



**Briefing for CITES COP20
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About Panthera

Panthera, founded in 2006, is devoted exclusively to preserving wild cats and their critical role in the world's ecosystems. Panthera's team of leading biologists, law enforcement experts, and wild cat advocates develop innovative strategies based on the best available science to protect cheetahs, jaguars, leopards, lions, pumas, snow leopards, tigers, and the 33 small cat species and their vast landscapes. In 35 countries around the world, Panthera works with a wide variety of stakeholders to reduce or eliminate the most pressing threats to wild cats—securing their future and ours.

Panthera at CITES COP20

Panthera works with CITES Parties around the world as partners in wild cat conservation. We combine science, technology and law enforcement expertise to help develop collaborative, evidence-based approaches that benefit wild cats and people, so that both can thrive.

Poaching and the illegal wildlife trade threaten all the big cats, which are sought after for their skins, teeth, claws, bones and organs for trinkets, luxury items, cultural use, and traditional medicines. Big and small wild cats are trafficked live for the illegal pet trade, which thrives online and is notoriously hard to enforce. Commercial captive breeding of all the big cat species raises special concerns for its potential to contribute to illegal trade and drive demand, with impacts on wild populations as yet unknown.

At COP20, the Parties to CITES will consider matters on legal and illegal trade in cheetahs, jaguars, lions, leopards, snow leopards and tigers and dozens of other documents and decisions that impact wild cats directly and indirectly.

Our recommendations are offered to assist with your decision-making, and we are available for additional information and discussion.

Strategic Matters

Cooperation

16.3 Joint CITES-CMS African Carnivores Initiative

SUPPORT Amendment to Res.Conf. 13.3 and Adoption of Revised and Draft Decisions

Panthera commends the Range States of African Carnivores for the progress they've made to implement activities under the Joint CITES-CMS African Carnivores Initiative. The 2021-2025 ACI Programme of Work was very comprehensive and ambitious for a five-year plan, and we support its continuation with an updated version developed by Range States. The task is daunting, but vitally important. Cheetahs, lions and leopards continue to decline across Africa faced by a panoply of complex and ever-evolving threats. For that reason, we support the recommendation to list these species for explicit and sustained attention under Resolution Conf. 13.3 on Cooperation and Synergy with CMS.

Illegal Trade and Enforcement

Doc. 41 CITES Big Cats Task Force

SUPPORT Adoption of Draft Decisions with Amendments

Panthera supports adoption of the Draft Decisions on the Big Cats Task Force with amendments as suggested below. The meeting in Entebbe, Uganda in 2023 produced numerous actionable recommendations that, if fully implemented and rigorously enforced, would help Parties meet their commitments to reduce illegal trade in big cats. However, given the dynamic nature of the trade, and rapidly developing tools and technologies to address it, we are concerned that there is currently no process to update the strategies, measures and activities Parties are encouraged to implement, which could change significantly during the 5+ years between Entebbe and COP21. To identify gaps and

improve outcomes, we therefore recommend that the Standing Committee consider whether a meeting of the Big Cats Task Force should be convened in the intersessional period between COP20 and COP21, preferably before SC82, to discuss Parties' progress, share information and best practices, and ensure implementation, enforcement and monitoring methods are up-to-date. The meeting could be held virtually to reduce the costs and encourage robust participation.

Additionally, as several subsequent CITES documents since the Big Cats Task Force Meeting was held reference the outcomes from the meeting, we encourage the Secretariat to feature the [Outcome document](#) more prominently on the CITES website so it can be more easily located and accessed.

We support the Draft Decisions with the amendments below:

“20.CC The Standing Committee shall:

- a) consider the report and recommendations of the Secretariat in accordance with Decision 20.BB and determine whether a meeting, whether physical or online, of the Big Cats Task Force would be appropriate to discuss gaps and best practices in implementation of the strategies, measures and activities outlined in the CITES Big Cats Task Force outcome document, and if so instruct the Secretariat, subject to external resources, to convene such a meeting and report on the outcome of the meeting to the 82nd meeting of the Standing Committee;
- b) based on the implementation of Decision 20.AA and paragraph a) of this Decision, ~~and~~ make recommendations to the Parties or the Secretariat as appropriate; and
- ~~b) c)~~ c) report on the implementation of the present Decision to the 21st meeting of the Conference of the Parties together with any recommendations it may have.”

