

# **The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)**

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## Summary

The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) has been ratified by 185 nations, including the United States, and the European Union. It regulates the international trade in animals and plants that may be threatened by trade. CITES entered into force in 1975 and as of January 2026 regulates the trade of over 40,900 species—including approximately 34,310 species of plants and 6,610 species of animals. Many believe that CITES has been a success, particularly in preventing extinction of listed species due to trade. Others believe that CITES, although successful, has had implementation difficulties, such as a lack of enforcement and failures to enact laws that implement the treaty in some nations.

Protected species are organized under CITES into three appendixes. Appendix I includes species that are threatened with extinction, which are or may be affected by international trade. International trade in Appendix I species is prohibited for commercial purposes, with exemptions in rare cases, such as for scientific research. Appendix II contains species that are not necessarily currently threatened with extinction but require controlled trade to prevent population declines. Appendix III species are listed because at least one country has requested other countries to assist it in regulating trade of that species.

A CITES Conference of the Parties (CoP) is held approximately once every three years, convening member parties and other stakeholders to contribute to decisions regarding species listing and resolutions to the convention. CoP20 was held in Uzbekistan in 2025. CoP20 represented the 50<sup>th</sup> anniversary of CITES and ended with increased protection for several species. The CoP also included measures to lower the illegal trade of wildlife. Parties adopted measures that addressed online wildlife crime, illicit financial flows, corruption, and annual illegal trade reporting.

In the United States, the Endangered Species Act (ESA; 16 U.S.C. §§1531-1544) implements CITES and contains separate provisions for protecting rare foreign species. Many species listed under the ESA are also listed under CITES. However, listings under the ESA are based on several criteria that may threaten the survival of the species. Species listed under CITES are evaluated solely on the threat of trade to a species' survival. CITES might allow for the trade in a listed species if trade is not detrimental to the survival of the species, whereas the ESA might allow imports of foreign endangered species if trade enhances the survival of the species in its native country.

The scope of CITES activities has expanded since ratification, and Congress could debate whether the current scope is addressing the core mandate of the convention to prevent trade from harming wildlife. Congress also could consider what level of appropriations for implementing CITES and contributions to the CITES Secretariat meet congressional goals for species preservation. Further, Congress might consider how the enactment and enforcement of laws that implement CITES in other countries are affecting the viability and effectiveness of the convention.

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## Introduction

The annual value of the global wildlife trade is estimated to be \$360 billion.<sup>1</sup> Although the wildlife trade brings revenue to many countries and communities globally, some scientists also point to it as a driver of biodiversity loss.<sup>2</sup>

Regulating the global wildlife trade to prevent species and consequently biodiversity loss is the objective of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). CITES is an international agreement among national governments that aims to ensure the international trade in plants and animals does not threaten their survival.<sup>3</sup> The global wildlife trade is estimated to involve over 70,000 species.<sup>4</sup> The United States, a signatory to CITES, historically has been one of the largest importers of wildlife and wildlife products. Other countries involved in the wildlife trade include China, Germany, and the Netherlands.<sup>5</sup> CITES also provides a framework for addressing the illegal trade in wildlife. According to UN Environment Programme estimates, illegal trade in wildlife products, including elephant ivory, rhino horns, and turtle shells, is estimated to be worth \$7 billion to \$23 billion annually.<sup>6</sup> This figure does not include illegal logging and illegal fishing, which can account, respectively, for roughly an additional \$50.7 billion-\$152 billion annually and \$11 billion-\$23.5 billion annually, respectively.<sup>7</sup> Such figures may place illegal wildlife trafficking among the top five most lucrative criminal activities worldwide, behind only narcotics, counterfeiting, and human trafficking.<sup>8</sup>

The implementation and enforcement of CITES is of interest to Congress because of the prominence of the United States in the international wildlife trade. Congress provides oversight on U.S. activities related to CITES and appropriations for the CITES Secretariat and conservation programs that aim to improve the populations and habitats of some species listed in CITES. Congress sometimes conducts oversight over U.S. proposals and participation in periodic meetings of parties that are signatories to CITES. These meetings are Conferences of the Parties (CoP). The next CoP for CITES is scheduled for Panama in 2028. The United States is planning to attend and be represented by the U.S. Fish and Wildlife Service (FWS).

This report provides background information on the structure of CITES, the implementation of CITES in the United States, and selected issues for Congress to consider.

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<sup>1</sup> Benjamin M. Marshall et al., “Mapping the Global Dimensions of U.S. Wildlife Imports,” *Current Biology*, vol. 35, no. 16 (August 18, 2025) (hereinafter Marshall et al., “Mapping the Global Dimensions.”)

<sup>2</sup> Benjamin M. Marshall et al., “The Magnitude of Legal Wildlife Trade and Implications for Species Survival,” *Proceedings of the National Academy of Sciences*, vol. 122, no. 2 (January 7, 2025) (hereinafter Marshall et al., “Magnitude of Legal Wildlife Trade”); Astrid A. Andersson et al., “CITES and Beyond: Illuminating 20 Years of Global, Legal Wildlife Trade,” *Global Ecology and Conservation* 26, 2021.

<sup>3</sup> Convention on International Trade in Endangered Species of Wild Fauna and Flora (March 3, 1973), 27 U.S.T. 1087. To view the text of CITES, see <http://www.cites.org/eng/disc/text.shtml>.

<sup>4</sup> Marshall et al., “Mapping the Global Dimensions.”

<sup>5</sup> CITES, *CITES Wildlife Tradeview*, 2025, <https://tradeview.cites.org/>.

<sup>6</sup> United Nations Environment Programme, *The Rise of Environmental Crime: A Growing Threat to Natural Resources Peace, Development and Security*, 2016, p. 20, <https://wedocs.unep.org/20.500.11822/7662> (hereinafter UN Environment Programme, *Rise of Environmental Crime*).

<sup>7</sup> UN Environment Programme, *Rise of Environmental Crime*.

<sup>8</sup> World Bank, *Analysis of International Funding to Tackle Illegal Wildlife Trade*, 2016, p. 1.

## Background

The origins of CITES can be traced to the 1960s, during international discussions about the world trade of wildlife and wildlife products and its effect on wildlife populations. In 1963, the International Union for Conservation of Nature and Natural Resources (IUCN) called for an international convention on the trade in animal species and their products.<sup>9</sup> A first draft of the convention was produced in 1964, and in 1973, the treaty was negotiated in Washington, DC, at a conference attended by delegations from 80 countries. CITES was signed by 21 nations in 1973, and entered into force in 1975 after 10 countries ratified the agreement. As of 2026, there are 185 parties to CITES.

CITES is applied to species whose populations may be significantly harmed by international trade. Species are first identified as needing protection and then assessed for the risk trade poses for the species survival. CITES regulates trade through a series of import and export permits corresponding to the degree of protection afforded the species. There are 6,610 species of animals and 34,310 species of plants listed under CITES as of January 2026.<sup>10</sup> The CITES Secretariat estimates that between 2016 and 2020, legal trade in CITES-listed animal species was valued at approximately \$1.8 billion and legal trade in CITES-listed plant species was valued at approximately \$9.8 billion.<sup>11</sup> The administrative bodies of CITES are the Secretariat, CoP, and the Management and Scientific Authorities of each country. The parties (i.e., signatory countries and the European Union) generally meet every two years at a CoP to evaluate the implementation of the treaty and consider efforts that would improve CITES's success.

Parties to CITES are responsible for implementing the convention in their national legislation.<sup>12</sup> In the United States, the implementing legislation for CITES is the Endangered Species Act (ESA; 16 U.S.C. 1531ff).<sup>13</sup> The Division of Management Authority and the Division of Scientific Authority of the Fish and Wildlife Service (FWS) in the Department of the Interior (DOI) exercise the responsibilities of the Management and Scientific Authorities. Enforcement responsibilities for CITES are shared in varying levels by the FWS (Office of Law Enforcement), the Animal and Plant Health Inspection Service (APHIS), and the U.S. Customs and Border Protection (CBP) in the Department of Homeland Security. The National Oceanic and Atmospheric Administration's National Marine Fisheries Service (NOAA Fisheries), in the Department of Commerce, also has a small role in CITES's enforcement.

