

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

Species conservation and trade

Fungi

AN ASSESSMENT OF THE PRACTICALITIES OF THE COP12 DECISION
THAT THE CONVENTION APPLIES TO FUNGI

1. This document has been submitted by the United Kingdom of Great Britain and Northern Ireland (UK).*

Background

2. At its 10th meeting (Shepherdstown, 2000), the Plants Committee briefly discussed the application of CITES to fungi and whether, during the negotiation of the Convention text, flora was understood to include fungi. The Chair of the Plants Committee requested the Vice-Chairman of the Nomenclature Committee to consider this and report back to PC11.
3. The Vice-Chair of the Nomenclature Committee [reported](#) back at the 11th meeting of the Plants Committee (Langkawi, 2001), with the conclusion that the taxonomic distinction between plants and fungi became the widely held consensus at some point between 1961 and 1971, and so prior to the agreement of the Convention text in 1973. The Plants Committee [agreed](#) for the Vice-Chairman of the Nomenclature Committee and the Secretariat to prepare a document requesting the CoP to decide on whether, in its opinion, the word 'flora' covers both Fungi and Plantae.
4. This issue was not revisited at the 12th meeting of the Plants Committee and no document was put forward to the following Conference of Parties. However, a summary was produced for the subsequent Conference of Parties (CoP12, Santiago, 2002) which drew on recollections from those involved in the original negotiations and consultation with a range of mycological authorities (Annex 2, CoP12 [Doc. 10.3](#)). This summary recommended that it was likely there was not an explicit intention during the drafting to exclude fungi, but that it was not considered that there were fungi species that met the criteria for listing on CITES. CoP12 agreed that the Convention should be considered to apply to fungi, with a reservation to this entered by Japan (CoP12 [Plen. 3](#) (Rev.)). This decision is captured in paragraph 1 of [Resolution Conf. 12.11](#) (Rev. CoP19) *Standard Nomenclature*, which states that "*The Conference of the Parties to the Convention, agrees that species of fungi are covered by the Convention*".
5. Since this CoP12 decision there have been no proposals to amend the CITES Appendices for a fungi species or taxa despite the approximately 150,000 currently described species¹. However, as the inoculants of agarwood-producing taxa (*Aquilaria* spp. and *Gyrinops* spp.), fungi have indirectly been involved in these discussions.

* *The geographical designations employed in this document do not imply the expression of any opinion whatsoever on the part of the CITES Secretariat (or the United Nations Environment Programme) concerning the legal status of any country, territory, or area, or concerning the delimitation of its frontiers or boundaries. The responsibility for the contents of the document rests exclusively with its author.*

¹ Phukhamsakda, C., Nilsson, R.H., Bhunjun, C.S. *et al.* The numbers of fungi: contributions from traditional taxonomic studies and challenges of metabarcoding. **Fungal Diversity 114**, 327–386 (2022). <https://doi.org/10.1007/s13225-022-00502-3>

6. At the recent 16th Conference of Parties (CoP16) to the Convention on Biological Diversity (CBD) held in Cali (Colombia), Chile and the UK co-launched a Fungal Conservation Pledge calling on Parties to recognise fungi in international agreements and implement measures for their conservation. CITES, as an international framework aiming to ensure that international trade of wildlife does not threaten the survival of these species in the wild and with a mandate that extends to fungi, appears to be an underutilised tool for addressing concerns about their conservation.
7. This document is intended to continue the discussion around the application of CITES to fungi following the CoP12 decision and provide Parties with an opportunity to consider the practical measures that may be needed prior to any fungi listing proposals being submitted or accepted.
8. The accompanying information document includes an analysis of fungal species in trade, including the potential threat to the species that current trade represents. This provides context for determining the practical measures that CITES may need to take prior to any listing proposals being submitted. Similar to previous assessments for other taxa, e.g. [snakes](#), or [analyses](#) of Red List data, this analysis is intended to provide Parties with a preliminary assessment rather than a suggestion of where listing proposals should be developed. It remains for Parties to develop robust proposals for any potential amendments to the CITES Appendices as set out in Article XV and in line with the criteria set out in [Res. Conf. 9.24](#) (Rev. CoP17).

