



**WWF's positions on a number of items for decision at the
15th Meeting of the Conference of the Parties to the Convention on the Conservation of Migratory Species of Wild Animals (CMS)
Campo Grande, Brazil, 23-29 March 2026**

At the outset, WWF wishes to thank the CMS Secretariat, the Scientific Council, the Standing Committee and the Government of Brazil for their work in preparing for and framing the focus of this meeting.

The meeting takes place at a time when, according to the [interim report](#) on the State of the World's Migratory Species, and despite some good news stories, the trends for CMS-listed species are worsening overall, with increasing pressures and inadequate effective protection compounded by a lack of data in many instances..

WWF welcomes the continued focus at this meeting on ecological connectivity, as reflected in the slogan, *Connecting nature, sustaining life*. One of WWF's overarching objectives at this meeting will be to emphasise the importance of connectivity in all habitats – including aquatic habitats (freshwater and marine) and to ensure that all biomes are given equal priority in the outcomes. We are a proud member of the CMS orchestrated Global Partnership on Ecological Connectivity, and will be pleased to showcase, on behalf of our partners and on our own behalf, innovative work advancing terrestrial connectivity, ongoing work on blue corridors for cetaceans and for marine turtles, and extensive work to help establish important marine turtle areas for the first time, and to prioritize listing and subsequent action needed to restore populations of migratory freshwater fish.

We also endorse the continued focus on area-based conservation in marine ecosystems, including ongoing work on Important Marine Mammal Areas (IMMAs) and Important Shark and Ray Areas (ISRAs), as well as the new initiative being led through the Blue Corridors for Turtles partnership (led by WWF) and agenda item on Important Marine Turtle Areas (IMTAs), and a draft Resolution on seamounts.

At CoP14 we contributed to and welcomed Resolution 14.6 on *Deep-seabed mineral exploitation activities and migratory species*, which essentially called on Parties to refrain from that activity until there is greater certainty over the impacts. We now agree with the Scientific Council that it is premature in this regard to recommend mitigation measures.

We also welcome the initiative on illegal and unsustainable take of migratory species. This is an area of growing concern, and we share the conclusion that, while much of the attention of policy makers focuses on take driven by international trade, the bulk of such take is, in fact, being domestically driven.

WWF was pleased to participate in the preparation of the multi-species action plan for bustards and for Amazonian Migratory Catfish and we commend them for adoption.

Finally, noting that this meeting is taking place in the country with the largest population of jaguars, we welcome progress in addressing cooperation, both in CITES and in CMS, towards conservation of Latin America's most emblematic species listed in CMS Appendices – a species also representing the opportunity to connect an entire continent from Mexico to Argentina.

1. Agenda documents

Document number(s) ¹	Title	Content	WWF position
UNEP/CMS/COP15/Doc.15 UNEP/CMS/COP15/Doc.15/Add.1	Samarkand strategic plan for migratory species 2024-2032	Proposes amendments to Resolution 14.1 to incorporate indicators, and proposes draft Decisions for further work	WWF supports this document and particularly welcomes the prominence given to Key Biodiversity Areas in the indicators.
UNEP/CMS/COP15/Doc.25.1.1 UNEP/CMS/COP15/Doc.25.1.1/Add.1	Bycatch and other fisheries-induced mortality	Proposes amendments to Resolution 12.2 and associated draft Decisions	• It should be clear that the Resolution refers to all migratory taxa, including seabirds. • We support the inclusion of at least an interim CMS-specific definition of bycatch , even though we anticipate that there will be a need for further work on this in the next intersessional period. • We welcome the discussion of the threat of bycatch associated with the increasing croaker maw fisheries.