Doc. 45 Illegal Trade in Cheetahs

SUPPORT Adoption of Draft Decisions with Amendment

Panthera welcomes the Standing Committee's recommendations to maintain attention on the illegal trade in cheetahs, which is unique among the big cats for the prevalence of trafficking of live cubs for the pet trade, and therefore requires specific interventions at source, transit and consumer sites and online. We support the Draft Decisions presented in the Annex encouraging Parties to fully implement the recommendations from the [Big Cats Task Force](#), particularly strengthening legislation to specifically address the illegal trade in cheetahs and enforcement of that legislation, as well as complementary interventions such as demand reduction.

We note that more information is urgently needed to fully understand the extent and trajectory of the illegal cheetah trade to effectively combat it. We therefore welcome the emphasis in 20.AA c) on the Big Cat Task Force's detailed recommendations to strengthen collaboration at the regional and international levels. We recommend a minor amendment to the Decision to emphasize the importance of coordination and cooperation at the provincial level, as follows:

20.AA c) strengthen regional and international collaboration to address illegal trade in cheetahs as recommended in Section 3.1 e) through f) and Section 5.1 a) through i) of the Big Cats Task Force outcome document, and coordination with provincial authorities, law enforcement and civil society.

Regulation of Trade

Doc. 50 Non-detriment Findings

SUPPORT Adoption of Draft Decisions

Panthera welcomes the progress made through the CITES NDF Project to update and improve guidance for Parties to assist in making robust, science-based non-detriment findings (NDFs). Science-based NDFs developed through an open, inclusive, standardized process are essential to the effective implementation of CITES.

We attended the NDF Workshop in Nairobi in 2023 and are pleased that the Guidance is now accessible to Parties for field testing and feedback to inform future iterations. As part of this ongoing process, we encourage Parties to make their NDFs more widely available for diverse expert and stakeholder input in the interest of strengthening their effectiveness in sustainable management of trophy hunting.

Panthera supports adoption of the Draft Decisions and welcomes the engagement of the Animals and Plants Committees to consider amendments to Res. Conf. 16.7 (Rev. CoP17) to establish a regular mechanism for the Committees to identify, review and agree updates to the NDF guidance. Panthera stands ready to assist with this ongoing effort.

Species Conservation and Trade

Doc. 77.1 Implementation of Res 12.5 (Rev.COP19) on Conservation of and Trade in Tigers and other Appendix 1 Asian Big Cat Species

OPPOSE Deletion of Decision 18.105; SUPPORT Deletion of Other Decisions

Panthera recommends that Decision 18.105 on illegal trade in leopard parts be retained.

Leopards are thought to have lost between 65 and 73% of their historical range, and over 83% of their range in Asia. Four of the six leopard subspecies resident in Asia (Amur leopards, Arabian leopards, Indochinese leopards, and Javan leopards) are restricted to less than 5% of their historical range. A recent assessment of leopards in Southeast Asia (Rostro-Garcia et al. 2024) found that estimated leopard densities were among the lowest ever reported for the species anywhere in the world, and that current enforcement measures were insufficient to tackle the threats to leopards, particularly snaring. The report concluded that “the overall prognosis for leopards in Southeast Asia is becoming increasingly bleak.” Indeed, in recent years, leopards have become functionally extinct in Viet Nam, Lao PDR and Cambodia.

Meanwhile, illegal trade in leopards is increasing with leopards surpassing tigers as the most frequently seized Asian big cat. Shifting dynamics have been observed in recent years on the parts in trade, location of seizures, demand, and convergence (Duran & Stoner, 2025). Retaining Decision 18.105 keeps a much-needed spotlight on leopards and Parties to develop measures to address a complex and evolving trade that is putting additional pressure on a species in decline. We are concerned that the urgency conveyed in Decision 18.105 to address illegal trade in leopards, which was reiterated by the Standing Committee at SC77, has not led to a robust response from the Parties; furthermore, we fear that the need for species-specific measures will be overlooked within the broader framework of ABCs under Res. Conf. 12.5 and the CITES Big Cats Task Force. For this reason, we strongly recommend retaining Decision 18.105.

