CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES
OF WILD FAUNA AND FLORA

Seventy-ninth meeting of the Standing Committee
Samarkand (Uzbekistan), 23 November 2025

Compliance

IMPLEMENTATION OF RESOLUTION CONF. 17.7 (REV. COP19) ON *REVIEW OF TRADE IN SPECIMENS REPORTED AS PRODUCED IN CAPTIVITY*

1. This document has been prepared by the Secretariat, following consultation with the Members of the Animals Committee through its Chair.

2. Resolution Conf. 17.7 (Rev. CoP19) on *Review of trade in animal specimens reported as produced in captivity* concerns trade in specimens traded under source codes C, D, F or R, as defined in paragraph 3 r) of Resolution Conf. 12.3 (Rev. CoP19) on *Permits and certificates*. The Animals Committee, together with the Standing Committee and in cooperation with the Secretariat, is directed to play a key role in the implementation of Resolution Conf. 17.7 (Rev. CoP19).

3. The status of implementation of the cases selected for the two iterations of the review under Resolution Conf. 17.7 (Rev. CoP19) and the list of 14 current ongoing cases was presented to the 78th meeting of the Standing Committee (SC78; Geneva, 2025) in Annexes 1 and 2 to document SC78 Doc. 35.1. The status of implementation has remained unchanged since SC78.

4. At SC78, as indicated in summary record SC78 SR:

   The [Standing] *Committee noted the status of implementation of the cases selected for the two iterations of the review under Resolution 17.7 (Rev. CoP19) and the list of 14 current ongoing cases provided in Annexes 1 and 2 to document SC78 Doc. 35.1, respectively.*

   Concerning Centrochelys sulcata *from Benin, Mali and Togo, the* [Standing] *Committee urged Benin, Mali and Togo to provide a response to the Secretariat by 31 July 2025 so that the matter can be considered at SC79, noting that failure to provide a response may potentially result in a recommendation to suspend trade in* Centrochelys sulcata *at SC79.*

   Concerning Macaca fascicularis *from Cambodia, the Committee noted that the Animals Committee will consider the additional information provided by Cambodia and the outcomes of the mission to Cambodia to be undertaken, subject to external funding, through the intersessional consultation process provided for in paragraph 2 o) of Resolution Conf. 17.7 (Rev. CoP19) and report back to* [the 79th meeting of the Standing Committee] *SC79.*

   Concerning Agalychnis callidryas *from Nicaragua,* Chlamydotis macqueenii *from Kazakhstan,* Dendrobatus auratus *from Nicaragua,* Macaca fascicularis *from the Philippines,* Macaca fascicularis *from Viet Nam,* Oophaga pumilio *from Nicaragua,* Testudo graeca *from Jordan,* Testudo horsfieldii *from Uzbekistan, and* Testudo kleinmanni *from Egypt, the Committee noted that the Animals Committee will consider the additional information provided by the respective countries through the intersessional consultation process provided for in paragraph 2 o) of Resolution Conf. 17.7 (Rev. CoP19) and report back to SC79.*

   Concerning Testudo kleinmanni *from the Syrian Arab Republic, the* [Standing] *Committee agreed to:*

   i) retain Testudo kleinmanni from the Syrian Arab Republic in the review, until it provides clarification on:

A. *the identification of the species (*Testudo kleinmanni *or* Testudo graeca*, the latter of which is native to the Syrian Arab Republic);*

B. *the founder stock (information relating to legal acquisition and non-detriment findings, if it is confirmed to be Testudo kleinmanni);*

C. *supplementation from the wild, if applicable; and*

D. *annual production and retention rates;*

ii) *request the Syrian Arab Republic to register its breeding facilities for* T. kleinmanni *if it intends to export this Appendix-I species for commercial purposes;*

iii) *encourage the Syrian Arab Republic to provide a response to the Secretariat by 30 January 2026 so that the matter can be considered at AC34;*

iv) *encourage the regional representatives for Asia to reach out to the Syrian Arab Republic to respond to the request for information of the Animals Committee.*

5. In the present document, the Secretariat reports on actions taken by Parties to implement recommendations made by the Animals Committee and Standing Committee to ensure compliance with the obligations of Article III and VI, as well as Article VII, paragraph 4 and 5 of the Convention for the cases indicated in the table below. Updates are provided for all cases currently in the review of trade in animals specimens reported as produced in captivity, with the exception of *Testudo kleinmanni* from the Syrian Arab Republic, which will be reported on at the next meeting of the Animals Committee.

6. In accordance with paragraph 2 o) of Resolution Conf. 17.7 (Rev. CoP19), the Members of the Animals Committee were invited to provide their comments on the implementation of the recommendations to inform the review by the Standing Committee at the present meeting. These comments have been taken into consideration in the Secretariat's assessment and recommendations.

7. The list of species/country combinations and the links to the sources of information considered by the Animals Committee are indicated in Column 3.

Species	Country	Source of information considered
Agalychnis callidryas	Nicaragua	SC78 Doc. 35.1, Annex 3 and Annex 5a (Party's full response). Additional information in information document SC78 Inf. 29.
Centrochelys sulcata	Benin	No information provided
Centrochelys sulcata	Mali	No information provided
Centrochelys sulcata	Togo	Non-detriment finding (NDF) "primary evaluation template" (AC33 Doc. 15.1).
Chlamydotis macqueenii	Kazakhstan	SC78 Doc. 35.1, Annex 3 Additional information in information document SC78 Inf. 22.
Dendrobatus auratus	Nicaragua	Annex 3 to document SC78 Doc. 35.1 Annex 3 and Annex 5a (Party's full response). Additional information in information document SC78 Inf. 29.
Macaca fascicularis	Cambodia	SC78 Doc. 35.1 Annex 3 and Annex 5b (Partys' full response).
Macaca fascicularis	The Philippines	SC78 Doc. 35.1 Annex 3 and Annex 5c (Party's full response).
Macaca fascicularis	Viet Nam	SC78 Doc. 35.1 Annex 3 and Annex 5d (Party's full response). Additional information in information document SC78 Inf. 14.
Oophaga pumilio	Nicaragua	SC78 Doc. 35.1 Annex 3 and Annex 5a (Party's full response). Additional information in information document SC78 Inf. 29.
Testudo graeca	Jordan	SC78 Doc. 35.1 Annex 3 (Party's response). Additional information from Party, including photographs of the breeding facility.

Species	Country	Source of information considered
Testudo horsfieldii	Uzbekistan	SC78 Doc. 35.1 Annex 3 and Annex 5e (Party's full response). Additional information in information document SC78 Inf. 34.
Testudo kleinmanni	Egypt	SC78 Doc. 35.1 Annex 3 and Annex 5f (Party's full response). Additional information in information document SC78 Inf. 31.

8. In response to the comments and the clarifications sought by the Animals Committee Members, several Parties submitted additional information. This additional information was not reviewed by the Members of the Animals Committee, but the Secretariat took it into consideration in its assessment and recommendations. Where relevant, the additional information is included in Column 2 of the table in Annex 1 to the present document.

Implementation of the recommendations from the Animals Committee

9. The tables in Annex 1 to the present document contain the following information for the 13 species/country combinations to be reviewed by SC79:

   Heading = Species / country combination concerned (arranged in alphabetical order by species)

   Column 1 = Recommendations from AC33 [where AC32 recommended asking the same questions again, those questions are included as a note (see Annex of document AC30 Doc. 13.1 for details of questions)]

   Column 2 = Summary of response from the Party concerned, recommendation of the Animals Committee and any additional information subsequently submitted by the Party concerned.

   Column 3 = Assessment and recommendation of Secretariat, following consultation with the Animals Committee and after consideration of additional information provided, where relevant.

Agalychnis callidryas, Dendrobates auratus and *Oophaga pumilio* / Nicaragua

10. At SC78, Nicaragua was requested to provide further clarifications on when the prohibition on taking these species from the wild came into force; when the three registered facilities were established; whether there are additional captive-breeding facilities that do not export and how they sourced their founder stock; and to provide species-specific information on the current stock, production and mortality rates. Nicaragua provided the necessary clarifications for each of the three species. The Animals Committee commended Nicaragua on its efforts in this regard.

Centrochelys sulcata / Benin, Mali and Togo

11. Concerning *Centrochelys sulcata* from Benin, Mali and Togo, which were retained in the review from the first iteration of Resolution Conf. 17.7 (Rev. CoP18) in July 2017, the Secretariat wrote to the three Parties concerned on 14 March 2025 and invited them to provide updates to be considered at the present meeting, following an intersessional consultation with the Members of the Animals Committee. The letter indicated that failure to respond could result in a possible recommendation to suspend trade at SC79. At the time of writing, no response or new information had been received from Benin, Mali or Togo. Togo did, however, previously provide a response to AC33 with an assessment of the production of live specimens of *C. sulcata* from Togolese breeding farms, using a non-detriment finding (NDF) "primary evaluation template" (see document AC33 Doc. 15.1). The Standing Committee may therefore wish to consider recommending that Parties suspend trade in *Centrochelys sulcata* from Benin and Mali, as neither Party has provided a response to the consultations sent from the Secretariat on behalf of the Animals Committee or Standing Committee. With regard to *Centrochelys sulcata* from Togo, the Secretariat recommends that the Standing Committee encourage Togo to respond to the recommendations adopted at AC33.

Chlamydotis macqueenii / Kazakhstan

12. Kazakhstan provided additional responses to the questions of the Animals Committee. Kazakhstan did not specify the purpose for which the birds are produced, but it is implied that the breeding is part of a conservation programme. An examination of the CITES trade database indicates that the vast majority of trade in this species since 2010 was recorded under purpose code N (reintroduction or introduction into the wild) or B (breeding in captivity or artificial propagation). However, one possible transaction of concern is the export of

460 live birds in 2022 under purpose code T (commercial purposes) from Kazakhstan to Uzbekistan (as reported by the importer but not included in the annual report for 2022 by Kazakhstan). Kazakhstan was invited to clarify these points, but at the time of writing no response has been received. It is the Secretariat's view that this species/country combination be retained until Kazakhstan provides clarification on the purposes for which the animals produced in this facility are used; and the export of 460 live birds in 2022 under purpose code T from Kazakhstan to Uzbekistan.

Macaca fascicularis / Cambodia

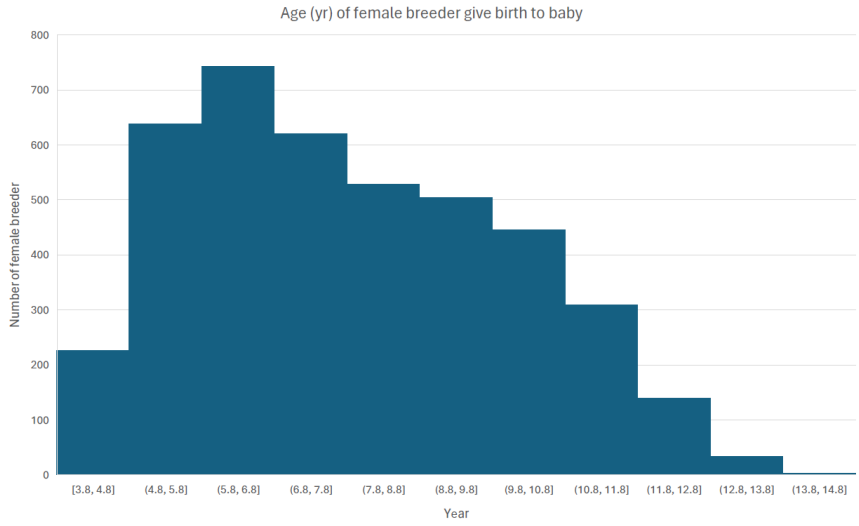
13. Concerning *Macaca fascicularis* from Cambodia, the Secretariat and the Chair of the Animals Committee undertook a mission at the invitation of Cambodia in June 2025. As mandated by the Standing Committee at SC78, the objective of the mission was to conduct a technical verification and assessment of the trade in captive bred *Macaca fascicularis,* based on information provided by Cambodia in response to the *Review of trade in animal specimens reported as produced in captivity* process, as well as information from other sources raising concerns that wild specimens may be "laundered" through captive-breeding facilities in Cambodia. A detailed account of the mission and its findings is presented in document SC79 Doc. 6.3.2 on *Application of Article XIII in Cambodia.*

14. On 2 June, Cambodia submitted additional information to the Secretariat including on: the Government's oversight on trade in *M. fascicularis*; birth rates; breeding stock replacement; reproduction; productivity and census information by facility; applicable national laws, regulations and protocols for *M. fascicularis*; national Good Facility Practices (GFP) Guidelines; genetic traceability of captive-bred *M. fascicularis*; ecology and habitat distribution; IUCN Red List classification; national human-wildlife conflict mitigation and control measures; and global health security and global pandemic response and preparedness. The comprehensive information can be found in Annex 2 to the present document.

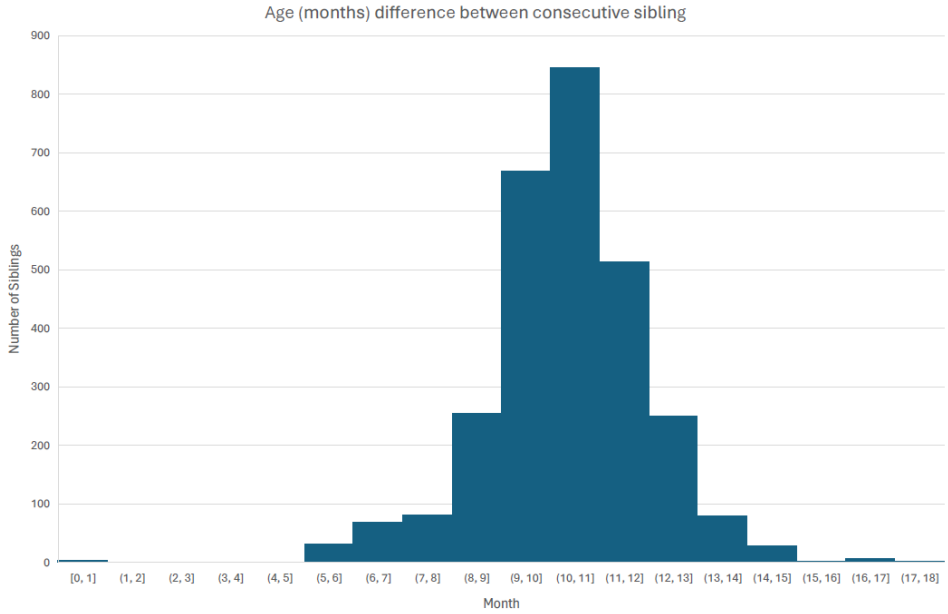
15. The mission team visited four breeding facilities owned by three companies as well as the airport customs control centre. Meetings were held with the Management Authority (MA) and Scientific Authority (SA), the veterinarians involved in testing the animals, and all of the companies involved in captive-breeding operations in nine facilities. The Secretariat verified the information provided by Cambodia in its 2 June 2025 submission with the authorities and the breedersIt was clear that some of the discrepancies in the data in the 2 June 2025 submission came from inconsistent reporting methods by the breeding facilities. For example, when reporting number of female breeders, some facilities used only "active" breeders, even though the total number of females would have been higher if "inactive" breeders had been included. This gave the appearance over time that the stock was being supplemented, when in fact these animals were already at the facility and reclassified from "inactive" to "active". In addition, facilities used different methods for recording births, with some counting from the time of birth, while others only recording 'births' after weaning. As a result, mortality rates did not consistently account for still births.