## Classification into Appendixes and the Permit System

Under CITES, species that are thought to be in need of protection are identified by the parties, and then their trade is regulated through export and import permits. Among the criteria used to consider a species for listing under CITES are (1) trade in the species; (2) population size of the

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<sup>9</sup> William Wijnstekers, *The Evolution of CITES: 11<sup>th</sup> Edition* (International Council for Game and Wildlife Conservation, 2018) (hereinafter Wijnstekers, *Evolution of CITES*).

<sup>10</sup> CITES, "The CITES Species," <https://cites.org/eng/disc/species.php>.

<sup>11</sup> CITES-listed animal and plant species represent only a portion of the total value of global wildlife trade. CITES Secretariat, *World Wildlife Trade Report 2022*, Geneva, Switzerland, 2022, p. 34.

<sup>12</sup> Resolution Conf. 8.4 (Rev. CoP15) on National Laws for Implementation of the Convention, [https://www.cites.org/sites/default/files/document/E-Res-08-04-R15\\_0.pdf](https://www.cites.org/sites/default/files/document/E-Res-08-04-R15_0.pdf).

<sup>13</sup> The ESA prohibits any person subject to the jurisdiction of the United States from engaging in trade in any specimens contrary to the provisions of CITES or possessing any specimens traded contrary to the provisions of the convention. The implementation of CITES in the United States is discussed in federal regulations under 50 C.F.R. 23.

species; (3) quality of habitat used by the species; (4) extent of the area where the species is distributed; (5) number of subpopulations and their size; and (6) reproductive potential.<sup>14</sup>

When a party is interested in including, deleting, or changing the appendix of a species under CITES, the party must submit a proposal to propose a new listing or amend the existing listing based on a set of criteria.<sup>15</sup> The information used in the proposal is based on the “best information available.” To adopt an amendment based on a proposal, two-thirds of the parties voting must vote in favor. The set of criteria used to justify changes in the listings has evolved over the years. When CITES took effect in 1975, several species had already been identified for inclusion in the appendixes. At the first CoP, criteria for including a species under CITES were promulgated and included the submission of data on population size and range of the species. In 1994, new criteria for listing a species under Appendix I and II under CITES were adopted in Resolution Conf. 9.24 (Conf. 9.24).<sup>16</sup> These criteria include parameters based on the level of international trade of the species, distribution and population size of the species, nature and intensity of threats facing the species (e.g., habitat loss, disease, and pollution), management of the species, conservation of the species in its range country, and consultations with other countries where the species are found.<sup>17</sup> Conf. 9.24 has been amended numerous times at COP meetings and by the Secretariat; it was last fully reviewed at COP17 in 2016.<sup>18</sup> Resolution Conference 9.25 sets guidelines for considering species under Appendix III of CITES.<sup>19</sup>

Three appendixes in CITES correspond to different levels of protection from international trade. Under CITES, any species, subspecies, or geographically separate population of a species can be listed. Once listed under CITES, species can be traded between countries only with the proper permits. Permits are given if trade is not expected to be detrimental to the survival of the species. Certificates of Exemption are granted when trade in a species meets a specified set of criteria for exemption.<sup>20</sup> (See “Exemptions,” below, for further discussion.) Article II of the treaty provides conditions under which species are to be included in each Appendix.

## **Appendix I**

The most stringent restrictions on trade are for species listed in Appendix I. For Appendix I, Article II states,

Appendix I shall include all species threatened with extinction which are or may be affected by trade. Trade in specimens of these species must be subject to particularly strict regulation in order not to endanger further their survival and must only be authorized in exceptional circumstances.

CITES generally prohibits commercial international trade in specimens of these species. Circumstances under which these species can be traded include scientific exchange, breeding, or educational programs. Both an import and an export permit (or reexport certificate) are required

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<sup>14</sup> GAO, *Protected Species: International Convention and U.S. Laws Protect Wildlife Differently*, GAO-04-964, September 2004 (hereinafter GAO, *Protected Species*).

<sup>15</sup> Article XV of CITES.

<sup>16</sup> CITES, Res. Conf. 9.24 (Rev. CoP17), “Criteria for Amendment of Appendices I and II,” <https://cites.org/sites/default/files/documents/COP/19/resolution/E-Res-09-24-R17.pdf>.

<sup>17</sup> Criteria presented are based on a summary provided by GAO, *Protected Species*, pp. 21-22.

<sup>18</sup> Wijnstekers, *Evolution of CITES*.

<sup>19</sup> CITES, Res. Conf. 9.25 (Rev. CoP18), Implementation of the Convention for Species in Appendix III, <https://cites.org/sites/default/files/documents/COP/19/resolution/E-Res-09-25-R18.pdf>.

<sup>20</sup> Wijnstekers, *Evolution of CITES*.

for the limited trade allowed for species in Appendix I.<sup>21</sup> For example, all eight species of Pangolin—a small, scaly anteater living in parts of Africa and Asia—are listed in Appendix I. They were listed in 2017 due to declines in their populations. Pangolins are considered one of the most trafficked mammals in the world because of high demand for their scales for use in traditional Chinese medicine and their meat, which is considered a delicacy in several countries.<sup>22</sup>

## **Appendix II**

According to Article II, Appendix II species are

- (a) all species which although not necessarily now threatened with extinction may become so unless trade in specimens of such species is subject to strict regulation in order to avoid utilization incompatible with their survival; and (b) other species which must be subject to regulation in order that trade in specimens of certain species referred to in sub-paragraph (a) of this paragraph may be brought under effective control.

Trade in Appendix II species is less restrictive than trade in Appendix I species, and exchange is permitted for commercial purposes if trade will not be detrimental to the species in the wild. For example, trade of Appendix II species requires only an export permit from the country of origin, unless the importing country has imposed additional requirements, which is allowed under CITES.<sup>23</sup> Appendix II contains roughly 97% of species listed under CITES.<sup>24</sup>

In certain cases, CITES treats individuals or parts of Appendix I species as Appendix II species if they have been bred in captivity or artificially propagated. In addition, an introduction from-the-sea certificate is required for the import of Appendix I or II specimens taken from the high seas outside of any country's jurisdiction.<sup>25</sup>

## **Appendix III**

Appendix III species classified under CITES include

- all species which any Party identifies as being subject to regulation within its jurisdiction for the purpose of preventing or restricting exploitation, and as needing the cooperation of other parties in the control of trade.

International trade of Appendix III species may require one of the following three documents: (1) export permit, granted for species coming from the country that listed it; (2) reexport permit, granted for Appendix III species being exported from a country that previously imported it; or (3) certificate of origin, for Appendix III specimens that are being exported from a country other than the listing country.<sup>26</sup> For example, if the United States sought to allow the export of a common peafowl (*Pavo cristatus*) hatched in the United States, a certificate of origin would need to be issued because the species was originally listed by Pakistan. A certificate of origin requires that the specimens were legally obtained from within the exporting country.<sup>27</sup> There is no requirement

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<sup>21</sup> A reexport certificate is granted for Appendix I species being exported from a country that previously imported it. For example, if the United States imported a species from Kenya, where it was listed originally, and then exported it, a reexport permit would be necessary. This would also include items subsequently converted to manufactured goods.

<sup>22</sup> United Nations Office on Drugs and Crime et al., *World Wildlife Crime Report 2020: Trafficking in Protected Species*, May 2020.

<sup>23</sup> Article IV of CITES.

<sup>24</sup> CITES Secretariat, *World Wildlife Trade Report 2022*, Geneva, Switzerland, 2022, p. 3.

<sup>25</sup> Article III and IV of CITES.

<sup>26</sup> Article V of CITES.

<sup>27</sup> Article V of CITES.



to show that the trade in the specimen would not be detrimental to the species' survival since it was not from the listed population.