¹¹ NOTE: Not all of the Scientific Council Addenda were available at time of writing

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			- We welcome the decisions for marine mammals and marine turtles and agree in general with SC proposed Decision and Resolution amendments. - We support the view that all bycatch constitutes take, even if the affected animals are not retained.
UNEP/CMS/COP15/Doc.25.1.2 UNEP/CMS/COP15/Doc.25.1.2/Add.1	Bycatch of Chondrichthyan species	Reports on progress to implement Decisions 14.117 and 14.118 Chondrichthyan Species (Sharks, Rays, Skates and Chimaeras). It proposes the deletion of these Decisions.	WWF agrees with the Scientific Council that the COP14 Decisions should be retained.
UNEP/CMS/COP15/Doc.25.1.3 UNEP/CMS/COP15/Doc.25.1.3/Add.1	Fish aggregating devices	Includes the executive summary and recommendations of a report on the Relationship between Fish Aggregating Devices (FADs) and Marine Debris in the Mediterranean Sea, and associated draft Decisions	WWF commends CMS for its work on this often-neglected issue and supports the draft Decisions.
UNEP/CMS/COP15/Doc.25.2.1/Rev.1	Marine pollution	Includes draft Decisions and a new Resolution on marine pollution	WWF supports the draft Resolution and Decisions and stands ready to contribute to finalisation of the text in the aquatic working group.
UNEP/CMS/COP15/Doc.25.2.3 UNEP/CMS/COP15/Doc.25.2.3/Annex 1 UNEP/CMS/COP15/Doc.25.2.3/Add.1	Deep seabed mining	Includes draft Decisions and a report entitled <i>Impacts of Deep-sea Mining on Migratory Species: Review and Knowledge Gaps</i>	WWF agrees with the Scientific Council that it is premature in this regard to recommend mitigation measures, and that the recommendations in Annex 2 should be amended accordingly.

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UNEP/CMS/COP15/Doc.25.3.1 UNEP/CMS/COP15/Doc.25.3.1/Add.1	Priorities for Area-based Conservation of Marine Migratory Species	Proposes a draft Resolution on Important Marine Turtle Areas (IMTAs) and a draft Resolution on Priorities for Area-based Conservation of Marine Migratory Species, with associated draft Decisions	WWF supports both Resolutions. • The Resolution on Important Marine Turtle Areas (IMTAs) will make an important contribution towards achieving area-based conservation and connectivity of marine turtles in marine biomes. • We welcome the reference to KBAs in the draft Resolution on Priorities for Area-based Conservation of Marine Migratory Species. We do not consider it inappropriate that Paragraph 6 of that agreement calls for CMS Parties that have not done so to ratify another agreement (BBNJ) and we support that call.
UNEP/CMS/COP15/Doc.25.3.3 UNEP/CMS/COP15/Doc.25.3.3/Add.1	Conserving seamount ecosystems	Includes a draft Resolution	WWF thanks the Governments of Monaco and Panama for taking this Resolution forward on what are uniquely vulnerable biodiversity hotspots. We support it with the amendments suggested by the Scientific Council.
UNEP/CMS/COP15/Doc.25.5 UNEP/CMS/COP15/Doc.25.5/Add.1	Marine turtles	Includes draft Decisions relating to the <i>Single Species Action Plan for the Hawksbill Turtle (Eretmochelys imbricata) in South-East Asia and the Western Pacific Ocean Region</i> and reports on the Blue Corridors Initiative and its role	WWF supports the draft Decisions and welcomes the work on turtle blue corridors and IMTAs.

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		in helping to identify Important Marine Turtle Areas (IMTAs)	
UNEP/CMS/COP15/Doc.25.6.1/Rev.1 UNEP/CMS/COP15/Doc.25.6.1/Annex 1 UNEP/CMS/COP15/Inf.25.6.1	Freshwater fish	Includes a global assessment of migratory freshwater fish, a case study assessment for the Amazon Basin, new draft Decisions and proposed amendments to <i>Resolution 12.2 on Migratory freshwater fish</i> , aimed <i>inter alia</i> at encouraging listing of more species on the Appendices	WWF shares the concern regarding the under-representation of freshwater fish in the Appendices, participated in the development of the two assessments and, as such, supports the Resolution amendments and the draft Decisions.
UNEP/CMS/COP15/Doc.25.6.2/Add.1 UNEP/CMS/COP15/Doc.25.6.2/Annex 2 UNEP/CMS/COP15/Doc.25.6.2/Add.1	European eel	Includes a draft Resolution proposing a Single Species Action Plan for the European eel	The European eel is in need of urgent action and cooperations and, accordingly, WWF supports this proposal.
UNEP/CMS/COP15/Doc.25.6.4/Rev.1 UNEP/CMS/COP15/Doc.25.6.4/Annex 2	Single Species Action Plan for the Northeast Atlantic and Mediterranean Sub-Population of the Tope Shark (<i>Galeorhinus galeus</i>)	Proposes a Single Species Action Plan for these populations	WWF acknowledges the urgency of cooperative action for this species in the Northeast Atlantic and Mediterranean Sea and supports the proposal. (WWF participated in the development of this plan.)
UNEP/CMS/COP15/Doc.25.6.5 UNEP/CMS/COP15/Doc.25.6.5/Add.1 UNEP/CMS/COP15/Doc.25.6.5/Annex 2	Multi-species Action Plan for Amazonian Migratory Catfish	Contains a draft Resolution, a Multi-species Action Plan, and draft decisions for adoption	WWF participated in the development of this plan Brazil and supports its adoption.
UNEP/CMS/COP15/Doc.26.3.1 UNEP/CMS/COP15/Doc.26.3.1/Add.1	Flyways	Proposes amendments to Resolution 12.11 on <i>Flyways</i> , together with draft Decisions, in order to reinforce implementation	WWF commends the recommendations of the working group and supports the proposed amended Resolution and Decisions.