Doc 77.2 Asian Big Cats in Captivity

SUPPORT Adoption of Draft Decisions in Annex 2 with Amendments
OPPOSE Secretariat's Recommendation to Delete Decision 14.69

Panthera supports adoption of the Draft Decisions in Annex 2 of the document with some minor amendments for clarity as detailed below. We believe that these changes will assist Parties with implementing the Decisions by:

- 1) Clarifying to whom the Decisions are directed by eliminating the vague term “large.” Without an accompanying definition of what is meant by “large,” which has been discussed at CITES meetings before but never codified, it is unclear to whom these Decisions apply. Moreover, the Decisions should recognize that facilities with captive tiger populations of any size can be and have been implicated in illegal trade. The suggested language is based on Decision 14.69, which states that Parties “...shall implement measures to restrict the captive population to a level supportive only to conserving wild tigers.”
- 2) Removing text that seems to offer a choice between conservation value and educational value when assessing whether a facility's activities should continue. Educational value is an aspect of conservation value, not separate from it. Hence, we suggest conservation and educational value, rather than ‘or’.
- 3) Specifying in para. a) that breeding should be part of a program that is “internationally recognized” to narrow the circumstances under which breeding can take place, ensuring it is carried out with the intent to contribute to the conservation of wild tigers.

DRAFT DECISIONS ON TIGERS (PANTHERA TIGRIS) IN CAPTIVITY

Directed to Parties in whose territories there are captive tiger populations ~~facilities that breed large numbers of tigers and facilities housing large numbers of tigers~~

20.AA All Parties in whose territories there are ~~facilities that breed large numbers of tigers and facilities housing large numbers of~~ captive tigers populations are encouraged to consider taking the following methodical approach to restrict the captive population to a level supportive only to conserving wild tigers ~~regarding these facilities to improve their conservation and educational value,~~ as well as to put an end to the activities of facilities that do not have conservation and ~~or~~ educational value, that fail to comply with regulations or ~~and~~ pose a risk regarding parts and derivatives from these animals entering illegal trade, in accordance with their domestic legislation:

- a. identify facilities keeping tigers of genetic and conservation value and engage these facilities in internationally recognised coordinated conservation breeding programmes for such animals;
- b. identify facilities keeping tigers in captivity that are suitably located for ~~to ensure~~ public access and that meet husbandry and welfare conditions based on national and international guidelines, and implement support programmes where needed (for example providing guidance on development of educational materials, signs and posters), for these facilities to transform into facilities with educational value that are raising awareness benefitting conservation of tigers in the wild, including bringing the attention of the public to illegal trade

and the need to combat it;

- c. implement and enforce measures to reduce the number of tigers in facilities that are not contributing to conservation of wild tigers ~~or have limited educational value~~, by restricting breeding of tigers (e.g., by separating male and female tigers, sterilization or other disposal measures, including euthanasia) within these facilities, and addressing the risk of inbreeding by requiring genetic monitoring, as well as restricting these facilities from acquiring any new animals;
- d. taking into consideration Decision 14.69 that directs Parties to restrict the captive population to a level supportive only to conserving wild tigers and that tigers should not be bred for trade in their parts and derivatives, prohibit the establishment of new facilities keeping tigers in captivity with narrow exemptions where warranted;
- e. assess the need for rescue centres, sanctuaries, or other disposal measures, including euthanasia, etc. as may be required due to the phase-out of captive ~~intensive~~ tiger operations not supportive of conserving wild tigers;
- f. review management practices and controls to regulate activities of facilities keeping tigers in captivity to ensure that they are adequate to prevent tiger specimens from entering illegal trade from or through such facilities, including implementation of the strategies, measures and activities in Section 2 of the CITES Big Cats Task Force outcome document in the annex of SC77 Doc 39.3; ~~licensing of such facilities, accurate record keeping of individual tigers, regular inspections and well-regulated disposal of tigers that die in captivity and handling of carcasses;~~ and
- g. report on the implementation of this approach and in the case of relevant countries report on implementation of country-specific recommendations made by the Standing Committee at its 77th and 78th meetings, in their response to the Notification to the Parties issued by the Secretariat on Asian big cats (Felidae spp.) to facilitate reporting as required in Resolution Conf. 12.5 (Rev. CoP19) on Conservation of and trade in tigers and other Appendix-I Asian big cat species.