## Permit Regulations

Appendix I specimens require both an import and export permit for trade between party nations. If a non-party nation is involved, the party nation must provide the appropriate import or export permit depending on the trade of the species.<sup>28</sup> Appendix I specimens acquired abroad by individuals outside their country of usual residence may not be imported into the United States without CITES permits. A permit under CITES is not required for domestic trade within a party nation.<sup>29</sup>

If a party enters a *reservation*, the transaction does not require a permit from or into the country taking the reservation, but would require a permit from the importing or exporting country if it is a CITES signatory. A reservation for a particular species can occur when a party detracts from the listing of a species in question because it finds the listing of the species unacceptable.<sup>30</sup> The party is required to abide by the rules of the convention with regard to every other species except for those on which it has taken a reservation. Until a reservation is removed, that party is treated as a non-party state by other signatories for trade in that species.<sup>31</sup>

As of May 2025, the country with the greatest number of reservations was the United Kingdom, with 97.<sup>32</sup> All of these reservations were for Appendix III species, mostly birds and lizards, and the majority apply only to selected U.K. territories. Palau had the second-highest number of reservations, with 37, of which 17 were for listed marine species. Japan (32 reservations, all marine), Iceland (23 reservations, all marine), and Norway (11 reservations, all marine) also had numerous reservations for listed marine species. In addition, Switzerland (17 reservations), Saudi Arabia (16 reservations), and Liechtenstein (15 reservations) had registered 15 or more reservations each, primarily for bird species, reptiles, and some mammals. There were 43 other countries with at least one reservation. The United States had no reservations.

## Exemptions and Special Procedures

Article VII of the convention outlines some situations where the provisions for listed species discussed above do not apply. These situations can result in exemptions, where no CITES documentation is required, or in special procedures—where trade is regulated and specimens are treated under a different appendix or where documents other than the standard CITES documentation are required. For example, exemptions may apply for certain specimens that are personal or household effects, specimens in transit or transshipment, or specimens exchanged between registered scientific institutions. Special procedures may apply for pre-convention

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<sup>28</sup> Article III of CITES.

<sup>29</sup> The U.S. Fish and Wildlife Service (FWS) maintains records of legal and illegal international wildlife trade shipments and associated permits. These records are not published publicly, although some information has been released in response to Freedom of Information Act (FOIA) requests. Some recent studies have identified limitations in the international wildlife trade data compiled by FWS and other sources. For example, see Bruce J. Weissgold, "U.S. Wildlife Trade Data Lack Quality Control Necessary for Accurate Scientific Interpretation and Policy Application," *Conservation Letters* 17, no. 2 (March/April 2024), <https://doi.org/10.1111/conl.13005>. In recent years, FWS noted ongoing work to modernize the electronic permitting program associated with CITES and other wildlife trade authorities. FWS, *Budget Justifications and Performance Information: Fiscal Year 2026*, p. IA-6, <https://www.fws.gov/sites/default/files/documents/2025-09/fws-2026-greenbook508.pdf>.

<sup>30</sup> Article XXIII of CITES.

<sup>31</sup> Article XV and XXIII of CITES.

<sup>32</sup> CITES, "Reservations Entered by Parties," <https://cites.org/eng/app/reserve.php>.



specimens,<sup>33</sup> for specimens in transit, for species that are part of scientific exchanges,<sup>34</sup> for specimens that are bred in captivity or artificially propagated, or for specimens that are part of traveling exhibitions. These special procedures typically require the Management Authority to issue a certificate documenting the exceptional conditions that apply to the specimen in question. Further, Management Authorities may waive the permit or certificate requirement for specimens that are part of a traveling zoo, circus, plant exhibition, or other traveling exhibition.<sup>35</sup>

## **Administration of CITES**

The administration of CITES is divided into the Secretariat, the Management and Scientific Authorities, and the Conference of the Parties. The Secretariat is housed within the United Nations Environment Programme in Geneva, Switzerland, and is funded by parties through a trust fund. The Secretariat has a broad range of duties that include organizing meetings of the parties; preparing reports on the meetings; publishing annual status reports; and providing assistance in legislation, enforcement, science, and training to parties. The Secretariat is also responsible for undertaking scientific and technical studies that will contribute toward implementing CITES.<sup>36</sup>

Each party to CITES is responsible for creating its own Management and Scientific Authorities. The Management Authorities implement the convention in each country, primarily through the responsibility to grant or deny CITES permits and certificates. In general, a Management Authority must determine whether

- The specimen was obtained through the violation of any domestic laws
- A living specimen will be prepared and shipped in a manner not detrimental to its health or welfare
- An import permit has been granted for Appendix I species before an export permit can be granted
- The import of specimens on Appendix I is primarily for noncommercial purposes
- The necessary advice from the Scientific Authority has been issued.<sup>37</sup>

Management Authorities also must keep records of trade, care for species in transit, determine applicability of exemptions or special provisions, and designate exit and entry points for trade, among other things.<sup>38</sup>

Scientific Authorities provide scientific and technical guidance to Management Authorities.<sup>39</sup> The functions of Scientific Authorities are defined in part by CITES and the party. Among other things, Scientific Authorities are required to determine whether (1) imports or exports of CITES species will have a harmful effect on the survival of a species; (2) the intended facility for caring for an imported live specimen of a listed animal is adequately equipped; and (3) import

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<sup>33</sup> Pre-convention specimens are those specimens acquired before the species was listed under CITES.

<sup>34</sup> Scientific exchange is the noncommercial exchange of specimens between registered scientific institutions.

<sup>35</sup> Article VII of CITES.

<sup>36</sup> Rosalind Reeve, "Policing International Trade in Endangered Species, The CITES Treaty and Compliance" (The Royal Institute of International Affairs, London: 2002), p. 44 (hereinafter Reeve, "Policing International Trade").

<sup>37</sup> Article IX of CITES.

<sup>38</sup> Reeve, "Policing International Trade."

<sup>39</sup> Article IX of CITES.

restrictions for a specimen to the country should be proposed because trade may have a negative effect on the status of the species in the wild.<sup>40</sup>

CITES governing bodies also include the Standing Committee, which provides policy guidance and budget oversight to the Secretariat; and the Animals and Plants Committees, which provide specialized expertise and technical support to the CoP and Secretariat in decisionmaking about species.<sup>41</sup> The Standing Committee is composed of parties representing each of six major geographical regions (Africa, Asia, Europe, North America, Oceania, and Central and South America and the Caribbean); a representative from the Depository Government, Switzerland; the party that hosted the previous CoP; and the party that will host the next CoP.<sup>42</sup> The Animal and Plants Committees comprise experts from each of the six major geographical areas, plus one specialist on nomenclature per committee.<sup>43</sup>

## Conference of the Parties

The CoP convenes every two to three years. At these meetings, the parties vote on adopting amendments to Appendixes I and II; review the convention's progress in meeting its goals; consider reports from parties, committees, and the Secretariat; make provisions, including funding, to allow the Secretariat to operate; and make recommendations for improving CITES.<sup>44</sup> Taking actions on substantive proposals or making major procedural changes usually requires a two-thirds vote by the parties; however, many other decisions are made by consensus.<sup>45</sup> Attendance at the CoP is not limited to party members. Observers are invited to attend and generally include non-parties to CITES, the United Nations and its agencies, nongovernmental organizations, and any international or national body (government or not) that is "technically qualified in protection, conservation or management of wild fauna or flora."<sup>46</sup> Although all present can participate, only party members can vote. There have been 20 CoPs since the convention convened in 1973, the most recent in Uzbekistan in 2025.

### Selected Outcomes from CoP20

CoP20 represented the 50<sup>th</sup> anniversary of CITES and ended with increased protection for several species. For example, several marine species—including manta and devil rays, three species of sharks, some sea cucumbers, and guitarfish—were protected under different CITES appendixes. Whitetip sharks were placed into Appendix I, leading to a ban in trade. Protections also were provided for iguanas, two-toed sloths, songbirds, geckos, and other species. Proposals to trade confiscated elephant ivory and rhino horn were defeated. The CoP also included measures to lower the illegal trade of wildlife. Parties adopted measures that addressed online wildlife crime, illicit financial flows, corruption, and annual illegal trade reporting. CoP20 also conducted discussions on zoonotic risk mitigation from wildlife and cooperation with other Multilateral Environmental Agreements to achieve shared objectives. The U.S. position at CoP was based on its intent to "return CITES to its core mandate of ensuring that international trade in specimens of wild animals and plants does not threaten the survival of the species." The United States proposed zero nominal growth in the CITES budget, de-linked its efforts from the 2030 Agenda framework and advancement of the Sustainable Development Goals, and proposed some changes to species listings. The next CoP is scheduled for 2028 in Panama.

<sup>40</sup> Article IX of CITES.

<sup>41</sup> CITES, The Structure of CITES, <https://cites.org/eng/disc/org.php>.

<sup>42</sup> CITES, Standing Committee, <https://cites.org/eng/disc/sc.php>.