Document number(s) ¹	Title	Content	WWF position
		of the recommendations of the Flyways Working Group	
UNEP/CMS/COP15/Doc.26.3.2/Rev.1	Marine flyways	Proposes a new resolution and Decisions	With the entry into force of the Agreement on Marine Biodiversity of Areas Beyond National Jurisdiction (BBNJ Agreement) and given that seabirds are the most threatened group of birds, this initiative is timely and WWF is pleased to support it.
UNEP/CMS/COP15/Doc.26.4.2 UNEP/CMS/COP15/Doc.26.4.2/ Annex 1 UNEP/CMS/COP15/Doc.26.4.2/ Annex 2	Multi-species Action Plan to conserve African, Eurasian and Australian Bustards	Proposes a Resolution and Decisions to give effect to the plan	WWF participated in the development of this plan and warmly supports the outcome.
UNEP/CMS/COP15/Doc.27.1	Joint CITES-CMS African Carnivores Initiative	Includes draft Decisions that seek to make the initiative more range State-driven	WWF agrees with the conclusions in the document, and these could be reflected in the draft Decisions if they are amended to: • Review the focus and operational modalities of the ACI to ensure it is a Range State-driven effort; and • Reassess the ACI's setup to promote and support broad international partnership and synergistic cooperation between ACI Range States and other stakeholders, in line with priority Result 1.3 of the ACI POW.

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UNEP/CMS/COP15/Doc.27.4/Rev.1	Jaguar	Incorporates a Regional Action Plan for Jaguar Conservation together with supporting amendments to Resolution 14.14	The ongoing work on jaguar conservation is an outstanding example of inter-Convention and interstate cooperation. WWF welcomes the action plan and supports the amendments to the Resolution.
UNEP/CMS/COP15/Doc.28.1	Illegal and unsustainable take of migratory species	Proposes the adoption of new draft Decisions and amendments to Resolution 11.31(Rev.COP14), now to be titled <i>Illegal and unsustainable take of migratory species</i>	This document is, in part, the subject of intensive effort in a working group over a number of months. WWF participated in the working group and supports the outcome.
UNEP/CMS/COP15/Doc.28.2/Rev.1	Ecological connectivity	Proposes amendments to Resolution 14.16 (Rev.COP15) on <i>Ecological Connectivity</i> , and the adoption of new draft Decisions	The amendments have, <i>inter alia</i> , the effect of emphasising the importance of connectivity in the aquatic environment and WWF warmly supports them. We welcome the additions of the Scientific Council regarding the role of climate change.
UNEP/CMS/COP15/Doc.28.5/Rev.1	Wildlife Health	Proposes amendments to Resolution 12.6 (Rev.COP14) on <i>Wildlife health and migratory species</i> , and the adoption of new Decisions	This area of work is crucial in the light of the adoption of the Pandemics Instrument.
UNEP/CMS/COP15/Doc.28.6/Rev.1	Pastoralism	Presents the deliberations of the Scientific Council Working Group on the topic, as well as draft Decisions for taking the work forward	WWF commends the Scientific Council for its excellent work on this topic and supports the draft Decisions.