Practical considerations

9. **Committees:** The CoP12 decision that fungi are in scope of CITES impacts some of the assumptions under which the Convention currently operates, in particular the division of technical intersessional responsibilities between the Animals and Plants Committees. The mandate and terms of reference for CITES Committees is set out in [Res. Conf. 18.2](#) on *Establishment of Committees*, where paragraph 3 establishes the Animals and Plants Committees and Annex 2 sets out their terms of reference.
10. In order to implement the CoP12 decision on fungi, Parties could consider the establishment of a fungi-specific body equivalent to the Animals and Plants Committees to provide relevant technical expertise. However, this is likely disproportionate when weighing the technical input required at this time against the resourcing implications of establishing a new Committee. A more proportionate approach would be to consider fungi within the scope of one or both of the existing technical Committees. Although fungi are genetically closer to animals, for reasons of historic taxonomic association and workload, the Plants Committee appears to be the stronger candidate to take on this function. However, the regular joint sessions of the Animals and Plants Committees presents an opportunity for any fungi matters to be discussed in a way that allows for input from both technical Committees.
11. Such a decision has implications for the agenda and capacity of the Animals and Plants Committees. Parties are invited to consider and comment on the governance and administrative changes necessary to facilitate the technical Committee(s) fulfilling this function, and on the capacity of the Committee(s) and its members to do so.
12. **Party and Secretariat expertise:** Decision-making under CITES relies on Parties and the Secretariat being able to draw on appropriate expertise, for example, in evaluating proposals to amend the Appendices or to consider measures or activities necessary to address implementation difficulties, e.g. via Decisions or Resolutions. Currently, Parties and the Secretariat have expertise in a wide range of scientific, operational, taxonomic, enforcement and legal domains, and industry bodies, Non-Governmental Organisations or independent experts provide additional specialist input or capacity building to Parties and the Secretariat. Parties and the Secretariat should consider their ability to access the appropriate expertise in regards fungi as envisaged in the CoP12 decision, and any logistical or practical considerations deriving from that.
13. **Nomenclature specialist:** The role of an *ex-officio*, non-voting Nomenclature Specialist on each of the technical Committees with specialisms in zoological nomenclature and botanical nomenclature respectively is set out in paragraph 5 c) of Annex 2 of [Res. Conf. 18.2](#). These Nomenclature Specialists attend meetings as needed to support discussions on specific nomenclature issues. Fungal taxonomy and methods may be considered too different to be sufficiently covered by the existing Nomenclature Specialist roles. It may therefore be necessary to establish separate means for the Committees to access specialist advice fungal nomenclature, for instance by appointing an *ad hoc* expert to advise the Committee(s), by considering an Alternate with fungi specialism for one of the existing Nomenclature Specialists, or by establishing an additional *ex-officio*, non-voting fungi Nomenclature Specialist role in one of the technical Committees.

14. **Budgetary considerations:** Facilitating the explicit consideration of fungi will have budgetary implications which must be considered in light of the existing budgetary constraints on Convention activities. Assuming a relatively low number of proposals to include fungi species on the CITES Appendices in the short term, the level of funding and technical input would likely be relatively small. The input from CITES Committees would largely consist of the activities set out in paragraph 2 of Annexes 2 and 3 to Res. Conf. 18.2 *Establishment of Committees* and be “*in accordance with instructions from and authority delegated by the Conference of the Parties*”. The Conference of Parties may wish to consider whether activities beyond the core functions of the Secretariat relating to fungi-specific issues could be subject to external funding to support the sustainability of core budgets.
15. Given the potential for several fungi-specific decisions being put to CoP20 to address the points raised in paragraphs 9-14, it may be beneficial to consider the need for a specific Resolution that draws together an agreed approach. It will be helpful to understand Parties’ views on the merits or drawbacks of developing a new Resolution on the application of CITES to fungi or incorporating text into an existing Resolution to capture decisions of future CoPs relating fungi under CITES.

Recommendations

16. The Standing Committee is invited to:
 - a) take note of the issues raised in this document;
 - b) provide its views of the implications for implementation of the CoP12 decision relating to the application of the Convention to fungi, in particular the practical considerations outlined in paragraphs 9-14;
 - c) provide its views on the utility of developing Resolution text relating to the application of CITES to fungi as described in paragraph 15; and,
 - d) consider the analysis of the impact of trade on fungi species in paragraph 8 and in an information document for the present meeting and provide any views of the appropriateness of a potential CITES listing proposal for any of these species.