<sup>43</sup> CITES, Animal and Plants Committees, [https://cites.org/eng/disc/ac\\_pc.php](https://cites.org/eng/disc/ac_pc.php).

<sup>44</sup> Article XI of CITES.

<sup>45</sup> GAO, *Protected Species*, p. 8.

<sup>46</sup> Article XI of CITES.

**Source:** CITES, CITES CoP20 Concludes with a Clear Roadmap to Enhance Wildlife Trade Regulation and Further Strengthen Implementation of the Convention, December 16, 2025, <https://cites.org/eng/news/pr/cites-CoP20-concludes-with-clear-roadmap-to-enhance-wildlife-trade-regulation-2025>.

## Enforcement of CITES

The enforcement of CITES is primarily the responsibility of the party countries. CITES does not have any enforcement authority. Parties are required to enact and implement legislation that will prohibit trade that violates the treaty, as well as provide for penalties for violations and the confiscation and, where feasible, the return of illegally traded specimens.<sup>47</sup> Under Article VIII, other enforcement activities are listed and include (1) designation of ports of entry and exit for species; (2) care for living specimens; (3) maintenance of detailed records on the import and export of listed species; and (4) preparation of a biennial report on the regulatory measures taken to enforce the provisions of the treaty. Party countries are also allowed to adopt stricter domestic measures than provided in the convention (Article XVI of CITES). Several countries have done so, including countries within the European Union and the United States under the ESA.

Trade of a particular species or exports of a species from a range country can be temporarily suspended under CITES. Such a suspension may occur if there are not sufficient guarantees that trade is not detrimental to the survival of the listed species or if adequate legislation to implement CITES is absent, illegal trade is prevalent, or required scientific reports are missing. Some suspensions of trade are specific to the species, whereas other suspensions can be for all trade for a country.<sup>48</sup>

Recommendations to suspend trade in specimens of CITES-listed species are made by the CoP and the Standing Committee. A recommendation to suspend trade provides a period of time during which the relevant country can move from noncompliance to compliance by inter alia making progress in the enactment of adequate legislation, combating and reducing illegal trade, submitting missing annual reports or responding to specific recommendations of the Standing Committee concerning the implementation of Article IV of the convention in the context of the Review of Significant Trade. Recommendations to suspend trade are withdrawn immediately upon a country's return to compliance.<sup>49</sup>

As of December 2025, 35 countries were affected by at least a species-specific trade suspension resolution, including Equatorial Guinea, Senegal, Tanzania, Ghana, Niger, Liberia, Belize, and Togo, among others. Of those countries, Afghanistan, Djibouti, Dominica, Grenada, Guinea,

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<sup>47</sup> Article VIII of CITES. The parties to the convention adopted a resolution directing the Secretariat to review national laws to assess implementation of the convention. Resolution Conf. 8.4 (Rev. CoP15) on National Laws for Implementation of the Convention, <https://cites.org/eng/res/08/08-04R15.php>. This resolution directs the Secretariat to identify parties whose domestic measures do not (1) designate a Management and Scientific Authority (see section on CITES Scientific and Management Authorities below for more information); (2) prohibit trade of species in violation of the convention; (3) penalize violations; and (4) authorize for the confiscation of species illegally traded or possessed. Parties that do not have sufficient measures to implement CITES can be subject to a temporary suspension of trade of CITES-listed species until adequate measures are enacted, according to the resolution.

<sup>48</sup> CITES, "CITES Compliance Procedures," <https://cites.org/eng/prog/compliance>. For example, in 2023, CITES sanctioned Mexico for failing to stop illegal fishing and trade that endangered vaquita porpoises and totoaba fish. The sanction consisted of CITES recommending that all parties suspend all commercial trade in specimens of CITES-listed species with Mexico. The sanction was lifted later in 2023 when Mexico demonstrated progress in enforcement against illegal fishing and trade of the species.

<sup>49</sup> CITES, "Countries Currently Subject to a Recommendation to Suspend Trade," <https://cites.org/eng/resources/ref/suspend.php>.

Liberia, Libya, Oman, Sao Tome and Principe, and Somalia were subject to a complete suspension of commercial trade or all trade on all species.<sup>50</sup>

## **The International Consortium on Combating Wildlife Crime**

The CITES Secretariat teams up with other organizations to address international wildlife crime and the illegal wildlife trade. For example, the International Consortium on Combating Wildlife Crime (ICWC) is composed of five intergovernmental bodies that aim to end wildlife crime by strengthening criminal justice systems in certain countries and coordinating international, regional, and subregional entities to address wildlife crime.<sup>51</sup> The five partners are the CITES Secretariat, the World Bank Group, the World Customs Organization, the United Nations Office on Drugs and Crime, and the International Criminal Police Organization (INTERPOL). These organizations established ICWC in 2010. The ICWC supported other partners to carry out Operation Thunder in 2025;<sup>52</sup> this operation led to the seizure of nearly 30,000 live animals and the identification of 1,100 people suspected of the illegal trafficking of wild fauna and flora. The operation consisted of members of law enforcement agencies (e.g., police, customs, border security, forestry and wildlife authorities) from 134 countries who made a total of 4,640 seizures. Many species involved in the seizures were listed under CITES.<sup>53</sup>

## **Implementation of CITES in the United States**

The United States is one of the leading importers of CITES-listed wildlife in the world, second only to China.<sup>54</sup> Commercial trade is the largest category of use in the wildlife trade for the United States.<sup>55</sup> In terms of number of individuals, one analysis showed that reptiles, birds, and fish were among the groups of species most traded by the United States from 2000 to 2022.<sup>56</sup> In terms of permit applications from 2017, importing or exporting hunted animal trophies are the dominant use of international wildlife for the United States, according to FWS data. (See **Figure 1**.) The United States is the largest importer of animal trophies in the world (see **Figure 2**). Of CITES-listed species, 2019-2024 data indicated that the United States imported the most wildlife trophies from Canada and South Africa. The CITES-listed species most imported include the American black bear (*Ursus americanus*), sandhill crane (*Antigone canadensis*), and chacma baboon (*Papio ursinus*).<sup>57</sup>

The Secretary of the Interior, through the FWS's International Affairs Program, has the primary responsibility for implementing CITES in the United States. The Secretary of the Interior is the Managing Authority and Scientific Authority for CITES, as authorized under the ESA. All wildlife species that enter or exit the United States must be accompanied by a permit, in

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<sup>50</sup> CITES, "Countries Currently Subject to a Recommendation to Suspend Trade," <https://cites.org/eng/resources/ref/suspend.php>.

<sup>51</sup> CITES, "ICCWC—International Consortium on Combating Wildlife Crime," <https://cites.org/eng/prog/iccwc>.

<sup>52</sup> INTERPOL, "30,000 Live Animals Seized in Global Operation Against Wildlife and Forestry Crime," press release, December 11, 2025, <https://www.interpol.int/en/News-and-Events/News/2025/30-000-live-animals-seized-in-global-operation-against-wildlife-and-forestry-crime> (hereinafter INTERPOL, "30,000 Live Animals Seized in Global Operation").

<sup>53</sup> INTERPOL, "30,000 Live Animals Seized in Global Operation."

<sup>54</sup> This is based on data from 2019 to 2024 and covers only wildlife and fish, not plants. CITES Wildlife Tradeview, "Global Overview," <https://tradeview.cites.org/en/overview>

<sup>55</sup> Marshall et al., "Magnitude of Legal Wildlife Trade."