16. The CITES MA of Cambodia submitted documentation for all the harvest in the wild of the original founder stocks prior to 2010 (four facilities with a total of 42,640 specimens – out of an estimated population of minimum 1,5 million animals (2,84%). In 2010, it was decided to no longer authorize the take of wild specimens of *M. fascicularis*. However, in 2018, the Ministry of Agriculture, Forestry and Fisheries (MAFF) had issued a permit allowing for 2,000 problem wild animals to be taken from public areas and provided to one facility (Facility 5). There had been some estimate of the population in the public areas at the time by the Forestry Administration (FA) but the mission did not receive a comprehensive explanation of the basis for the offtake. A second permit had been issued in 2021 to allow for another offtake of 1,500 animals. There had been a census at the time estimating a population of 9,246 specimens in public areas in ten specifically listed provinces, so the collection of the full amount would be 16 percent of the local population. To date, about 200 of the 1,500 animals have been collected. A further population estimate in 2023 of animals present in the same public areas concluded the presence of about 7,000 specimens. It is not clear what the national population estimate is currently. In conclusion, some population estimates had been done but not a comprehensive NDF. There are sufficient animals in captivity at present, so there should be no need to collect any further animals.

17. Concerning the high reproductive rates of *M. fascicularis* and the capacity of the breeding facilities to produce the numbers claimed, the Secretariat concluded during the mission that the numbers reported by the facilities is feasible. The facility that reported high reproductive rates held individual data of every animal, including health, pregnancy, birth, weaning, etc. Daily control sheets are kept, indicating pregnancy, birth dates and weaning dates of individually marked females over several years. One of the breeding facilities was able to extract data which demonstrated that females gave birth between the ages of around 4 to 13, which a peak around the age of 5 to 8, as represented in the graph below.



18. The breeding facility also provided an analysis of the birth rate of 1,300 female breeders. It indicated that female breeders on average give birth with an interval of 9-11 months, making more than one birth per year per female possible. This is due to short weaning time and a harem structure. The methods used to increase the production rates were only used during a period of high demand. The following graph was provided by the facility.



19. Considering the measures Cambodia has taken to avoid potential “laundering” of wild specimens as captive-bred, Cambodia issues transport permits for all movements of animals (without which any animal transported in the country is confiscated). The Secretariat was also informed that each breeding facility submits monthly reports detailing all inputs and outputs. Copies of these monthly reports were provided to the Secretariat following the mission. The three largest facilities have initiated DNA testing and sampling in order to prove and document paternal parentage of each offspring produced. In a one male/multi-female group for captive-bred monkeys, it is best to track paternal parentage because maternal lineage is already known, while paternal lineage determines genetic diversity, breeding success, and long-term population health.

20. In an effort to obtain comprehensive information on the supply to and from the breeding facilities and to understand the different ways that each facility reports its data, the Secretariat developed a questionnaire and requested the Cambodian MA to work with the breeding facilities to provide information concerning (1) facility details and establishment, (2) production levels and (3) management.

21. These completed questionnaires were provided by Cambodia on 2 September 2025. For reasons of confidentiality, these were anonymized before circulation to the Members of the Animals Committee and are also provided here in Annex 3 to the present document.

22. The Animals Committee considered the additional information provided by Cambodia and the outcomes of the mission undertaken in June 2025 that were shared with the members by the Secretariat and the Chair of the Animals Committee. The focus of the Animals Committee was on the scientific aspects relating to the trade in captive-bred *Macaca fascicularis* from Cambodia, specifically the reportedly high productivity rates and the non-detriment findings (NDFs) required for founder stock and supplementation of wild specimens from the wild. Cambodia has provided clarifications and evidence to support the high reproduction rates reported for *Macaca fascicularis* to the satisfaction of the Animals Committee. Concerning the NDF for the founder stock, Cambodia has provided proof of its assessment at the time, which was precautionary in nature. The Secretariat considers that this species / country combination can be removed from the review, noting that issues relating to legal acquisition findings and implementation will be addressed under Article XIII (see document SC79 Doc. 6.3.2 on *Application of Article XIII in Cambodia*).

Macaca fascicularis / the Philippines

23. The Philippines provided clarifications to the Secretariat on the NDF and the offtake of wild specimens, including the removal of problem wild animals from public areas. The response details the status and distribution of the species and the nature and context of the offtake. Details of the response from the Philippines can be found in Annex 1 to the present document. The Philippines has provided responses to the questions of the Animals Committee and addressed the outstanding concerns raised regarding the offtake from the wild and the use of source code F. The Secretariat considers that this species / country combination can be removed from the review.

Macaca fascicularis / Viet Nam

24. Viet Nam has provided responses to the questions of the Animals Committee and addressed the outstanding concerns raised regarding the origin of the founder stock, the biological sustainability of the founder stock and the management mechanism of satellite farms, including controls and logbook to ensure traceability. Details of the response from Viet Nam can be found in Annex 1 to the present document. The Secretariat considers that this species / country combination can be removed from the review.

Testudo graeca / Jordan

25. Jordan confirmed that it is a protected animal as per Jordanian regulations and law since at least 2002, and it is against national law to remove *Testudo graeca* from the wild. It provided responses to the questions of the Animals Committee, including the following statistics:

- Current breeding stock: 280 – 300
- No. of breeding facilities: 1
- Breeding adults: 230+-
- Ration of males to females – 1:2
- No. of offspring: 100 – 120
- Production rate: (1,000 eggs / year)
- Mortality rate: 5%

26. The information provided by Jordan, including recent photographs of the facility that breeds the species raised several concerns by the Animals Committee with regards the captive-breeding of *Testudo graeca* in Jordan, including the suitability of the facility. These concerns are detailed in the table in Annex 1 to the present document. The Secretariat proposes several recommendations to address these concerns for consideration by the Standing Committee.

Testudo horsfiledii / Uzbekistan

27. Uzbekistan has provided responses to all the requests from AC33, including an NDF for the establishment of quotas for specimens born in captivity (F1) and ranched (R) specimens. The Secretariat notes that, in information document SC78 Inf. 34, Uzbekistan presented a table with the year of establishment, details of the initial breeding stock (male/female), retention rate, year and numbers of wild captures, the current breeding stock (male/female), the production rate for 2023 and 2024, and the mortality rate. The table

indicates that 5 of the 16 facilities have received supplementary wild stock since their establishment and that the annual total number of wild offtake for breeding was as follows:

Year	Total wild offtake for breeding purposes
2008	1,831
2009	2,500
2010	0
2011	0
2012	1,000
2013	1,000
2014	3,976
2015	2,055
2016	7,300
2017	2,565
2018	2,800
2019	7,495
2020	2,505
2021	6,070
2022	1,060
Total (2008 to 2022)	42,157

28. These numbers would not appear to be excessive and in view of the production method (only one establishment is currently retaining offspring), the facilities cannot yet breed to F2. Therefore, Uzbekistan is no longer using the source code C [animals bred in captivity in line with Resolution Conf. 10.16 (Rev. CoP19) on *Specimens of animal species bred in captivity*].

Testudo kleinmanni / Egypt

29. In its response, Egypt has provided detailed responses to the questions of the Animals Committee and has already suspended all exports of this species for more than a year. Egypt is amenable to the publication of a zero export quota and the Secretariat suggests that this should remain in place until the facilities are registered, a process that Egypt indicates that it has initiated through a comprehensive review of breeding facilities.

Summary of the conclusions of the Secretariat on implementation of recommendations

30. In the absence of a response to the consultation following SC78, the Secretariat recommends that the Standing Committee recommend that all Parties suspend trade in the following species/country combinations:

- *Centrochelys sulcata* / Benin
- *Centrochelys sulcata* / Mali

31. The Secretariat recommends that the following species/country combinations be removed from the review:

- *Agalychnis callidryas* / Nicaragua
- *Dendrobatus auratus* / Nicaragua
- *Macaca fascicularis* / Cambodia
- *Macaca fascicularis* / the Philippines
- *Macaca fascicularis* / Viet Nam
- *Oophaga pumilio* / Nicaragua
- *Testudo horsfieldii* / Uzbekistan
- *Testudo kleinmanni* / Egypt (subject to the publication of zero export quotas for all sources until the breeding facilities are registered)

32. The Secretariat recommends that the following species/country combinations be retained within the review until such time as they address the recommendations of the Animals and Standing Committees:

- *Centrochelys sulcata* / Togo
- *Chlamydotis macqueenii* / Kazakhstan

- *Testudo graeca* / Jordan

Recommendations

32. The Standing Committee is invited to:

    a) remove the following species/country combinations from the review:

        i) *Agalychnis callidryas, Dendrobates auratus* and Oophaga pumilio / Nicaragua;

        ii) *Macaca fascicularis* / Cambodia, the Philippines, Viet Nam;

        iii) *Testudo horsfieldii* / Uzbekistan;

        iv) *Testudo kleinmanni* / Egypt.

    b) concerning *Centrochelys sulcata* / Benin and Mali:

        i) retain *Centrochelys sulcata* from Benin and Mali in the review;

        ii) recommend that all Parties suspend trade in specimens of *C. sulcata* from Benin and Mali until such time as it addresses the concerns of the Animals and Standing Committees; and

        iii) encourage Benin and Mali to provide an update on the implementation of the recommendations to the Secretariat by 30 March 2026 so that the matter can be considered at the 34th meeting of the Animals Committee (AC34; Geneva, July 2026, tbc).

    c) concerning *Centrochelys sulcata* / Togo:

        i) retain *Centrochelys sulcata* from Togo in the review, until it provides evidence of legal acquisition of all breeding stock for all facilities, including information on source of animals used to augment the breeding stock; and

        iii) encourage Togo to provide an update on the implementation of the recommendations to the Secretariat by 31 March 2026 so that the matter can be considered at the 34th meeting of the Animals Committee (AC34; Geneva, July 2026, tbc).

    d) concerning *Chlamydotis macqueenii* from Kazakhstan:

        i) retain *Chlamydotis macqueenii* from Kazakhstan in the review until it provides clarification on:

            A. the purposes for which the animals produced in this facility are used; and

            B. the export of 460 live birds in 2022 under purpose code T from Kazakhstan to Uzbekistan; and

        ii) invite Kazakhstan to provide an update on the implementation of the recommendations to the Secretariat by 31 March 2026 so that the matter can be considered at the 34th meeting of the Animals Committee (AC34; Geneva, July 2026, tbc).

    e) concerning *Testudo graeca* from Jordan:

        i) retain *Testudo graeca* from Jordan in the review until it:

            A. publishes a zero quota for specimens of all source codes;

            B. submits a non-detriment finding for the specimens of wild origin and for the founder stock of captive-bred specimens that it is breeding *Testudo graeca* in line with Resolution Conf. 10.16 (Rev. CoP19) on *Specimens of animal species bred in captivity* for consideration by the Secretariat and the Chair of the Animals Committee; and

            C. establishes a monitoring and traceability system to ensure the correct source code is applied for any potential future trade.

ii) encourage Jordan to consider the concerns raised by the Animals Committee relating to the facility and to take measures to ensure that the facility is suitably equipped to house and care for the species; and

iii) invite Jordan to provide an update on the implementation of the recommendations to the Secretariat by 31 March 2026 so that the matter can be considered at the 34th meeting of the Animals Committee (AC34; Geneva, July 2026, tbc).

UPDATE ON THE 13 SPECIES / COUNTRY COMBINATIONS SELECTED FOR THE REVIEW OF TRADE IN SPECIMENS OF SPECIES REPORTED TO BE PRODUCED IN CAPTIVITY AT AC32, RETAINED AT AC33 AND SC78, TO BE REVIEWED AT SC79.

For each species / country combination the following is presented:

Heading = Species / country combination concerned (arranged in alphabetical order by species)
Column 1 = Recommendations from AC33 [where AC32 recommended asking the same questions again, those questions are included as a note (see Annex of document AC30 Doc. 13.1 for details of questions)]

Column 2 = Summary of response from the Party concerned, recommendation of the Animals Committee and any additional information subsequently submitted by the Party concerned.

Column 3 = Assessment and recommendation of Secretariat, following consultation with the Animals Committee and after consideration of additional information provided, where relevant.

1. *Agalychnis callidryas* / Nicaragua

Recommendations from AC33	**Response from Party, recommendation of the Animals Committee and any additional information subsequently submitted by the Party concerned**	**Assessment and recommendation of Secretariat**
The Animals Committee agreed to retain the species-country combination, but to acknowledge the efforts made by Nicaragua to respond to the questions posed by the Animals Committee. The Animals Committee requested Nicaragua to provide an individual response to the questions concerning *A, callidryas* and to provide more information, in particular on the acquisition of the founder stock and the mortality rates within the facilities.	The response received from the Party to SC78 is summarized in Annex 3 of document SC78 Doc. 35.1 and the Party's full response in Annex 5a of that document. Additional information is presented in SC78 Inf. 29. Recommendation of the Animals Committee The information provided by Nicaragua appears to be sufficient to allow this species country combination to be released from the process. The AC wished to congratulate Nicaragua on their efforts in this regard.	Assessment Nicaragua has provided detailed responses to all of the questions and concerns raised by the Animals Committee regarding *Agalychnis callidryas*. The Secretariat considers that this species / country combination can be removed from the review. Recommendation

		The Standing Committee is invited to remove *Agalychnis callidryas* from Nicaragua from the review.
2. *Centrochelys sulcata* / Benin		
Recommendations from AC33	**Response from Party, recommendation of the Animals Committee and any additional information subsequently submitted by the Party concerned**	**Assessment and recommendation of Secretariat**
The Animals Committee: i) agreed to retain *C. sulcata* from Benin in the review and maintain its current zero export quota for captive bred specimens (C) of *C. sulcata* until such time as it addresses the concerns of the Animals and Standing Committees; and ii) encouraged Benin to provide an update on the implementation of the recommendations to the Secretariat by 30 September 2024 so that the matter can be considered at the 78th meeting of the Standings Committee (SC78; Geneva, February 2025).	The Secretariat wrote to Benin on 14 March 2025 requesting an update by 31 July 2025 so that these cases could be considered at the present meeting, following an intersessional consultation with the members of the Animals Committee. The letter indicated that failure to respond could result in a possible recommendation to suspend trade at SC79. At the time of writing, no response or new information had been received from Benin. Note that the recommendations from SC74 for Benin were: *Benin requested to:* *a) provide documentation for the justification of the legal origin of the founder stock;* *b) amend the published quota to include only specimens with a maximum carapace length of 15 cm; and* *c) provide information (e.g., in the form of stud books, pictures or other documentation) that allows the assessment of the ability of the breeding facilities to produce F1/F2 offspring in the reported numbers and the ability of the facilities in its territory to produce F2 specimens or manage the species in a manner demonstrated to be capable of doing so.*	<u>Assessment</u> Benin has not provided a response or implemented the recommendations from SC74. <u>Recommendation</u> **The Standing Committee is invited to:** **i) retain *Centrochelys sulcata* from Benin in the review;** **ii) recommend that all Parties suspend trade in specimens of *C. sulcata* from Benin until such time as it addresses the concerns of the Animals and Standing Committees; and** **iii) encourage Benin to provide an update on the implementation of the recommendations to the Secretariat by 30 March 2026 so that the matter can be considered at the 34th meeting of the Animals Committee (AC34; Geneva, July 2026, tbc).**

