

How TRAFFIC can help with development and implementation of the proposed new Resolution

- **Providing input** into refining the species/ country combinations for review criteria if required.
- **Making available** to the Secretariat any relevant information TRAFFIC holds with respect to concerns about captive production.
- **Playing an active role** in Animals Committee working groups to assist Parties with selecting a limited number of species/ country combinations, and provide scientific input to the development of recommendations if requested.
- **Support Parties with the implementation** of the new Resolution if requested, including meeting any recommendations.
- **Support the development** and implementation of tools and techniques to verify the provenance of specimens reported as from captive-bred sources.
- **Providing input and support** to Parties and the CITES Secretariat in any other way.

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Green tree python *Morelia viridis*

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INTRODUCTION

Captive breeding of wildlife for commercial purposes is often seen as a useful conservation tool to relieve pressure on wild populations, while still allowing trade to continue and contribute to livelihoods. However, the deliberate misuse of source codes (i.e. claiming specimens are captive bred when they are in fact from the wild) can have negative implications for conservation.

There is evidence that the large scale deliberate misuse of source codes is occurring, and this undermines the purpose and effective implementation of CITES by leading to over-harvesting, illegal trade, and loss of community benefits.

A mechanism is required to allow concerns of deliberate misuse of source codes to be identified and investigated and for measures to be taken in a timely manner to ensure compliance with the Convention. A new Resolution for this has been recommended by the Animals Committee and Standing Committee. Concerns have been expressed in relation to the proposed new mechanism, some of which are addressed here:

Is a new Resolution affordable and likely to deliver improvements?

The fundamental aim of CITES is to ensure that international trade in specimens of wild animals does not threaten their survival, and this must include trade misreported as from captive bred sources. Therefore, the proposed Resolution Relating to a Review of Trade in Animal Specimens Reported as Produced In Captivity is as integral to CITES as other mechanisms such as the Review of Significant Trade (RST) which ensure that the aim of CITES is upheld, and supported by compliance measures used where necessary.

RST has led to significant improvements for species/country combinations, such as the development of national management plans, improved monitoring of wild populations, and the development of sustainable harvest methods. In some cases, RST has catalysed the international community to assist with these improvements through capacity building and funding¹. The recent Evaluation of RST process should greatly improve the process, most notably by speeding it up. It is essential for CITES to be monitoring correct use of source codes in order to meet its aims, and so TRAFFIC agrees with the Secretariat the mechanism should be funded from core funding.

Would it be better to restrict the scope of the new Resolution?

One suggestion has been to limit a new Resolution to monitor trade only in Appendix I listed species. However, in TRAFFIC's experience, much of the trade identified as being suspect is in Appendix II listed species. Appendix I listed species currently have some level of additional monitoring and regulation (as facilities must be registered with CITES if breeding Appendix I listed species, import permits issued), whereas currently there is very little oversight of facilities breeding Appendix II species.

TRAFFIC have identified examples of dubious claims of breeding across many taxa (birds, reptiles, amphibians, mammals etc. see Case Studies), and not limited only to live animals, but other commodities too. Also, the new Resolution should encompass source codes C, F, D and R as questionable trade has been recorded in each of these, often in combination with one another.

Are existing compliance measures succeeding at addressing this problem?

There is currently no systematic, transparent and regular process under CITES for reviewing trade from captive sources. To date potential issues have been raised on an ad hoc basis, through reports such as those produced by IGOs, NGOs, academics etc. Existing Resolutions such as RST are not designed to (or considered to be easily modified to) address issues of deliberate misuse of source codes: a phenomenon which has apparently developed on a large scale only relatively recently. The proportion of trade declared as from captive-bred sources is only likely to grow in the future, as stakeholders (including governments) encourage captive-breeding, and as a greater number of species desired in trade are protected nationally and internationally from wild harvest.

Inspections of facilities were commissioned by the CITES Secretariat in 2013-2014 to address concerns regarding the volume of captive-bred specimens claimed to be produced by these facilities. Issues were found at all facilities inspected. For example, with the agreement of the Lao People's Democratic Republic CITES Management Authority, the Secretariat arranged for TRAFFIC to visit the only known commercial snake farm in Lao PDR. The Lao PDR Management Authority were unable to facilitate access to the facility, which forms part of a wider compliance case. The new Resolution would give greater clout to the inspection of breeding facilities by Secretariat representatives should the new mechanism identify certain facilities that require attention.

