

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES
OF WILD FAUNA AND FLORA



Thirty-first meeting of the Animals Committee
Online, 31 May, 1, 4, 21 and 22 June 2021

EU COMMENTS TO AC31 DOC. 14.3 "PUBLICATION OF A MANAGEMENT REPORT FOR
RETICULATED PYTHON (*MALAYOPYTHON RETICULATUS*¹) IN PENINSULAR MALAYSIA

1. This document has been submitted by the European Union in relation to agenda item 14.3 on the *Publication of a management report for reticulated pythons (Malayopython reticulatus) in peninsular Malaysia*.*
2. Trade in skins of *Malayopython reticulatus*¹ is strongly influenced by fashion trend and subject to fluctuating demands. Exports from Peninsula Malaysia peaked at almost 300,000 in the year 2000 what is unsustainable by all assessments. Accordingly, the setting of adjustable harvest and export quotas based on recent population data are an essential conservation tool for trade in this species and the quality of the respective NDF should reflect the risk that high trade volumes bring to an apex predator.
3. The EU welcomes that with AC31 Doc. 14.3, Malaysia provides an NDF for the management and trade in reticulated pythons (*Malayopython reticulatus*) skins from Peninsular Malaysia published by the Department of Wildlife and National Parks Peninsular Malaysia (PERHILITAN) in 2021. However, it seems that this NDF does not follow some well-established approaches. While innovative techniques are important to cope with changing conservation challenges, their initial application should be accompanied by robust scientific evaluations to ensure that the population density of species is maintained throughout their range at a level consistent with their role in the ecosystems and well above the level at which that species might become eligible for inclusion in Appendix I, as prescribed in article 4 (3) of the Convention.
4. Of specific concern is the replacement of data collected from the wild with figures derived from slaughterhouses, which are biased by factors such as selective harvesting based on market demands, and therefore allow very limited inferences about population trends and detrimental effects of trade. At present, the targeted size classes mainly include the cohort of sexually mature animals. While the presented change in the management system provides considerable economic benefits, conservation risks might be increased. The monitoring of the population structure in the slaughterhouses is a useful tool which may add to, but should not replace, periodic field monitoring in harvest and non-harvest areas. Furthermore, the data from slaughterhouses can only be interpreted in conjunction with respective precise locality data of collected specimens and resources (time and effort) spent to catch those specimens. To better understand and assess the sustainability of this approach, Malaysia should enclose the respective data in their NDF.
5. Considering *Malayopython reticulatus* as too evasive for capture-recapture surveys is contradicted by an annual harvest of more than 100.000 specimens and a single failed attempt to apply this method does not prove it is not applicable for testing the correlation between data based on direct observation of the wild population and indirect inferences derived from slaughterhouses.

¹ According to the currently valid Resolution Conf. 12.11 (Rev. CoP18) on Standard Nomenclature this respective genus and species epithets used by the CITES Authorities of Malaysia refer to *Python reticulatus*. *Malayopython reticulatus* is currently a synonym to the valid species designation *Python reticulatus* as per use in CITES.

* The geographical designations employed in this document do not imply the expression of any opinion whatsoever on the part of the CITES Secretariat (or the United Nations Environment Programme) concerning the legal status of any country, territory, or area, or concerning the delimitation of its frontiers or boundaries. The responsibility for the contents of the document rests exclusively with its author.

6. The EU acknowledges that an e-licencing system is under development. However, the indicated replacement of tags and permits by an e-licence system seems to be in a testing stage. The nationwide application and an evaluation of the efficiency in preventing overharvesting and wildlife laundering are yet to be completed.
7. Recognising that the population of *Malayopython reticulatus* certainly sustains a certain degree of harvest, but considering the time constrains and challenges of running AC31 as online meeting and the complexity of evaluating the uncertainties pointed out in 3 and 4, the AC may wish to recommend discussing the new approaches in the planned NDF workshop before making any decisions and increasing the current quota.