Re: Secretariat's Comments on Decision 14.69

Panthera opposes the Secretariat's recommendation to delete Decision 14.69 and its amendments to Draft Decision 20.AA. First, it is not clear why deleting the Decision aligns better with the Convention as the Secretariat states, but the risks of deleting it are surely greater than any presumed benefits in terms of advancing its implementation. Directed to all Parties, Decision 14.69 was adopted in 2007 to restrict captive breeding of tigers to the sole purpose of their conservation in the wild and to prohibit breeding for trade in their parts and derivatives. As noted in Section 3 a) of Doc. 77.2, the Secretariat has attempted to obtain a better understanding of its implementation through a series of Missions to captive tiger facilities conducted over the past several years. The Secretariat's own reports from those Missions note that, while some progress has been made to implement Decision 14.69, there is still much work to be done. The Standing Committee explicitly references ongoing consideration of Decision 14.69 in the Draft Decisions with respect to restricting the establishment of new captive tiger facilities, making it clear that the Committee did not intend to delete it. We urge the COP to reject the Secretariat's comments and retain Decision 14.69.

Re: Conservation Breeding Guidance

We invite Parties to take note of a [guidance document](#) prepared in response to discussions during the Plenary session of AC33 on conservation breeding, specifically for assessing whether a captive facility breeding tigers is contributing to the conservation of wild tigers. The document was developed by a group of experts in tiger conservation and tiger trade, animal welfare, and zoos and sanctuaries with tiger conservation breeding programs and can be used to complement the guidance documents on conservation breeding shared in paras. 17-22 of the current document.

Doc. 80 (Rev.1) African Lions

SUPPORT Adoption of Draft Revised Decisions with Amendments

Panthera welcomes the Standing Committee's report. The recent global Red List Assessment on Lion estimated that lions are present in only 6% of their historic range, a 34% reduction since 2004 (Nicholson et al. 2025). While habitat loss, loss of prey base, and human-lion conflict are the key drivers of declines in lion populations, the illegal trade in lion bones and other body parts—primarily for traditional medicine—is a growing threat to lions in Africa. A recent study of lion killing in Mozambique showed that targeted poaching of lion body parts for the illegal wildlife trade increased significantly between 2010 and 2023, and when combined with other types of human-caused lion killing, including legal trophy hunting, could threaten the country's lion populations over the long-term (Almeida et al., 2025).

The [CITES Comparative Study of African Lion Population Trends](#) shows that among 19 lion range States responding to a questionnaire on threats to lions, illegal killing or poaching for parts ranked second after human-lion conflict. However, the report also notes that States reported low numbers of animals killed through poaching, indicating a data gap.

We support adoption of the Draft Revised Decisions but suggest that the illegal killing and trade of lions and gaps in knowledge about its extent and impact on lion populations, warrant ongoing attention by the CITES Committees. Therefore, we propose that the Decisions be reworded so that:

- 1) the Secretariat issues a notification to Parties asking them to report on activities under Decision 19.208 and;
- 2) the Secretariat be mandated to report to SC82 on the outcomes of this Decision under Decision 19.207 (Rev. CoP20).

Doc. 81 Jaguars and Doc. 81 add. Outcomes of the 2nd Jaguar Range State Meeting

SUPPORT Adoption of Draft Resolution and Draft Decisions

Panthera welcomes the progress between CITES CoP19, CMS COP14 and CITES CoP20 to advance a regional approach to jaguar conservation—a necessary strategy for a species whose range spans 18 countries along the Jaguar Corridor from northern Mexico to northern Argentina. Recognizing that addressing the many threats to jaguars goes beyond the scope of any one treaty or UN Convention, we commend the collaborative efforts to develop a comprehensive Regional Action Plan and strong Resolutions under CITES and CMS to support its implementation, as agreed by all range States at the recent meeting in Mexico City.