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UNEP/CMS/COP15/Doc.28.7/Rev.1	Light pollution	Incorporates a proposed amendment to Resolution 13.5 (Rev.COP14) CMS international light pollution guidelines for migratory species to mandate the Scientific Council to monitor new evidence of the impacts of light pollution and approaches to mitigation, and provide advice to the COP, as appropriate.	CMS has done excellent work on this topic to date and the momentum must be maintained. Accordingly, WWF supports this proposal.
UNEP/CMS/COP15/Doc.28.8/Rev.1	Insect decline	Proposes amendments to Resolution 13.6 on <i>Insect decline and its threat to migratory insectivorous animal Populations</i> advocating further research and a more precautionary approach to pesticide use.	Insect decline has cascading effects for other species and for ecosystems and needs urgently to be addressed. WWF supports this document.
UNEP/CMS/COP15/Doc.28.9/Rev.1	Cumulative effects	Proposes draft Decisions encouraging Parties and the Scientific Council to work on guidelines for assessment of cumulative effects	WWF agrees that CMS has a mandate to carry out this work in respect of migratory species and supports the draft Decisions. The question of cumulative impacts also takes on added importance in the light of the entry into force of the Agreement on Marine Biological Diversity of Areas beyond National Jurisdiction (BBNJ Agreement)
UNEP/CMS/COP15/Doc.28.10/Rev.1	Infrastructure	Proposes amendments to Resolution 07.02 (Rev.COP14) on Impact Assessment and Migratory Species <i>Impact Assessment and Migratory Species</i> with a view to	These amendments to the Resolution are timely. WWF supports.

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		addressing cumulative impacts and to strengthening guidance in particular in respect of assessments in aquatic habitats. A reference is included to the Agreement on Marine Biological Diversity of Areas beyond National Jurisdiction (BBNJ Agreement)	
UNEP/CMS/COP15/Doc.28.12/Rev.1	Climate change	Proposes an amendment to Annex 2 Decision Framework of Resolution 12.21 (Rev.COP14) on <i>Climate change and migratory species</i> , as the adoption of new draft Decisions.	The proposed amendments to the Resolution elaborate considerably on the guidance for situations where a migratory species' range shifts as a result of climate change. WWF supports.

2. Proposals for the amendment of Appendices I and II

Document number(s)	Proponent	Title	WWF position
UNEP/CMS/COP15/Doc.30.2.1/Rev.1	Zimbabwe	Inclusion of the Cheetah (<i>Acinonyx jubatus</i>) population of Zimbabwe on Appendix I	WWF supports but we do not consider that continued trophy hunting would be consistent with Appendix I obligations
UNEP/CMS/COP15/Doc.30.2.2 UNEP/CMS/COP15/Doc.30.2.2/Add.1	Tajikistan and Uzbekistan	Inclusion of the striped hyena (<i>Hyaena hyaena</i>) on Appendix I and II	WWF shares the concerns regarding the data deficiency, the poor conservation status of the species at the national level in many of the Range States, as well as the low population numbers of 5,000-10,000 animals throughout all of its extensive range, and we support the proposal.

