AC32 Doc. 15.1 AC32 SR AC33 Doc. 15.2	Removed for **Nicaragua** at AC33
Ctenosaura similis	AC32 Doc. 15.1 AC32 SR AC33 Doc. 15.2	Removed for **Nicaragua** at AC33
Dendrobatus auratus	AC32 Doc. 15.1 AC32 SR	Ongoing for **Nicaragua** See document AC33 Doc. 15.2
Gecko gecko	AC32 Doc. 15.1 AC32 SR AC33 Doc. 15.2	Removed for **Indonesia** at AC33
Hirudo medicinalis	AC32 Doc. 15.1 AC32 SR AC33 Doc. 15.2	Removed for **Azerbaijan** at AC33 See document AC33 Doc. 15.2
Kinyongia boehmei	AC32 Doc. 15.1 AC32 SR AC33 Doc 15.2	Removed for **Kenya** at AC33
Macaca fascicularis	AC32 Doc. 15.1 AC32 SR AC33 Doc. 15.2	Ongoing for **Cambodia, Philippines** and **Viet Nam** Removed for **Indonesia** at AC33
Nectophrynoides asperginis	AC32 Doc. 15.1 AC32 SR AC33 Doc. 15.2	Removed for the **United States of America** at AC33
Oophaga pumilio	AC32 Doc. 15.1 AC32 SR	Ongoing for **Nicaragua** See document AC33 Doc. 15.2
Testudo graeca	AC32 Doc. 15.1 AC32 SR	Ongoing for **Jordan** See document AC33 Doc. 15.2
Testudo horsfieldii	AC32 Doc. 15.1 AC32 SR	Ongoing for **Uzbekistan** See document AC33 Doc. 15.2
Testudo kleinmanni	AC32 Doc. 15.1 AC32 SR	Ongoing for **Egypt** and the **Syrian Arab Republic** See document AC33 Doc. 15.2

SPECIES/COUNTRY COMBINATIONS CURRENTLY
IN THE REVIEW OF TRADE IN ANIMAL SPECIMENS
REPORTED AS PRODUCED IN CAPTIVITY (AS OF NOVEMBER 2024)

Countries are arranged in alphabetical order, with the relevant species in the second column. The final column indicates when the species/range States combination was last discussed.

Country	Species	Status / Comments
Benin	*Centrochelys sulcata*	Selected at AC29. Last reviewed at AC33.
Cambodia	*Macaca fascicularis*	Selected at AC32. Last reviewed at AC33. To be reviewed at this meeting.
Egypt	*Testudo kleinmanni*	Selected at AC32. Last reviewed at AC33. To be reviewed at this meeting.
Jordan	*Testudo graeca*	Selected at AC32. Last reviewed at AC33. To be reviewed at this meeting.
Kazakhstan	*Chlamydotis macqueenii*	Selected at AC32. Last reviewed at AC33. To be reviewed at this meeting.
Mali	*Centrochelys sulcata*	Selected at AC29. Last reviewed at AC33.
Nicaragua	*Dendrobatus auratus*	Selected at AC32. Last reviewed at AC33. To be reviewed at this meeting.
	Oophaga pumilio	Selected at AC32. Last reviewed at AC33. To be reviewed at this meeting.
	Agalychnis callidryas	Selected at AC32. Last reviewed at AC33. To be reviewed at this meeting.
Philippines	*Macaca fascicularis*	Selected at AC32. Last reviewed at AC33. To be reviewed at this meeting.
Syrian Arab Republic	*Testudo kleinmanni*	Selected at AC32. Last reviewed at AC33. To be reviewed at this meeting.
Togo	*Centrochelys sulcata*	Selected at AC29. Last reviewed at AC33.
Uzbekistan	*Testudo horsfieldii*	Selected at AC32. Last reviewed at AC33. To be reviewed at this meeting.
Viet Nam	*Macaca fascicularis*	Selected at AC32. Last reviewed at AC33. To be reviewed at this meeting.

UPDATE ON SPECIES / COUNTRY COMBINATIONS SELECTED FOR THE REVIEW OF TRADE IN ANIMAL SPECIMENS OF SPECIES REPORTED TO BE PRODUCED IN CAPTIVITY AT AC32 AND RETAINED AT AC33

For each species / country combination the following is presented:

Heading = Species / country combination concerned (arranged in alphabetical order by species)
Column 1 = Recommendations from AC33 [where AC32 recommended asking the same questions again, those questions are included as a note (see Annex of document AC30 Doc. 13.1 for details of questions)]
Column 2 = Summary of response from the Party concerned
Column 3 = Assessment and recommendation of Secretariat, following consultation with the Animals Committee

1. *Agalychnis callidryas* / Nicaragua

Recommendations from AC33	**Response from Party**	**Assessment and recommendation of Secretariat, following consultation with the Animals Committee**
The Animals Committee agreed to retain the species/country combination, but to acknowledge the efforts made by Nicaragua to respond to the questions posed by the Animals Committee. The Animals Committee requested Nicaragua to provide an individual response to the questions concerning *A, callidryas* and to provide more information, in particular on the acquisition of the founder stock and the mortality rates within the facilities.	Nicaragua confirmed in its response that it has three registered breeding facilities for *Agalychnis callidryas*. specimens. The Secretariat notes that these are the same facilities registered to breed and export *Dendrobatus auratus* and *Oophaga pumilio.* Regular inspections of breeding facilities are conducted by a commission of multiple agencies, including Ministerio del Ambiente y de los Recursos Naturales (MARENA), local municipal environmental units, and the police. These inspections verify compliance with regulations, including the number of breeding stock, offspring, and overall sanitary and husbandry practices. Inspection results are documented in detailed reports, including photographs and conclusions.	Assessment Nicaragua has provided an individual response for *Agalychnis callidryas* as requested. However, the response is lacking details on the acquisition of the founder stock and the mortality rates within the facilities. Further clarification is needed on the following: - when the prohibition on taking this species from the wild came into force; - when the three registered facilities were established; - whether there are additional captive breeding facilities that do not export and how they sourced their founder stock.

	Breeding stock (pie de cría) must be acquired exclusively from authorized captive breeding establishments within Nicaragua. The collection of specimens from the wild is strictly prohibited, and acquisition must be supported by purchase invoices to ensure traceability and legal compliance. The report does not provide specific numerical data on mortality rate. It primarily discusses mortality during transport and within breeding facilities, caused by stress and overcrowding. It outlines preventative measures such as handling frogs with gloves to avoid disease transmission, ensuring gloves are free of harmful chemicals, regularly changing water to maintain cleanliness and health, etc. For full response see Annex 5a	In addition, details on the current stock, production and mortality rates are not provided. Recommendation **The Standing Committee is invited to:** **i) retain *Agalychnis callidryas* from Nicaragua in the review, until it provides:** **a. further clarifications on when the prohibition on taking this species from the wild came into force; when the three registered facilities were established; whether there are additional captive breeding facilities that do not export and how they sourced their founder stock; and** **b. information on the current stock, production and mortality rates; and** **ii) encourage Nicaragua to provide a response to the Secretariat by 30 January 2026 so that the matter can be considered at AC34.**
2. *Chlamydotis macqueenii* / Kazakhstan		
Recommendations from AC33	**Response from Party**	**Assessment and recommendation of Secretariat, following consultation with the Animals Committee**
The Animals Committee agreed to retain the species/country combination. The Animals Committee requested Kazakhstan to provide the response to the Animals Committee for its consideration. ***Note:*** *Questions asked following AC32 were C1, C2, C3, C4, C5, C6.*	No response was received from Kazakhstan.	Assessment Kazakhstan has not responded to the questions posed by the Animals Committee. Recommendation

		The Standing Committee is invited to: **i) retain *Chlamydotis macqueenii* from Kazakhstan in the review, until it responds to the Animals Committee questions; and** **ii) encourage Kazakstan to provide a response to the Secretariat by 30 January 2026 so that the matter can be considered at AC34.**
3. *Dendrobatus auratus* / Nicaragua		
Recommendations from AC33	**Response from Party**	**Assessment and recommendation of Secretariat, following consultation with the Animals Committee**
The Animals Committee agreed to retain the species/country combination, but to acknowledge the efforts made by Nicaragua to respond to the questions posed by the Animals Committee. The Animals Committee requested Nicaragua to provide an individual response to the questions concerning *D. auratus* and to provide more information, in particular on the acquisition of the founder stock and the mortality rates within the facilities.	The response from Nicaragua on the captive breeding of *Dendrobates auratus* confirms that there are three breeding facilities in Nicaragua registered for the captive breeding and exportation of *Dendrobates auratus*. specimens. It is noted that these are the same facilities registered to breed and export *Oophaga pumilio* and *Agalychnis callidryas*. These facilities collectively manage breeding stock to support sustainable export practices under the supervision of Nicaragua's Ministry of the Environment and Natural Resources (MARENA). The report provides the following details about the acquisition of breeding stock: - Breeding stock (*pie de cría*) must be acquired exclusively from authorized captive breeding establishments in Nicaragua.	<u>Assessment</u> Nicaragua has provided an individual response for *Dendrobatus auratus* as requested. However, the response is lacking details on the acquisition of the founder stock and the mortality rates within the facilities. Further clarification is needed on the following: - when the prohibition on taking this species from the wild came into force; - when the three registered facilities were established; - whether there are additional captive breeding facilities that do not export and how they sourced their founder stock. In addition, details on the current stock, production and mortality rates are not provided. <u>Recommendation</u> **The Standing Committee is invited to:**