3. *Centrochelys sulcata* / Mali		
Recommendations from AC33	**Response from Party, recommendation of the Animals Committee and any additional information subsequently submitted by the Party concerned**	**Assessment and recommendation of Secretariat**
The Animals Committee: i) agreed to retain C. sulcata from Mali in the review until such time as it addresses the concerns of the Animals and Standing Committees; and ii) urged Mali to provide an update on the implementation of the recommendations to the Secretariat by 30 September 2024 so that the matter can be considered at the 78th meeting of the Standing Committee (SC78; Geneva, February 2025).	The Secretariat wrote to Mali on 14 March 2025 requesting an update by 31 July 2025 so that these cases could be considered at the present meeting, following an intersessional consultation with the members of the Animals Committee. The letter indicated that failure to respond could result in a possible recommendation to suspend trade at SC79. At the time of writing, no response or new information had been received from Mali. Note that the recommendations from SC74 for Mali were: *Mali requested to:* *a) provide evidence of the legal acquisition of the stock,* *b) provide documentation and evidence in the form of stud books, pictures or other documentation that allows the assessment of the ability of the breeding facilities to produce F1/F2 offspring in the reported numbers,* *c) amend the published quota to include only specimens with a maximum carapace length of 15 cm and the scientific basis by which it has been established that the quantities of* Centrochelys sulcata *taken from the wild and used as breeding stock. would not be detrimental to the survival of the species.*	Assessment Mali has not provided a response or implemented the recommendations from SC74. Recommendation **The Standing Committee is invited to:** **i) retain *Centrochelys sulcata* from Mali in the review; and** **ii) recommend that all Parties suspend trade in specimens of *C. sulcata* from Mali until such time as it addresses the concerns of the Animals and Standing Committees; and** **iii) encourage Mali to provide an update on the implementation of the recommendations to the Secretariat by 30 March 2026 so that the matter can be considered at the 34th meeting of the Animals Committee (AC34; Geneva, July 2026, tbc).**
4. *Centrochelys sulcata* / Togo		
Recommendations from AC33	**Response from Party, recommendation of the Animals Committee and any additional information subsequently submitted by the Party concerned**	**Assessment and recommendation of Secretariat**
The Animals Committee: i) agreed to retaining *Centrochelys sulcata* from Togo in the review, until it provides	The Secretariat wrote to Togo on 14 March 2025 requesting an update by 31 July 2025 so that these cases could be considered at the present meeting, following an intersessional consultation with the members of the Animals Committee. The letter indicated that failure	Assessment Togo has partially addressed the recommendations of the Standing

evidence of legal acquisition of all breeding stock for all facilities, including information on source of animals used to augment the breeding stock; and ii) encouraged Togo to provide an update on the implementation of the recommendations to the Secretariat by 30 September 2024 so that the matter can be considered at the 78th meeting of the Standing Committee (SC78; Geneva, February 2025).	to respond could result in a possible recommendation to suspend trade at SC79. At the time of writing, no response or new information had been received from Togo. However, at AC33, Togo did respond with an assessment of the production of live specimens of *C. sulcata* from Togolese breeding farms, following a non-detriment finding (NDF) "primary evaluation template" (see document AC33 Doc. 15.1). The outcome of the discussions at AC33 is in column 1 of this table.	Committee, but the origin and the legality of the breeding stock remains unclear. Recommendation **The Standing Committee is invited to:** **i) retain *Centrochelys sulcata* from Togo in the review, until it provides evidence of legal acquisition of all breeding stock for all facilities, including information on source of animals used to augment the breeding stock; and** **ii) encourage Togo to provide an update on the implementation of the recommendations to the Secretariat by 31 March 2026 so that the matter can be considered at the 34th meeting of the Animals Committee (AC34, 2026).**
5. *Chlamydotis macqueenii* / Kazakhstan		
Recommendations from AC33	**Response from Party, recommendation of the Animals Committee and any additional information subsequently submitted by the Party concerned**	**Assessment and recommendation of Secretariat**
The Animals Committee agreed to retain the species-country combination. The Animals Committee requested Kazakhstan to provide the response to questions *C1 to C6* the Animals Committee for its consideration.	The response received from the Party to SC78 is summarized in Annex 3 of document SC78 Doc. 35.1. Additional information was presented in SC78 Inf. 22. Recommendation of the Animals Committee The response from Kazakhstan does not satisfactorily answer the questions raised. Kazakhstan should provide clear information on: • the number of facilities breeding the species, • when they were established, • how their founder stocks were established and if they were established with wild taken specimens,	Assessment Kazakhstan has responded to the questions posed by the Animals Committee. Kazakhstan did not specify the purpose for which the birds are produced, but imply that the breeding is part of a conservation programme. An examination of the CITES trade database indicates that the vast majority of trade in this species since 2010 is recorded under purpose code N (reintroduction or introduction into the wild) or B (breeding in captivity or artificial

	• how it was determined that the offtake did not threaten the survival of the species. In addition, the following should be clarified: • how often animals taken from the wild are added to the breeding stock and • how it was determined that the offtake of the wild specimens does not threaten the survival of the species. • whether the facilities provided evidence that they are able to produce offspring to the F2 generation. Finally, there are questions regarding the purposes for which the animals produced in this facility are used, and clarification on this point would be useful. The AC is therefore of the view that clarifications to the issues mentioned above would be necessary to able to determine whether Kazakhstan can be removed from the process. <u>Additional clarifications received from Party</u> Kazakhstan confirmed that there is only one breeding facility: the Sheikh Khalifa Houbara Bustard Breeding Centre in Kazakhstan (SKHBC-KZ), which was established in 2008. The current breeding flock of *C. macqueenii* descends from: 1. captive individuals transferred from other facilities (breeding centres or customs housing facilities, a total of 3 752 individuals between 2009 and 2023). 2. wild-taken individuals resulting from egg collections following both local and international regulations (a total of 1,181 wild-taken individuals between 2005 and 2018, which includes 52 individuals transferred from the Houbara Breeding Centre in Abu Dhabi that resulted from previous egg collection in Kazakhstan in 2005 and 2006). Kazakhstan states that all founders were acquired following both local and international regulations. It confirms that “in accordance	propagation). One possible transaction of concern is the export of 460 live birds in 2022 under purpose T from Kazakhstan to Uzbekistan (as reported by the importer but not included in the annual report for 2022 by Kazakhstan). <u>Recommendation</u> **The Standing Committee is invited to:** **i) retain *Chlamydotis macqueenii* from Kazakhstan in the review until it provides clarification on:** **A. the purposes for which the animals produced in this facility are used; and** **B. the export of 460 live birds in 2022 under purpose code T from Kazakhstan to Uzbekistan; and** **ii) invite Kazakhstan to provide an update on the implementation of the recommendations to the Secretariat by 31 March 2026 so that the matter can be considered at the 34th meeting of the Animals Committee (AC34, 2026).**

	with the legislation of the Republic of Kazakhstan, any removal of specimens is carried out only on the basis of a bio-justification prepared by the national Scientific Authority. This conclusion evaluates the status of the population and provides recommendations on the permissible volume of removals, ensuring that such activities do not threaten the survival of the species". In addition, "scientific monitoring includes evaluation of calving/reclutching success, population density estimates throughout the years, and other long-term data on population dynamics, which support decision-making by the competent authorities". Kazakhstan indicates that the captive population is managed to preserve its genetic diversity and prevent inbreeding through pedigree analyses. Therefore, each individual's pedigree is recorded to allow for accurate estimation of genetic parameters, such as individual mean kinship and inbreeding coefficients. Pedigree analyses are performed on a yearly basis. It states that "the goal is to ensure that the captive flock remains representative of the genetic diversity of its source population and of the wild populations it is intended to reinforce". Therefore, alongside strict genetic management, Kazakhstan states that "limited but regular inputs from wild populations are used as the most effective strategy to prevent genetic drift.". The conservation breeding programmes for the Asian houbara rely on artificial reproduction techniques and hand-rearing of the chicks. With proven records of the successful breeding in captivity, *C. macqueenii* chicks produced at the Sheikh Khalifa Houbara Breeding Centre in Kazakhstan since 2010 were of a captive-bred generation between one and eight. The captive population is managed to preserve its genetic diversity and prevent inbreeding through pedigree analyses. Therefore, each individual's pedigree is recorded to allow for accurate estimation of genetic parameters, such as individual mean kinship and inbreeding coefficients. Pedigree analyses are performed on a yearly basis.	
6. *Dendrobatus auratus* / Nicaragua		

Recommendations from AC33	Response from Party, recommendation of the Animals Committee and any additional information subsequently submitted by the Party concerned	Assessment and recommendation of Secretariat
The Animals Committee agreed to retain the species-country combination, but to acknowledge the efforts made by Nicaragua to respond to the questions posed by the Animals Committee. The Animals Committee requested Nicaragua to provide an individual response to the questions concerning *D. auratus* and to provide more information, in particular on the acquisition of the founder stock and the mortality rates within the facilities.	The response received from the Party to SC78 is summarized in Annex 3 of document SC78 Doc. 35.1 and the Party's full response in Annex 5a of that document. Additional information is presented in SC78 Inf. 29. Recommendation of the Animals Committee The information provided by Nicaragua appears to be sufficient to allow this species country combination to be released from the process. The AC wished to congratulate Nicaragua on their efforts in this regard.	Assessment Nicaragua has provided detailed responses to all of the questions and concerns raised by the Animals Committee regarding *Dendrobates auratus*. Recommendation **The Standing Committee is invited to remove *Dendrobatus auratus* from Nicaragua from the review.**

7. *Macaca fascicularis* / Cambodia

Recommendations from AC33	Response from Party, recommendation of the Animals Committee and any additional information subsequently submitted by the Party concerned	Assessment and recommendation of Secretariat
The Animals Committee agreed to retain the species-country combination and requested Cambodia to provide clarifications about the high reproduction rates in writing to the Secretariat for review by the Animals Committee.	The response received from the Party to SC78 is summarized in Annex 3 of document SC78 Doc. 35.1 and the Party's full response in Annex 5b of that document. See also Annex 2 of the present document. Recommendation of the Animals Committee "In relation to our concerns about the high reproduction rates indicated by Cambodia in its responses to the questions of the AC, after having seen and reviewed the latest information provided by Cambodia as well as the mission report of the Secretariat and the AC chair, the AC is of the view that the reproduction rates are plausible. In particular, the recording of detailed data on the level of individual females helped verification of the reproduction rates.	Assessment Cambodia has provided clarifications on and evidence to support the high reproduction rates reported for *Macaca fascicularis* for review by the Animals Committee as requested. Concerning the NDF for the founder stock, Cambodia has provided proof of its assessment at the time., which was precautionary in nature. The Secretariat considers that this species / country combination can be removed from the review, noting that issues relating to Legal Acquisition Findings (LAF) and

	We would nevertheless stress that it would be advisable if in the future the facilities would all report in a consistent manner to the authorities that allows a clear understanding of how many animals are at the facility, how many are reproductive, how many are not reproductive, how many babies are still with the mothers and how many babies are separated in order to know how many animals are at the facilities at any time. In relation to the animals taken from wild populations to stock and supplement the numbers in the facilities, the AC is still concerned that no scientifically robust NDF has been provided that allows to assess whether the offtake is not detrimental to the survival of the species in the wild. This is particularly the case for the more recent introductions of so-called problem animals from public sites." Additional clarifications received from Party The CITES MA of Cambodia subsequently submitted documentation for all of the harvest in the wild of the original founder stocks prior to 2010 (four facilities with a total of 42,640 specimens - out of an estimated population of minimum 1,5 mill (2,84%). For several of the authorizations, the companies asked for a lot more specimens than they were authorized to capture. However, it was evident that the authorities took a precautionary approach and allowed significantly lower numbers than requested by the facilities. In one case, the request was for 35,000 animals but authorisation was only granted for 4,000 animals.	implementation will be addressed under Article XIII (see document SC79 Doc. 6.3.2 on *Application of Article XIII in Cambodia*). Recommendation **The Standing Committee is invited to remove *Macaca fascicularis* from Cambodia from the review.**

8. *Macaca fascicularis* / the Philippines

Recommendations from AC33	**Response from Party, recommendation of the Animals Committee and any additional information subsequently submitted by the Party concerned**	**Assessment and recommendation of Secretariat,**
The Animals Committee agreed to retain the species-country combination and to ask the same questions again since the Philippines have not provided responses to the initial letter.	The response received from the Party to SC78 is summarized in Annex 3 of document SC78 Doc. 35.1 and the Party's full response in Annex 5c of that document. Recommendation of the Animals Committee To release the Philippines from the process, it would be helpful for the Philippines to clarify how it determined that the offtake from the	Assessment The Philippines has provided responses to the questions posed by the Animals Committee and addressed the outstanding concerns raised regarding the offtake from the wild and the use of source code F.

