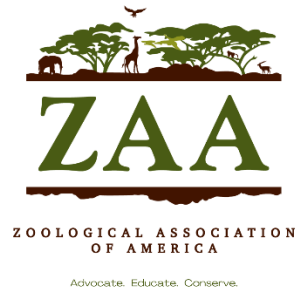


September 17, 2025



Public Comments Processing,
U.S. Fish and Wildlife Service
Attn: Docket No. FWS-HQ-IA-2024-0033; MS: PRB (JAO/3W);
5275 Leesburg Pike
Falls Church, VA 22041–3803.

RE: Notice - Convention on International Trade in Endangered Species of Wild Fauna and Flora
Conference of the Parties: Request for Species Proposals, Information and Recommendations on
Resolutions, Decisions, and Agenda Items (Docket ID FWS-HQ-IA-2024-0033)

The following are the comments of the Zoological Association of America in the above proceeding regarding agenda items for the upcoming Conference of the Parties (“CoP20”) of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES or the Convention).

The Zoological Association of America (ZAA) is a non-profit zoological trade organization that represents professionally managed zoos, aquariums, conservation breeding facilities, wildlife conservation ranches, and conservation education-based animal ambassador programs. With more than seventy-five accredited members, ZAA is one of the largest accrediting organizations in the zoological sector, counting among its members many of the finest facilities in the United States. ZAA professional members and accredited facilities make significant contributions to global conservation through reintroduction programs, rescue efforts, and rehabilitation work around the world. In addition, ZAA organizations provide education programming designed to help the public connect with wildlife and understand the vital importance of conservation of multiple species, including many that are listed as under CITES.

Comments on CoP 20 Agenda Items

In general, ZAA supports the United States’ approach to the CoP 20 as outlined by the Director of U.S. Fish and Wildlife Service (“FWS”) at the public meeting held on September 10, 2025 (which a ZAA representative attended and submitted brief comments). Below are ZAA’s comments on several specific agenda items

CoP Doc. 55: Purpose-of-Transaction Codes

It is our understanding that the purpose code working group has been active for more than a decade and represents a significant effort to define each purpose code to promote more consistent use. In 2022 the working group reached agreement on a definition of Z - zoos; M - medical including biomedical research; E - educational; N - re-introduction or introduction to the wild; and L - law

enforcement/judicial/forensic. These definitions were adopted via revisions to Resolution Conf. 12.3 at the 19th Conference of the Parties to CITES. The working group was then reinstated to "focus on clearly defining purpose-of transaction codes, other than those adopted as of CoP19, ..." and focused on codes P - personal and T - commercial.

Per Doc. 55, these codes will be considered by the Parties at CoP20 together with a decision that, again, reinstates the working group pursuant to a draft decision. That draft decision, however, is not consistent with the direction adopted by the Parties that was put in place at CoP19 in that it fails to ensure proper focus on the outstanding codes that have not yet been addressed by the working group. Specifically, it appears to attempt to re-open discussions exclusively on purpose code Z despite that a detailed definition was agreed by the Parties in 2022.

This perception was reinforced by the public comments of certain groups at the public meeting which made allegations about misuse or improper use of the Z code. As ZAA and others stated, these allegations, if true, demonstrate, at most, issues with the implementation of the Z code and not with its definition, which was previously agreed to by the Parties following extensive work by the working group. The United States should reject this transparent attempt by some groups to unnecessarily reopen the previously adopted Z code and thereby prevent the working group from moving forward with its overall efforts. To avoid this waste of resources and duplication of work, the draft decision should be amended to mandate the working group to focus exclusively on codes not yet agreed to by previous CoPs by deleting the reference to the Z code, as follows:

20.XX The Standing Committee shall re-establish an intersessional joint working group to review the use of purpose-of-transaction codes by Parties, with the following terms of Reference:

b) the working group shall focus on clearly defining purpose-of transaction codes, other than those adopted as of at CoP19 or CoP20, to encourage their consistent use, and consider the possible elimination or amendment of current codes or the inclusion of new ones. In particular the working group shall continue the discussions on purpose codes 'Q', 'B', 'G', 'P', and 'S' ~~and 'Z'~~ with purpose code 'B' as a priority,;

CoP20 Doc 61: Rapid Movement of Wildlife Diagnostic Samples and Musical Instruments

ZAA supports any efforts by the CITES Parties and the United States in particular to enhance the movement of CITES-listed species when there is no negative conservation impact. To this end, we recommend revising the Draft Decisions to include clear directives for implementation rather than simply identifying existing problems. Specifically in the United States we believe the FWS needs to do more to properly and fully implement existing mechanisms for rapid movement of samples to achieve Parties objective of ensuring more effective and efficient management of CITES-listed species.

CoP20 Doc. 102: The 'Lookalike' Criterion

ZAA believes that Doc. 102 regarding the use and misuse of the "lookalike" criterion highlights an important concern regarding the efficient and effective use of resources. There appear to be numerous examples where a CITES lookalike listing or proposed listing would impart no conservation

value. ZAA urges the United States government to support any draft decisions and the development of a relevant working group to address this issue.

Thank you for considering these comments. If you have any questions or would like additional information, please contact us.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kelly George", is displayed on a light gray rectangular background.

Kelly George
Executive Director
Zoological Association of America