	- The collection of specimens from the wild, including *Dendrobates auratus*, is strictly prohibited. - The acquisition of breeding stock must be supported by a **purchase invoice** to ensure legal compliance and traceability. - This policy ensures adherence to the sustainable practices outlined in national regulations, including Decree 8-98, which governs the trade and management of wildlife species. - The report emphasizes the prohibition of any collection of specimens from their natural habitats, reinforcing the commitment to conservation and the prevention of exploitation of wild populations. The report mentions mortality rates in the breeding facilities for *Dendrobates auratus*, but it does not provide specific numerical data or percentages. Instead, it discusses the causes and mitigation measures related to mortality. Mortality primarily occurs during transportation and, occasionally, within the breeding facilities (ranarios). The main causes are stress and overcrowding. Mitigation measures mentioned include careful handling, toxic residue control, water quality management: etc: Breeding facilities are required to report the mortality of breeding stock in their monthly reports to the administrative authority, but the report does not include a summary or specific data from these reports. For full response see Annex 5a	**i) retain *Dendrobates auratus* from Nicaragua in the review, until it provides:** **a. further clarifications on when the prohibition on taking this species from the wild came into force; when the three registered facilities were established; whether there are additional captive breeding facilities that do not export and how they sourced their founder stock; and** **b. information on the current stock, production and mortality rates; and** **ii) encourage Nicaragua to provide a response to the Secretariat by 30 January 2026 so that the matter can be considered at AC34.**

4. *Macaca fascicularis* / Cambodia

Recommendations from AC33	Response from Party	Assessment and recommendation of Secretariat, following consultation with the Animals Committee
The Animals Committee agreed to retain the species/country combination and requested Cambodia to provide clarifications about the high reproduction rates in writing to the Secretariat for review by the Animals Committee.	Cambodia provided a detailed response in writing to the Secretariat, following its oral presentation at AC33. Concerning the high production rates, Cambodia states the following: A) In natural and wild conditions, LTMs reach sexual maturity at the age of four years for females and six years for males. The females at higher rank of hierarchy will reach sexual maturity before the lower-ranking females. The species lives in a colony comprising several males and females, led by an alpha male. The number of females in the colony is always greater than males. This social organisation system allows this species to have multiple mating partners (polygynandrous/promiscuous mating) (Maharadatunkamsi et al., 2020). B) In captivity or in a controlled farm environment: female LTMs reach sexual maturity at the age of 3.5-4 years old, while the males reach it at 4-6 years old. C) The females have a gestation period of approximately 165 days with an average of one baby per pregnancy. In natural and wild conditions, the weaning period is 420 days, while at a farm in a controlled environment the weaning period can be as short as 100-120 days (0.70 - 0.80 kg/baby) to increase productivity.	<u>Assessment</u> Cambodia provided clarifications on the high production rates for *Macaca fascicularis* for review by the Animals Committee as requested. However, uncertainties remain with regards to the high production rates mentioned by Cambodia, which suggest that augmentation of the breeding stock may have taken place more regular than "occasionally" at least in three of the six facilities (2, 3, 6) and therefore source code C might not be applicable for these facilities. The Secretariat was made aware of concerns by a Party that the reported breeding output from five out of six of the captive-breeding facilities exceeds the biological capacity of the species to produce that number of offspring in captivity. A confidential lab report analysing the data previously provided by Cambodia was made available to the members of the Animals Committee and to Cambodia for their consideration, at the request of the Party that provided the lab report. In addition, discrepancies in the trade data indicate higher volumes reported by importing Parties than Cambodia as the exporter. <u>Recommendation</u> **The Standing Committee is invited to:** **i) recommend that all Parties suspend trade in specimens of *Macaca***

	Cambodia breeding farms employed techniques and modalities to optimize conditions for the breeding of LTMs resulting in an increase of up to 3 offspring in 2 years per breeding female. These actions can significantly increase breeding rates of LTM raised in captivity: • The cages have optimal facilities, well controlled environments, and clean sanitary conditions; • The breeding groups of monkeys are provided abundant nutrition and food supply; • Group breeding consistent with wild conditions: the ratio of male to female is typically around 1:12, or about 2 to 3 male monkeys, and 28 to 32 female monkeys are placed in two adjoining pens for group breeding. The pens are 80-90 cubic meters (pens are joined with two holes to allow the LTMs to go from pen to pen, with each of the pens having dimension of at least 3m x 6 m x 2.5 m); • Timely observation to determine pregnancy and animal conditions and then to isolate the pregnant females reduce abortion rate and promote readiness for birth; • Timely regrouping of lower ranking and lower productive female breeders, as well as introduction of new male breeders into breeding groups with extra food supply and toys to increase animal environment enrichment, prevent fighting, and obtain a more rapid harmony in the living environment; • Replacing non/low-productive male breeders or any male that is not willing to have sexual relationships with most female breeders in the group;	***fascicularis*** **from Cambodia until such time as it:** **a. provides clarification on how breeding stocks are replaced and if they are experiencing a reduction in reproductive output when breeding with F1 and subsequent generations;** **b. provides information to address the main observations that productivity in 5 of the 6 registered facilities is disproportionately high relative to what is considered biologically possible; and** **c. indicates what measures have been implemented to ensure that laundering of wild specimens does not occur through any of the facilities;** **ii) encourage Cambodia to implement proper logbook keeping, including all birth and death as well as relations (pedigree), and preferably combined with genetic parenthood tests, where appropriate, in order to monitor reproduction rates and to identify cases of potential incorrect application of source code C; and** **iii) encourage Cambodia to provide a response to the Secretariat by 30 January 2026 so that the matter can be considered at AC34.**

	• Introducing 2 or more male breeders per breeding group to achieve higher pregnancy rate per group; • Timely implementation of lactation: the lactation time of infant monkeys is set to be carried out around 100-120 days of age, until the infant monkeys can independently eat solid foods; • Intensive care and feedings for newly weaned babies resulting in higher adaption and survival after weaning; and, • Providing for a high number of available young female breeders (aged from 4-10 years old), which naturally have a higher productivity rate. Cambodia provided details from five facilities to explain the reproductive rates achieved. See full response in Annex 5b	
5. *Macaca fascicularis* / the Philippines		
Recommendations from AC33	**Response from Party**	**Assessment and recommendation of Secretariat, following consultation with the Animals Committee**
The Animals Committee agreed to retain the species/country combination and to ask the same questions again since the Philippines have not provided responses to the initial letter. ***Note:*** *Questions asked following AC32 were C1, C2, C3, C4, C5, C6*	In its cover letter, the Philippines reiterates "that the average annual exports of *M. fascicularis* captive-bred offsprings from CY 2018 to CY 2022 is only 452 individuals. Also, from 2016 to 2017, the Philippines has no exportation of live *M. fascicularis* due to commercial airline restrictions". Taking the information into consideration, Philippines is of the opinion that it has no significant trade of *M. fascicularis* covering the said period. The Philippines confirmed that there is only one captive breeding facility for monkeys (DMT). A	<u>Assessment</u> The Philippines has provided responses to the questions posed by the Animals Committee. The main concern outstanding is the regular augmentation from the wild. Philippines should be requested to clarify if the collection quota of 8,000 individuals from the wild under a wildlife permit for commercial purposes is an annual quota, or a one-off collection and how it is has been determined that this collection and

	breeding permit was first issued to DMT by DENR in 1991. Its initial breeding stocks totaling 1115 heads were acquired through Wildlife Collector's Permits issued by Department of Environment and Natural Resources (DENR) from years 1990 to 1995, in accordance with national policies/guidelines governing the trade of Long-tailed Macaque. Section 5 of the DENR AO 2004-55 provides the requirements and processes for the issuance of Wildlife Collector's Permit (WCP) and Wildlife Farm Permit (WFP). Below are the WCPs issued to DMT from 2009 to 2022: Wildlife Collector's Permit No. / Date issued / Quantity allowed for collection / No. of individuals actually collected WCPb 2009-19 / May 25, 2009 / 1923 / 479 WCPBMB 2020-01 / October 29, 2020 / 2500 / 2150 WCPBMB 2022-01 / February 23, 2022 / 350 / 350 Wildlife Collector's Permits WCPBMB 2020-01 and WCPBMB 2022-01 were granted to DMT as part of population management efforts to address human- animal conflict. Long-tailed macaques have been reported as pests to agricultural crops in many areas in the Philippines. These reports, duly validated by the DENR representatives and/or mammal expert and as deliberated by the Philippine Red List Committee for Wild Fauna led	previous collections are not detrimental to the survival of the species in the wild. <u>Recommendation</u> **The Standing Committee is invited to:** **i) retain *Macaca fascicularis* from the Philippines in the review, until it clarifies whether:** **a. the collection quota of 8,000 wild individuals is a one-off or an annual quota;** **b. the collection is done under a wildlife permit; and** **c. how it has been determined that these offtakes are not detrimental to the survival of the species in the wild; and** **ii) encourage the Philippines to provide a response to the Secretariat by 30 January 2026 so that the matter can be considered at AC34.**

	to the delisting of the long-tailed macaques from the Philippine List of Threatened Species in 2019. As part of the conditions on the issued wildlife permits, DMT regularly submits a quarterly inventory report to the nearest DENR Office, for validation/monitoring and reference for the issuance of CITES Export Permit. DENR states that it set a collection quota of 8,000 individuals of monkeys allowed for collection from the wild under a wildlife permit for commercial purposes, pursuant to the provisions of Act No. 2590 as amended, but the Secretariat notes that it is not clear if this is an annual quota. All breeders, progenies, and wildlife collections for export shall bear the official (tattoo) code prescribed by the Protected Areas and Wildlife Bureau (PAWB), now the Biodiversity Management Bureau (BMB). The authorized monkey collector must surrender the original transport permit/s issued by the DENR Region concerned to PAWB (now BMB) within three (3) days upon arrival of the animals in the respective farms for issuance by BMB of tattoo codes and weight inspection. See full response in Annex 5c	

6. *Macaca fascicularis* / Viet Nam

Recommendations from AC33	**Response from Party**	**Assessment and recommendation of Secretariat, following consultation with the Animals Committee**
The Animals Committee agreed to retain the species/country combination and requested Viet Nam to better clarify both the origin of the founder stock and the biological sustainability of the founder stock.	Viet Nam provided a very detailed response with an update on responses to questions C1 to C6 and further clarifications on: - Origins of the founder stock, and any addition to the founder stock if there is;	<u>Assessment</u> Viet Nam has provided responses to the questions posed by the Animals Committee. Vietnam clarified that the founder stock of the