Note: *Questions asked following AC32 were C1, C2, C3, C4, C5, C6*	wild (including problem animals) does not threaten the survival of the species. The AC would also recommend to the Philippines to use the source code F for the animals produced in their facility until there is documented evidence that there are specimens produces to F2 in the facility. Additional clarifications received from Party On 16 September 2025, the Philippines provided clarifications to the Secretariat on the NDF and the offtake of wild specimens, including the removal of problem animals. The response details the status and distribution of the species and the nature and context of the offtake. The Philippines confirms that there is only one breeder of the species and they have "reliably been producing progeny past the F2 generation for decades, hence the absence of any collection quotas in the 11 years preceding the issuance of the quota from 2020" The Philippines confirms that "The farm is regularly inspected and adheres to rigorous standards. It maintains a comprehensive database to track each individual animal, applies permanent tattoos at weaning, and collect samples for genetic testing". Furthermore, "the issuance of quotas in 2020 reflects an expansion of operations, not an inability to produce F2 generation animals or beyond".	The Secretariat considers that this species / country combination can be removed from the review. Recommendation **The Standing Committee is invited to remove *Macaca fascicularis* from the Philippines from the review.**
9. *Macaca fascicularis* / Viet Nam		
Recommendations from AC33	**Response from Party, recommendation of the Animals Committee and any additional information subsequently submitted by the Party concerned**	**Assessment and recommendation of Secretariat**
The Animals Committee agreed to retain the species-country combination and requested Viet Nam to better clarify both the origin of the founder stock and the biological sustainability of the founder stock. In addition, the Animals Committee agreed to raise concerns to the Standing Committee in relation to the inspection process and the source of the information used in the responses described in the response from Viet Nam.	The response received from the Party to SC78 is summarized in Annex 3 of document SC78 Doc. 35.1 and the Party's full response in Annex 5d of that document. Additional information is presented in SC78 Inf. 14. Recommendation of the Animals Committee Vietnam has responded to almost all the questions from SC78 and the AC analysis. Some outstanding issues relate to the origin of the founder stock of some facilities, where some more clarification would be helpful (i.e. what is the source of the auctioned and confiscated animals, what are the "various sources" in Facility 1). As for the control and documentations scheme in their satellite farm system, Viet Nam should be encouraged to strengthen their controls and the	Assessment Viet Nam has provided responses to the questions posed by the Animals Committee and addressed the outstanding concerns raised regarding the origin of the founder stock, the biological sustainability of the founder stock and the management mechanism of satellite farms, including controls and logbook to ensure traceability.

	logbook keeping in order to have a better traceability of their internal movements and production. With clarification of these issues, the AC is of the view that Viet Nam could be released from the process. <u>Additional clarifications received from Party</u> Viet Nam provided additional information regarding the origin of the founder stock from some facilities, particularly the confiscated and auctioned monkeys which were confiscated by the enforcement authorities. It indicates that these monkeys were mainly from and before 2010. Only 2 of the 4 facilities have these specimens and there are now only 189 individuals at Facility 4 and 45 individuals at Facility 2. Concerning the 'various sources' at Facility 1, Viet Nam explains that this refers to "legally purchased stock from different domestic operations". According to the operation's report and documents authenticated by Dong Nai provincial Forest Protection Department, during the year 1994-1996, there were a total of 17 transactions to purchase monkeys of Facility 1 from 4 different operations (details were provided). Viet Nam also explained that before the year 2000, it's long-tailed macaques were classified as common wild animals, not yet included in the List of endangered, precious, and rare species for management as stipulated under Ministerial Decree. All the monkeys were initially purchased from legal sources, however, the purchase documents did not indicate whether the original source was from ranching or from breeding activities as this information was not required by the laws at the time. Regarding the management mechanism of satellite farms, including controls and logbook to ensure traceability of internal movements and product. These include original documents of legal origin and purchase document for parent stock or its supplement stock, documents of transactions whenever transfer of ownership of the specimens (trade, movement, exchange, etc.), logbook of captive-breeding/raising, etc.	The Secretariat considers that this species / country combination can be removed from the review. <u>Recommendation</u> **The Standing Committee is invited to remove *Macaca fascicularis* from Viet Nam from the review.**

	Viet Nam noted that long-tailed macaque is currently classified in the Group IIB of List of endangered, precious and rare forest fauna(currently stipulated under Circular No. 27/2025/TT-BNNMT dated 24/6/2025 of the Minister of Agriculture and Environment) regulating the management of endangered, precious and rare species; captive-breeding and ranching of common forest fauna and CITES implementation. Consequently, all domestic operations including satellite farms, must meet the captive-breeding and ranching conditions specified in the circular including the granting of a facility code by the Provincial Forest Protection Department before operating; the requirement for legal origins of the parental stocks; facilities shall be built to follow national technical standards on shelter for primates; and comply with relevant environmental and veterinary regulations. The Provincial Forest Protection Departments (PFPDs) are assigned to directly manage and supervise Long-tailed Macaques farming activities at the facilities. Annually, the PFPDs will conduct at least 2 periodic inspections at the breeding facilities, normally happening in the middle and end of the year. These inspections check the records of the facility owner in the logbook of facility, check the actual number of individuals kept at the farm to serve as a basis for assessment of the reproduction capacity, and to verify information upon commercial sales transaction. In addition, each time the facilities sell or increase the stock due to purchase, reproduction or other activities, the facilities shall report to the PFPDs for actual inspection and record in the logbooks.	

10. *Oophaga pumilio* / Nicaragua

Recommendations from AC33	**Response from Party, recommendation of the Animals Committee and any additional information subsequently submitted by the Party concerned**	**Assessment and recommendation of Secretariat**
The Animals Committee agreed to retain the species-country combination, but to acknowledge the efforts made by Nicaragua to respond to the questions posed by the Animals Committee. The Animals Committee requested Nicaragua to provide an individual response to the questions concerning *O. pumilio* and to	The response received from the Party to SC78 is summarized in Annex 3 of document SC78 Doc. 35.1 and the Party's full response in Annex 5a of that document. Additional information is presented in SC78 Inf. 29. Recommendation of the Animals Committee	Assessment Nicaragua has provided detailed responses to all of the questions and concerns raised by the Animals Committee.

provide more information, in particular on the acquisition of the founder stock and the mortality rates within the facilities.	The information provided by Nicaragua appears to be sufficient to allow this species country combination to be released from the process. The AC wished to congratulate Nicaragua on their efforts in this regard.	The Secretariat considers that this species / country combination can be removed from the review. Recommendation **The Standing Committee is invited to remove *Oophaga pumilio* from Nicaragua from the review.**
11. *Testudo graeca* / Jordan		
Recommendations from AC33	**Response from Party, recommendation of the Animals Committee and any additional information subsequently submitted by the Party concerned**	**Assessment and recommendation of Secretariat**
The Animals Committee agreed to retain the species-country combination as no response was received and requested the Secretariat to ask the same questions again. ***Note:*** *Questions asked following AC32 were C1, C2, C3, C4, C5, C6 In addition, explain the shift of source code Indicate the ages and sizes of animals exported*.	The response received from the Party to SC78 is summarized in Annex 3 of document SC78 Doc. 35.1. Additional information was provided by Jordan on 2 February 2025, including photographs of the breeding facility. Recommendation of the Animals Committee The information and documentation provided by Jordan raises many questions in relation to the facility claiming to produce captive bred specimens of this species. The reported number of offspring of 100-120/year seems very low compared with the reported number of eggs produced (approx. 1,000). Specimens at the facility are not marked individually and all animals are being kept together which does not allow a proper bookkeeping or follow up of who has been breeding with whom which would be essential to be able to use the correct source codes and determine whether the facility is able to produce F2 offsprings. Further, the facility appears to be inappropriate for keeping the species, and the feeding regime described and shown in the pictures is also considered inappropriate. Furthermore, the origin of the founder stock is still not clear. In short there is no evidence that the facility is breeding *Testudo graeca* in line with the Convention and Res. Conf. 10.16. The AC would therefore recommend "that Jordan could only be removed from the review subject to a zero-export quota for specimens of all source codes. If Jordan wishes to resume trade in	Assessment Several concerns remain with regards captive breeding of *Testudo graeca* in Jordan, including the suitability of the facility. There is currently a published zero export quota for wild specimens of *Testudo graeca* from Jordan under the review of significant trade (RST). Recommendation **The Standing Committee is invited to:** **i) retain *Testudo graeca* from Jordan in the review until it:** **A. publishes a zero quota for specimens of all source codes;** **B. submits an NDF for the specimens of wild origin and for the founder stock of captive bred specimens that it is breeding *Testudo graeca* in line with Res. Conf. 10.16 for**

	captive bred specimens this species, it should only do so after it has evidence that a proper NDF is in place for specimens of wild origin and for the founder stock of captive bred specimens that it is breeding *Testudo graeca* in line with Res. Conf. 10.16. As for the animals currently at the facility, the AC would recommend that the Jordan MA consult the Jordan SA on appropriate and feasible means to dispose of the specimens. Resolution Conf. 17.8 (Rev. CoP19 could provide some options to consider)."	**consideration by the Secretariat and the Chair of the AC; and** **C. establishes a monitoring and traceability system to ensure the correct source code is applied for any potential future trade;** **ii) encourage Jordan to consider the concerns raised by the AC relating to the facility and to take measures to ensure that the facility is suitably equipped to house and care for the species; and** **iii) invite Jordan to provide an update on the implementation of the recommendations to the Secretariat by 31 March 2026 so that the matter can be considered at the 34th meeting of the Animals Committee (AC34, 2026).**

12. *Testudo horsfieldii* / Uzbekistan

Recommendations from AC33	**Response from Party, recommendation of the Animals Committee and any additional information subsequently submitted by the Party concerned**	**Assessment and recommendation of Secretariat**
The Animals Committee agreed to retain the species-country combination and that Uzbekistan should: - Provide information and details on source codes for different specimens and how individuals from different sources are differentiated - Provide evidence on the ability to produce such high numbers of specimens	The response received from the Party to SC78 is summarized in Annex 3 of document SC78 Doc. 35.1 and the Party's full response in Annex 5e of that document. Additional information is presented in document SC78 Inf. 34. Recommendation of the Animals Committee "The information provided by Uzbekistan demonstrates that for most facilities the founder stock was obtained from the wild and regular replenishment of the facilities with animals is taking place. A rather high number of individuals is also introduced into the facilities which is against provisions of Resolution Conf. 10.16 which mentions that only "occasional" animals may be introduced into the breeding	Assessment Uzbekistan has provided responses to all of the requests from AC33, including an NDF for the establishment of quotas for specimens born in captivity (F1) and ranched (R) specimens. The Secretariat considers that this species / country combination can be removed from the review.

- Provide information on initial stock, subsequent introductions and annual production - Provide more information on what measures Uzbekistan is taking to ensure that wild specimens cannot be laundered through captive-breeding facilities and exported as specimens reported as produced in captivity - Provide information on whether they intend to move all trade to captive breeding in the future	facility. It is also unclear whether an NDF has been established for the introduction of that number of specimens coming from the wild. From the response it is also not clear if and how the facilities are able to produce F2 specimens and how they are able to tell apart the various source codes to be attributed to all specimens under the system". Additional clarifications received from the Party The Secretariat notes that Uzbekistan subsequently submitted an NDF to support a proposed quota of 53,159 F1 specimens and 5,000 ranched specimens of *Testudo horsfieldii* (SC79 Doc. 7.1). The NDF addressed several of the concerns raised by the Animals Committee mentioned above. These quotas were agreed with the Chair of the Animals Committee and published on the CITES website on 2 September 2025. In addition, however, the Chair made some suggestions in relation to Uzbekistan's system of harvest/captive breeding, which have been shared with Uzbekistan for its consideration to improve its future scientific assessments.	Recommendation **The Standing Committee is invited to remove *Testudo horsfieldii* from Uzbekistan from the review.**

13. *Testudo kleinmanni* / Egypt

Recommendations from AC33	**Response from Party, recommendation of the Animals Committee and any additional information subsequently submitted by the Party concerned**	**Assessment and recommendation of Secretariat**
The Animals Committee agreed to retain the species-country combination and requested Egypt to, in the short term, request the Secretariat to publish a zero-quota for trade in *T. kleinmanni* for commercial purposes (all source codes). The Animals Committee further requested Egypt to provide information on – - a NDF for the creation of their founder stocks;	The response received from the Party to SC78 is summarized in Annex 3 of document SC78 Doc. 35.1 and the Party's full response in Annex 5f of that document. Additional information was provided in SC78 Inf. 31. Recommendation of the Animals Committee The requests for action by SC78 have in this case all not entirely been fulfilled. The question of the NDF for the establishment of the founder stock is not explained satisfactorily. So far, no zero export quota for exports of all sources has been published and no facility has been registered according to Resolution Conf. 12.10 (Rev CoP15).	Assessment Egypt has provided detailed responses to the questions posed by the Animals Committee and has already suspended all exports of this species for more than a year. Egypt is amenable to the publication of a zero export quota and the Secretariat suggests that this should remain in place until the facilities are registered, a process that Egypt indicates that it has initiated through a comprehensive review of breeding facilities.

- the exact number of current facilities - more comprehensive details on the keeping and breeding of the species bred to allow an assessment on the plausibility of the figures presented - the methods for proper and reliable marking of individuals.	The AC would therefore recommend that the recommendations from SC78 are being upheld and Egypt urged to comply with them. <u>Additional clarifications received from Party</u> Egypt provided the following clarifications in response to the comments of the Animals Committee. With regard to the matter of the zero-export quota for *Testudo kleinmanni*, Egypt emphasized that it has in fact suspended all export operations of this species. All companies and entities concerned were officially notified to cease any export activities of *T. kleinmanni* more than one year ago. Furthermore, Egypt does not object to the publication of a temporary zero-export quota until the procedures at the Standing Committee are completed. Concerning the issue of the Non-Detriment Finding (NDF) for the establishment of founder stocks, Egypt indicated that: the majority of the specimens that entered into the captive breeding programmes of *Testudo kleinmanni* in Egypt were confiscated specimens resulting from illegal trade activities, particularly within the country, or other specimens that had been involved in trade, including international trade. Furthermore, one of the major breeding centres has ceased operations and transferred all of its remaining stock to other breeding facilities. In addition, national legislation allows for the acquisition of a small and limited quota from the wild to initiate breeding programmes. Such acquisitions are continuously assessed and monitored by the CITES Management Authority of Egypt together with the national Scientific Committee for the implementation of CITES. Therefore, most of the specimens used to establish the breeding facilities have either originated from major breeding centres or were confiscated specimens that, after notification of the CITES Management Authority and the Scientific Committee, were transferred to these facilities for breeding and propagation purposes. With regard to the breeding facilities more generally, Egypt states that it is currently conducting a comprehensive review of all centres holding this Appendix I listed species, with the objective of compiling	The Secretariat considers that this species / country combination can be removed from the review subject to the publication of zero export quotas for all sources until the breeding facilities are registered. <u>Recommendation</u> **The Standing Committee is invited to remove *Testudo kleinmanni* from Egypt from the review subject to the publication of zero export quotas for all sources until the breeding facilities are registered.**

	a complete file for their eventual registration with the Secretariat. This process is ongoing, and we intend to submit the consolidated information once finalized. Egypt emphasized its strong commitment to halting all forms of illegal trade affecting this species. It firmly believes that maintaining the suspension of exports for a temporary period can contribute to the recovery of wild populations. Indeed, according to recent field monitoring, the numbers of *T. kleinmanni* in the wild have shown encouraging signs of increase. At the same time, production in breeding facilities has also increased significantly, particularly in light of the declining local and international demand for this species.	

KINGDOM OF CAMBODIA

NATION RELIGION KING

Cambodia CITES Management Authority

N° 70 CCMA Phnom Penh, 2 - June - 2025

Dr. Ivonne Higuero
Secretary General
CITES Secretariat
Palais des Nations
Avenue de la Paix 8-14
1211 Genève 10
Switzerland

Subject: Additional Information and Clarification on Captive Long-tailed Macaque *(Macaca fascicularis)*

Dear Secretary General,

Please find attached Cambodia's submission of additional information and clarification regarding the captive breeding of *Macaca fascicularis*. This submission follows up on our letter dated 5 March 2025, in which we indicated the additional information would be submitted to the Animal Committee through the CITES Secretariat by 31 May 2025.

We wish to inform you that Cambodia may provide further updates or clarifications after receiving feedback from the CITES Secretariat Mission Team, which is scheduled to take place in Cambodia from 9 to 16 June 2025.