Also, during a visit to a facility in Panama in 2014, it was concluded that it was not possible to provide numbers of specimens held at the facility, and although there was evidence of breeding taking place at the facility it was not possible to determine how extensive this was. The CITES Secretariat therefore concluded that it may be preferable to use the source code W in this case in order for a full legal origin and non-detriment finding to be made. This demonstrates that closer scrutiny is required in monitoring breeding facilities and the use of non-wild source codes.

Is a new Resolution proportionate to the scale of the problems?

The number of specimens reported as being captive-bred or captive born increased during the 1990s and now outnumbers that declared as from the wildⁱⁱⁱ. The volume of specimens reported to CITES as being from captive-bred animals is increasing, and is now higher than those declared as from the wild: between 2000 and 2012 captive-bred specimens (source code 'C') accounted for 13.3 million live animals in commercial trade, whereas wild specimens (source code 'W') accounted for 10.5 million animals.

Due to the size of the trade and/or threatened status of some of the taxa concerned, any fraudulent trade involving falsely declared wild specimens as captive-bred is likely to impact wild populations. Not all specimens declared as 'C' have been done so fraudulently, and it is difficult to determine what proportion has been, but a growing body of evidence, including TRAFFIC's own research, shows that this is a widespread

occurrence. A recent review of 14 case studies found unusual trade patterns – in terms of source codes used, trade routes and volumes, and new case studies are provided below.

Will legitimate breeding facilities be burdened by the additional requirements in relation to the new Resolution?

Any additional burden on legitimate breeding facilities would be offset by the reduction of competition with non-compliant facilities which are able to offer specimens more cheaply as they do not invest in the costs necessary to genuinely breed individuals.

CASE STUDIES

There are many examples where there are doubts about the true provenance of captive-bred and ranched specimens. A number of new case studies illustrate examples of deliberate misuse of source codes and why a mechanism is necessary to regulate this. Additional detailed accounts are attached in supplementary material.

1) Wild specimens routinely reported as captive-bred to circumvent legislative protection?

Green Tree Python *Morelia viridis* CITES Appendix II^{vii}

Wild harvest and trade of Green Tree Pythons in range State Indonesia is prohibited due to its protected status, but exports of captive-bred individuals are permitted. Surveys of wildlife traders, and research tracing Green Tree Pythons from their point of capture to breeding farms in Indonesia, revealed that illegally-harvested and traded wild-caught specimens were sold to breeding farms, where they are given CITES export permits declaring them to be captive-bred. At least 80% specimens exported as captive-bred are in fact wild-caught. This illegal harvest has been found to impact wild populations negatively.

Boelen's Python *Morelia boeleni* CITES Appendix II^{viii}

Boelen's Pythons have a zero-harvest quota for wild-sourced specimens in range State Indonesia. Captive breeding in this species has been largely unsuccessful, and ranching (where just-hatched young are collected from the wild) has been widely recorded. The majority of specimens have a wild-sourced origin, but all exports have been inaccurately declared under source codes 'C' or 'F' to circumvent national regulations.



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Emerald Tree Monitor *Varanus prasinus* CITES Appendix II

Wild harvest and trade of Emerald Tree Monitors in range State Indonesia is prohibited due to its protected status, but exports of captive-bred individuals are permitted. In 2016, Indonesian authorities authorised five breeding facilities to breed 762 Emerald Tree Monitors for export as pets. Biological parameters, the reported breeding stock and the difficulty of keeping and breeding this species, raises questions about the feasibility of producing the numbers set in the quota and provides opportunity for laundering wild-sourced specimens, undermining legitimate commercial breeders and traders and both Indonesian and international legislation on wildlife trade.

2) Volumes of specimens reported as captive-bred not economically viable

Tokay Gecko *Gecko gecko* Not CITES listed^{iv}

Breeding, raising and feeding large numbers of individuals to an age at which they can be sold requires significantly greater time and monetary inputs than selling wild-caught animals for many species. In March 2014, authorities from the range State Indonesia permitted six companies to export over three million live captive-bred Tokay Geckos for the pet trade. Considering the enormous logistical and economic costs required (140 000 breeding females, 14 000 breeding males, 30 000 incubation containers, 112 000 rearing cages and a constant supply of food), and the relatively low value of an individual specimen (approximately USD2 if exported as a pet), it is extremely unlikely that companies could breed and maintain the volumes declared in a profitable manner. Such quantities can only be sustained through the routine declaration of wild-caught individuals as captive-bred.