A just-released rapid assessment of jaguar trade trends over the past decade (Go-Insight 2025) shows that illegal trade in jaguars persists and highlights the need to address critical intelligence gaps to better understand the trade dynamics, including convergence with other serious and organized crimes, and deploy effective interventions. Panthera supports the Draft Resolution and the Draft Decisions that encourage jaguar range States to take action to combat illegal killing and trade in jaguars as part of an integrated regional conservation strategy. We emphasize that Parties' efforts to strengthen law enforcement and cooperation at the national and international levels could be further enhanced by adopting a strategic management model of policing that builds trust, coordination and collaboration capacity at the provincial level. This approach, tapping into local knowledge and building partner-working skills among provincial authorities, law enforcement, and civil society stakeholders who often act as first responders to wildlife crime, can improve results along the entire intelligence chain. chain.

As co-authors of the Jaguar 2030 Roadmap, an historic collaboration with range States, IGOs, NGOs, the GEF and multi-lateral development banks to secure the Jaguar Corridor, Panthera welcomes range States' renewed commitment to protect the emblematic species of the Americas and all that jaguars contribute to people and biodiversity. We stand ready to support range States to implement the Regional Action Plan, as stated in the Draft Resolution, and look forward to engaging on critical next steps regarding the development of the intergovernmental platform and the monitoring system.

Doc. 82 Guidance for NDFs for Trade in Leopard Hunting Trophies

SUPPORT Revised and Draft Decisions with Amendments

With few exceptions, the kind of comprehensive, long-term studies of leopard populations needed to make science-based NDFs for leopard hunting trophies are not available, and, as range States themselves point out (in Para. 8 d)), are exceedingly challenging to do. The challenges notwithstanding, regular surveys are critical to determining whether leopard trophy hunting is sustainable. Leopard populations are dynamic and change over time in response to a range of factors, potentially including trophy hunting offtake. Continued monitoring is needed to ensure that this offtake does not become unsustainable when added to high levels of mortality from poaching and conflict with livestock farmers.

For this reason, we urge the CoP to retain the language from Decision 18.166 (Rev. CoP19) that encourages range States to conduct regular surveys and adjust quotas as appropriate in Draft Decision 20.AA as this is an ongoing necessity for adaptive management.

In the absence of robust population data—and particularly trend data—in most leopard range States, an adaptive management approach with robust monitoring is the best way to ensure that legal leopard hunting is non-detrimental to the species' survival in the wild. These methods should be developed in line with scientific best practices, in an inclusive and transparent process, to ensure the quality and veracity of the information collected. In South Africa, where leopard trophy quotas are directly tied to monitoring of population trends, current hunting offtake levels are at approximately 5% of the CITES quota (Trouwborst et al 2019).

The few recent, large-scale camera trap studies in Southern African countries have shown lower densities of leopards than previously estimated. CITES quotas for southern African range States are based on the estimates produced by Martin & de Meulenaer, 1989. Although broad-scale population

estimates for leopards are notoriously imprecise, the most recent national estimate from South Africa (Swanepoel et al 2014) puts leopard numbers at 4476 individuals, a substantial decline from the Martin & de Meulenaer estimate of 23,472.

Panthera supports adoption of the Draft Decision with the following amendments:

Directed to Parties which have quotas for leopard hunting trophies established under Resolution Conf. 10.14 (Rev. CoP19)

20.AA Parties which have quotas for leopard hunting trophies established under Resolution Conf. 10.14 (Rev. CoP19) to:

- a. conduct regular surveys and adjust quotas as appropriate;
- b. consolidate existing information relating to the management and monitoring of leopard and hunting quotas that assist Parties in the making of non-detriment findings for trade in leopard hunting trophies in compliance with Resolution Conf. 10.14 (Rev. CoP19) and to share this with leopard range States through the African Carnivores Initiative and with the Animals Committee.

We welcome efforts by range States to explore additional steps they can take to ensure that leopard trophy hunting is sustainable and encourage them to make their NDFs public in support of developing a standardized, science-based approach. We stand ready to assist with these efforts, including the development of a checklist that sets out the key aspects to be addressed in making an NDF, as mentioned in Para. 8 m).

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