In addition, the Animals Committee agreed to raise concerns to the Standing Committee in relation to the inspection process and the source of the information used in the responses described in the response from Viet Nam.	- The biological sustainability of the founder stock; - Inspection process in accordance with the laws; - Validation of the source of information reported. Viet Nam states that previously, *Macaca fascicularis* were imported from Laos and Cambodia to supplement breeding stocks. From 2011 to present, domestic breeding facilities the country no longer imports live *Macaca fascicularis* from abroad but only uses domestic sources to maintain breeding and reproduction for export. Detailed information is provided for 4 breeding facilities, which Viet Nam notes has been provided by the facilities and validated by the provincial Forest Protection Departments (PFPD). According to the regulations on inspection of farming activities as specified in Circular No. 26/2022/TT-BNNPTNT of the Ministry of Agriculture and Rural Development, the Viet Nam CITES Management Authority has the rights to request PFPD to provide relevant information, and to inspect, verify the origin, captive breeding and raising activities at the facilities when necessary. Annually, the PFPD will conduct at least two periodic inspections at the breeding facilities, normally happening in the middle and end of the year. These inspections check the records of the facility owner in the logbooks monitoring the breeding activities, check the actual number of individuals kept at the farm to serve as a basis for assessment of the reproduction capacity, and to verify information upon commercial sales transaction. As normal practice, at the periodic inspections at the end of the year, the PFPD preside over the inspections, in coordination with the Viet Nam	four facilities that export in some cases goes back to legal imports of long tailed macaques (LTM) mainly from Laos and Cambodia, which were reported under source code C, F or R, but could also be from other sources (such as for facility 1). All facilities regularly added further specimens from other “domestic legal breeding facilities” to complement their breeding stocks (in total 13.426 specimens were added to the four exporting facilities in five years from other facilities). For some of the four exporting facilities the added stock forms a large percentage of the overall breeding females. In relation to these possible “satellite farms” that may not actually export, Viet Nam could clarify the following: a) how many additional domestic breeding facilities (satellite farms) exist in Vietnam apart from the 4 that are specifically mentioned in the response? b) how large are these satellite farms, when were they established, did their founder stock come from the wild (if before 2006) and what volumes do they produce? c) if these satellite farms only breed to supply exporting facilities; and d) if these satellite farms are registered and inspected in the same manner as the four facilities breeding for export and follow the same rules (including logbook keeping)? e) how is it ensured that laundering of wild specimens does not occur through any of the facilities? Recommendation **The Standing Committee is invited to:**

	CITES Scientific Authority, Viet Nam CITES Management Authority, the local Animal Healthcare, Veterinary and Environment Authority to evaluate the overall captive breeding and raising activities of the facility. Although, according to regulations, the specimen marking for Long-tailed Macaques is not mandatory, all 04 (four) facilities have been marking the species with collars around their necks. These collars are numbered and contain information about gender and year of birth, allowing the authorities to check when necessary. See full response in Annex 5d	**i) retain *Macaca fascicularis* from Viet Nam in the review, until it provides clarification on the following:** **Regarding satellite farms (additional domestic breeding facilities that supply stocks to the four facilities that export *M. fascicularis*):** **a. the number of additional domestic breeding facilities (satellite farms) in Viet Nam apart from the 4 that are specifically mentioned in the response to the questions posed by the Animals Committee;** **b. the capacity of these satellite farms in terms of volume of off-spring produced,** **c. information relating to when they were established and if the founder stock were sourced from the wild (if before 2006);** **d. whether these satellite farms only breed to supply exporting facilities; and** **e. whether these satellite farms are registered and inspected in the same manner as the four facilities breeding for export and whether they follow the same rules (including logbook keeping).** **Regarding all facilities keeping and breeding *M. fascicularis*** **f. measures implemented to ensure that laundering of wild specimens does not occur through any of the facilities.** **ii) encourage Viet Nam to provide a response to the Secretariat by 30**

		January 2026 so that the matter can be considered at AC34.
7. *Oophaga pumilio* / Nicaragua		
Recommendations from AC33	**Response from Party**	**Assessment and recommendation of Secretariat, following consultation with the Animals Committee**
The Animals Committee agreed to retain the species/country combination, but to acknowledge the efforts made by Nicaragua to respond to the questions posed by the Animals Committee. The Animals Committee requested Nicaragua to provide an individual response to the questions concerning *O. pumilio* and to provide more information, in particular on the acquisition of the founder stock and the mortality rates within the facilities.	Nicaragua confirmed that there are currently three facilities registered with MARENA, the CITES administrative authority, that are exporting *Oophaga pumilio* specimens. It is noted that these are the same facilities registered to breed and export *Dendrobatus auratus* and *Agalychnis callidryas*. The report specifies the following about the acquisition of breeding stock for *Oophaga pumilio* in captive breeding facilities: Breeding stock (referred to as "pie de cría") must be obtained exclusively from other authorized captive breeding establishments within Nicaragua. It is strictly prohibited to collect specimens from the wild, including poison dart frogs (*Oophaga pumilio*), for use as breeding stock. The purchase of breeding stock must be documented with an official purchase invoice to ensure traceability and compliance with legal requirements. Nicaragua states that these measures are in place to prevent the depletion of wild populations and to ensure that captive breeding operations contribute to conservation rather than exploitation. Concerning the mortality rates within the facilities, the report does not include specific numerical data	<u>Assessment</u> Nicaragua has provided an individual response for *Oophaga pumilio* as requested. However, the response is lacking details on the acquisition of the founder stock and the mortality rates within the facilities. Further clarification is needed on the following: - when the prohibition on taking this species from the wild came into force; - when the three registered facilities were established; - whether there are additional captive breeding facilities that do not export and how they sourced their founder stock. In addition, details on the current stock, production and mortality rates are not provided. <u>Recommendation</u> **The Standing Committee is invited to:** **i) retain *Oophaga pumilio* from Nicaragua in the review, until it provides:** **a. further clarifications on when the prohibition on taking this species from the wild came into force; when the three registered facilities were established; whether there are additional captive breeding facilities**

	or percentages on mortality rates in the breeding facilities for *Oophaga pumilio*. It primarily discusses mortality during transport and within breeding facilities, caused by stress and overcrowding. It outlines preventative measures such as handling frogs with gloves to avoid disease transmission, ensuring gloves are free of harmful chemicals, regularly changing water to maintain cleanliness and health, etc. Facilities are required to submit monthly reports to the administrative authority, including data on the number of breeding pairs, births, and mortalities. However, the document itself does not include aggregated mortality statistics. For full response see Annex 5a	**that do not export and how they sourced their founder stock; and** **b. information on the current stock, production and mortality rates; and** **ii) encourage Nicaragua to provide a response to the Secretariat by 30 January 2026 so that the matter can be considered at AC34.**
8. *Testudo graeca* / Jordan		
Recommendations from AC33	**Response from Party**	**Assessment and recommendation of Secretariat, following consultation with the Animals Committee**
The Animals Committee agreed to retain the species/country combination as no response was received and requested the Secretariat to ask the same questions again. ***Note:*** *Questions asked following AC32 were C1, C2, C3, C4, C5, C6 In addition, explain the shift of source code Indicate the ages and sizes of animals exported*.	Jordan confirmed that there is only one breeding facility for the Greek Turtles (*Testudo graeca*), which "was established in 2001, and it was licensed since that time according to our national law and regulations, which is the Agriculture Law". The facility started two years after establishment (2003) according to the same person. It started by exporting 300 tortoises which were imported legally from Syria, as in Jordan this species is conserved and protected according to law, and it is considered illegal to collect it from the wild and sell it. Jordan states that the facility is under regular inspection and meets the required criteria for such purpose according to guidelines of Resolution	<u>Assessment</u> Jordan has provided satisfactory responses to questions C1, C3 and C6. Concerning C2, it is not clear if the facilities are required to keep records. Jordan indicates that the facility was established by imports from the Syrian Arab Republic but there is no record in the CITES trade database that could account for this (and it is not clear if these specimens were originally from the wild or captive bred). It may have been possible to collect specimens from the wild in Jordan back in 2003. Jordan may wish to clarify this. Jordan has also not provided an adequate response to C4 or C5 on the current breeding stock and production rates or evidence of an NDF for the establishment of the founder stock. The shift of source code and the ages and sizes

	Conf. 10.16 (Rev. CoP19), and that the facility has successfully bred F1/F2 since the year 2005. Concerning the inspection of the facilities, Jordan states that the facility is inspected regularly every 3-4 months. The Royal Society for the Conservation of Nature (RSCN), as the Management Authority of CITES, are the responsible authority to enforce the wildlife protection according to Agriculture Law and CITES regulations. The environmental police and any other entity responsible for implementing the laws such as Ministry of Agriculture, or Ministry of Environment can also make inspection visits whenever it is needed. Jordan further states that an unannounced check was carried out a couple of years ago to the facility to double check the numbers and conditions, and it was agreed to a size restriction of exported tortoises listed on the CITES permit, to ensure it is not collected from the wild. This small size restriction remains in place. Jordan states that "The breeding stock at the facility was established through best practices and according to the provisions of CITES as well as by respecting the Agriculture Law and taking into account animal welfare." Concerning supplementation of the breeding stock from the wild, Jordan states "No supplement from the wild as per the farm declaration and also by confirmation and observations taken during the inspection". "The Royal Society for the Conservation of Nature (RSCN), the MA of CITES in Jordan, has the responsibility from the government of Jordan to conserve the wildlife species in Jordan since 1973, and since that time, it applies the related articles	of animals exported is not provided, though Jordan does indicate that a size restriction is in place. <u>Recommendation</u> **The Standing Committee is invited to:** **a) retain *Testudo graeca* from Jordan in the review, until it provides details on:** a. **the current breeding stock and production rates; and** b. **the shift in source codes and the ages and sizes of animals exported; and** **ii) encourage Jordan to provide a response to the Secretariat by 30 January 2026 so that the matter can be considered at AC34.**

	within Agriculture Law which basically prohibited hunting, trading, or even ownership of several wild species including the protected wild *Testudo graeca* in Jordan." Jordan confirms that no wild specimens of *Testudo graeca* were exported at all. Concerning legal acquisition, Jordan explains that "The captive bred facility for *T. graeca* in Jordan imported the stock according to the national law when it was established, this was confirmed by the previous team of CITES in Jordan. But the achieving system was not computerized during that time. So, it is very difficult to have any documentation to prove that." Finally, Jordan explains that there was a minor shift in sizes of specimens due to lack of exporting during the Covid times, where borders and shipments were almost very limited, but again not necessarily all permits were used.	