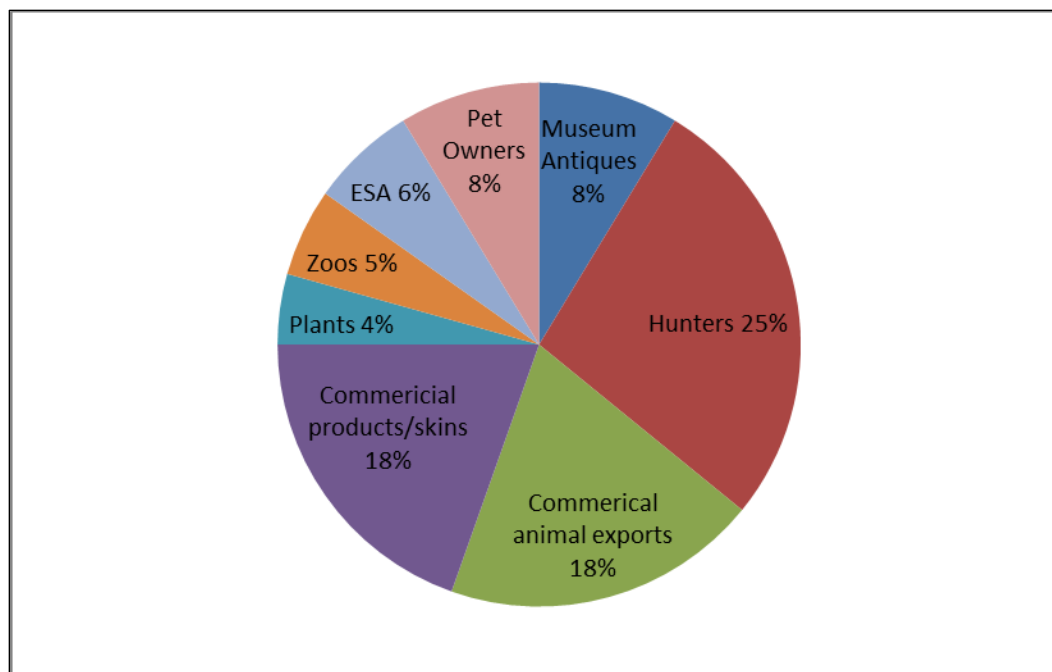
<sup>56</sup> Marshall et al., "Magnitude of Legal Wildlife Trade."

<sup>57</sup> CITES Trade Database, <https://trade.cites.org/>.

compliance with U.S. laws.<sup>58</sup> The FWS is responsible for issuing permits for the export, import, or reexport of protected species under the terms of CITES and domestic laws; monitoring trade and transport of listed species; enforcing permit regulations; investigating cases of illegal trade; and implementing other U.S. laws that address wildlife trade and wildlife trafficking, including Executive Order 13773 on preventing international trafficking.<sup>59</sup> The FWS also is responsible for coordinating and preparing U.S. proposals for the CoP. The FWS generally coordinates with other federal agencies to prepare these proposals.

**Figure 1. Breakdown of U.S. Permit Applications for International Wildlife, by Most Types**

(as reported in 2016)



**Source:** U.S. Fish and Wildlife Service, *Budget Justification and Performance Information, Fiscal Year 2017*, p. 1A-8, <https://www.fws.gov/sites/default/files/documents/Fiscal%20Year%202017%20Fish%20and%20Wildlife%20Service%20Presidents%20Budget.pdf>.

**Notes:** Percentage values do not add up to 100%, because other types of permits with smaller percentages are not included. These are permits for circuses, biomedical applications, marine mammal applications, and injurious wildlife applications. The category labeled ESA represents permit applications sought under the authority of the Endangered Species Act.

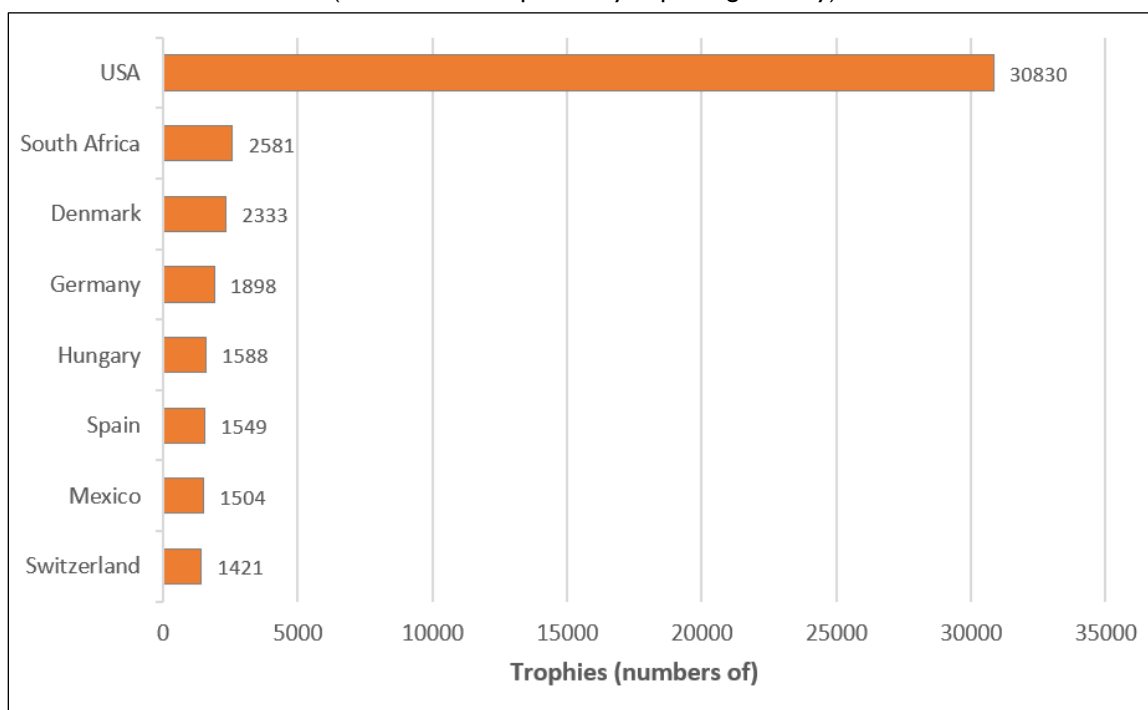
Other federal agencies are involved in implementing CITES in the United States. NOAA Fisheries provides scientific advice and assistance to the FWS for marine species. Although NOAA Fisheries does not have legal authority to implement the terms of the convention, it does have enforcement and monitoring responsibilities over some marine species that are jointly covered by the ESA and CITES, such as great whales, Queen Conch, some species of hard coral,

<sup>58</sup> Note that CITES imposes no direct controls on shipments between U.S. states or territories.

<sup>59</sup> Executive Order 13773, "Executive Order on Enforcing Federal Law with Respect to Transnational Criminal Organizations and Preventing International Trafficking," 82 Federal Register 10691, February 14, 2017; GAO, *Protected Species*, pp. 12-13.

and dolphins.<sup>60</sup> APHIS is responsible for inspecting all shipments of plants into the United States and assists the FWS in inspecting and detecting items that contain wildlife parts or products. Further, the Department of Agriculture assists the FWS on policies related to plants, and the Department of State is responsible for providing U.S. annual contributions to the convention as well as assistance with international environmental agreements.

**Figure 2. Top Importers of Mammal Trophies**  
(2019-2025, as reported by importing country)



**Source:** CITES, “Wildlife TradeView,” accessed October 6, 2025, <https://tradeview.cites.org/en/overview>.

**Notes:** These are trade data that were designated by the importing country as for the purpose of “Hunting Trophy” with the trade term *Trophy*. The few data that were entered as weight instead of trophy number were subtracted from the country total to control for units of measure as much as possible. These data are from CITES-listed species.

Wildlife trade involving the United States is also regulated by other laws, such as the Endangered Species Act, Marine Mammal Protection Act, Lacey Act, Fisherman’s Protection Act, and END Wildlife Trafficking Act.<sup>61</sup> A short summary of each of these laws follows.

- The Endangered Species Act (ESA; 16 U.S.C. §§1531-1544) aims to conserve species determined to be endangered or threatened and the ecosystems upon which those species rely. Species are evaluated for their risk of extinction—presently (i.e., *endangered species*) or in the foreseeable future (i.e., *threatened*

<sup>60</sup> NOAA Fisheries, “Convention on International Trade in Endangered Species of Wild Fauna and Flora,” <https://www.fisheries.noaa.gov/national/international-affairs/convention-international-trade-endangered-species-wild-fauna-and>.

<sup>61</sup> Other U.S. programs such as the Multinational Species Conservation Fund support conservation activities of specific foreign species under the authority of several laws. The Fund benefits tigers, rhinoceroses, elephants, great apes (e.g., chimpanzees and gorillas), and marine turtles, often in conjunction with efforts under CITES. For more information, see CRS Report RS21157, *International Species Conservation Funds*, by Pervaze A. Sheikh.