3) Specimens reported as captive-bred but known to be difficult to maintain and breed in captivity

Crocodile Monitor *Varanus salvadorii* CITES Appendix II

In 2016, Indonesian authorities authorised five breeding facilities to breed 170 Crocodile Monitors for export as pets. Only a few facilities (zoos) have successfully bred the species: is extremely difficult to maintain and breed in captivity due to its large size, aggressive nature and general lack of knowledge about its ecology. This lack of captive husbandry success raises questions about the feasibility of breeding such quantities, and the authorization for captive-breeding of quantities much higher than can be realistically produced. This may create a situation where wild-sourced specimens mis-declared as captive-bred may be used to make up the shortfall in genuine captive-bred animals.

Short-beaked Echidna *Tachyglossus aculeatus* Not CITES listed^{v, vi}

Three shipments of seven Short-beaked Echidnas entered the USA from the range State Indonesia in 2011 and 2012 declared under source code F (born in captivity). However, this species is extremely difficult to breed in captivity, with only a few Australian and American institutes with specialised husbandry expertise successfully breeding fewer than 50 F1 individuals of the species in the past 100 years, and only two F2 offspring documented globally. Therefore, the source of these seven animals is likely to be wild. Furthermore, in 2016 Indonesia set an unrealistic quota of captive-breeding and exporting 50 Short beaked Echidnas, potentially allowing more wild-sourced individuals to be exported as captive-bred.

4) Erratic trade patterns for specimens reported as captive-bred from non-range States

African Grey Parrots *Psittacus erithacus* and Australian parrots (Psittacidae) CITES Appendix II^{ix, x}

Singapore imported and re-exported large quantities of CITES-listed captive-bred African and Australian parrot species, and discrepancies were detected between import and export figures reported. Over half of the 41 737 African Grey Parrots reportedly imported into Singapore between 2005 and 2014 were declared as source code ‘C’, but re-exported numbers, particularly for W-declared specimens, were significantly lower and were unaccounted for. These indicate a lack of transparency in record-keeping.

Likewise, for the thousands of source code ‘C’ Australian parrots imported into and re-exported from Singapore, anecdotal information indicates the possibility that specimens smuggled from Australia could have been laundered using suspect breeding facilities in non-range States to circumvent national and international regulations.



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Further Reading

- i AC26/PC20 Doc. 7 <https://www.cites.org/sites/default/files/eng/com/ac-pc/ac26-pc20/E-AC26-PC20-07.pdf>
- ii SC66 Doc. 41.1 <https://cites.org/sites/default/files/eng/com/sc/66/E-SC66-41-01x.pdf>
- iii AC27 Doc. 17 (Rev.1) Annex 2 <https://cites.org/sites/default/files/eng/com/ac/27/E-AC27-17.pdf>
- iv AC27 Doc. 17 (Rev.1) Annex 1 <https://cites.org/sites/default/files/eng/com/ac/27/E-AC27-17.pdf>; Nijman, V and Shepherd, C.R. (2015) *Adding up the numbers: an investigation into commercial breeding of Tokay Geckos in Indonesia*. TRAFFIC. Petaling Jaya, Selangor, Malaysia.
- v Beastall, C. and Shepherd, C.R. (2013) Trade in “captive-bred” echidnas. *TRAFFIC Bulletin* 23 (1):16-17
- vi Janssen, J. and Chng, S.C.L., in prep
- vii Lyons, J. A., and Natusch, D. J. (2011). Wildlife laundering through breeding farms: illegal harvest, population declines and a means of regulating the trade of green pythons (*Morelia viridis*) from Indonesia. *Biological Conservation* 144:3073-3081.
- viii Lettoof, D. (2015) An assessment of the impact of the pet trade on 5 CITES-Appendix II case 424 studies: *Morelia boeleni*. CITES Secretariat, Geneva, Switzerland
- ix Poole, C. M. and Shepherd, C. R. Shades of grey: the legal trade in CITES-listed birds in Singapore, notably the globally threatened African grey parrot *Psittacus erithacus*. *Oryx*: 1-7.
- x Low, B.W., 2014. The global trade in native Australian parrots through Singapore between 2005 and 2011: a summary of trends and dynamics. *Emu*, 114(4): 389-390.
- xi Janssen, J, in press. How to buy your dragon: are zoos facilitating commercial trade in Indonesia’s national icon? *TRAFFIC Bulletin*