9. *Testudo horsfieldii* / Uzbekistan

Recommendations from AC33	**Response from Party**	**Assessment and recommendation of Secretariat, following consultation with the Animals Committee**
The Animals Committee agreed to retain the species/country combination and that Uzbekistan should: - Provide information and details on source codes for different specimens and how individuals from different sources are differentiated - Provide evidence on the ability to produce such high numbers of specimens - Provide information on initial stock, subsequent introductions and annual production	Uzbekistan provided a response on 28 November 2024. Concerning source codes for different specimens, Uzbekistan provided details of how source codes are applied as set out in paragraph 18 of its Resolution of the Cabinet of Ministers of the Republic of Uzbekistan No. 290 of October 20, 2014, "Regulations on the Procedure of Permit Procedures in the Sphere of International Trade in Endangered Species of Wild Fauna and Flora (CITES)".	<u>Assessment</u> Uzbekistan has provided responses to all of the requests from AC33. Further clarification about the productivity is required. The following question serves as an example of the clarification needed: is the reproductive capacity of mature species of 1.8 - 2.3 heads per 1 female per clutch or per year? In addition, no information is provided on the founder stock of each facility, when each one

- Provide more information on what measures Uzbekistan is taking to ensure that wild specimens cannot be laundered through captive-breeding facilities and exported as specimens reported as produced in captivity - Provide information on whether they intend to move all trade to captive breeding in the future	Concerning how individuals from different sources are differentiated, Uzbekistan noted that under 'kennel' conditions, animals grow much faster and have evident growth zones that are not pigmented and remain light yellow, unlike wild specimens, providing photographic evidence to demonstrate this. An information guide on how to differentiate between wild *T. horsfieldii* and those bred or reared in captivity is included in the submission. Concerning the ability to produce such high numbers of specimens, Uzbekistan indicates that there are 16 nurseries that are engaged in keeping and breeding *Testudo horsfieldii*. The total number of (sexually) mature species in these nurseries is 43,957 species. 74% of these are females ♀ the remaining 23% are males and ♂ 3% of which sex has not been determined. The reproductive capacity of mature species is 1.8 - 2.3 heads per 1 female. Concerning initial stock, subsequent introductions and annual production, Uzbekistan states that when removing animals from the wild to create breeding stock, nursery owners are committed to adhering to the principle of non-detriment to the population and are guided by the following criteria: • In areas designated for construction. • Regions where land is being repurposed for agricultural needs. • Confiscated turtles, whose return to the wild is challenging. • Rearing of juvenile individuals. • Removal of mature individuals, on a small scale, strictly based on scientific grounds and with justification from the Scientific Authority. Uzbekistan also provides details of a programme of returning 10% of the collected specimens that reach 6cm back into the wild. These releases are	was established and what supplementation from the wild has occurred. It should be noted that an export quota for 2024 of 53,159 for F specimens (born in captivity) and zero export quotas for W, R and C was published for Uzbekistan on 19 December 2024. Concerning quotas not fully utilized in a particular year, Uzbekistan should be reminded of paragraph 21 in Resolution Conf. 14.7 (Rev. CoP15) on *Management of nationally established export quotas* that provides guidance on *Quotas not fully utilized in a particular year.* <u>Recommendation</u> **The Standing Committee is invited to:** **i) retain *Testudo horsfieldii* from Uzbekistan in the review, until it provides clarifications on:** **a. the productivity of each breeding facility/nursery; and** **b. the founder stock of each facility, including when each one was established and what supplementation from the wild has occurred;** **ii) encourage Uzbekistan to:** **a. consider paragraph 21 in Resolution Conf. 14.7 (Rev. CoP15) on *Management of nationally established export quotas* that provides guidance on *Quotas not fully utilized in a particular year;* and** **b. provide a response to the Secretariat by 30 January 2026 so**

	monitored for 2 years and Uzbekistan reports a survival rate of 70-96% . Concerning what measures Uzbekistan is taking to ensure that wild specimens cannot be laundered through captive-breeding facilities, Uzbekistan outlines a comprehensive inspection and traceability system. Each nursery submits annual reports to the Ministry, detailing the number of breeding stock, the number of offspring produced, the condition of the animals, and any other changes. All acquisitions of tortoises are recorded both in the nurseries and with the Ministry. If necessary, records related to the acquisition and breeding of animals are also checked during inspections. All nurseries undergo annual inspections during key periods of the tortoises' biological cycle, such as mating, egg laying, incubation, hatching, and growth. Concerning whether they intend to move all trade to captive breeding in the future, Uzbekistan confirms that the Management Authority hopes to eliminate the seizure of wild tortoises. There is an intention to increase the number of ranching, captive bred and farmed species, with subsequent introduction of 10% into habitats annually. The Secretariat notes the explanation from Uzbekistan on 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) appears to indicate that Uzbekistan has added a previous unused portion of a quota to the quota for the following year. See full response in Annex 5e	**that the matter can be considered at AC34.**

10. *Testudo kleinmanni* / Egypt

Recommendations from AC33	Summary of response from Party concerned	Assessment and recommendation of Secretariat, following consultation with the Animals Committee
The Animals Committee agreed to retain the species/country combination and requested Egypt to, in the short term, request the Secretariat to publish a zero-quota for trade in *T. kleinmanni* for commercial purposes (all source codes). The Animals Committee further requested Egypt to provide information on – - a NDF for the creation of their founder stocks; - the exact number of current facilities - more comprehensive details on the keeping and breeding of the species bred to allow an assessment on the plausibility of the figures presented - the methods for proper and reliable marking of individuals.	Egypt submitted an NDF for *Testudo kleinmanni* in Egypt. Two scenarios were assessed (1) a status quo scenario where stressors and population levels continue on the same trajectory; and (2) a limited collection scenario that may result in a decline in Egyptian tortoise collection for the pet trade. Egypt states that "The authority to establish a breeding operation for Egyptian tortoises and to catch the initial breeding stock is issued by the Management Authority. A breeding stock license is only issued when the Management Authority is satisfied that the applicant for the breeding operation has established a breeding facility suitable for simulating the natural habitat of the species to ensure its success in captivity." It appears that removal from the wild is prohibited except for use as breeding stock and "All the authorized wildlife breeding operations are routinely inspected to ensure enforcement and compliance. The breeding operations are required as a matter of procedure to file with the management Authority quarterly returns on the performances of the operations." Authority for establishment of a breeding operation for Egyptian tortoises and capture of the initial breeding stock is issued by the Management Authority. The response provides details on the reproduction and captive breeding of the species (see Section B), while Section C) provides details on the current facilities.	<u>Assessment</u> The NDF provided by Egypt does not adequately address the establishment of the founder stock. Egypt did not request the Secretariat to publish a zero-quota for trade in *T. kleinmanni* for commercial purposes (all source codes) as requested by the Animals Committee at AC33. Egypt did confirm that the number of current breeding facilities is 2. Egypt did provide details on the keeping and breeding of the species and it would appear that the figures presented are plausibility. Methods for marking individuals are also provided. <u>Recommendation</u> **The Standing Committee is invited to:** **i) retain *Testudo kleinmanni from* Egypt in the review, until further clarifications on the NDF for the establishment of the founder stock are provided;** **ii) request the Secretariat to publish a zero-quota for trade in *T. kleinmanni* for commercial purposes (all source codes);** **iii) request Egypt to register its breeding facilities for *T. kleinmanni* if it intends to export this Appendix I species for commercial purposes; and** **iv) encourage Egypt to provide a response to the Secretariat by 30 January 2026 so**

	Section D details the methods of marking that are used. For full response see Annex 5f	**that the matter can be considered at AC34.**
11. *Testudo kleinmanni* / Syrian Arab Republic		
Recommendations from AC33	**Response from Party**	**Assessment and recommendation of Secretariat, following consultation with the Animals Committee**
Since no response was received, the Animals Committee agreed to retain the species/country combination and ask the same questions again. ***Note:*** *Questions asked following AC32 were C1, C2, C3, C4, C5, C6 In addition, Indicate the ages and sizes of animals exported*	The Syrian Arab Republic provided a response to all of the questions posed. It confirmed that there is only one authorized breeding facility for this species since 1997 and it is authorized by the Syrian CITES Authority for breeding and by The Syrian Ministry of Agriculture. It stated that the first generation was produced since 1999, while the second generation was registered in 2007. Since joining the CITES agreement in 2003, Syria states that it has been seeking to comply with the agreement. Syria has begun to register breeding and propagation facilities that meet the standards related to breeding and propagation. The Syrian CITES Authority administration conducts periodic inspections and continuous follow-up of the facility, and all inspections are documented in special records for each facility according to the species that are being bred on the farm. These records are matched with the records of the farm itself. The Syrian CITES Authority is responsible for doing the inspections, regularly, quarterly throughout the year, and in spring when the species is mating. Syria states that there were no	<u>Assessment</u> The Syrian Arab Republic (SAR) has provided answers to questions C1 to C3, but further information is required in relation to questions C4 to C6. Further clarification is required concerning some of the statements made by SAR in its response to understand the situation. For example, “The facility keeps up to date the species, and the production is about 60-65% from the estimated production” and “it is allowed to the [facility] to collect 700 from this species for breeding in the captive”, when it also states that the breeding stock did not receive additional specimens from the wild. As the Syrian Arab Republic is not a range State for *Testudo kleinmanni*, it raises the possibility that the facility is actually breeding the native *Testudo graeca* and this is a case of misidentification. If the species is confirmed to be *T. kleinmanni*, it would be important for the Syrian Arab Republic to confirm when the founder stock was obtained, in what numbers (i.e. males, females, juveniles) and what the annual production rates have been over the years.