- species*). Listing a species under the ESA triggers protections and provisions intended to promote recovery and prevent extinction.
- The Marine Mammal Protection Act (MMPA) of 1972 (16 U.S.C. §§1361 et seq.) aims to conserve marine mammal populations by establishing a moratorium on the killing of marine mammals in U.S. waters and by U.S. nationals on the high seas.
  - The Lacey Act (16 U.S.C. §§3371-3378) implements enforcement mechanisms for the illegal trade of wildlife within the United States. Specifically, the Lacey Act makes it illegal to engage in the trade of fish and wildlife taken in violation of any U.S. or Indian tribal law, treaty, or regulation as well as the trade of any of these items acquired through violations of foreign law or treaties (this includes CITES). Plant species are subjected to the Lacey Act if they are taken in violation of a law or treaty of the United States or a law or regulation of any state. However, plants are defined as those indigenous to any state and either (1) listed under CITES or (2) listed pursuant to any state law that provides for the conservation of species threatened with extinction (16 U.S.C. §3371(f)). Therefore, a plant is not covered under the Lacey Act unless it is indigenous to a state. This definition, for example, precludes the application of the Lacey Act to many tropical timber species listed under CITES.
  - Under the Fisherman's Protective Act (22 U.S.C. §§1971-1979) there is a provision (Pelly Amendment) that authorizes the President to discontinue the importation of products from a country that allows fishing operations, takings, or trade that diminishes the effectiveness of an international fishing treaty or program in international endangered and threatened species (e.g., CITES).
  - The Eliminate, Neutralize, and Disrupt Wildlife Trafficking Act of 2016 (END Wildlife Trafficking Act; P.L. 114-231) highlights wildlife trafficking as a serious international crime. Under this act's direction, the Department of State's Bureau of Oceans and International Environmental and Scientific Affairs works to strengthen international cooperation on wildlife trafficking and conducts analyses to identify "focus countries" and "countries of concern," as defined by the act.<sup>62</sup>

Regulations guiding the implementation of CITES in the United States have been updated by the FWS several times since the treaty's inception. The changes are intended to reflect current CITES provisions that have been modified or added by the parties over time. Most recently, changes were published by the FWS on February 23, 2022.<sup>63</sup> (See 50 CFR Part 23.) The FWS issued this rule to incorporate "minor, noncontroversial updates" to reflect decisions made by CITES parties from CoP16 (the last U.S. CITES regulation update was in May 2014) to CoP18. Many of the changes explained procedures and requirements already in effect, specific requirements related to documentation and reporting of activities, and definitions of new terms, among other things.

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<sup>62</sup> A *focus country* refers to a foreign country determined by the Secretary of State to be a major source of wildlife trafficking products, a major transit point of wildlife trafficking, or a major consumer of wildlife trafficking products. A *country of concern* is a foreign country with similar characteristics as a focus country but in which the government has actively engaged in or knowingly profited from wildlife trafficking. U.S. Department of State, *2021 END Wildlife Trafficking Report*, <https://www.state.gov/2021-end-wildlife-trafficking-report/>.

<sup>63</sup> FWS, "Implementing the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES); Updates Following the Eighteenth Meeting of the Conference of the Parties (CoP18) to CITES," 87 *Federal Register* 10073-10080, February 23, 2022.



## CITES and the Endangered Species Act

The ESA and CITES lists overlap but are not identical, with many species included in both lists. The ESA aims to conserve species listed under the act. Under the ESA, domestic and foreign species of animals (both vertebrate and invertebrate) and plants can be listed as either *endangered* or *threatened*, according to an assessment of the risk of their extinction.<sup>64</sup> Once a species is listed, the act provides tools to aid in its conservation and recovery and to protect its habitat. Among these tools are the ESA's prohibition of *take* (i.e., killing, capturing, or harming) of endangered species without a permit.<sup>65</sup> Regulations under the ESA for foreign species largely address import restrictions and domestic breeding activities within the United States; the ESA generally does not regulate listed species outside the United States and U.S. territories, because these species are beyond U.S. jurisdiction. For example, the ESA does not prohibit individuals from killing listed species in foreign countries.<sup>66</sup>

Although there are similarities between CITES and the ESA in listing and protecting species, several fundamental differences exist. The ESA and CITES have similar rationales for listing species; namely, that there is a threat to the survival of the species. However, under CITES, this threat is specifically associated with the harvesting of the species or their parts for international trade, although other parameters may be considered.<sup>67</sup> Under the ESA, consideration of the threat to survival is broader and includes factors such as habitat loss, disease, and predation in addition to trade and consumption.<sup>68</sup> For example, a species with low population size that is experiencing habitat loss but is not traded could be listed under ESA and not CITES.

The discrepancy in factors analyzed under the ESA and CITES could result in unequal levels of protection. For example, the Saiga antelope (*Saiga tatarica mongolica*) is listed under Appendix II in CITES and is listed as endangered under the ESA. These listings carry different requirements related to trade, such as importing a sport-hunted trophy. Species that are not prohibited for trade under CITES but are listed as threatened or endangered under the ESA can be imported to the United States if the importer meets the requirements under Section 10 or a Section 4(d) rule (see textbox below) of the ESA. For example, Section 10 permits under the ESA have been issued for the import of endangered giant pandas, cheetahs, and Asian elephants for scientific research but generally not for incidental take.<sup>69</sup>

Under the highest level of protection under both the ESA and CITES, species might not receive equivalent safeguards, listed as endangered under the ESA versus being listed in Appendix I of CITES, for their survival. CITES allows for trade in Appendix I species if trade is not primarily commercial and is not detrimental to the species' survival (e.g., household goods).<sup>70</sup> To receive an

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<sup>64</sup> *Domestic species* are those species found in the United States, regardless of whether they are also found elsewhere. *Foreign species* are species that are not native to the United States and therefore are only found abroad.

<sup>65</sup> ESA; 16 U.S.C. §1532(19).

<sup>66</sup> Any person seeking to hunt such species would be subject only to the laws and regulations of the country where the species resides. However, the ESA can limit a hunter's ability to bring back to the United States (i.e., import) any trophy from such a hunt. For example, individuals are required to obtain appropriate permits prior to importing a trophy of an ESA-listed species—such as a lion (*Panthera leo leo*) or an African elephant (*Loxodonta africana*)—and certain restrictions apply on how many such trophies can be imported into the United States.

<sup>67</sup> Article II of CITES.

<sup>68</sup> ESA; 16 U.S.C. §1533(a)(1).

<sup>69</sup> The ESA authorizes the Secretary to issue a permit to exempt certain actions from ESA prohibitions. Eligible actions include taking species for scientific purposes, enhancing the survival of listed species, and incidental taking of listed species during otherwise lawful actions. 16 U.S.C. §1539(a).

<sup>70</sup> Article III of CITES.

import permit for an endangered species under the ESA, the import of the endangered species must have a net result of enhancing the survival of the species.<sup>71</sup> For example, cheetahs are an Appendix I species under CITES and are listed as endangered under the ESA. Under CITES, some countries have allowed the limited trade of sport-hunted cheetahs, because it was shown that this trade would not be a detriment to the population. Under the ESA, however, FWS has not issued permits for importing sport-hunted cheetah trophies, because their take has not been shown to enhance the species' survival in its range country.<sup>72</sup>

#### **Section 4d Under the Endangered Species Act**

Section 4(d) under the Endangered Species Act (ESA; 16 U.S.C. §§1531-1544) authorizes the creation of special rules for conserving *threatened* species. Under Section 4(d), the Secretary of the Interior may issue rules for threatened species that deviate from the protections given to endangered species, including rules that may permit some trade in the species or its products. Otherwise threatened species generally have all legal protections allocated to endangered species. Under this authority, the U.S. Fish and Wildlife Service (FWS) has issued several rules pertaining to threatened species under the ESA that are also listed as Appendix II species under Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). The FWS has lifted import bans and, in some cases, allowed the import of sport-hunted trophies of some threatened species when it was shown that regulated trade would be an incentive for developing conservation programs in the species' countries of origin. For example, some species of saltwater crocodiles listed as threatened under the ESA have a Section 4(d) rule that allows for the import of body parts from managed populations. This rule was implemented under the premise that limited trade in crocodile body parts would encourage the development of conservation programs in their native country.

**Source:** Endangered Species Act, 16 U.S.C. §§1531-1544. 50 C.F.R. §17.42(c). U.S. Department of the Interior, FWS, "Draft Policy for Enhancement-of-Survival Permits for Foreign Species Listed Under the Endangered Species Act," 68 *Federal Register* 49512, August 18, 2003.

