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. 14.2 "PUBLICATION OF A MANAGEMENT REPORT FOR COMMON WATER MONITORS (*VARANUS SALVATOR*) IN PENINSULAR MALAYSIA

1. This document has been submitted by the European Union in relation to agenda item 14.2,* which inter alia invites the members of the Animals Committee to note the Management Report for Common Water Monitors (*Varanus salvator*) in Peninsular Malaysia, invites Parties and other relevant stakeholders to review the Management Report and offer analysis of whether the system in place provide confidence that the proposed quota (120,000 skins/year) is sustainable, and invites the Parties and other stakeholders to review the Management Report and offer informed thoughts to improve Malaysia's management system.

2. AC31 Doc. 14.2, submitted by Malaysia, provides the report "Management and trade in Asian Water Monitors (*Varanus salvator*) in Peninsular Malaysia" published by the Department of Wildlife and National Parks Peninsular Malaysia (PERHILTAN) in 2020, as NDF for *Varanus salvator* skins from Peninsular Malaysia. Based on the report, Malaysia considers increasing the export quota from currently 83,000 to 120,000 skins/year, and claims that the increased quota is sustainable. According to the report, exports of *V. salvator* skins from Peninsular Malaysia never exceeded 106,113 skins/year (annual mean exports of ca. 65,422 skins/year) since 2011.

3. The EU is a major importer of monitor lizard skins (*Varanus salvator*) for the leather industry and thus shares the responsibility for sustainable and non-detrimental use of this species. The EU would like to use the possibility to contribute to further improvement of Malaysia's Management system

   According to the respective EU legislation, i.e. Article 4 2.(a) of the Council Regulation (EC) No. 338/97[1], that is implementing the CITES Convention, also in case of imports of Appendix II species into the EU, "*the competent scientific authority, after examining available data and considering any opinion from the Scientific Review Group, is of the opinion that the introduction into the Community would not have a harmful effect on the conservation status of the species or on the extent of the territory occupied by the relevant population of the species, taking account of the current or anticipated level of trade".* In order to form such NDF, the Scientific Authorities are dependent on comprehensive information on the conservation and management status of certain species in its range states.

4. The EU welcomes Malaysia's publication of an NDF for *Varanus salvator* and acknowledges Malaysia's efforts to comply with CITES Article IV, paragraph 3.

   The EU consulted Malaysia repeatedly in order to assess the sustainability of the export quota for *Varanus salvator*. The Scientific Authorities of the EU have examined a previous version of the NDF for *Varanus salvator* by Malaysia in the past, have recognised and appreciated the changes and improvements, but also

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* *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.*

[1] *Council the Regulation (EC) No. 338/97 of 9 December 1996 on the protection of species of wild fauna and flora by regulating trade therein (https://eur-lex.europa.eu/eli/reg/1997/338/oj)*

identified some limitations of the NDF. The EU would like to share the following considerations on the Management Report with the Animals Committee, which were also shared on 11.12.2020 with Malaysia.

A/ Analysis of sustainability of the management system in place, including the proposed quota (120,000 skins/year)

5. The Scientific Authorities of the EU concluded that the data provided in AC31Doc. 14.2 demonstrate that the current harvest rates and the current annual export quota of 83,000 individuals appear to be non-detrimental to the wild population. However, the NDF provided by Malaysia also shows a trend of decreasing mean body size in some wild populations, which may indicate certain impact of the harvest and therefore needs to be closely monitored, to ensure that the original natural spectrum of the species' role in the ecosystem is maintained. As presented in the NDF, the leather industry targets specifically animals within a certain size-range – i.e. mainly animals with few or no scars - therefore the pressure on this rather young but already reproducing cohort of the population appears rather high.

6. There is an increased risk that if the harvest numbers are set too high, this affected cohort will be over-collected, which could lead to a demographic change that would put the entire population at risk in the mid-term.

7. The presented NDF seems to provide a solid basis to demonstrate sustainability of the current harvest regime with a quota of 83,000 skins annually and a mean export level of 65,422 skins/year (2011-2019). However, sustainability of the proposed quota of 120,000 specimens cannot be considered without additional scientific data and continuous monitoring.

B/ Suggestions to improve Malaysia's management system

8. Sustainability of harvest and trade can only be assessed based on latest scientific data. Therefore, prior to the proposed substantive increase in quota, Malaysia should establish and implement a concrete monitoring plan that includes continuous surveys and introduce an adaptive management system for the species. This would enable Malaysia to quickly adjust harvest levels (quotas, size/weight limits) to population declines or distinct changes in the population demography.

   Although paragraph 3.6.4 in the NDF provided by Malaysia mentions continued monitoring, it does not provide any tangible information on its implementation and cannot therefore be considered to provide sufficient grounds for an increase in quota.

9. Malaysia is invited to consider implementing the following steps:

   - Establishment of an ongoing monitoring program that would enable Malaysia to quickly detect, report and respond to changes in numbers, population structure, density and distribution of *Varanus salvator*.

   - Such monitoring would specify and determine how, where, when (season) and in which intervals monitoring will be carried out in the future, and how Malaysia will react rapidly to changes in the population size and structure. It is recommended to conduct future repeated surveys during the same season of the year to keep the results of different years comparable with each other. The monitoring should contain, but does not have to be limited to, continuing capture-recapture estimates, estimations of population densities as well as a regular assessment of the population demography in order to gather a full picture on population trends.

   - In order to monitor the demography of the respective populations, it would be useful to continue capturing animals in harvested areas, take measurements (at least snout-vent length (SVL), tail length (TL) and weight) and record the sex on a regular basis (more often in areas of high harvest intensity, preferably at least annually). There is lack of data on survival rates of juveniles and growth rates in the field, which is indeed difficult to obtain. Potentially, measurements (e.g., SVL, weight) gained from recaptured individuals that have been recaptured over several years could be used in the future to estimate growth rates, given that enough data are available.

   - The same research should be conducted in areas where harvest does not take place and results should be compared with those of areas where harvest occurs. Stability of populations in non-harvest areas should be verified, since the last survey in these areas was done ten years ago. Surveys in non-harvest areas may be conducted with bigger time intervals than surveys in harvest areas.

- The impact of other causes of mortality (such as local consumption, habitat loss, culling programs for *Varanus salvator* as mitigation of wildlife conflicts, road kills) should be identified and assed and considered in the quota setting process if necessary.

- Harvest quotas, export quotas and - if needed - (local or temporary) size or weight limits for harvest based on recent monitoring data for the respective areas should be set and these measures need to be reassessed on a regular basis.

- It is not clear from the present NDF which data basis was used to determine the current forest cover and the natural landscape character of Malaysia. The corresponding data should be cited with details of the literature/ source used.

- It would be advisable to study the learning behaviour of animals after being caught once in a trap, which will influence the probability of recapturing, and has to be considered when interpreting results of capture-recapture estimates. Furthermore, data over which distances animals are attracted by baits and if there are age or sex related differences should be assessed and considered when interpreting results of population densities.

8. The most crucial point is to pursue continuous monitoring of *Varanus salvator* in the future and provide a concrete plan that would allow for an adaptive management enabling the timely recognition and quick assessment of changes in the population structure, followed by adjustments in harvest and quotas.