	unusual activities observed at the facility recorded in the inspections. Syria also "quotes" the following: - The facility is suitable for breeding the species, there is suitable place for production and for stocks of specimens. - The facility keeps up to date the species, and the production is about 60-65% from the estimated production. - The first and second generations have the signs indicative of wild origin, especially in admiring of living on the wild spaces, but after the following generations they could live in normal basins. - The facility does not face any difficult in the breeding of the species. - The facility has the enough facilities to produce and breed the species. - When the Syrian CITES Authority started the record of facilities, it put the national guidelines and the decisions related to regulate the process. Syria states that "it is allowed to the [facility] to collect 700 from this species for breeding in the captive", but also states that the breeding stock did not receive additional specimens from the wild, this was according to the national regulations and decisions related this matter. The Secretariat will reach out to Syria to confirm if the 700 refers to the initial founder stock.	<u>Recommendation</u> **The Standing Committee is invited to:** **i) retain *Testudo kleinmanni* from the Syrian Arab Republic in the review, until it provides clarification on:** **a. the identification of the species (*Testudo kleinmanni* or *Testudo graeca*, the latter of which is native to the Syrian Arab Republic);** **b. the founder stock (information relating to legal acquisition and non-detriment findings, if it is confirmed to be *Testudo kleinmanni*);** **c. supplementation from the wild, if applicable; and** **d. annual production and retention rates; and** **ii) request the Syrian Arab Republic to register its breeding facilities for *T. kleinmanni* if it intends to export this Appendix I species for commercial purposes; and** **iii) encourage the Syrian Arab Republic to provide a response to the Secretariat by 30 January 2026 so that the matter can be considered at AC34.**

SUMMARY OF RESPONSES FROM THE ANIMALS COMMITTEE

The responses from Parties to the questions raised by the Animals Committee at its 33rd meeting in July 2024 were analyzed by the Members and alternate Members of the Animals Committee in December 2024. Detailed comments and conclusions are provided for each case under review.

Concerning *Macaca fascicularis* from Cambodia (KH)

- The generic information provided by Cambodia on the biology of long-tailed macaques (LTMs) in the introductory chapter is generally plausible.
- Concerning the high production rates, Cambodia outlined several measures to increase the reproduction rate, which are possible in theory, however taken into account data from literature, as well as figures from facilities in other countries in the region, an output of 3 offspring per two years and female seems extremely high and can be deemed impossible on a regular basis. Considering the mentioned mean gestation period of 165 days and weaning of 100-120 days and assuming that a female would get pregnant immediately after weaning (which seems doubtful) a maximum of 2.5-2.8 birth per two years (1.25-1.4 birth/year/female) would be possible by simple maths. However, this would not consider a certain natural infant mortality and stillbirth. Furthermore, it seems extremely unlikely that such a high reproduction rate will be reached regularly, if at all, and equally for all females in a breeding stock, noting that there is no evidence from literature that drastically reducing the weaning to only 100-120 days would actually decrease the interbirth intervals. The effect of reduction of weaning on interbirth intervals might be proven by genetic parental tests.
- Furthermore, forced weaning after 3.5 to 4 months is extremely early, not natural and may amongst others lead to poor maternal care in adulthood and antisocial behaviour, which could negatively affect the reproductive output of specimens separated early from their mothers. As mainly young females (according to Cambodia between 4-10 years) are used as breeding females, because they have higher reproduction rates, it is likely that breeding females will be replaced regularly. It is then questionable if reproductive output can be kept as high, if breeding females are replaced with specimens produced under the circumstances described (forced weaning etc.). The given figures rather suggest that some regular supply of wild specimens was necessary (at least in the past) to maintain a high reproductive output at least in some facilities. But KH might wish to clarify how breeding stocks are replaced and if they are experiencing a reduction in reproductive output when breeding with F1 and subsequent generations.
- However, it has to be noted also that the ratio of birth/female/ year has decreased in all six facilities from 2021-2023 to levels that might be possible in theory according to what is known from literature.
- It has to be further noted, that the supply of specimens taken from touristic sites needs to be also considered as augmentation from the wild in accordance with Resolution Conf. 10.16 (Rev. CoP19). In case a facility would frequently add such specimens as described in the first reply by KH to AC33, source code “F” should be used for these facilities.
- An examination of the legal trade in *Macaca fascicularis* from Cambodia shows up the frequent mis-match between trade reported by the exporter and the importer. The Animals Committee would like to highlight to the Standing Committee that such discrepancies in reporting of trade makes it difficult for Scientific Authorities and the Animals Committee to analyse trade data, so the guidelines for Management Authorities to report trade may need to be tightened.
- Overall, concerns remain that the high productivity rates cannot reflect a closed-cycle breeding operation in five out of six facilities reported by Cambodia, according to analyses conducted by the United States of America (National Fish and Wildlife Forensics Laboratory). The report shows that the reported breeding output from five out of six of the captive-breeding facilities exceeds the biological capacity of the species to produce that number of offspring in captivity; in two cases, the supposed monthly breeding outputs exceeded the highest documented breeding outputs by an order of magnitude for months on end. This seems to point to these five facilities obtaining new stock (presumably from the wild) rather than breeding them in-house.
- It is proposed that the Standing Committee invite Cambodia to consider these analyses, identify whether there is information addressing the main observations derived from the analysis (productivity disproportionately high relative to what is biologically possible reported), and report its findings.
- It is also suggested that proper logbook keeping, including all birth and death as well as relations (pedigree), and preferably combined with genetic parenthood tests, where appropriate, should be

implemented to enable to comprehend and monitor reproduction rates and to identify cases of potential incorrect application of source code C.

Conclusions of the Animals Committee

The members are of the view that the species/country combination should be retained in the process and that Cambodia be invited to respond to the concerns raised in the individual submissions by members of the AC as well as the analysis submitted by the US Fish and Wildlife service in relation to the capacity of the registered facilities to produce the numbers of specimens of *M. fascicularis*.

Concerning *Macaca fascicularis* from the Phillippines

- The Philippines responded to two (C5 and C6, and parts of C1) of six questions, including information on LAF of the specimens used as breeding stock. Document AC33 Doc. 15.2 also contains some information regarding the combination that could be considered.
- The response of the Philippines suggests that offtake of wild specimens to supply the only existing breeding facility occurs on a regular basis also to address human-wildlife conflict/ as pest control.
- The breeding stock of the single captive-breeding facility in the Philippines seems to have been legally acquired through permits issued by the Department of Environment and Natural Resources of the Philippines. The CITES trade database shows a total of 1,411 live animals reported exported in 2018-22 (an average of 282 per annum), which is an order of magnitude or more less than average annual exports from Cambodia (16,358), China (3,943, but only pre-Covid), and Viet Nam (3,479), and less than is traded out of Mauritius 836 exporter reported, or 980 including only an importer reported trade.
- It is understood that the legal origin of the initial parental stock was collected between 1990 and 1995 as part of a control of human- macaque conflict regulation, as well as other entries dated in 2009, 2020 and 2022, for a total of 3,094 individuals (entered or collected by these means). However, the parental stock is reported as F1 in document AC33 Doc. 15.2 with less animals (16 males and 81 females). So, it is not clear if the rest of the individuals mentioned are wild taken, F1/F2 or subsequent, which source codes are applicable, how are these are being used, etc. If trade considered F specimens, the corresponding questions F1, F2, F3 and F4 should be asked and answered.
- There is little information available on the status of *Macaca fascicularis* on the Philippines, while it is generally considered widespread.
- It would be important to understand whether the quota of 8,000 specimens is an annual harvest quota, or was set for one occasion, as well as to learn whether specimens are only collected from areas where the species is abundant and considered pests and how this is ensured.
- It would probably be useful for the AC/SC to have a population number of individuals considered problematic, in what areas they are (e.g., peri-urban, urban, etc.) or other information that gives an idea of how serious the problem of human-animal conflict is, so that AC/SC can understand that the extractions carried out were sustainable (i.e., to have a reference point of the wild population and the population considered problematic).
- Based on the information provided it cannot be concluded that the facility is breeding the species in accordance with Resolution Conf. 10.16 (Rev. CoP19), as detailed information on the breeding stock, the generations bred and husbandry conditions is not available. The information provided though indicates wild augmentation is taking place regularly (more than occasionally), which must not be of conservation relevance, but suggests that source code “F” could be appropriate for offspring in the breeding facility.
- In order to conclude on whether breeding is in line with Resolution Conf. 10.16 (Rev. CoP19) further information would be necessary including to ask questions C1-C4 again.

Conclusions of the Animals Committee

The responses by members indicate that the case should be retained and the questions raised by the members should be answered before the case can be removed from the process. In particular, question C1-C4 do not seem to have been answered. In addition, if the productions system does not comply with the definitions of source code C, as defined under Resolution Conf. 10.16 (Rev. CoP19), and the source code F may be more appropriate, questions F1, F2, F3 and F4 may have to be answered. However, one member was of the view that due to the very limited trade numbers, the answers seemed satisfactory and the case could be released from the process, a sentiment shared by the Chair of the AC.

