

**IWMC Special Comment  
on Proposal 44  
Mobula or Devil Rays**

**On 29 July, the Secretariat of the Convention on Migratory Species, CMS, published its recommendations on the marine species proposals submitted for consideration at CITES CoP17. IWMC would like to draw your attention to the recommendation respecting Proposal 44, Mobula or Devil Rays (Mobula spp.)**

**Le 29 juillet, le Secrétariat de la Convention sur les espèces migratrices (CMS) a publié ses recommandations sur les propositions relatives aux espèces marines soumises pour examen à la CdP17. IWMC souhaite attirer votre attention sur la recommandation concernant la proposition Prop. 44, raies mobula ou diables de mer (Mobula spp.).**

*“The CMS Secretariat is pleased to bring to your attention the comments of CMS on the proposals to Amend CITES Appendices I & II (Marine Species)...*

*3. Mobula or Devil Rays (Mobula spp.)*

*All nine species of the genus Mobula were listed on Appendix I and II of CMS in 2014 as well as Annex 1 of the CMS Sharks MOU in 2016. Consequently, the 124 Parties to CMS, out of which 123 are also Parties to CITES (see Table 2), have committed to strictly protect all species of the genus Mobula by: prohibiting the taking of such species, with very restricted scope for exceptions; conserving and where appropriate restoring their habitats; preventing, removing or mitigating obstacles to their migration and controlling other factors that might endanger them. Thus, these 123 Parties to both Conventions have already adopted measures which would preclude the issuing of Non-Detriment Findings for these species.” (Underlining, ours)*

**For all purposes, a CITES Appendix II listing of the genus Mobula, will be the equivalent of an Appendix I listing for the 123 CITES Parties which are also Party to the CMS, as these Parties will be preclude to issue a NDF certificate, as required by CITES.**

**Quels qu’en soit les buts, une inscription à l’Annexe II de la CITES correspondrait à une inscription à l’Annexe I pour ses 123 Parties qui sont également Parties à la CMS, puisqu’elles n’auraient pas la possibilité d’émettre un certificat de commerce non préjudiciable, ainsi que le requiert la CITES.**

Lausanne, 9 August 2016