[redacted]iguero, the assurances of our highest consideratio[redacted]

[redacted]
Ministry of Agriculture, Forestry and Fisheries
Chairman of Cambodia CITES Management Authority

Cc:
- Forestry Administration
- Animals Committee
- Range States

CAMBODIA RESPONSE (Additional Clarification and information) to CITES SC78

Subject: Review of Trade in Animal Specimens Reported as Produced in Captivity
[Resolution Conf.l7.7 (Rev.CoP18)]

Common Names: Long-tailed macaque, Crab-eating macaque
Scientific Name: *Macaca fascicularis*
Laboratories Name: Cynomolgus monkey
Cambodia Classification: Common Species *(Forestry Law 2022 article 48, 49, 50, 96, 100, 101, Prakas No. 509)*
CITES Appendix: II

Cambodia understands that, based on document AC33 Doc. 15.2, the written responses provided by Cambodia in Annex 2 of that document, and Cambodia's oral interventions at AC33, the Animals Committee has decided to retain *Macaca fascicularis* from Cambodia under review. Cambodia further understands that the Secretariat recognizes the detailed clarifications provided orally concerning the high reproductive rates of *M. fascicularis* achieved by the breeding facilities in question.

In February 2025, the Secretariat requested that Cambodia provide, prior to November 2025, responses to submitted questions as well as additional records and data regarding birth rates of *M. fascicularis* at captive breeding facilities. Accordingly, Cambodia submits this comprehensive supplemental response for review by the Animals Committee in advance of the 79th meeting of the Standing Committee.

Introduction:

The Forestry Administration (FA) of the Ministry of Agriculture, Forestry and Fisheries (MAFF) is the agency responsible for the management of wildlife and the forest estate. MAFF serves as the Cambodia CITES Management Authority, while the FA functions as the CITES Scientific Authority for terrestrial species. This supplemental response has been approved by MAFF.

Cambodia has a strong record of compliance with all CITES regulations and remains fully committed to its obligations. Cambodia adheres to CITES AC29 Inf. 1 (Guidance for Inspection of Captive Breeding and Ranching Facilities). This commitment is also demonstrated through Cambodia's recent update of the National Ivory Action Plan (NIAP)[1] and similar levels of discipline and rigor are applied to the management of *Macaca fascicularis.*

Cambodia has consistently provided transparent information on the breeding facilities and their productivity. These practices were outlined in Cambodia's submission to the Animal Committee in September 2023 and are further elaborated in this response.

Cambodia maintains comprehensive practices for the management of *M. fascicularis*, including ground transportation, import and export, and management and oversight of captive breeding facilities. These procedures are reinforced through regular government inspections at the facilities and associated official documentation). All dimensions of these practices have been compiled, including laws and regulation references, into a single document to make clear Cambodia's extensive regulation of this species (See Exhibit A).

In addition to these practices, Cambodia is currently developing "Good Facilities Practices (GFP)"—a set of guidelines for captive breeding. These will cover enhanced documentation and reporting requirements, and are scheduled for implementation by breeding facilities in 2025.

[1] See https://cites.org/eng/niaps.

Finally, as a world leader in the breeding and supply of *M. fascicularis*, Cambodia, working with a recognized global leader in genetic traceability, is developing and implementing an innovative genetic testing program for *M. fascicularis* which will include a statistical sampling of progeny and sires to corroborate parentage of captive-bred animals.

This supplemental response addresses the Secretariat's latest inquiry regarding *M. fascicularis* and provide detailed information in the following key areas:

1. Cambodian Government Oversight
2. Birth Rate and Information and Clarification on Morphology reports submitted by the U.S.A. to CITES Secretariat (1st report – Lab Case #: 24-0053 and 2nd report – Lab Case #: 24-0152)
3. Breeding Stock Replacement
4. Reproduction
5. Productivity and Census Information by Facility
6. Cambodia Laws Regulations and Protocols for *M. fascicularis*,
7. Cambodia Good Facility Practices (GFP) Guidelines
8. Genetic Traceability of Captive Bred LTMs
9. Ecology and Habitat Distribution
10. IUCN Red List Classification
11. Human-Wildlife Conflict Mitigation and Control Measures in Cambodia
12. Global Health Security and Global Pandemic Response and Preparedness
13. Summary

1. Cambodian Government Oversight:

The FA oversees implementation of laws, regulations and policies relating to captive breeding facilities in the Cambodia

The FA, working in a concerted effort and mobilizing resources set comprehensive action plans to support the effective implementation of the **Pentagonal Strategy –phase I** of the **Royal Government** of the **7th Legislature of the National Assembly** focuses on the **Pentagon 4:** "Sustainable and Environmentally Friendly Development"; **Side 2:** "Sustainable management of natural resources, cultural heritage and tourism"; **Priority Action 2:** "Strengthening harmonious and sustainable management, conservation, protection and development of Cambodia's important ecosystems through the continued management of forest and wildlife resources by maintaining the forest cover of at least 60% of the total land area; reforestation; prevention and timely response to wildfires and conservation of peatlands; promoting the development of environment friendly and sustainable plantations; sustainable reduction of reliance on non-timber forest products; preventing encroachment on forest lands and natural protected areas; promoting the conservation of natural protected areas, forests and wildlife; and cracking down on forest crimes, wildlife trafficking, and natural resource crimes".

Hundreds of officers from relevant and competent agencies work collaboratively on the management conservation of wild fauna and flora in Cambodia. The leadership of MAFF and FA is dedicated to strong management and conservation efforts by enforcing all laws and regulations. Enforcement by FA is carried out by over 1,000 personnel at both central and provincial levels.

Cambodian has enacted relevant legislation, and actions have been taken to address illegal trans-national and in country wildlife trade, especially forest and wildlife crime related to money laundering. The primary Cambodian laws addressing such matters are (1) the **Law on Anti-Money Laundering and Combating the Financing of Terrorism**, and (2) the **Law on Combating the Financing of Proliferation of Weapons of Mass Destruction**. Additionally, UNODC provided tools that are used in the investigation of confiscated wildlife crime.

The Royal Government of Cambodia, has also established the Sub-Committee Taskforce for Implementing the Immediate Outcomes (IO) Asia/Pacific Group on Money Laundering (APG) of the

FATF and Anti-Money Laundering / Countering the Financing Terrorism (also used for Combating the Financing Terrorism, AML/CFT). In addition, FA has established a Specialized Taskforce on Forest and Wildlife Crime related to Money Laundering that consisted of 59 officers from FA Headquarter, Chief of 4 Regional Forestry Administration Inspectorates and 25 Municipal and Provincial Forestry Administration Cantonments. This specialized Taskforce was tasked to implement the IO 6, OI-7, IO-8 of FATF and AML/CFT. The Taskforce was included in Natural Resources and Environmental Crime Immediate Outcome 6, 7 and 8 (IO 6, OI-7, IO-8) of FATF and Anti-Money Laundering / Countering the Financing Terrorism (also used for Combating the Financing of Terrorism, AML/CFT).

2. Birth Rate and Information and Clarification on Morphology reports submitted by the U.S.A. to CITES Secretariat (1st report – Lab Case #: 24-0053 and 2nd report – Lab Case #: 24-0152):

2.1 Background of Morphology Reports:

The two morphology reports that were submitted by the U.S.A. to CITES Secretariat contain numerous points which are inaccurate, and inconsistent with LTM breeding practices in Cambodia. The data used in one of the morphology reports was not official data from Cambodia; rather, such data reflected preliminary, and ultimately, inaccurate estimates. The data in the other morphology report was from CITES submissions. Cambodia previously explained in its September 2024 the limitations of such data, and why such data is not appropriate for determining breeding facility production rates. Cambodia now again addresses data from data obtained from LTM breeding facilities in the Country. Information contained in this written response is intended to address both morphology reports submitted by the U.S.A. unless stated otherwise.

As an initial matter, there are three primary areas in which assumptions used in the morphology reports are inconsistent with actual breeding facility data. First, the birth-rate and interbirth intervals (IBI) used in the reports are inconsistent with current captive breeding facility practices. The typical weaning period at captive breeding facilities in Cambodia is 3-6 months (3 months during periods of high demand).

Secondly; the weaning age has a significant impact on birth rates and facility production because an early weaning age reduces the IBI. When weaned at three months, the IBI for LTM becomes a low of 255 days (90+165); when weaned at six months, the IBI is a low of 345 days. Cambodia (as most Asian captive breeding facilities) does not wean beyond 6 months because the risk of transferring infections (e.g., BV, SRV and STLV) or other diseases from the dam (mother) to the offspring increases.

Thirdly; the breeding facilities are able to increase productivity by employing a number of practices to maximize production, such as using a harem structure of 2-4 males to 30-40 females in larger housing units. These and other methods are varied over time depending on market conditions.

Fourth; data from facilities represents a snap shot in time, and must take into consideration changing market conditions that influence how many active and inactive breeders are maintained in a facility.

We explain these issues in greater detail below.

2.2 Analysis of Morphology Reports

Cambodia believes it important to formally address the morphology reports that were submitted by the U.S.A. to CITES without Cambodia's prior review or consultation. The essence of the analysis contained in these reports is to extrapolate the production from NHP colonies based on growth rates and breeding practices gathered from a cursory literature review. However, this analysis is

inconsistent with data produced at the actual breeding colonies in question, as well as the requirement to verify assumptions and analyses. Specifically, the following call into question the validity of the analysis in the Report Lab Case #: 24-0053 and Lab Case #: 24-0152:

- Questionable Source of Data: The Cambodian Management Authority and Scientific Authority was not consulted to verify the data that served as the basis for the analysis. This is in violation of CITES Conf. 11.3 (Rev. CoP19), which states that the Management Authority of the importing state should reach out to the Cambodian Management Authority to seek clarification and verification.
- Discrepancies with Internal Records: The data used in the morphology reports are not consistent with Official Government Data. An analysis based on this flawed dataset is not reliable;
- Real World Evidence: Data from Southeast Asia indicate that *M. fascicularis* growth rates consistently surpass the presumed maximum of 61% suggested in the morphology reports. Additionally, advancements in breeding methodologies and technologies aimed at enhancing the well-being and productivity of captive bred *M. fascicularis* appear were not considered by the authors.
- Inaccurate Assumptions: The morphology reports base their conclusions on inaccurate assumptions, including that breeding facilities have consistently operated at the maximum breeding capacity. This perspective disregards the commercial environment that led facilities to breed at lower output levels between 2014 to 2017. The breeding numbers reported to CITES during this time were active breeders only. Due to market conditions and limited global demand, the facilities moved breeders into an inactive status (they were not being bred) and these breeders were not included in the reported numbers.
- Weaning: Weaning age has a tremendous impact on the annual birth rate and IBI, just as it does in other captive bred species. *M. fascicularis* has an IBI of 255-345 days at Cambodian captive breeding facilities.

"A maximum birthrate for the captive Long-Tail Macaques reported by Cambodia to be closer to the maximum observed in captive-born breeding colonies in the literature, namely 61% of females aged 6-9 giving birth in a year" – page 11 of the report

Birth rates as reported to CITES by other captive breeding countries:

Country	**Number of Female Breeders**	**# produced in the previous year**	**Birth Rate**
Philippines	2,986	2,240	75.0%
Indonesia	2151	1,613	75.0%
Vietnam	16,090	9,330	58.0%
- Facility 2	*2,006*	*1,360*	*67.8%*
- Facility 3	*3,156*	*1,976*	*62.6%*

Source: AC33 Doc. 15.2 (https://cites.org/sites/default/files/documents/E-AC33-15-02_2.pdf)

Data from Mauritius facilities also report annual Birth Rates of 71%. It is well documented that Mauritius *M. fascicularis* originated from fewer than 10 animals. Therefore, *M. fascicularis* from Mauritius is likely severely in-bred. Additionally, Mauritius facilities have exported primarily to Europe where market conditions require that animals are weaned at 8 months or above, as they are viral naive. Even with these two compounding facts, these facilities still achieve a 71% annual birth rate. If the facilities in Mauritius had greater genetic diversity and weaned at four months, they would achieve a much higher birth rate.

3. Breeding Stock Replacement:

The Animal Committee requested clarification on how breeding stocks are replaced and if Cambodian facilities are experiencing a reduction in reproductive output when breeding with F1 and subsequent generations.

The breeding facilities in Cambodia have not reported any reduction in productivity from F1 and subsequent generations. These facilities monitor the productivity of females and move lower productive females into different harems to increase their productivity.

a) Breeding stocks are replaced (or added to) primarily through the following categories of animals:

i. Animals that had minor and even major defects resulting from trauma, etc.
ii. BV, SRV or STLV serological positive animals which are not exported
iii. Mature animals which have not been exported - a percentage of this group are put into active breeding depending on market forecasts. They may be held as inactive breeders until the facility sees a requirement to move them to active.

Since this is a Common (nuisance) species in Cambodia with a high incidence of human-wildlife conflict (HWC), occasionally a small number (and percentage) of wild caught (F0) nuisance animals, with a government issued permit which includes an approved quota, are trapped and added to facilities. This trapping is conducted in accordance with all laws and regulations (Conf 10.16).

Reducing the HWC also helps with genetic diversity in the breeding stock of facilities. Adding F0s to the facilities must be completed very cautiously as there is a risk for the facilities to introduce diseases which can be present in wild caught *M. fascicularis* to the facility population. It is a very long process to integrate these trapped animals into the breeding colonies. Once trapped, *M. fascicularis* go through an extensive quarantine process in which multiple rounds of testing are completed to ensure that there are no diseases present in the F0 LTMs. All F0s trapped must clear this extensive quarantine period and process before they can be added to the breeding population.

b) The facilities have not reported any reduction in reproductive output from F0 to later generations. Based on the latest introduction of F0s in 2019, the facilities see F0 (~54%) had a lower reproductive output as compared to the current F2 breeders (70-100%). It is believed this is a result of the F0s requiring a longer time to acclimatize to the facility environment. They will continue to monitor this. There is no theoretical reason why F1, F2 or F3 generation would have lower fertility rates than F0s, and perhaps severe inbreeding could negatively impact this. Cambodia has not experienced depressed fertility rates given the size of gene pools and lack of inbreeding.

4. Reproduction:

A) In natural and wild conditions: *M. fascicularis* reaches sexual maturity at the age of four years for females and six years for males. The females at higher rank of hierarchy will reach sexual maturity before the lower-ranking females. The species lives in a colony comprising several males and females, led by an alpha male. The number of females in the colony is always greater than males. This social organization system allows this species to have multiple mating partners (polygynandrous/promiscuous mating) (Maharadatunkamsi *et al.*, 2020).

B) In captivity or in a controlled facility environment: female LTMs reach sexual maturity at the age of 3.5-4 years old, while the males reach sexual maturity at 4-6 years old.

C) The females have a gestation period of approximately 165 days with an average of one baby per pregnancy. In natural and wild conditions, the weaning period is 420 days, while at a

facility in a controlled environment the weaning period can be as short as 100-120 days (0.70 – 0.80 kg/baby) to increase productivity.