Concerning *Macaca fascicularis* from Viet Nam

- Vietnam provided a detailed response and overview table on the breeding stocks and number of offspring, specimens added to the stock, quantity exported, husbandry obligations for registration and maintenance of breeding operations (including logbook keeping), as well as on inspections.
- The information on breeding of the species under the given circumstances seems plausible. A quick analysis of breeding rate data in the response from Viet Nam shows that the annual reproductive outputs of the four facilities have varied from year to year (from 31% to 91%) but have average outputs that appear plausible given the range of values provided in the analysis of breeding outputs in Cambodia. Facilities 1 and 4 were both within the known range for all 5 years, whereas Facilities 2 and 3 each matched or exceeded the "outlier" value in the Fish & Wildlife report in two of the five years, but their average outputs were below that reported in the previous outlier, and well below the very suspicious productivity values claimed for breeding facilities in Cambodia. Still births are not reported separately, but neonatal death rates seem to be significantly lower than those reported in Supplementary Table 2 of the Fish and Wildlife Report, though they cover only the first 2 weeks of neonatal life.
- Vietnam clarified that the founder stock of the four facilities that export in some cases goes back to legal imports of LTM mainly from LA and KH, which were reported under source code C, F or R, but could also be from other sources (such as for facility 1). All facilities regularly added further specimens from other "domestic legal breeding facilities" to complement their breeding stocks (in total 13.426 specimens were added to the four exporting facilities in five years from other facilities). For some of the four exporting facilities the added stock forms a large percentage of the overall breeding females.
- It is unclear a) how many additional domestic breeding facilities exist in Vietnam; b) what is their scale; c) if they only breed to supply exporting facilities; and d) if they are registered and inspected in the same manner as the four facilities breeding for export and follow the same rules (including logbook keeping). Based on the information provided, these additional facilities should also not be allowed to add any new wild specimens to their stocks since 2006. It is unclear when those facilities were established, if they were based on founder stock obtained from the wild (if before 2006). A clarification on the abovementioned aspects regarding these "satellite facilities" and how it is ensured that laundering of wild specimens through these facilities is not taking place would aid to be able to conclude if requirements of Resolution Conf. 10.16 (Rev. CoP19) are met.
- One member suggested that more information on the breeding stock (C5), such as receipts, certificates etc. that confirm the legal purchase, would be useful for validating the legality and the source of the breeding stock. They also suggested that "an unbiased expert in husbandry to evaluate the likelihood of the information would be welcome to inform the SC deliberations".

Conclusions of the Animals Committee

The members were generally in agreement that the data presented by Viet Nam seem plausible and that they do seem to be able to produce the numbers exported in these facilities. In relation to the origin of the animals kept in these premises however, some questions do remain which the SC may wish to consider in its deliberations. In particular, the existence of several satellite farms that supply the registered farms may need some scrutiny.

Concerning *Chlamydotis macqueeni* from Kazakhstan

- Kazakhstan did not provide a response.
- Questions C1 to C6 should be asked again.

Conclusions of the Animals Committee

As no responses were received from Kazakhstan, the members were of the view that this species/country combination should be retained in the process and that Kazakhstan should be requested to answer to the same set of questions again.

Concerning *Testudo graeca* from Jordan

- Question C1 was answered mostly to satisfaction, as Jordan stated that they started exporting tortoises in 2005 that have been legally imported by Syria. The summary information indicates that the parental stock is composed of individuals exported from Syria, but no details are presented regarding the following: how many individuals were imported, what source code they used, or what generation they were.
- However, according to the CITES trade database, the first import of larger quantities of live *T. graeca* originating from Syria (1,000 specimens) or any other country occurred only in 2013, while Jordan

already exported larger quantities (1,200 to JP and 1,600 to US) of this species under source code C in 2002 (exporter reported). As such it seems likely that the founder stock was indeed obtained from the wild in Jordan. But Jordan may wish to clarify.

- Since 2002, larger quantities have been regularly exported under source code C, while Jordan stated that the facility managed to breed F1/F2 only since 2005.
- The following statement is of concern "….the facility has successfully bred F1/F2 since the year 2005" – If the facility started operations in 2003, with the import (and export) of Syrian specimens, producing F1 in 2005 is realistic, but F2 would take another 5-8 years after that. But as an Appendix II species, F2 production is not obligatory.
- It is indicated that F2 generation is produced according to Resolution Conf. 10.16 (Rev. CoP19), but no information is included to indicate how this condition is met.
- Concerning question C2, it is not clear if facilities are required to keep records; if so, they would be desirable but are not provided.
- Question C3 was answered to satisfaction
- Question C4: The reply by Jordan did not contain any details on the current breeding stock or the founder stock, the reproductive output in the facility, or husbandry requirements that would allow a proper assessment against the requirements of Resolution Conf. 10.16 (Rev. CoP19).
- Jordan became a Party to CITES in 1979, Syria in 2003; but the earliest record of *Testudo graeca* imports to Jordan from Syria (or anywhere) are from 2013. In other words, there should have been records of that 300+ import in 2003, but there are not. [there are records of 4,800 *Testudo graeca* exported from Jordan in 2003, *all with source code C*]. So there is no way of telling what was imported in 2003, and how many were kept as founder stock.
- Concerning question C5, although Jordan states that "The breeding stock at the facility was established through best practices and according to the provisions of CITES as well as by respecting the Agriculture Law and taking into account animal welfare," without information on the founder stock, including an NDF, it is difficult to determine whether or not this question has been answered appropriately.
- C6: We'll have to take their word for it, in which case C6 is answered to satisfaction.
- Neither the ages nor the sizes of animals exported are specified (years and centimeters carapace length), and shifts in source code are not explained.
- *Testudo graeca* can generally be bred well in captivity, but likewise is one of the most frequently seized species and illegaly trafficked among live reptiles in the EU.
- In order to address the ongoing issue of smuggling in *T. graeca*, that in view of potential future exports and based on clarification of the remaining questions, it is advisable to permanently mark the breeding stock in addition to logbook keeping and only allow the export of juveniles of a certain size.

Conclusions of the Animals Committee

The members were of the view that the information submitted Jordan does not fully comply with the questions asked and the species country combination should be retained in the process. In particular it does not appear that sufficient information regarding the founder stock (quantities, source, etc.) and data used to determine production capacity were provided (i.e., # females, clutch size, % survival, etc.) and that therefore the production capacity of the facility cannot be determined.

Concerning *Testudo horsfeildii* from Uzbekistan

- Regarding production details, Uzbekistan reports the existence of 16 breeding facilities with 43,957 mature individuals (74% females) and a reproductive capacity of 1.8 to 2.3 offspring/female. However, no additional information on production, mortality, etc., has been provided. Based on the data presented, we estimate the presence of at least 32,528 females, with a potential production of 58,500-74,814 offspring. Considering a 10% release into the wild, this suggests a commercial production availability (without mortality) of 52,695 to 67,333 individuals.
- The questions and/or clarifications regarding productivity remaining are:
    - The reported productivity (1.8-2.3 offspring/female): is this per clutch or per year? How many clutches are produced annually?
    - What is the estimated mortality rate of offspring in captivity?
    - In 2022, a quota of 106,081 F1 specimens was reported, and 70,959 individuals in 2023. This exceeds the maximum estimated commercial production.
- Concerning the request for information on the initial stock and subsequent introductions, the report provided only mentions the number of breeding facilities and the total number of mature individuals to

date, as well as seizures up to 2022. The following information would be useful:

  - How many specimens have been introduced from the wild (authorized for extraction and establishment of parental stock)? According to quotas published on the CITES website and the information provided, there are individuals with source code R (ranching) and the information mentioned the possibility of wild collection.
  - No information was included in the initial stock of each facility, the start of breeding activities, etc.
  - It is unclear if the 16 breeding facilities were formed or reinforced from confiscated specimens.

- Regarding measures taken by Uzbekistan to ensure that wild specimens are not laundered through captive-breeding facilities, Uzbekistan provides information on differences between captive-bred and wild individuals. This could be supplemented with information on marking methods for traded specimens (traceability).
- Concerning quotas, it is not clear how the export quotas in 2020 and 2021 have been established. Uzbekistan seems to have use “unused” quotas from previous year and added it to subsequent years.
- On the first page of Uzbekistan’s response, the definition given for source code ‘R’ is potentially very different from the CITES definition of ‘R’. This difference seems to complicate the report: In effect, the information provided seem to mix information concerning ranching and regarding founder stock collection for closed-facility captive breeding.
- Overall, it is difficult to understand the exact production systems used for *Testudo horsfieldii* in Uzbekistan, what source code is associated with what production system, and how quotas are set for the different systems. It is further noted that the last quotas published by Uzbekistan for *T. horsfieldii* date from 2022.
- Establishment or supplementation of founder stock with specimens confiscated from illegal trade or by removal of animals (adults/all size classes?) from areas to be converted to residential or agricultural purposes (pages 2-3), is defensible. However, to note that only 1-3% of juveniles survive in the wild is disingenuous, as the collection from the wild concerns adults. Moreover, release of headstarted animals is stated to occur partly in regions where eggs or juveniles were collected, which makes no sense if stock is collected from areas slated for land conversion.
- Overall, it would be informative to get better data on the 16 breeding facilities together holding nearly 44,000 mature specimens (page 2). This is a relatively aggressive species that needs a square meter per adult animal with substantial hiding spaces/opportunities; on that basis, each breeding facility should cover an average of more than a quarter hectare. No picture documentation of any facility is provided (photo 2 on page 8 suggests a long-term unrealistic stocking density).
- As an aside, in 2008, only one registered facility in Uzbekistan existed to produce *Testudo horsfieldii*; apparently another 15 facilities became operational / registered since then.
- The report provided does not allow a meaningful assessment of ranching management, source population size and trend, or volumes of offspring taken through ranching operations. As noted above, Uzbekistan’s definition of source code R does not easily correspond to the R questions posed.
- Concerning evidence on the ability to produce such high numbers of specimens, natural clutch size is 3-4 eggs, and 2-4 clutches may be produced per female per year (review in Kuzmin, 2002, page 119), for an output of 12-20 eggs/female/year; the stated productivity of 1.8-2.3 hatchlings per female (page 2) is far below this capacity and may be the result of stress from high-density keeping (photo 2, page 8)
- Considering nearly 44,000 adult breeders collectively, of whom nearly 33,000 are females, annual production of 60-76,000 hatchlings is reasonable, which would likely be reared to yield 55-70,000 6-8cm juveniles (about 2-3 years old).
- The information from Uzbekistan regarding *Testudo horsfieldii* appears to show that captive-reared specimens can be distinguished visually for at least 2 years, and they have good systems in place to monitor and manage the 16 captive breeding operations through oversight from their Ministry of Ecology, Environment and Climate Change, and their Academy of Sciences. However, insufficient information is provided to document that this ability to separate C from W specimens is deployed by inspectors; one assumes it is, but it is not clearly shown.
- Concerning information on whether they intend to move all trade to captive breeding in the future, iIf zero quotas are established for source codes W and R (page 15), then only F and C remain, and the shift from originally mostly W via R to C (including F) will have been completed. Shifts between production systems was already indicated in AC24 Doc.8.1, pages 19-23. If zero quotas are indeed announced for 2024 and onwards, the R questions become of historical interest only.
- Members expressed differing views on the practice of head-starting captive-born hatchlings and then releasing them into wild populations. One member expressed concern that the practice carries significant disease risk if reared at a facility that also receives confiscated tortoises as supplementary breeding stock. It appears that no mixed-species facilities exist (i.e. no contact with *Testudo graeca* or other

species of tortoises), which reduces the risks, but it remains a concern. More broadly, often the merit of releasing animals into a wild population is doubtful: If the population is stable, new arrivals may disrupt the existing individuals, and if the population is declining, it is more effective to address the causes of decline than to expose more animals to it. Another member expressed the view that the model of returning 10% of captive output to the wild is sound given good survival rates after release, but wondered why it is "challenging" to release confiscated turtles to the wild rather than use them to top-up existing stocks of captive animals. In most years, over 2,000 turtles are seized, with over 16,000 animals seized in 2021, which would average out to be more than the total number of captive-bred animals released to the wild.