Both the ESA and CITES allow limited take of endangered species in some cases where the objective is scientific research, conservation, or education. The ESA further allows the issuance of permits for incidental take during otherwise lawful actions.<sup>73</sup>

Coverage differs for global species addressed by the ESA and CITES. ESA-listed species largely reside in the United States. The ESA has 1,684 domestic species and 705 foreign species listed as threatened and endangered.<sup>74</sup> CITES has 1,878 species listed in the United States under one of the three appendixes and approximately 39,000 species foreign to the United States. All parties participate in the listing of species under CITES and are privy to their domestic trade data and concerns.

## **Considerations for Congress**

CITES is an international treaty that is steadily gaining acceptance in the world and growing in terms of its application. CITES is one of the world's most widely accepted treaties, with 185 signatories. Many stakeholders also assert that it has significantly increased monitoring and control of international wildlife trade and has played a part in the conservation of many species

<sup>71</sup> ESA, 16 U.S.C. §1539(a).

<sup>72</sup> For other examples, see the GAO, *Protected Species*, p. 34.

<sup>73</sup> Incidental take permits make it legal to take a listed species under certain circumstances. To obtain a permit, a landowner must prepare a habitat conservation plan (HCP) approved by the FWS to protect endangered species on the landowner's property. By entering into an HCP, landowners can receive an incidental take permit whereby they can take an endangered species, if they are engaged in otherwise lawful activity (e.g., such as land clearing).

<sup>74</sup> FWS, "Listed Species Summary," <https://ecos.fws.gov/ecp/report/boxscore>, accessed January 2, 2026.

that may have gone extinct if freely traded.<sup>75</sup> Few species listed under CITES have gone extinct due to trade. According to some scientists, the success of CITES is attributed to increased listings of species affected by trade, better monitoring and analysis of trade by participating countries, and the use of science-based criteria to consider listings.<sup>76</sup> Although it is difficult to attribute the conservation of a species solely to CITES, several species have noticeably improved since being listed on CITES.<sup>77</sup>

Although most observers believe the treaty has been effective in curbing the international trade of endangered and threatened species, some argue that many issues with implementation remain.<sup>78</sup> The primary issue, according to some, is the lack of implementing legislation, and hence enforcement mechanisms, in several party nations.<sup>79</sup> This lack compromises the treaty's effectiveness and lowers the value of enforcement and monitoring activities in complying party nations. Some also note that the use of reservations and the persistence of the global illegal wildlife trade have posed additional challenges to the success of CITES.

Congress appropriates funding to the FWS to administer CITES and conducts oversight over the implementation of CITES. Congress also conducts oversight over U.S. efforts to address the global wildlife trade and its effect on the United States and other countries. Congress might consider addressing global challenges related to CITES as well as other issues related to the implementation of CITES in the United States. Some issues related to CITES that Congress might consider include (1) global enforcement and implementation of CITES; (2) the scope of CITES; and (3) appropriations for implementing CITES in the United States and supporting the CITES Secretariat.

## **Global Implementation of CITES**

If Congress wanted to pursue strategies to increase the implementation of CITES, options include supporting (1) efforts to increase the adoption of legislation implementing CITES by parties and (2) global enforcement of CITES.

Although parties to the treaty are obligated to implement legislation upholding CITES and to establish Management and Scientific Authorities, some have failed to do so and consequently have not enforced the treaty as effectively as other parties. Moreover, substantial variations exist among countries regarding the regulation of domestic wildlife trade. This lack of consistency in the implementation of legal frameworks can be exploited by wildlife traffickers, who may actively seek out lax jurisdictions to traffic goods. Inconsistency also may indicate a lack of political will to correct and amend variations in the law. It also may highlight a lack of international policy consensus or prioritization on how, and how much, to curb wildlife

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<sup>75</sup> For example, see United Nations, "50 Years of CITES: Protecting Wildlife from Trade-Driven Extinction," press release, July 1, 2025, <https://news.un.org/en/story/2025/07/1165151>.

<sup>76</sup> GAO, *Protected Species*.

<sup>77</sup> GAO, *Protected Species*.

<sup>78</sup> Erica Lyman, "It Takes Two: CITES, Illegal Wildlife Trade, and Importing Country Liability," *William and Mary Environmental Law and Policy Review*, vol. 47, no. 3 (April 2023); and Jeremiah D. Clark, "A Review of CITES Impact and Suggestions for Incremental Improvement," *Temple International and Comparative Law Journal*, vol. 37, no. 1 (2022), pp. 127-159.

<sup>79</sup> For example, see Tonya Wyatt, *Is CITES Protecting Wildlife? Assessing Implementation and Compliance* (Routledge, 2021), pp. 192.

trafficking.<sup>80</sup> CITES monitors national legislation to implement CITES. (See overview in the textbox entitled “CITES National Legislation Project.”)

### **CITES National Legislation Project**

The CITES Secretariat’s National Legislation Project identifies countries that have not implemented legislation meeting the four minimum requirements for effective implementation of CITES: (1) establishment of Management and Scientific Authorities; (2) prohibition of trade in violation of CITES; (3) penalties for violations; and (4) protocols for confiscating illegally traded specimens. The Secretariat analyses legislation and sorts parties into the following three categories:

Category 1—legislation that is believed generally to meet the requirements for implementation of CITES

Category 2—legislation that is believed generally to meet one to three of the four requirements for effective implementation of CITES

Category 3—legislation that is believed generally not to meet any of the four requirements for effective implementation of CITES

As of November 2025, 65 (35%) of the 185 parties to the convention were listed in categories 2 or 3.

The Conference of the Parties and Standing Committee can make recommendations to suspend trade in specimens of CITES species with certain countries, either completely or for particular species, due to lack of compliance with CITES. These suspensions are intended to push a country to “move from non-compliance to compliance by the enactment of adequate legislation, combating and reducing illegal trade, submitting missing annual reports, or responding to specific recommendations of the Standing Committee.” As of November 2025, 36 countries were subjected to some sort of recommendation to suspend trade. Most of these were for trade in one or more individual species with the country in question. However, as of November 2025, the Secretariat recommended suspending all trade in CITES species with Afghanistan, Djibouti, and Grenada, and it recommended suspending all commercial trade in CITES species with Comoros, Dominica, Guinea, Lebanon, Liberia, Libya, Oman, San Tome and Principe, and Somalia.

**Sources:** CITES, “Status of Legislative Progress for Implementing CITES,” <https://cites.org/eng/legislation>; and CITES, “Countries Currently Subject to a Recommendation to Suspend Trade,” at <https://cites.org/eng/resources/ref/suspend.php>.

If Congress chose to support efforts by parties to enact legislation to implement CITES, options could include providing technical assistance and directly supporting efforts by the CITES Secretariat. Another option for Congress would be to focus on modifying U.S. laws to improve implementation of CITES.

Some argue that many countries lack the resources to police and monitor the legal and illegal wildlife trade. Further, they assert that violations of wildlife trade laws are a low priority in these countries. Barriers toward effective enforcement in certain countries include (1) underfunding for wildlife trade enforcement; (2) corruption, which includes collusion between wildlife poachers and law enforcement officials; and (3) a low priority for conservation in regional and national governments.<sup>81</sup> Law enforcement officials also identified a lack of political support as a hindrance to their effectiveness against the illegal wildlife trade—a trend that if changed, some contend, could strengthen penalties, sentencing, and prosecution of wildlife crimes.<sup>82</sup>

If Congress chose to take action in this area, it could consider providing assistance to parties to increase enforcement of CITES. This could include international training, technical assistance, and cooperation to enhance wildlife law enforcement capabilities. The United States also could advise parties on the type and extent of penalties for wildlife crime. Some contend that penalties

<sup>80</sup> See also GAO, *International Convention and U.S. Laws Protect Wildlife Differently*, GAO-04-964, September 15, 2004.

<sup>81</sup> CITES, *Tiger Technical Mission Report* (Geneva, Switzerland: 1999).

<sup>82</sup> International Consortium on Combatting Wildlife Enforcement Crime (ICCWC), *First Global Meeting of the Wildlife Enforcement Networks*, 2013.

for CITES violations in party nations are not adequate to prevent illegal wildlife trade.<sup>83</sup> CITES does not provide guidance on the level or types of penalties to impose, and how the parties penalize violators varies widely.