Breeding Facility Practices to Increase Production: The demand for captive-bred *M. fascicularis* which were used to accelerate the discovery of Covid-19 vaccines and lifesaving therapeutics increased during the recent pandemic. Cambodian breeding facilities have developed and employed techniques and modalities to optimize conditions for the breeding of the species resulting in an increase of up to 3 offspring in 2 years per breeding female. These facility operating practices significantly increase breeding rates of *M. fascicularis* raised in breeding facilities:

Life Stage	Practice
All Life Stages	Animals maintained in well-controlled, clean and sanitary housing.
All Life Stages	Animals provided abundant nutrition and ample water.
Adult Life Stages	Animals provided with toys for animal environment enrichment, prevent fighting, and obtain a more rapid harmony in the living environment.
Breeding Animals	Ratio of males to females is maintained in each pen at about 1:8-12 (2-4 sires with 24-40 dams) to maximize pregnancy rates.
Breeding Animals	Timely regrouping of lower productive female breeders, and introduction of new male breeders into breeding groups to maximize breeding potential.
Female Breeders	Females are closely monitored to determine pregnancy conditions. Pregnant females can be isolated to reduce abortion rates and promote readiness for birth.
Female Breeders	Providing a high number of available young female breeders in each breeding group aged from 4-10 years old to maximize pregnancy rates.
Female Breeders	Timely implementation of lactation for about 100-120 days of age, until infants are able to independently eat solid foods (Baby can eat solid food at 60-90 days of age, independently can eat solid food at 100-120 days of age).
Male Breeders	Replacement of lower productive male breeders to maximize sexual relationships with most female breeders in the group.
Infants	Intensive care and feedings of newly weaned infants resulting in higher adaption and survival rates after weaning.
Gestation period	Approximately **165 days** with an average of one baby per pregnancy.
Weaning period	At a facility in a controlled environment the weaning period can be as short as **100-120 days** (0.70 – 0.80 kg/baby) to increase productivity. In natural and wild conditions, the weaning period is **420 days,**

5. Productivity and Census information by Facility:

Analysis of Birth Rate Data

Cambodia previously proposed that CITES modify the existing data collection form to include last year's average active breeding stock numbers. This will prevent a misleading interpretation of birth rate when breeding stocks change (e.g., an increase in breeding stock over last year will give a false reduction in birth rate number).

First; breeding facilities have both active and inactive female breeders and vary the number of active breeders based upon market conditions. During periods of high market demand, more females become active, and breeding practices occur to maximize the number of offspring available. Maximizing breeding rates adds additional cost and only occurs if market demand justifies such costs.

Second; offspring produced in the previous year may not correspond with the number of breeders available at a given inspection date. Again, this is because the number of active and inactive breeders

varies over time. Consequently, a larger number of infants may exist than active breeders given forward-looking market conditions.[1]

Third; census data collected at each breeding facility reflects a snapshot in time of that facility at the end of a reporting year. Consequently, end-of-year numbers may not be reflective of changes made in response to market conditions.

Following are summaries of data from the captive breeding facilities in Cambodia.

Facility #1: [redacted]

Description/Year	2020	2021	2022	2023	2024
Female breeders	14,974	11,293	17,745	15,371	13,733
Births (doesn't include transfers from corrals for 2021)	8,899	6,283	13,632	9,160	8,531
Annual Birth Rate	**0.59**	**0.56**	**0.77**	**0.60**	**0.62**
Mortalities	265	393	387	1,055	1,627

Facility #2: [redacted]

Description/Year	2020	2021	2022	2023	2024
Female breeders	1159	2402	2724	3113	3569
Births	945	3071	2838	1991	2,547
Annual Birth Rate	**0.82**	**1.28**	**1.04**	**0.64**	**0.71**
Mortalities	309	182	152	177	228

Facility #3: [redacted]

Description/Year	2020	2021	2022	2023	2024
Female breeders	2,109	2,327	2,150	1,876	1,943
Births	927	2,416	2,208	1,592	725
Annual Birth Rate	**0.45**	1.04	1.03	0.85	**0.37**
Mortalities	210	18	35	138	**80**

Note: The facility #3, No export

Facility #4: [redacted]

Description/Year	2020	2021	2022	2023	2024
Female breeders	5,612	5,956	6,023	5,110	5,092
Births	1,467	1,899	1,821	1,518	1,541
Annual Birth Rate	**0.26**	**0.32**	**0.30**	**0.30**	**0.30**
Mortalities	359	315	425	415	294

Facility#5: [redacted]

Description/Year	2020	2021	2022	2023	2024
Female breeders	839	1097	0	0	0
Births	252	641	19	0	0
Annual Birth Rate	**0.30**	**0.58**	**0**	**0**	**0**
Mortalities	78	291	169	46	**18**

Facility #6: [redacted]

[1] See, e.g., https://cites.org/sites/default/files/documents/E-AC33-15-02_2.pdf.

Description/Year	2020	2021	2022	2023	2024
Female breeders	22,984	30,232	35,076	21,833	21,966
Births	18,847	36,190	35,513	14,134	11,845
Annual birth Rate	**0.82**	**1.19**	**1.01**	**0.65**	**0.54**
Mortalities	372	2,247	3,386	6,202	4,487

Facility #7: [redacted]

Description/Year	2020	2021	2022	2023	2024
Female breeders	0	0	0	0	836
Births	0	0	0	0	412
Annual Birth Rate	**0**	**0**	**0**	**0**	**0.49**
Mortalities					42

Facility #8: [redacted]

Description/Year	2020	2021	2022	2023	2024
Female breeders	-	-	-	-	924
Births	-	-	-	-	40
Annual Birth Rate					**0.04**
Mortalities					6

Summary Annual Birth Rate

Description/Year	2020	2021	2022	2023	2024
Facility #1	0.59	0.56	0.77	0.60	0.62
Facility #2	0.82	1.28	1.04	0.64	0.71
Facility #3	0.45	1.04	1.03	0.85	0.37
Facility #4	0.26	0.32	0.30	0.30	0.30
Facility #5	0.30	0.58	0	0	0
Facility #6	0.82	1.19	1.01	0.65	0.54
Facility #7	0	0	0	0	0.49
Facility #8	0	0	0	0	0.04
Average Annual Birth Rate	**0.54**	**0.83**	**0.83**	**0.61**	**0.44**

Remarks:

- Births produced previous year do not correspond with the number of female breeders during the inspection date.
- All data in the above table were extracted from the monthly and annual reports of the respective breeding facilities. The CITES Management and Scientific Authorities have placed their trust in the data provided by each breeding farm, as the figures remain below the maximum theoretical level of 1.5 babies per female breeder per year.
- Facilities have active and inactive female breeders; the facilities adjust depending on market demand.
- Numbers in tables are full year and breeders are snapshots of the day reported and counted (at the end of each respective year).
- The Annual Birth Rate for 8 operating facilities were in a range of **0.04 to 1.28** babies/year/female breeder, which is well below the maximum theoretical level of **1.5** babies/year/female breeder.
- Facility #5 has not been used for breeding since 2022, its primary use is for required quarantine of LTMs prior to export embarkation.

- Facility #7 has resumed operations in March 2024.
- Facility #8 commenced operations in August 2024, that is why the Birth Rate is very low in 2024.
- The highest birth rates (up to 1.28 babies/year/female breeder) were observed in 2021 and 2022; this is during the recent pandemic when demand was high for captive-bred *M. fascicularis*, which were used to accelerate the discovery of Covid-19 vaccines and lifesaving therapeutics, and the facilities were weaning at a very young age (~3 months) to maximize productivity of female breeders.

6. Cambodia Laws Regulations and Protocols for *M. fascicularis*:

Cambodia has implemented and maintains a robust system of laws and policies to manage LTM. Cambodia has compiled a list of such laws and regulations which govern the captive breeding process for *M. fascicularis*, including ground transportation and import and export of the species. This list is attached to this report as **Exhibit A**. This includes the following:

- Forestry Law
- Law on Animal Health and Animal Production
- Law on Anti-Money Laundering and Combating the Financing of Terrorism
- Law on Combating the Financing of Proliferation of Weapons of Mass Destruction.
- Investment Law of the Kingdom of Cambodia
- Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)
- Resolution Conf. 10.3* - Designation and role of the Scientific Authorities
- Resolution Conf. 18.6 - Designation and role of Management Authorities
- Pentagonal Strategy – Phase I of the Royal Government of the 7th Legislature of the National Assembly
- Declaration on classification and the list of wildlife species No. 020
- Joint Declaration on Public Service Provision of the Ministry of Agriculture, Forestry and Fisheries No. 1013, dated December 28, 20212
- Joint announcement on the provision of incentive awards to the Ministry of Agriculture, Forestry and Fisheries and the Ministry of Economy and Finance No. 1014, dated December 28, 2012
- Sub-Decree No. 53 of the Royal Decree on International Trade in Endangered Species of Wild Fauna and Flora, dated May 28, 2002
- Code of Conduct on National Single Window (related to the commodities under MAFF)

Note; The Import, Export, Re-Export, Transport, and collection of wild animals for the **wildlife in the common species class** shall comply with the: Forestry Law, Article 26, 48,50 96, 100, 101.

The Long-tailed Macaque (*M fascicularis)* is included in the **wildlife in the common species class.**

The attached list of laws is structured to include a description of the activity, the Government Agency which is the decision maker or issuer, and the applicable law or regulations. It covers:

- Principle/license for export for a) Exports; b) Imports and c) Re-Exports (same as export);
- CITES Permits: a) Exports; b) Imports and c) Re-Exports;
- Export and Import Permit for **wildlife in the common species class**;
- Export and Import Permit (Customs and Excise Office)
- Transportation; and
- Animal Health Certificates
- Certificate of Origin (CO, as required for some importing countries)

The Export process includes ten different competent authorities (agencies):

- MAFF – Ministry of Agriculture, Forestry, and Fisheries
- FA – Forestry Administration
- FA CITES SA – Forestry Administration CITES Scientific Authority
- Local FA – Local Forestry Administration
- CITES MA – CITES Management Authority
- GDAHP – General Directorate of Animal Health and Production
- Local GDAHP – Local General Directorate of Animal Health and Production
- Ministry of Commerce (for Certificate of Origin-CO, as requires for some importing countries)
- Customs and Excise Office (at Customs house for export tax and export permit)
- Customs and Excise Office (at embarkation)

Enforcement: An export of LTMs now involves **40-55** officers from these **ten** competent authorities, and includes at least six facility visits with six reports, seven approvals, three permits, and one certificate.

7. Cambodia Good Facility Practices (GFP) Guidelines:

Cambodia is presently developing a common set of GFPs which will be provided to all *M. fascicularis* breeding facilities for implementation. These GFPs will include the minimum guidelines for managing *M. fascicularis* captive breeding facilities in Cambodia. These guidelines will include the following requirements:

- Enhanced record keeping standards, including clinical, behavioral, productivity, housing, census – active breeders, births, commercial stock, exports, mortalities, and additions from outside of facility
- Animal health standards
- Animal housing standards
- Animal welfare standards
- Behavior and Enrichment
- Employee health and safety
- Export standards, including quarantine, testing, crates, and ground transportation
- Introduction of new breeders from outside the facility
- Waste management

Census records from breeding facilities will be required to be submitted to the Cambodian government annually and will be verified by government representatives with physical onsite inspections. Guidelines will be finalized with implementation commencing at Cambodian breeding facilities by the end of 2025.

8. Genetic Traceability of Captive Bred LTMs:

Cambodia has been collaborating with a global leader in animal genetics to develop an innovative genetic testing program to confirm the parentage of *M. fascicularis* raised in Cambodian breeding facilities. Short tandem repeat (STR) DNA profiling will be used on a statistical sampling of progeny to verify parentage. STR analysis has been extensively studied; it forms the basis of human forensic DNA profiling in the U.S.A. and around the world.

Genomic DNA will be extracted from whole blood. A panel of informative STR markers is used in PCR reactions to amplify diagnostic loci for individual identification and parentage analysis. Using frequency data from a limited representative data set, the random match probability (RMP) for a homozygous individual at every locus is 1 in 16.4 billion. If an individual were heterozygous at 50% of the loci with the two most common alleles, the RMP increases to 1 in 5.55 quadrillion. Probability

of exclusion with only the sire is achieved with 9 markers (99.949%). For the 29-marker panel the probability of parentage is greater than 99.99999997% for *M. fascicularis*.

9. Ecology and Distribution (habitats):

M. fascicularis are widely distributed and, although some island endemic subspecies may have low populations, the global population contains millions of adults, with stable or increasing populations (Nuttall et al. 2021; Brotcorne et al. 2021). The species has been listed by IUCN as a nuisance species (IUCN 2023).

This species is a highly adaptive and "ecologically diverse" (Kemp and Burnett 2003), and able to live in various habitats, including mangroves, swamps, and agricultural lands near forests (Eudey *et al.*, 2020). *M. fascicularis* thrives in secondary habitats with densities at least twice the long-term norm (Moore et al. 2023). As a result, the population is higher in secondary forests and disturbed areas, compared to primary forests (Kemp and Burnett 2003). They are more opportunistic and abundant in disturbed areas, which results in the species becoming a nuisance and frequently dangerous. These life history characteristics serve as a further buffer against species extinction risks.

M. fascicularis is one of the most abundant and resilient primates in nature. This is evident by the excessive numbers of LTMs which cause agricultural damage, endangering the livelihood of people and tourists (including frequent biting and attacking). Consequently, this species must be managed and controlled. Human-macaque conflicts in urban areas in Cambodia, such as in tourism hot-spots like Angkor Wat and elsewhere within range States are increasing. Government wildlife agencies are required and must respond to these situations to manage the macaques.

10. IUCN Red-list Classification:

IUCN Red-list: Vulnerable Species -VU (Before March 2022) and **Endangered Species – EN** (in March 2022). In March 2022, the IUCN Red List Authority reassessed the status of long-tailed macaque (*Macaca fascicularis*) as ENDANGERED…only two (2) years after it had been assessed as meeting the Red List criteria for VULNERABLE. This would suggest a major change in status over the last few years. However, this is not the situation nor the experience of responsible authorities in Range States. LTMs remain a nuisance species in Cambodia and other range states. IUCN did not contact the responsible agency in Cambodia to discuss these matters nor obtain information from Cambodia prior to reclassifying this species.

The 2022 reclassification, based on an assessment completed by Hansen et al. (2022), is unsupported by available scientific evidence (NABR 2023). The National Association for Biomedical Research (NABR), a U.S.-based association that represents biomedical researchers, challenged the Endangered rating (NABR 2023; Normile 2023). On June 24, 2024, the IUCN granted NABR's petition challenging the IUCN's designation of *M. fascicularis* as Endangered.

In granting the petition, the IUCN noted the authors' use of inflammatory statements and emotive language, "does not follow the standards of objectivity expected of Red List assessments" (IUCN 2024). The IUCN concluded by requiring a reassessment of the species by February 2025, and if not completed, requiring the species to be returned to "Data Deficient" status. It is our understanding that IUCN still has this under review.

On June 22, 2023, the late Dr. Robert "Hank" Jenkins of Creative Conservation Solutions submitted a letter to IUCN asserting that the Hansen et al. (2022) authors had violated the IUCN "Conflict of Interest Policy" by failing to disclose their affiliations with organizations that have blanket policies opposed to all trade in live primates for bio-medical research purposes (Jenkins 2023). Dr. Jenkins requested that the IUCN investigate this matter and take appropriate action. This request remains unanswered by the IUCN.