Conclusions of the Animals Committee

Substantive information has been provided by Uzbekistan. However, several questions remain and the members of the AC have listed several of them in their responses. Therefore, they are of the view that this species/country combination should be retained in the process until these questions have been answered satisfactorily. However, one member was of the view that based on the information provided, this species/country combination may be released from the process.

Concerning *Testudo kleinmanni* from Egypt

- Egypt provided a lot of general and readily available information on biology, past distribution and trade and specific information on two breeding farms.
- Parts of the NDF seem copy-paste of various sources without a clear structure and seem heavily based on a review of the literature, including European hobbyist literature, rather than the biology of the species in nature, or the realities of captive production in-country.
- The pictures provided by Egypt show husbandry conditions that are not considered most appropriate for the species. Information in the text is in direct contradiction with the evidence in the pictures (example: "Do not feed the tortoises too much or too little and always feed the tortoises a varied high-fiber, low-protein vegetable diet."; photo: food dishes of peas and carrots, which are low fiber, high sugar, high protein). Due to the water basin visible in one enclosure, there is a risk of drowning for the animals; there are usually no open water areas in the species' natural habitat. Egypt presented an individual marking with epoxy, which has been found suitable in other turtle species if combined with logbook keeping/ a database, noting that these markings can be scraped off. However, it is an important first step to address illegal trade that is apparently still taking place nationally and internationally and should be endorsed.
- Egypt amongst others stated that the species range extremely decreased from over 120,000 km to 16,600 km in 2003 and probably decreased further, amongst others by new peach orchard cultivation, and heavy grazing.
- Besides anecdotal records from the 80s, 90s and 2000, recent distribution records are lacking. Egypt states that "The only "evidence" obtained that some population or small individuals may still exist is based entirely on oral contacts with local Bedouins." By the end of 1990, the Egyptian tortoise appeared to be ecologically and physically extinct in Egypt, but in 2000 a small population of the Egyptian tortoise was found in northern Sinai (in the Zaranik Protected Area) at a density of about four to five tortoises per square kilometre. Due to the species being still offered in commercial and pet markets, it is assumed to be still present, or being largely illegally imported from Libya by Bedouins. Egypt also noted that the Libyan population might likely also vanish. Maintenance and control on legislation in these countries is very poor according to Egypt. Egypt concluded that trade from the wild should be stopped, also the trade flow from Libya to Egypt, awareness should be raised, the species should be at forefront of Egyptian natural history conservation agenda and captive-breeding under supervision of the administrative body and scientific committees should be promoted.
- The link between the farm's parental stock establishment and the sustainable extraction from the wild is lacking, nor the origin of parental stock in each farm.
- In terms of the establishment of breeding operations, Egypt stated that it is prohibited to remove Egyptian tortoise specimens from the wild, but that the authority to establish a breeding operation for Egyptian tortoises and to catch the initial breeding stock is issued by the Management Authority. Information on how it was determined that the breeding stock used for the facilities was established in a manner non-detrimental to the survival of the species in the wild was not provided (as requested per C5).
- Some concerns about the inspection process include the following:
    - 'Facility Staff accompanying the inspection' are the same two names for both facilities; the facilities are stated to have a single location, so they must be separate. Are they nevertheless sharing staff, or is this a mis-interpretation and are these two persons wildlife inspectors/advisors to the inspector? In either case, it's interesting that the named veterinarian accompanying the inspection is also the veterinarian named as supervising both facilities.

- Most recent exports from both facilities were reportedly using source code' C', without clearly documenting F2 production.
- Legal acquisition of founder stock in 2007 and 2009 is not documented with collecting permits, invoices or other Legal Acquisition documentation.
- It is indicated that extractions from the wild are allowed only to form parental stock, but it is not indicated if in the 2 farms these were taken from the wild or acquired from other centres, or, according to the information in AC33 doc. 15.2, if they were seized. It is important to clarify.
- Both facilities could plausibly have legally acquired their founder stock domestically, and the currently reported numbers of adults held and hatchlings produced are realistic.
- One facility: Based on known reproductive capacity, a founder stock of 24 adult females should, under optimal conditions, have been able to reproduce to a current holding of 212 females over 15 years, though the past year's production of 109 hatchlings from 212 mature females (potential 4 eggs/female/year) suggests the animals are producing far below maximum capacity.
- One facility: the number of adult females (295) is larger than the total reported adult breeding stock (213). 421 juveniles from 295 females
- Egypt did not provide the age of animals exported as requested by the AC but the size of animals sold is provided (3-5 cm).
- *T. kleinmanni* has been on CITES Appendix I since 1995, and there are no registered breeding establishments for the species. Although the production capacity is not in doubt, it appears that Res. Conf. 12.10 (Rev. CoP15) and the use of codes (D) are not being followed (CITES Trade Database shows Egypt exporting in 2022 and 2023 250 individuals for commercial purposes with source code "C").
- Considering the lack of a proper NDF for the breeding stock, the extremely critical conservation status, further uncertainties regarding genuine captive-breeding, ongoing smuggling, and the fact that the species is listed in Appendix I:
- Egypt should again be requested to ask for the publication of a zero-quota for commercial trade in specimens of source code C; and
- to register breeding operations in line with Resolution Conf. 12.10 (Rev. CoP15) if it intends to export the species for commercial purposes.

Conclusions of the Animals Committee

The members are of the view that this species/country combination should be retained in the process. Egypt has not submitted a NDF for the acquisition of the founder stock and has not yet asked the Secretariat to publish a zero quota for the species from Egypt. In addition, several details on the breeding of the species are lacking as detailed in the responses from the members. Finally, as *T. kleinmanni* is listed in Appendix I of CITES, the members also indicated that the facilities breeding this species have not been registered in line with Resolution Conf. 12.10 (Rev. CoP15) if Egypt intends to export the specimens for commercial purposes.

Concerning *Testudo kleinmanni* from the Syrian Arab Republic

- *Testudo kleinmanni* was included in Appendix II in 1975, and in Appendix I in 1995. Known range States are Egypt, Israel and Libya; Syria has never been known to be a range State. Biology and captive maintenance and breeding reviewed in AC33 Doc. 15.2 Annex 3 pages 87-95.
- In suitable climate, enclosure conditions and feeding, maturity at 8 years is possible, and starting with adult animals in 1997, F1 in 1999 and F2 in 2007 is biologically feasible.
- It should be clarified when, from where and of which source the breeding stock was legally acquired, acknowledging the critical conservation status and ongoing illegal trade in the species.
- There are no import records of (live) *Testudo kleinmanni* into Syria; Syria joined CITES in 2003, Egypt in 1978, Israel in 1980, Libya in 2003. It would theoretically be possible to have imported founder stock from Libya before 1997 and have no record of the transaction.
- The only export record from Syria is 1000 specimens in 2015, declared as purpose T, origin C. This is presumably why the species was included in the process (AC32 Com.4 refers to 2017, when the CITES Trade Database shows no Syrian exports). Logistically, it makes little sense to accumulate 1000 specimens (representing many years of breeding output) and ship them all out in one transaction/year.
- Syrian Arab Republic clarified that there is only one facility (a zoo) that is authorized to breed the species since 1997. The Syrian Arab Republic may wish to confirm that the 1000 specimens exported in 2015 to Egypt were bred in this facility.
- "The facility keeps up to date the species, and the production of zoo about 60-65% from the estimated production" – I am at a loss to interpret this; does this mean that 60-65% of offspring produced is retained to increase breeding stock, or does it mean that the facility produces about 60-65% of the theoretical maximum output possible (from the recorded number of mature females, and maximum clutch size and annual clutch number)?

- "According to the national decisions, it is allowed to the zoo to collect 700 from this specie for breeding in the captive." – considering that this species is not native to Syria, it is not understood what is meant here. One possible explanation might be that the facility does not, in fact, keep and breed (non-native) *Testudo kleinmanni*, but instead keeps and breeds *Testudo graeca* (native to Syria, Appendix II) and somehow mixed up the names in export documentation. Clear photographs of the facility and the specimens held and produced would clarify this matter instantly.
- "The first and second generations have the signs indicative of wild origin, especially in admiring of living on the wild spaces, but after the following generations they could live in normal basins" – This is not clear; does it indicate that F3 and onwards have become 'domesticated' and lost natural behaviour?
- A big problem is trying to understand the production capacity of the facility. Assuming a founding female producing eggs one year after arrival, each adult female averaging 4 eggs per year, the offspring maturing in 5 years, the facility holding on to all female offspring to increase breeding stock, and zero mortality of any animals, a single founder female could theoretically after 15 years have given rise to a breeding adult population of 77 females, producing 308 hatchlings by year 15. But a facility producing such numbers would have started shipping animals out well before then – but the absence of small shipments before or after 2015 is remarkable.
- The following questions were not posed as part of the Review (but are inherent in question C4), but their answers are essential to understand the facility's potential production and production trends:
    - When was the founder stock obtained?
    - What were the founder stock numbers? i.e. mature males, females, immatures?
    - What has been the annual production over the years?
- Overall, it is not possible to confirm that the species is bred in line with the requirements of Resolution Conf. 10.16 (Rev. CoP19) in the Syrian Arab Republic.
- Further acknowledging that T. kleinmanni is an Appendix I species, the species should not be exported for commercial purposes without registration in accordance with Resolution Conf. 12.10 (Rev. CoP15).

