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Expert letter on Galápagos marine and land iguanas for CITES CoP20, Prop. 22 & 23:

July 2025

To whom it may concern,

As experts in herpetology, conservation biology, wildlife law enforcement, and wildlife trade legislation, we respectfully urge the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) to support the proposals submitted by Ecuador to transfer the Galápagos land iguanas (*Conolophus* spp.) and the marine iguana (*Amblyrhynchus cristatus*) from Appendix II to Appendix I at CoP20.

These species are iconic endemics of the Galápagos Islands, possessing irreplaceable ecological and evolutionary significance. However, mounting evidence from recent scientific assessments clearly demonstrates that their survival is increasingly imperilled by a combination of factors, including climate change, invasive predators, habitat degradation, and poaching for the illegal pet trade.

1. Elevated conservation concern and documented population declines

- The IUCN Red List categorizes *Conolophus marthae* as Critically Endangered, while *C. subcristatus*, and *C. pallidus* are classified as Vulnerable. While the species *Amblyrhynchus cristatus* is classified as Vulnerable, ten of its eleven subspecies are individually categorized as Critically Endangered or Endangered. These statuses reflect observed or inferred population declines exceeding thresholds for Appendix I listing, in line with Resolution Conf. 9.24 (Rev. CoP17) criteria.
- Many subpopulations are genetically isolated, small in number, and exhibit limited recruitment due to predation by invasive species such as cats and rats. In some colonies of *A. cristatus*, recruitment is below 10%.
- Marine iguanas are also severely threatened by El Niño events which regularly cause mass mortalities in the species — up to 90% in affected populations—and climate change is expected to increase their frequency.

2. Escalating illegal international trade

- Despite Ecuador never authorizing the export of live specimens, marine and land iguanas have repeatedly appeared in international trade. Juveniles are particularly targeted, as they are easier to smuggle and misrepresent as captive bred.
- Reflecting these concerns, the Scientific Review Group (SRG) of the European Union has maintained a **Negative Opinion** for *Conolophus subcristatus* since 2020. This decision applies to *all countries and all source codes* of import, based on persistent doubts regarding the legal origin of traded specimens.
- A 2025 peer-reviewed study (Auliya et al., 2025¹) documents fraudulent captive-breeding claims, dubious origins of stock from non-range countries, and ongoing laundering of wild-caught individuals as captive-bred, facilitated by the questionable issuance of CITES export permits by government authorities. These findings are echoed by a recent scientific investigation published in *Biological Conservation* (Granados et al., 2025), which provided genetic evidence of illegal trade of Galápagos iguanas across multiple continents.

3. Inadequacy of current regulatory protections under Appendix II

- The status quo under Appendix II has demonstrably failed to prevent international trafficking. The laundering of wild specimens under the guise of captive breeding – often involving countries of origin with no legal source stock – compromises the effectiveness of CITES controls and Ecuador's sovereign conservation mandates.
- In **Notification to the Parties No. 2025/063**² Ecuador formally requested that all CITES Parties **refrain from issuing import or export permits** for any specimens of *Amblyrhynchus* and *Conolophus* species. This appeal underscores the urgent need to support the range State's national legislation and enforcement efforts and to ensure full compliance with Article IV of CITES.
- Appendix I listing is necessary to reflect the precautionary principle and afford these species the highest level of protection, prohibiting commercial trade and enabling better scrutiny of any future movement for scientific or conservation purposes.

4. Strong national protections merit international reinforcement

- Ecuador enforces strict legal bans on the removal or export of wildlife from the Galápagos islands. National legislation prohibits the commercial use of these species and restricts movement to exceptional scientific purposes.
- Elevating *Amblyrhynchus* and *Conolophus* spp. to Appendix I would align CITES provisions with Ecuadorian law and bolster enforcement against illegal trade routes that exploit loopholes under the current regime.
- By elevating these species to Appendix I, national governments will be better prevented from issuing questionable or illegal CITES export permits for trafficked animals and/or their offspring.

