

28th August 2020

Japan Wildlife Conservation Society

Recommendations of proposals to amend the CITES Appendices

1.

[Suggestion 1]

Although we support the new additions of seven species to Appendix III, these species should be transferred to Appendix II at CoP19, with a condition of zero-quota exportation. Moreover, given prevention of additional illegal capture and exportation in our country led by international trade of individual already inhabiting in other country, JWCS suggests that the other Japanese indigenous gecko species should be transferred to Appendix I at the next CoP, if they meet the biological criteria described in the Appendices and are identified as targets of illicit trades.

[Reason]

All *Goniurosaurus spp.* excluding Japanese indigenous species were listed in Appendix II at CoP18. Japanese government stated they had considered to list down the species to Appendix III during the meeting. However, It is difficult to distinguish species in same taxon and likely to re-group the species in the future. Therefore, all *Goniurosaurus spp.* should be included in Appendix II.

It does generally not mean that Appendix II have stronger effect than Appendix III on prevention of illicit third-country trades. Thus, it is recommended to put all subspecies into Appendix II together for understanding the international trend of illegal trade. In addition, as national endangered species their export quota should be set at zero, based on Japanese Law for the Conservation of Endangered Species of Wild Fauna and Flora.

CoP18 Com. I Rec. 14 p. 4

https://cites.org/sites/default/files/eng/cop/18/Com_I/SR/E-CoP18-Com-I-Rec-14.pdf

Echinotriton spp. indigenous to China (i.e. *Echinotriton chinhaiensis* and *Echinotriton maxiquadratus*) were listed in Appendix II at CoP18. *Tylototriton verrucosus spp.* and *Paramesotriton spp.* which have similar morphological characteristics to *Goniurosaurus spp.*,

were also listed in Appendix II. Again, to conduct a proper enforcement, all *Goniurosaurus* spp. including Japanese indigenous species should be listed to Appendix II.

[Suggestion 2]

Other than the seven addition, IUCN Red List listed the Japanese indigenous species, whose “Use and trade” is “Pets/display animals, horticulture” and “Geographical Scope” to be “Global”, should also added to CITES Appendices as they likely satisfy biological morphology and trade criteria.

In addition to the seven species, Japanese indigenous species listed by IUCN Red List in “International” of “Pets/display animals, horticulture”, should be added to CITES Appendices as they likely meet biological or trade criteria.

[Reason]

Followings are a few examples of IUCN Red List listed species whose trade status is global.

Stumpy Bullhead (*Tachysurus ichikawai*)

<https://www.iucnredlist.org/species/39293/110460709#threats>

Sword-tail newt, also called Japanese sword-tail newt (*Cynops ensicauda*)

<https://www.iucnredlist.org/species/59441/11942003>

Tokyo salamander (*Hynobius tokyoensis*)

<https://www.iucnredlist.org/species/59103/11880869>

Amami Ishikawa's Frog (*Odorrana splendida*)

<https://www.iucnredlist.org/species/54314436/54316058>

Ishikawa frog (*Odorrana ishikawae*)

<https://www.iucnredlist.org/species/54308994/115406253>

Miyako grass lizzard (*Takydromus toyamai*)

<https://www.iucnredlist.org/species/178488/96878070>

* Note

This document published by JWCS is a public comment on a list proposal to Appendix III of *Goniurosaurus* spp. and *Echinotriton* spp. which are native to Japan. The public comment period was from July 31st to August 29th 2020 conducted by the Ministry of the Environment. You can check the detail of the proposal in Japanese [here](#).

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