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UNEP/CMS/COP15/Doc.30.2.3 UNEP/CMS/COP15/Doc.30.2.3/Add. 1	France	Inclusion of the giant otter (<i>Pteronura brasiliensis</i>) in Appendices I and II of the CMS	The listings would make it possible to improve collaboration among range States and implement measures to ensure ecological connectivity, as well as enabling management and protection of freshwater ecosystem habitats. WWF supports.
UNEP/CMS/COP15/Doc.30.2.4 UNEP/CMS/COP15/Doc.30.2.4/Add. 1	Uzbekistan	Removal of the Bukhara deer (<i>Cervus elaphus yarkandensis</i>) from Appendix I	WWF notes that the Scientific Council requested that the proponent provide more details on the status of the species in the wild, the methodology used to assess the population, and a justification as to how it no longer meets the Appendix I criteria. Until WWF has had a chance to review that information, we are not in a position to support this proposal.
UNEP/CMS/COP15/Doc.30.2.5/Rev.1 UNEP/CMS/COP15/Doc.30.2.5/Rev.1/Add.1	New Zealand, Australia, Brazil, Chile, Cook Islands, Dominican Republic and Fiji	Inclusion of gadfly petrels (<i>Pterodroma</i> sp.) on Appendix I and II	WWF commends the proponents for tabling this proposal, which will bring a further 26 threatened seabirds onto the Appendices.
UNEP/CMS/COP15/Doc.30.2.12 UNEP/CMS/COP15/Doc.30.2.12/Add.1	Panama	Inclusion of the three species of thresher sharks [pelagic thresher shark, bigeye thresher shark, and common thresher shark (<i>Alopias pelagicus</i> , <i>Alopias superciliosus</i> , <i>Alopias vulpinus</i>)] in Appendix I	WWF agrees that inclusion of the three species is warranted, given the difficulty of identifying them in the field and the patterns of exploitation.
UNEP/CMS/COP15/Doc.30.2.13 UNEP/CMS/COP15/Doc.30.2.13/Add.1	Brazil	Inclusion of the Patagonian Narnownose Smoothhound (<i>Mustelus schmitti</i>) on Appendix II	This species is assessed as Critically Endangered globally, with fishing pressure and bycatch being the main threats. Appendix II listing will

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			facilitate co-management of this shared stock. WWF supports.
UNEP/CMS/COP15/Doc.30.2.14 UNEP/CMS/COP15/Doc.30.2.14/Add.1	Ecuador	Inclusion of the scalloped hammerhead shark (<i>Sphyrna lewini</i>) on Appendix I	WWF supports this proposal. We do not consider that the putative data gaps alter the fundamental conclusion that the species is Critically Endangered.
UNEP/CMS/COP15/Doc.30.2.15 UNEP/CMS/COP15/Doc.30.2.15/Add.1	Ecuador	Inclusion of the great hammerhead shark (<i>Sphyrna mokarran</i>) on Appendix I	WWF supports this proposal. We agree with the Scientific Council that apparent population improvements observed in a few well-managed regions should not be generalized to the global scale, given ongoing fishing pressure, international trade, and the species' biological vulnerability.
UNEP/CMS/COP15/Doc.30.2.16 UNEP/CMS/COP15/Doc.30.2.16/Add.1	Brazil	Inclusion of the angular angel shark (<i>Squatina guggenheim</i>) on Appendix II	WWF supports this proposal. The species occurs across multiple jurisdictions and shows seasonal habitat shifts, and we consider this sufficient to merit Appendix II listing.
UNEP/CMS/COP15/Doc.30.2.17 UNEP/CMS/COP15/Doc.30.2.17/Add.1	Brazil	Inclusion of the spotted sorubim (pintado/surubim) (<i>Pseudoplatystoma corruscans</i>) on Appendix II	WWF welcomes and supports the proposal to include this emblematic Pantanal species on Appendix II, hopefully leading to the international cooperation essential for its conservation.

3. Proposals for Concerted Actions

Document number(s)	Proponent	Title	WWF Position
UNEP/CMS/COP15/Doc.31.3.13 UNEP/CMS/COP15/Doc.31.3.13/ Add. 1	Brazil	Concerted Action for the Sand Tiger Shark (<i>Carcharias taurus</i>)	WWF agrees with the Scientific Council that the proposal is well developed, built on multi-stakeholder workshops and incorporating such elements as Important Shark and Ray Areas (ISRAs), bycatch concerns, and habitat identification. WWF thus supports this proposal.
UNEP/CMS/COP15/Doc.31.3.14/Rev.1 UNEP/CMS/COP15/Doc.31.3.14/Add.1	Marine Research and Conservation Foundation (MARECO) and the Irish Basking Shark Group	Concerted Action for the basking shark (<i>Cetorhinus maximus</i>)	WWF notes the revision of this proposal in the light of Scientific Council comments and commends it for adoption.
UNEP/CMS/COP15/Doc.31.3.16/Rev.1 UNEP/CMS/COP15/Doc.31.3.16/Add.1	Ecuador, Manta Trust and WCS	Concerted Action for the manta and devil rays (Mobulidae)	WWF welcomes this timely proposal, coming just after the decision to list all Mobulidae on CITES Appendix I at CoP20 last year.