¹ <https://www.sciencedirect.com/science/article/pii/S0006320725001417>

² <https://cites.org/sites/default/files/notifications/E-Notif-2025-063.pdf>

Given the urgent threats to these species, and the clear evidence that they meet the criteria for inclusion in CITES Appendix I, we respectfully urge all Parties to support the proposals to transfer *Amblyrhynchus cristatus* and *Conolophus* spp. to CITES Appendix I, as proposed by the sole range state Ecuador.

We thank you for your attention and for your continued commitment to the principles and objectives of the Convention.

Sincerely,

1. Washington Tapia Aguilera, Director General de Conservando Galápagos, Galápagos Conservancy, Ecuador
2. Dr Sandra Altherr, Head of Science, Pro Wildlife, Germany; IUCN SSC Tortoise and Freshwater Turtle Specialist Group
3. Daniel Ariano-Sánchez, PhD, Director, Center for Environmental and Biodiversity Studies, Universidad del Valle de Guatemala; IUCN SSC Iguana Specialist Group
4. Dr Mark Auliya, Museum Koenig Bonn & Leibniz Institute for the Analysis of Biodiversity Change, Bonn, Germany; Co-chair, IUCN SSC Monitor Lizard Specialist Group
5. Juan Carlos Cantu, Director Teyeliz AC, Mexico
6. Giuliano Colosimo, PhD, Dept. of Biology, University of Rome Tor Vergata, Italy; IUCN SSC Iguana Specialist Group
7. Prof Dr David Edwards, Director of Centre for Global Wood Security, Dept of Conservation Research Institute, University of Cambridge, UK
8. Dr. Alex Figueroa, Department of Biological Sciences, University of New Orleans, USA
9. Kumudani Bala Gautam, PhD, Assistant Professor, Forensic Science, Graphic Era (Deemed to be University), Dehradun; Co-chair, IUCN SSC Monitor Lizard Specialist Group
10. Gabriele Gentile, PhD, Professor of Zoology, Dept. of Biology, University of Rome Tor Vergata, Italy; IUCN SSC Iguana Specialist Group
11. Glenn P. Gerber, PhD, Caribbean Program Head/Scientist, San Diego Zoo Wildlife Alliance, USA; IUCN SSC Iguana Specialist Group
12. Tandora Grant, San Diego, USA; IUCN SSC Iguana Specialist Group
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14. Dr. Sylvia Hofman, Museum Koenig Bonn & Leibniz Institute for the Analysis of Biodiversity Change, Bonn, Germany
15. Alice Hughes, PhD, Associate Professor, School of Biological Sciences, Faculty of Science, University of Hong Kong, Hong Kong
16. Jordi Janssen, Founder of Wildview Analytics, Brazil; IUCN SSC Skink & Monitor Lizard Specialist Groups

17. Dr. Christine Kaiser, Managing Editor for Resources, Herpetology Notes, Distinguished Visiting Professor, Kyoto University, Japan
18. Prof Dr Hinrich Kaiser, Department of Biology, Victor Valley College, Victorville, California, USA; Editor-in-Chief of Herpetology Notes and member of the Executive Committee, World Congress of Herpetology
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20. Dr. Claudia Koch, Section Herpetology, Leibniz Institute for the Analysis of Biodiversity Change, Bonn, Germany; IUCN SSC Snake Specialist Group
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22. Susan Lieberman, PhD, Vice President, International Policy, Wildlife Conservation Society
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24. Prof Vincent Nijman, Oxford Brookes University, UK; IUCN SSC [Primate, Bear, Asian Songbird Trade] Specialist Groups
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30. Christian Sevilla, Ecosystem Conservation and Restoration, Galápagos National Park, Ecuador
31. Dr Chris R. Shepherd, Canada; Senior Conservation Advocate and Wildlife Trade Expert, Center for Biological Diversity
32. Bhim Singh, PhD, Principle Project Associate, Wildlife Institute of India
33. Monique Sosnowski, PhD, Assistant Professor, Wildlife Crime and Security Consultant, Farmingdale State College, SUNY, USA
34. Bruce Weissgold, USA; President International Iguana Foundation; IUCN SSC Iguana Specialist Group
35. Stuart Williamson, former Senior Investigator in the New Zealand Wildlife Enforcement Group
36. Dr. Seyyed Saeed Hosseini Yousefkhani, Associate Professor of Herpetology, Head of the Institute of Biological Science, Damghan University, Iran