Furthermore, IUCN maintains a Global Invasive Species Database (GISD) which lists the top 100 most invasive species, *M. fascicularis* is included on this list (IUCN 2023). For example, Malaysia culled nearly 54,000 LTM in 2018 as part of human-wildlife conflict management program in the country (Perhilitan 2018).

11. Human-Wildlife Conflict (HWC) Mitigation and Control Measures in Cambodia:

The highest densities of long-tailed macaques are found where they are intentionally provisioned such as temples or adjacent to agriculture and settlements where they have access to crop raiding and garbage. In forests, higher densities are found in mangroves, riverine forests, secondary forests, with lower densities in primary forests, and even lower densities in higher altitude forests (Fooden, 1995).

***Macaca fascicularis* (Long-tailed Macaque - LTM) is a nuisance species.** Some countries trap and euthanize this invasive species as the population increases, and it becomes a nuisance and danger to the public. Since 2010, the Forestry Administration of Cambodia has banned the trapping of wild LTMs. This ban remains in place. However, in 2018 permits were issued for the trapping of 2,000 nuisance LTMs. These permits and trappings were in accordance with Resolution Conf. 10.16 (Rev. CoP19), paragraph 2 (ii) B (1), and were conducted in a manner which was not detrimental to the survival of the species in the wild.

The LTMs collected in 2018 were not from natural forests, protected areas, nor flooded forests. The trapping of the nuisance LTMs was from public places and tourism sites where regular human-macaque conflicts were occurring. The nuisance animals were trapped and brought to facilities to be used as breeders (all trapped LTMs had to pass a lengthy quarantine period to ensure no diseases were introduced onto the facility). This not only protects our citizens and tourists (and in one case our school-age children), but it brings genetic diversity into the facilities' breeding pool.

Prior to issuing the permits, the Forestry Administration assessed population, distribution, threats, conservation status, reproduction, habitat, and control to minimize the risk of human-macaque conflict at these public places and tourism sites in provinces of Cambodia which were having a high incidence of human-macaque conflicts. The population of each site was estimated to determine how many macaques were allowed to be trapped. Trapping numbers were established for each site to reduce the incidence of human-macaque conflicts while not adversely impacting the survival of the population at the site. In addition, an assessment of impacts caused by macaques on tourists and citizens, including damages caused to both private and public property was also completed.

The assessment also included complaints from government institutions, Buddhism pagodas, schools and other residents affected by the nuisance macaques. Moreover, complaints have been received from institutions, tourism sites and residents, which request the Forestry Administration to trap and remove the nuisance macaques from the affected areas. Culling or euthanizing LTMs from these areas is not acceptable in Cambodia, especially to Cambodia's Buddhists which make up 90% of the population.

Clearly, *M. fascicularis* is not in need of additional protective measures, it is, in fact, an invasive species that is routinely culled in several countries and the growing population must be continually managed to reduce human-macaque conflict.

12. Global Health Security and Global Pandemic Response and Preparedness:

As an integral part of the **Global Health Security and Global Pandemic Response and Preparedness,** *M. fascicularis* are vital for scientific research and are required by most country's regulatory agencies to evaluate the safety and efficacy of a range of life-saving drugs and treatments prior to their assessment in human clinical trials. A recent U.S. National Academies of Sciences study

concluded that "…they (NHPs) remain an important research model."[1] There is no doubt that lawfully securing captive-bred LTMs for research is imperative for the support of critical pharmaceutical research and development around the world to deliver vaccines and medicines to billions of people, especially during times of a global pandemic, such as COVID19, and for many other diseases.

There are hundreds of millions (if not billions) of people who benefit from advancing the development of fast-track lifesaving vaccines and medicines using *M. fascicularis* in vital scientific research. On the other side are animal activist organizations that utilize emotive advocacy language designed to benefit their own agendas to manipulate and mislead. Their actions lack both scientific objectivity and rigor and seemingly are against the existence of humanity as they want to prohibit the trade of captive-bred LTMs.

At the beginning of the pandemic, as other countries were suspending the import and export of live animals, Cambodia and the breeding facilities saw the global need for captive-bred NHPs and implemented techniques (documented in this report) to support this need. Cambodia has been a reliable partner to the world in a time of dire need. Its contributions were of critical importance to the global response to the Covid-19 pandemic.

Despite its own challenges and responsibilities associated with confronting the pandemic, Cambodia supplied captive bred *M. fascicularis* to accelerate the development of vaccines and therapeutics needed to control and combat the virus. Cambodia embraced a holistic and outward-looking global pandemic response strategy and, if it were not for its uncompromised willingness to respond to the global pandemic requirements, the concerted effort to produce a safe, reliable vaccine in an unprecedented short period of time would not have been possible. The world was able to secure the fast-tracking of the life-saving vaccines that were developed and utilized as the result of the increased availability of Cambodia's captive-bred LTMs which were used to speed up the process of producing Covid-19 vaccines and lifesaving therapeutics. While others chose to withhold availability, Cambodia supplied its LTMs which exemplified the principles of equity, equality, and mutual benefit for hundreds of millions of people who were affected by the rapid spread of this terrible virus.

If the supply of *M. fascicularis* for biomedical research purposes is reduced, interrupted or stopped, then the response to disease research or, of critical importance, global pandemics will be negatively impacted. Countries will become unable to develop lifesaving drugs and vaccines in the short term, impacting global health security, particularly for the poor and less developed countries in the world who cannot afford to buy expensive drugs or vaccines. In turn, drugs and vaccines will become more expensive with continued interruption of development and, ultimately, supply.

SUMMARY:

This additional written response is provided at the request of the Secretariat CITES concerning questions posed about captive breeding facilities for *M. fascicularis*. Cambodia submits this response well in advance of the date requested by the Secretariat to allow for a review of these matters.

Cambodia notes that questions posed about captive breeding facilities for *M. fascicularis* have been driven largely by preliminary and unofficial data obtained by the U.S.A., and disparate data submitted to CITES, which have been misinterpreted and misconstrued. These misinterpretations could have been addressed, saving both countries countless hours of time, if a dialogue between the countries would have occurred with the prior U.S. Administration. Furthermore, careful research done would have shown that breeding rates achieved at Cambodian breeding facilities are consistent with those achieved at other similar facilities in Asia. Regardless, Cambodia has, in this paper, provided data from the facilities in question to make clear that such facilities are in compliance with Cambodian law.

[1] See https://www.nationalacademies.org/our-work/nonhuman-primate-model-systems-state-of-the-science-andfuture-needs.

Cambodia fully complies with all national and international laws, regulations, and required procedures, particularly those relating to the CITES Convention and International Health Regulation related to the Management, at its breeding facilities. Such breeding facilities play an important role in international trade, and scientific research occurring on animals raised in such facilities contributes to **Global Health Security and Global Pandemic Response and Preparedness**.

Cambodia is introducing innovative programs to be the world leader of captive bred *M. fascicularis*. Cambodia has introduced enhanced best-practice processes at captive breeding facilities, including an innovative voluntary genetic testing and traceability program, is working on enhanced and verified documentation at each facility through a world class GFP program, and a robust protocol which records all of the applicable laws and regulations in a single document.

Cambodia continues to export its captive-bred *M. fascicularis* for bio-pharmaceutical research purposes and for advancing the development of lifesaving vaccines and medicines. Cambodia believes this follows the principles of moral responsibility, humanitarianism, equity, and equality, especially in helping provide affordable vaccines and medicines to billions of people.

Cambodia thanks the Animals Committee and Standing Committee for its review and involvement in these matters. Cambodia believes responses and evidence provided above as well as previously fully address questions posed by the Animals Committee regarding this matter. Cambodia respectfully requests that the Animals Committee forego further inquiry regarding this matter to enable discussions of more pressing conservation matters.

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Questionnaire to be completed for LTM breeding facilities in Cambodia.

1. Facility details and establishment

Facility Name [redacted] Facility 1

Facility Address [redacted]

Land size (m^2): 267,322 **Maximum capacity:** 50,000 animals

Licence No. and date: 403 (11/08/2005), new 088 (13/03/2025)

Date of start of operations: 2003 [redacted]

[redacted]

Initial founder stock **Wild** **Captive** **Imports**

Quantity (Year): 16,000 wild (prior to 2010) – [redacted] In response to AC33, it was stated that the initial stock was 4,000 (these were the introductions of breeding LTM in 2003 and 2004, including 1,000 infants born in the facility), of which approximately 2,500 were males and approximately 13,500 were females.

Supplementary stock **Wild** **Captive** **Imports** [redacted]

Quantity (Year):

Export markets: United States, Canada and China

Remarks: * The total number of breeders in 2020 and the total number of juvenile monkeys are reversed when entered, and the numbers are interchangeable. **The total number of breeders in 2021 and the total number of births include the numbers transferred from the corrals, so this figure is higher than the figure reported on June 25, because the latter does not count these amounts.

2. Production levels

Description/Year	2017	2018	2019	2020	2021	2022	2023	2024
a) Total female breeders *** (Average), including reserve female LTM put into mating that year	7,988	8,882	9,157	9,039*	12,293**	17,745	15,371	13,733
- Of which active breeders (if possible)								
- Of which inactive breeders (if possible)								
b) Introductions to the facility****								
- Of which from the wild -								
c) Exports from the facility*****								
- Of which transfers to other facilities -	750 ([redacted])	340 ([redacted])						
- Of which international exports -	-	2,054	4,310	5,899	4,982	5,616	7,269	9,580
d) Births (total per year)	4,821	7,305	8,359	8,899	10,123**	13,632	9,160	8,531
e) Birth rate (total number of live offspring born in the year divided by the average number of active female breeders for that year)	0.60	0.82	0.91	0.98	0.82	0.77	0.60	0.62
f) Mortality****** (total per year) (Total number of deaths per year after weaning)	109	154	147	265	393	387	1,055	1,627
Total number of animals at year end	16,103	20,860	24,762	27,497	32,245	39,874	40,710	38,034

Facility 4

Note: *The total number of breeders in 2020 and the total number of juvenile monkeys are reversed when entered, and the numbers are interchangeable. **The total number of breeders in 2021 and the total number of births include the numbers transferred from the corrals, so this figure is higher than the figure reported on June 25, because the latter does not count these amounts.

*** *Please provide an average over the year and indicate if this figure includes active and inactive breeders or only active breeders and if it includes pregnant females.*

**** *Includes international imports, introductions from the wild and from other facilities*

***** *Includes International exports and transfers to other facilities*

****** *natural, euthanasia etc. Please indicate at what age deaths are recoded (e.g. after birth, after weaning, other)*

[redacted]

Remarks: * The total number of breeders in 2020 and the total number of juvenile monkeys are reversed when entered, and the numbers are interchangeable. **The total number of breeders in 2021 and the total number of births include the numbers transferred from the corrals, so this figure is higher than the figure reported on June 25, because the latter does not count these amounts.

Management

a) **Duration of quarantine period for wild animals before introduction into breeding population: 45 to 60 days**

b) **ID method (tag, microchip, other):** ID tag

c) **DNA parentage testing (y/n): part**

- **if yes, since when and how many of total population are already screened? As of June 2024, the total number of animals screened is 3,500.**

d) **DNA tests done by external/internal lab? From outside**

e) **Weaning age (generally): 3.5 to 6 months**

f) **Weaning age minimum and maximum: 100 days and 180 days**

g) **Staff (total):** 235

h) **Vets (total):** 22 veterinarians and 27 veterinary assistants

Remarks: * The total number of breeders in 2020 and the total number of juvenile monkeys are reversed when entered, and the numbers are interchangeable. **The total number of breeders in 2021 and the total number of births include the numbers transferred from the corrals, so this figure is higher than the figure reported on June 25, because the latter does not count these amounts.

Questionnaire to be completed for LTM breeding facilities in Cambodia.

1. Facility details and establishment

Facility Name: [redacted] Facility 2

Facility Address: [redacted]

Land size (m^2): 47,050 **Maximum capacity:** **8500** animals

Licence No. and date: [redacted]

Date of start of operations: 2011

Initial founder stock: **Wild** **Captive** **Imports**

Quantity (Year): **3000 heads (2006-2008)**

Supplementary stock: **Wild** **Captive** **Imports**

Quantity (Year): **57 wild (2022), 166 wild (2025),**

540 Captive (2020) from [redacted] Facility 3

100 Captive (2018) and 300 Captive (2024) from [redacted] Facility 6

Export markets: **Republic of KOREA and Japan**

2. Production levels

		2017	2018	2019	2020	2021	2022	2023	2024
a)	Total female breeders *	824	850	900	1,159	2,402	2,724	3,113	3,569
	- Of which active breeders (if possible)	824	850	900	989	2,402	2,724	3,113	3,569
	- Of which inactive breeders (if possible)				170				
b)	Introductions to the facility**		100 (VBR-PP)		540 (RDG)				300 (VBR-PS)
	- Of which from the wild						57		
c)	Exports from the facility***								
	- Of which transfers to other facilities						999 ([redacted]	1,504 [redacted]	1,000 [redacted]
	- Of which international exports	226	400	190	540	690	-	250	89
d)	Births (total per year)	385	444	557	945	3,071	2,838	1,991	2,547
e)	Birth rate (total number of live offspring born in the year divided by the average number of active female breeders for that year)	0.47	0.52	0.62	0.82	1.28	1.04	0.64	0.71
f)	Mortality**** (total per year)	516	691	462	509	569	492	177	228
Total number of animals at year end		3442	2895	2800	3,236	5048	6,452	6,512	8,042

Facility 4

* *Please provide an average over the year and indicate if this figure includes active and inactive breeders or only active breeders and if it includes pregnant females.*

** *Includes international imports, introductions from the wild and from other facilities*

*** *Includes International exports and transfers to other facilities*

**** *natural, euthanasia etc. Please indicate at what age deaths are recoded (e.g. after birth, after weaning, other)*

2025 is as 30 June 2025*

3. Management

a) Duration of quarantine period for wild animals before introduction into breeding population: 45 days to 60 days

b) ID method (tag, microchip, other): ID Tag

c) DNA parentage testing (y/n): Yes,

- **if yes, since when and how many of total population are already screened?**

We started from March 2025 and is about 10% of total population.

d) **DNA tests done by external/internal lab?** External Lab.

e) **Weaning age (generally):** 5 months old.

f) **Weaning age minimum and maximum:** from 4 to 6 months

g) **Staff (total):** 80

h) **Vets (total):** 6

Questionnaire to be completed for LTM breeding facilities in Cambodia.