Conclusions of the Animals Committee

The members of the Animals Committee are of the view that this species/country combination should be retained in the process. The Syrian Arab Republic should be requested to provide more in formation on the origin of the founder stock, the method of production to comply with Resolution Conf. 10.16 (Rev. CoP19), other possible production facilities. Finally, as *T. kleinmanni* is listed in Appendix I of CITES, the members also indicated that the facility breeding this species has not been registered in line with Resolution Conf. 12.10 (Rev. CoP15) if the Syrian Arab Republic intends to export the specimens for commercial purposes.

Concerning *Dendrobatus auratus* from Nicaragua

- Nicaragua stated that they have registered a total of three facilities for the captive breeding and export (which are the same for all three species) and likewise that breeding stock will be acquired from authorized captive breeding establishments in Nicaragua. The dates since they have been operational are missing.
- Clarification is needed on whether there are further breeding establishments in Nicaragua and how breeding stock for those facilities was sourced. The CITES trade database does not include any imports of all three species since their listing in 1987. At some point probably some specimens from the wild would have needed to be taken to serve as founder stock. Some offtakes from the wild in the past could certainly have been regarded as non-detrimental to all three species acknowledging that they species are considered as locally abundant and have a fast life history. All three species can also be bred in captivity quite well, while smuggling in poison dart frogs is still an issue.
- Data Collection Forms were not provided for these 4 facilities. However, some information from the form was provided by Nicaragua in their response. Overall, it appears that not all of the information contained in the Data Collection Form was provided by Nicaragua for each facility, including information on founder stock and important data used to calculate production capacity of the facilities.
- However, there is little doubt that these facilities are able to generally breed the species under the conditions mentioned in the reply.
- Acknowledging the significant trade volumes and ongoing smuggling in poison frogs and in order to confirm that the species are bred in compliance with Resolution Conf. 10.16 (Rev. CoP19), information on a) since when offtake from the wild is prohibited in Nicaragua, b) if there are further facilities breeding the species in addition to the three facilities mentioned and how and when they obtained their breeding stock of which source c) an overview of the reproduction rates and current size of the breeding stocks is important.
- No specific details are provided for each establishment. General management practices and legal aspects are mentioned, but there is no explanation of how field control and monitoring are implemented,

including verification protocols, visit reports, and inspection details before export. It is mentioned that reports and documents exist, but they are not provided.
- As collection of specimens from the wild is not authorized, the approach to managing genetic erosion in the parental stock is not specified.
- In addition to fungal infections, wild subpopulations in Costa Rica, Nicaragua, and Panama are threatened by capture for the international pet trade (CITES 2015).
- Thought the causes of mortality, how it occurs, and mitigation measures are provided, numerical data on mortality rates are not provided.
- Detailed information regarding the founder stock (quantities, source, chain of custody, etc.) and data used to determine production capacity (i.e., # females, clutch size, % survival (mortality info), etc.) were not provided by Nicaragua. As a result, production capacity of the facilities cannot be determined. [The CITES Trade Database shows an export of ~4,000 C specimens in 2022]

Conclusions of the Animals Committee

The members of the Animals Committee do not in principle doubt the capacity of the three registered facilities to breed this species and produce the numbers exported. There are however some questions that Nicaragua may want to provide in order for the Members to be confident that these facilities comply with the requirements of Resolution Conf. 10.16 (Rev. CoP19). In particular, it is mentioned that the species may not be taken from the wild and that all supplementation of specimens comes from other farms breeding the species. However, no data are given in relation to since when offtake of wild specimens is prohibited, as well as in relation to the mentioned additional farms and the controls of these farms to avoid laundering of wild-taken specimens. Finally, information on the reproduction rates and current size of the breeding stocks is not provided.

Concerning *Oophaga pumilio* from Nicaragua

- Nicaragua stated that they have registered a total of three facilities for the captive breeding and export (which are the same for all three species) and likewise that breeding stock will be acquired from authorized captive breeding establishments in Nicaragua. The dates since they have been operational are missing.
- Clarification is needed on whether there are further breeding establishments in Nicaragua and how breeding stock for those facilities was sourced. The CITES trade database does not include any imports of all three species since their listing in 1987. At some point probably some specimens from the wild would have needed to be taken to serve as founder stock. Some offtakes from the wild in the past could certainly have been regarded as non-detrimental to all three species acknowledging that they species are considered as locally abundant and have a fast life history. All three species can also be bred in captivity quite well, while smuggling in poison dart frogs is still an issue.
- Data Collection Forms were not provided for these 4 facilities. However, some information from the form was provided by Nicaragua in their response. Overall, it appears that not all of the information contained in the Data Collection Form was provided by Nicaragua for each facility, including information on founder stock and important data used to calculate production capacity of the facilities.
- However, there is little doubt that these facilities are able to generally breed the species under the conditions mentioned in the reply.
- Acknowledging the significant trade volumes and ongoing smuggling in poison frogs and in order to confirm that the species are bred in compliance with Resolution Conf. 10.16 (Rev. CoP19), information on a) since when offtake from the wild is prohibited in Nicaragua, b) if there are further facilities breeding the species in addition to the three facilities mentioned and how and when they obtained their breeding stock of which source c) an overview of the reproduction rates and current size of the breeding stocks is important.
- No specific details are provided for each establishment. General management practices and legal aspects are mentioned, but there is no explanation of how field control and monitoring are implemented, including verification protocols, visit reports, and inspection details before export. It is mentioned that reports and documents exist, but they are not provided.
- As collection of specimens from the wild is not authorized, the approach to managing genetic erosion in the parental stock is not specified.
- In addition to fungal infections, wild subpopulations in Costa Rica, Nicaragua, and Panama are threatened by capture for the international pet trade (CITES 2015).
- Thought the causes of mortality, how it occurs, and mitigation measures are provided, numerical data on mortality rates are not provided.
- Detailed information regarding the founder stock (quantities, source, chain of custody, etc.) and data used to determine production capacity (i.e., # females, clutch size, % survival (mortality info), etc.) were

not provided by Nicaragua. As a result, production capacity of the facilities cannot be determined. [The CITES Trade Database shows an export of 5,000-8,000 F specimens and ~2,000 C specimens in 2022]

Conclusions of the Animals Committee

The members of the Animals Committee do not in principle doubt the capacity of the three registered facilities to breed this species and produce the numbers exported. There are however some questions that Nicaragua may want to provide in order for the Members to be confident that these facilities comply with the requirements of Resolution Conf. 10.16 (Rev. CoP19). In particular, it is mentioned that the species may not be taken from the wild and that all supplementation of specimens comes from other farms breeding the species. However, no data are given in relation to since when offtake of wild specimens is prohibited, as well as in relation to the mentioned additional farms and the controls of these farms to avoid laundering of wild-taken specimens. Finally, information on the reproduction rates and current size of the breeding stocks is not provided.

Concerning *Agalychnis callidryas* from Nicaragua

- Nicaragua stated that they have registered a total of three facilities for the captive breeding and export (which are the same for all three species) and likewise that breeding stock will be acquired from authorized captive breeding establishments in Nicaragua. The dates since they have been operational are missing.
- Clarification is needed on whether there are further breeding establishments in Nicaragua and how breeding stock for those facilities was sourced. The CITES trade database does not include any imports of all three species since their listing in 1987. At some point probably some specimens from the wild would have needed to be taken to serve as founder stock. Some offtakes from the wild in the past could certainly have been regarded as non-detrimental to all three species acknowledging that they species are considered as locally abundant and have a fast life history. All three species can also be bred in captivity quite well, while smuggling in poison dart frogs is still an issue.
- Data Collection Forms were not provided for these 4 facilities. However, some information from the form was provided by Nicaragua in their response. Overall, it appears that not all of the information contained in the Data Collection Form was provided by Nicaragua for each facility, including information on founder stock and important data used to calculate production capacity of the facilities.
- However, there is little doubt that these facilities are able to generally breed the species under the conditions mentioned in the reply.
- Acknowledging the significant trade volumes and ongoing smuggling in poison frogs and in order to confirm that the species are bred in compliance with Resolution Conf. 10.16 (Rev. CoP19), information on a) since when offtake from the wild is prohibited in Nicaragua, b) if there are further facilities breeding the species in addition to the three facilities mentioned and how and when they obtained their breeding stock of which source c) an overview of the reproduction rates and current size of the breeding stocks is important.
- No specific details are provided for each establishment. General management practices and legal aspects are mentioned, but there is no explanation of how field control and monitoring are implemented, including verification protocols, visit reports, and inspection details before export. It is mentioned that reports and documents exist, but they are not provided.
- As collection of specimens from the wild is not authorized, the approach to managing genetic erosion in the parental stock is not specified.
- In addition to fungal infections, wild subpopulations in Costa Rica, Nicaragua, and Panama are threatened by capture for the international pet trade (CITES 2015).
- Thought the causes of mortality, how it occurs, and mitigation measures are provided, numerical data on mortality rates are not provided.
- Detailed information regarding the founder stock (quantities, source, chain of custody, etc.) and data used to determine production capacity (i.e., # females, clutch size, % survival (mortality info), etc.) were not provided by Nicaragua. As a result, production capacity of the facilities cannot be determined. [The CITES Trade Database shows an export of ~30,000 specimens in 2022 and 600 specimens in 2023]

Conclusions of the Animals Committee

The members of the Animals Committee do not in principle doubt the capacity of the three registered facilities to breed this species and produce the numbers exported. There are however some questions that Nicaragua may want to provide in order for the Members to be confident that these facilities comply with the requirements of Resolution Conf. 10.16 (Rev. CoP19). In particular, it is mentioned that the species may not be taken from the wild and that all supplementation of specimens comes from other farms breeding the species. However, no data are given in relation to since when offtake of wild specimens is prohibited, as well as in relation to the mentioned

additional farms and the controls of these farms to avoid laundering of wild-taken specimens. Finally, information on the reproduction rates and current size of the breeding stocks is not provided.