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Title: Don't overlook CITES criteria

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Main text:

Unsustainable international wildlife trade is a major conservation concern and CITES is a key tool for regulating it. Frank and Wilcove (Science, *Policy Forum*, 15 February 2019) assert that appropriate policy could be achieved by ensuring prompt inclusion of species in CITES that are

identified as threatened on The IUCN Red List of Threatened SpeciesTM [hereafter the ‘Red List’], at least in part by international trade. The authors claim that some 271 such species warrant inclusion in CITES Appendix I or II, which they characterize as a ‘backlog’ in need of clearing. The Red List currently informs decision-making in CITES, and we welcome the suggestion for closer interaction between the Red List and amendments to the CITES Appendices. However, the proposed approach of a near-automatic pathway overlooks the independent criteria and processes used for evaluating extinction risk on the Red List and for including species in CITES. The Red List uses objective categories and criteria with quantitative thresholds (e.g., based on population size and trends) and information on known or likely threats. Conversely, the listing of species under CITES, a legally-binding multilateral agreement, is a matter for its 183 Parties. CITES uses detailed biological and trade criteria against which to evaluate proposals to include species in its Appendices, and proposals can only be submitted by Parties. Crucially, species threatened on the Red List that can be ‘linked to’ international trade may not meet the criteria for inclusion in CITES, particularly when international trade is not a major threat. Prompt sharing of new or updated Red List assessments with the CITES Parties, and subsequent evaluation of species against the CITES listing criteria where appropriate, would ensure that international trade-threatened species are afforded the protection they need in a timely manner.