1. Facility details and establishment

Facility Name: [redacted] Facility 3

Facility Address: [redacted]

Land size (m^2) : 213440

Maximum capacity: 50000 animals

Licence No. and date: 080 (22/02/2007)

Date of start of operations: 2005

Initial founder stock: **Wild** **Captive** **Imports**

Quantity (Year): 1000 heads (2007)

Supplementary stock: **Wild** **Captive** **Imports**

Quantity (Year): None

Export Markets: **China, Republic of KOREA and Japan**

2. Production levels

	2017	2018	2019	2020	2021	2022	2023	2024
a)Total female breeders *	928	1605	1878	2,109	2,327	2,150	1,876	1,943
Of which active breeders(if possible)								
Of which inactive breeders(if possible)								
b) Introduction to the facility **								
Of which from the wild								
c)Export from the facility***				540		708		1,000
Of which transfers to other facilities				540 (Fac2) [redacted]		708 (Fac4) [redacted]		1,000 [redacted] Fac.7
Of which international exports								
d)Births(total per year)	228	635	765	927	2,416	2,208	1,592	725
e)Birth rate (total number of live offspring born in the year divided By the average number of active female breeders for that year	0.25	0.40	0.41	0.44	1.04	1.03	0.85	0.37
f) Mortality **** (total per year)	163	194	173	210	18	35	138	80
Total number of animals at year end	4,464	4,905	5,497	5,674	8,072	9,537	10,991	10,636

* Please provide and average over the year and indicate if this figure includes active and inactive breeders or only active breeders and if it includes pregnant females

** includes international imports,introductions from the wild and from other facilities

*** includes international Exports and transfers to other facilities

**** natural,euthanasia etc. Indicate at what age deaths are record(e.g. after birth ,after weaning, other)

3. Management

a) Duration of quarantine period for wild animals before introduction into breeding population: 45days to 60 days

b) ID method (tag,microchip, other): ID Tag and Microchip

c) DNA parentage testing(y/n) Plan to do if requied by CITES

- if yes,since when and how many of total population are already screened?

d) DNA tests done by external/internal lab? External lab

e) Weaning age (generally): 4months old

f) Weaning age minimum and maximum: From 3 to 4 months

g) Staff (total): 50

h) Vets(total): 10

Questionnaire to be completed for LTM breeding facilities in Cambodia.

1. Facility details and establishment

Facility Name: [redacted] Facility 4

Facility Address: [redacted]

Land size (m^2): 142,900 **Maximum capacity:** 26,000 animals

Licence No. and date: 190 (11/05/2005) and 330 (29/06/2022)

Date of start of operations: 2005

Initial founder stock:	**Wild**	**Captive**	**Imports**
Quantity (Year):		1024 heads (2005 Buy from Tian Hu),	

Supplementary stock:	**Wild**	**Captive**	**Imports**
Quantity (Year):		750 Captive from [redacted] and 669 from [redacted] (2017), 340 Captive from [redacted] and 864 from [redacted] (2018), 999 Captive from [redacted] and 708 Captive from [redacted] 2022), 1504 Captive (2023) from [redacted] 00 heads, buy from Viet Nam (August 2023), 1000 Captive (2024) from [redacted] 500 Captive (2025) from [redacted]	

Export Markets: Japan

Fac.1 Fac.7 Fac. 1 Fac.7 Fac. 2 Fac. 2 Fac. 2 Fac. 3

2. Production levels

	2017	2018	2019	2020	2021	2022	2023	2024
a) Total female breeders *								
- Of which active breeders (if possible)	5337	6403	5596	5612	5956	6023	5110	5092
- Of which inactive breeders (if possible)								
b) Introductions to the facility**	750 Fac.1 [redacted] 669 [redacted] Fac.6	340 [redacted] Fac. 1) 864 [redacted] Fac 6				999 Fac.2 [redacted] 708 Fac.3 ([redacted]	1504 [redacted] and 500 ([redacted] Fac.2 and 5	1000 [redacted] Fac.2)
- Of which from the wild								
c) Exports from the facility***								
- Of which transfers to other facilities								
- Of which international exports	2736	2559	2160	2160	2978	3072	5102	4608
d) Births (total per year)	1954	2097	1943	1467	1899	1821	1529	1541
e) Birth rate (total number of live offspring born in the year divided by the average number of active female breeders for that year)	0.37%	0.33%	0.35%	0.26%	0.32%	0.30%	0.30%	0.30%
f) Mortality**** (total per year)	896	497	1161	359	315	425	415	294
Total number of animals at year end	15345	15590	14212	13160	11766	11797	9813	7452

* *Please provide an average over the year and indicate if this figure includes active and inactive breeders or only active breeders and if it includes pregnant females.*

** *Includes international imports, introductions from the wild and from other facilities*

*** *Includes International exports and transfers to other facilities*

**** *natural, euthanasia etc. Please indicate at what age deaths are recoded (e.g. after birth, after weaning, other)*
2025 is as 30 June 2025*

3. Management

a) **Duration of quarantine period for wild animals before introduction into breeding population: N/A**

b) **ID method (tag, microchip, other): ID tag**

c) **DNA parentage testing (y/n): No**

- **if yes, since when and how many of total population are already screened?**

d) **DNA tests done by external/internal lab? N/A**

e) **Weaning age (generally): 5-6 Month**

f) **Weaning age minimum and maximum: 5-6 Month**

g) **Staff (total): 159**

h) **Vets (total): 9**

[redacted]

Questionnaire to be completed for LTM breeding facilities in Cambodia.

1. Facility details and establishment

Facility Name: [redacted] Facility 5

Facility Address: [redacted]

Land size (m²): 42,000 (38 blocks) **Maximum capacity :** 10,000 animals

Licence No. and date: 263 (20/08/2004)

Date of start of operations: 2004

Initial founder stock: **Wild** ☐ **Captive** ☐ **Imports**

Quantity (Year):

Supplementary stock: **Wild** **Captive** **Imports**

Quantity (Year): 2000 Quota from Government, initial 136 collect into Phnom Penh in 2019, the rest in Pursat, (keep in Pursat). The 136 collect in Phnom Penh was transfer to Pursat in 2022.

Export markets:

Facility has not been used for breeding since 2022, its primary use is for required quarantine of LTMs prior to export embarkation.

2. Production levels

Description/Year	2017	2018	2019	2020	2021	2022	2023	2024	
a) Total female breeders *	-	18	220	839	1,097	0	0	0	
- Of which active breeders (if possible)									
- Of which inactive breeders (if possible)									
b) Introductions to the facility**	1740 (VBR-PS)	925 ([redacted]	4186 ([redacted] 4,050) + F0 136	7,710 ([redacted]	4,590 ([redacted]	2,260 ([redacted]	620 ([redacted]	1,000 ([redacted]	All Facility 6
- Of which from the wild			136						
c) Exports from the facility***									
- Of which transfers to other facilities	600 (VBR-PS)	100 ([redacted]	688 ([redacted]	-	1,050 ([redacted]	1,755 ([redacted]			All Facility 6
- Of which international exports	1,286	1,538	3,034	6,696	3,751	2,726	335		
d) Births (total per year)	-	9	179	252	641	19	0	0	
e) Birth rate (total number of live offspring born in the year divided by the average number of active female breeders for that year)	-	0.50	0.81	0.30	0.58	0	0	0	
f) Mortality**** (total per year)	24	52	14	78	291	169	46	18	
Total number of animals at year end	1,659	880	1,520	2,709	2,848	457	696	1,678	

* *Please provide an average over the year and indicate if this figure includes active and inactive breeders or only active breeders and if it includes pregnant females.*

** *Includes international imports, introductions from the wild and from other facilities*

*** *Includes International exports and transfers to other facilities*

**** *natural, euthanasia etc. Please indicate at what age deaths are recoded (e.g. after birth, after weaning, other)*

3. Management

a) **Duration of quarantine period for wild animals before introduction into breeding population:**

b) **ID method (tag, microchip, other):** ID Tag

c) **DNA parentage testing (y/n):** Not yet

- **if yes, since when and how many of total population are already screened?**

d) **DNA tests done by external/internal lab?** N/A

e) **Weaning age (generally):** 4-6 months

f) **Weaning age minimum and maximum:** 3-6 months

g) **Staff (total): 37**

h) **Vets (total): 1**

Questionnaire to be completed for LTM breeding facilities in Cambodia.

1. Facility details and establishment

Facility Name: [redacted] Facility 6

Facility Address: [redacted]

Land size (m²): 420,000 (275 blocks) **Maximum capacity:** 80,000 animals

Licence No. and date: 220 (07/05/2015) Even though it does not clear in the Forestry law, it was reminded in 2015, that original licence issue in 2004 is not to the company cover Cambodia, [redacted]

[redacted]

Date of start of operations: 2006 (explain the different licence dates)

Initial founder stock: **Wild** **Captive** **Imports**

Quantity (Year): **22,640** (2006 to 2009)

Supplementary stock: **Wild** **p Captive** **Imports**

Quantity (Year): 2000 quota in 2018, 136 collect in Phnom Penh transfer to Pursat in 2022, 1864 collect in Pursat in 2021.

Export markets: **USA, Japan and China**

2. Production levels

	2017	2018	2019	2020	2021	2022	2023	2024
a) Total female breeders *	8,116	12,163	16,668	22,984	30,232	35,076	21,833	21,966
- Of which active breeders (if possible)								
- Of which inactive breeders (if possible)								
b) Introductions to the facility**	600 [redacted]	100 [redacted]	688 [redacted]		2,914 [redacted] 1,050)	1,755 ([redacted] 1,619)		
- Of which from the wild					1,864	136		
c) Exports from the facility***								
- Of which transfers to other facilities	1,740 [redacted]	925 [redacted]	4,050 [redacted]	7,710 [redacted]	4,590 [redacted]	2,260 [redacted]	620 ([redacted])	5,000 (1,000 [redacted] 300 ([redacted] 3,700 [redacted]
- Of which international exports	1,928	3,398	6,065	7,290	11,804	11,302	-	-
d) Births (total per year)	7,406	9,298	13,319	18,847	36190	35,513	14,134	11,845
e) Birth rate (total number of live offspring born in the year divided by the average number of active female breeders for that year)	0.91	0.76	0.80	0.82	1.20	1.01	0.65	0.54
f) Mortality**** (total per year)	602	310	202	372	7,888	8,386	9,086	4,487
Total number of animals at year end	19,985	24,750	28,440	31,915	46,737	62,057	66,485	68,843

All Fac.5

All Fac.5 except 2024 with 1,000 to Fac.5, 300 to Fac.2 and 3,300 to Fac.8

* *Please provide an average over the year and indicate if this figure includes active and inactive breeders or only active breeders and if it includes pregnant females.*

** *Includes international imports, introductions from the wild and from other facilities*

*** *Includes International exports and transfers to other facilities*

**** *natural, euthanasia etc. Please indicate at what age deaths are recoded (e.g. after birth, after weaning, other)*

3. Management

a) **Duration of quarantine period for wild animals before introduction into breeding population:** 45 days

b) **ID method (tag, microchip, other):** ID tag

c) **DNA parentage testing (y/n):** Yes

- **if yes, since when and how many of total population are already screened?** Since 2024. Breeder genetic blood bank established (all current 2,700 and future breeders blood was kept). Also set up a parental testing laboratory (current 14,000 plus juveniles had pair with their father using 23 STR loci, testing still on -going).

d) **DNA tests done by external/internal lab?** Internal

e) **Weaning age (generally):** 4 – 6 months

f) **Weaning age minimum and maximum:** 3 to 6 months

g) **Staff (total): 195+75**

h) **Vets (total): 10**

Questionnaire to be completed for LTM breeding facilities in Cambodia.

1. Facility details and establishment

Facility Name: [redacted] Facility 7

Facility Address: [redacted]

Land size (m2): 89,500 **Maximum capacity:** 16,000 animals

Licence No. and date: 046 (13/02/2024)

Date of start of operations: Resumed operations (Feb 2024)

Initial founder stock:	**Wild**	**Captive**	**Imports**
Quantity (Year):		**1000 heads**	
Supplementary stock:	**Wild**	**Captive**	**Imports**
Quantity (Year):		**1000 heads from** [redacted] **(28 March 2024)** Facility 3	

Export Markets: No

2. Production levels

	2017	2018	2019	2020	2021	2022	2023	2024
a) Total female breeders *								
- Of which active breeders (if possible)	971	868						836
- Of which inactive breeders (if possible)								
b) Introductions to the facility**								
- Of which from the wild								
c) Exports from the facility***								1000
- Of which transfers to other facilities	669 ([redacted])	864 ([redacted])						
- Of which international exports								
d) Births (total per year)	580	317						412
e) Birth rate (total number of live offspring born in the year divided by the average number of active female breeders for that year)	0.60%	0.37%						0.50%
f) Mortality**** (total per year)	774	828						59
Total number of animals at year end	1375	0						1353

Facility 4

* *Please provide an average over the year and indicate if this figure includes active and inactive breeders or only active breeders and if it includes pregnant females.*

** *Includes international imports, introductions from the wild and from other facilities*

*** *Includes International exports and transfers to other facilities*

**** *natural, euthanasia etc. Please indicate at what age deaths are recoded (e.g. after birth, after weaning, other)*

3. Management

a) Duration of quarantine period for wild animals before introduction into breeding population: N/A

b) ID method (tag, microchip, other): ID Tag

c) DNA parentage testing (y/n): No

- if yes, since when and how many of total population are already screened?

d) DNA tests done by external/internal lab? N/A

e) Weaning age (generally): 5-6 months

f) eaning age minimum and maximum: 5-6 months

g) Staff (total): 26

h) Vets (total): 01

Questionnaire to be completed for LTM breeding facilities in Cambodia.

1. Facility details and establishment

Facility Name: [redacted] Facility 8

Facility Address: [redacted]

Land size (m²): 204,285 **Maximum capacity:** 10000 animals

Licence No. and date: 502 (19/12/2022)

Date of start of operations: 2022

Initial founder stock:	**Wild**	**Captive**	**Imports**
Quantity (Year):2024		**3814 (FR-SSR114 Fac. 6 [redacted]3700)**	**500(VN)**

Supplementary stock:	**Wild**	**Captive**	**Imports**
Quantity (Year):			

Export markets:

2. Production levels

	2020	2021	2022	2023	2024
a) Total female breeders *					924
- Of which active breeders (if possible)					
- Of which inactive breeders (if possible)					
b) Introductions to the facility**					4,314 (3,700 [redacted] 114-FR-SSR, 500-VN)
- Of which from the wild					
c) Exports from the facility***					
- Of which transfers to other facilities					
- Of which international exports					
d) Births (total per year)					40
e) Birth rate (total number of live offspring born in the year divided by the average number of active female breeders for that year)					0.04
f) Mortality**** (total per year)					6
Total number of animals at year end					4,348

3,600 Fac. 6;

Note: FR- Family Rearing, SSR- Mr. Seng Sareoung. FR-SSR has been closed its operation after transfer 114 heads live LTM to [redacted] farm since July 2024.

Facility 6

* *Please provide an average over the year and indicate if this figure includes active and inactive breeders or only active breeders and if it includes pregnant females.*

** *Includes international imports, introductions from the wild and from other facilities*

*** *Includes International exports and transfers to other facilities*

**** *natural, euthanasia etc. Please indicate at what age deaths are recoded (e.g. after birth, after weaning, other)*

3. Management

a) **Duration of quarantine period for wild animals before introduction into breeding population: 60days**

b) **ID method (tag, microchip, other):** ID Tag

c) **DNA parentage testing (y/n):** No

- **if yes, since when and how many of total population are already screened?** N/A

d) **DNA tests done by external/internal lab?** N/A

e) **Weaning age (generally): 3month**

f) **Weaning age minimum and maximum: 3month-6month**

g) **Staff (total): 36**

h) **Vets (total): 4**