## Scope of CITES

CITES has broadened its scope since its ratification by the United States and other parties. For example, CITES has taken a leading role in addressing wildlife crimes through the International Consortium on Combating Wildlife Crime and promotes sustainable development practices to support wildlife conservation.<sup>84</sup> CITES is also working on a Gender Action Plan that integrates gender equality and indigenous and local knowledge into the wildlife trade. The plan promotes empowering women by calling for equal access, benefit sharing, leadership, and reducing gender-based violence involved in the wildlife trade.<sup>85</sup> Some stakeholders support these initiatives and others that expand the reach and influence of CITES, stating that CITES has evolved to address international wildlife trade that “advances both conservation goals and sustainable economic and livelihood benefits.”<sup>86</sup> They also assert that the CITES framework and 185 parties can provide a forum for reconciling conservation and trade and enabling discussion and collaboration on various issues related to conservation and trade.<sup>87</sup> A potential issue for Congress is whether the broadened scope of CITES since ratification meets current congressional goals for species protection.

Other stakeholders, including the Trump Administration, argue that CITES should refocus its efforts to its core mandate of ensuring international trade of wildlife does not threaten the species.<sup>88</sup> In its submitted position to CITES during CoP20, the Trump Administration noted that it planned to oppose efforts to “expand or dilute the work of the Secretariat or the Committees (such as those that conflate CITES with unrelated bodies focused on climate change and sustainable development).” Other stakeholders previously have noted that CITES efforts to become involved in the development of international markets and socioeconomic development for wildlife stray from the core mission of CITES.<sup>89</sup>

Congress might consider these perspectives and provide feedback on CITES initiatives during oversight of CITES and U.S. positions and proposals for CITES CoPs. For example, some parties under CITES are proposing to use the CITES platform to identify traded species that may

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<sup>83</sup> Roman Goergen, *The Problem with CITES, the Convention to Protect Endangered Wildlife*, Geographical, April 28, 2022, <https://geographical.co.uk/wildlife/the-problem-with-the-cites-endangered-wildlife-convention>.

<sup>84</sup> For example, see Goal 4 of the *CITES Strategic Vision: 2021-2030*, which states, “CITES policy development also contributes to and learns from international efforts to achieve sustainable development.” CITES, *CITES Strategic Vision (2021 - 2030)*, Annex to Resolution Conf. 18.3., 2019, [https://cites.org/eng/documents/Strategic\\_vision](https://cites.org/eng/documents/Strategic_vision).

<sup>85</sup> CITES, *CITES Gender Action Plan*, 19.51, 2023, <https://cites.org/eng/node/134787>.

<sup>86</sup> Ivonne Higuero, *Reflections on the Fiftieth Anniversary of the Entry into Force of the World Wildlife Treaty by CITES Secretary-General Ivonne Higuero*, Convention on International Trade in Endangered Species of Wild Fauna and Flora, July 1, 2025, <https://cites.org/eng/news/sg/cites-50-anniversary-since-entry-into-force-reflections-sg-higuero> (hereinafter Higuero, *Reflections on the Fiftieth Anniversary*).

<sup>87</sup> Higuero, *Reflections on the Fiftieth Anniversary*.

<sup>88</sup> Submission of the United States to CITES CoP20, *Refocusing CITES to its Core Mandate*, CoP20 Inf. 58, 2025, <https://cites.org/sites/default/files/documents/E-CoP20-Inf-058.pdf>.

<sup>89</sup> For example, see Erica Thorson and Chris Wold, *Back to Basics: An Analysis of the Object and Purpose of CITES and a Blueprint for Implementation*, Environmental Law Project Lewis and Clark Law School, March 9, 2010, <https://www.lclark.edu/live/files/4620-back-to-basics-an-analysis-of-the-object-and>.



transmit zoonotic diseases. They argue that this might help countries regulate the trade of species that could transmit diseases across borders.<sup>90</sup>

## **Funding CITES Implementation**

Congress may consider whether the level of funding for the implementation of CITES in the United States and funding for the CITES Secretariat meets congressional goals for species conservation.

Funding for the implementation of CITES in the United States is primarily through the International Affairs Program (IAP) and the Office of Law Enforcement (OLE) of the FWS. Congress considers funding for the FWS's international conservation activities in annual Interior, Environment, and Related Agencies appropriations bills. Funds also are appropriated to other federal agencies to conduct law enforcement that might cover monitoring or violations related to CITES. The second Trump Administration has undertaken efforts to reconsider the extent of U.S. financial support for international environmental agreements.<sup>91</sup> The FWS did not request funding at a specified level for its IAP or OLE activities for FY2026 but proposed to “transfer funding responsibility for international species conservation work back to other countries, reserving limited resources for domestic species.”<sup>92</sup> Congress may consider whether the Trump Administration proposals meet congressional objectives for species conservation or whether Congress should appropriate funds to implement CITES and determine the amount of funding to allocate and the conditions of such funding.

Congress also provides funds for the CITES Secretariat. The CITES Secretariat has a budget that relies on contributions from the parties. Funding for the Secretariat and some of its programs and activities comes from the CITES Trust Fund.<sup>93</sup> The CITES Trust Fund finances the administrative costs of the Secretariat, the CoPs, and other standing committees. The CITES Trust Fund is replenished from contributions of the parties. For the CITES Secretariat, funds are provided by the U.S. Department of State through the International Conservation Programs budget line. The United States provided approximately \$1.5 million annually in 2023 and 2024 to the CITES Trust Fund for operating the Secretariat.<sup>94</sup> The United States did not provide funds to the Trust Fund in 2025 because Congress rescinded the funds that were appropriated to CITES under P.L. 119-28.<sup>95</sup> The United States also provided approximately \$900,000 to the CITES External Trust Fund to implement activities by the Secretariat in FY2023.<sup>96</sup>

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<sup>90</sup> Report of the Standing Committee, *Roles of CITES in Reducing Risk of Future Zoonotic Disease Emergence*, CITES, CoP20 Doc. 15.1, November 24, 2025, <https://cites.org/sites/default/files/documents/E-CoP20-015-01.pdf>.

<sup>91</sup> Executive Order 14162, “Putting America First in International Environmental Agreements,” 90 *Federal Register* 8455, January 20, 2025, <https://www.federalregister.gov/documents/2025/01/30/2025-02010/putting-america-first-in-international-environmental-agreements>.

<sup>92</sup> FWS, *U.S. Fish and Wildlife Service, Fiscal Year 2026 Budget in Brief*, p. FWS-1, <https://www.doi.gov/sites/default/files/documents/2025-06/fy26bibfws508.pdf>. For more information, see CRS Insight IN12594, *International Conservation Funding*, by Pervaze A. Sheikh and Eric P. Nardi.

<sup>93</sup> CITES, “How Is CITES Financed,” <https://cites.org/eng/disc/fund.php>.

<sup>94</sup> The CITES Trust Fund finances the administrative costs of the Secretariat, the CoPs, and other standing committees. The CITES Trust Fund is replenished from contributions of the parties. Note, CITES operates on a calendar year budget.

<sup>95</sup> CITES, “Status of Contributions to the CITES Trust Fund (CTL) as of December 2025,” <https://cites.org/eng/disc/fund.php>.

<sup>96</sup> CITES External Trust Fund funds the voluntary program and project costs. The CITES External Trust Fund is replenished from contributions from parties and other entities whom provide funds on a voluntary basis.

In CoP20, the parties passed a resolution calling for an approximately 7.0% increase in the CITES budget.<sup>97</sup> The Secretariat justified this increase due to additional work and need for more capacity. The budget for CITES in the next three years (2026-2028) was estimated to be \$6.6 million for 2026, \$7.0 million for 2027, and \$7.6 million for 2028. Congress might consider what portion, if any, of those annual sums the United States should contribute to the Secretariat each fiscal year. Further, Congress might deliberate whether funding certain projects and activities conducted by CITES through contributions to the CITES External Trust Fund meets congressional goals for species preservation, or if these projects and activities might expand the scope of CITES wider than Congress intends.

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<sup>97</sup> CoP20 Com. II.17, <https://cites.org/sites/default/files/documents/E-CoP20-Com-II-17.pdf>.