

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



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Interpretation and implementation of the Convention

Species trade and conservation

CONCERNS ABOUT THE PRODUCTION AND TRADE IN BROWN CAIMANS
(*CAIMAN CROCODILUS FUSCUS*) FROM COLOMBIA

This information document prepared by the IUCN Crocodiles Specialist Group has been submitted by the European Union in relation to agenda item 41 on *Implementation of the Convention relating to captive-bred and ranched specimens*.

**Concerns about the Production and Trade in Brown Caimans
(*Caiman crocodilus fuscus*) from Colombia**

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1. The IUCN-SSC Crocodile Specialist Group (CSG) has actively promoted protection and recovery of wild crocodylian populations, and as recovery did take place, has assisted Parties wishing to reintroduce trade based on sustainable use, with technology and information transfer (eg Hutton and Webb 1992). The status of wild crocodylian populations internationally, and the patterns of international trade, have changed significantly (McGregor 2001; Webb 2008; Caldwell 2013). Many countries now trade legally in crocodylians produced through captive breeding, ranching and wild harvest (Hutton et al. 2002; Hutton and Webb 2002, 2003; Jenkins et al. 2006; Webb 2008; Caldwell 2013).
2. Colombia developed a *Caiman crocodilus* farming industry, restricting production to captive-breeding, in the mid-1980's. The CSG as a whole, and various CSG members in different capacities, assisted Colombia in various ways, and have continued to do so. The CSG fully supports the concept of Colombia having a viable and profitable industry based on consumptive uses of *C. crocodilus*, if it is legal, sustainable and verifiable.
3. It has become apparent, particularly since 2005, through CITES trade statistics, information from CSG members in the industry and past officers of the Colombian Management Authority, that exports of genuine farm-produced skins from Colombia have included significant numbers of illegally taken wild harvested skins and ranched *C. crocodilus* skins.
4. The general situation, as the CSG understands it, is that:
 - a. Export quotas are issued to individual farms by the Government. These export quotas are based on estimates of the production potential of each farm, derived from stock inventories, and "scaled-to-production" estimates (often self-reported) using correction factors (numbers of nesting females; clutch sizes; egg viability; hatching rates; hatchling survival rates; juvenile growth and survival rates etc) that are not scientifically justified.
 - b. Individual farm production estimates were routinely falsified so that they exceeded the real production potential of the facility.

- c. The falsification was aimed at obtaining the highest annual export quota possible, through misleading the Management Authority. It has been reported to the CSG that these unrealistic quotas were achieved by various means, including the following:
 - i. Farms were required to comply with strict self-reporting procedures on stocks and production dynamics (see Jenkins et al. 1994 and Jenkins and Pani 1996).
 - ii. However, farms employed technicians to “work backwards” through these reporting requirements, first determining the size of export quota the farm wanted (which some informants estimate were commonly 40-70% greater than production), and then manipulating the size and age structure of stock records on the farm, with convenient correction factors (see 4a above), to support the requested quota.
 - iii. When inspections took place, farms:
 - a. would purchase wild-caught juveniles, from “national providers”, of the sized animals they needed to match the contrived stock estimates; or,
 - b. Arrange to move stock between farms, so stocks matched the required levels when the inventories took place; or,
 - c. would find other ways of ensuring the results of inspection matched the inflated export quotas.
- d. The export quotas approved for individual farms, obtained through this contrived process, became items that could be traded commercially to tanneries, traders or other farms. That is, an export quota for 30,000 animals could be used to export the farm’s production of say 10,000, and the remaining capacity (20,000) on-sold to other operators. Export quotas could also be accumulated over years, so that they did not match actual exports (Jenkins et al. 1994).
- e. Under this arrangement, tanneries, traders and some farms, which purchased whole quotas or unused parts of quotas, were able to acquire CITES Export Permits for them.
- f. This arrangement allowed illegal wild skins, the origin of which remains unclear, to fill the quotas and be exported with CITES Export Permits.
- g. Although Colombia had a legal size limit of 1.2m total length (TL) for the export of *C. crocodilus* skins, skin length is a difficult measure to use for enforcement (see below). Large wild skins

exceeding 1.2m in Colombia were simply trimmed and sectioned to meet the statutory size limits.

- h. Farms purchasing large, wild adult skins also claimed that there was a significant turnover of their adult breeding stock, through mortality, and special provisions were made through CITES to export the large wild skins with CITES permits.
 - i. All skins were exported with captive bred source codes on Colombian CITES Export Permits.
5. The CSG conservatively estimates that some 30+% of all *C. crocodilus* skins exported from Colombia since 1990 have been wild harvested or ranched, in contravention of Colombian laws. Major importers of skins from Colombia, who can readily distinguish wild from captive farmed skins, consider the CSG estimate of 30+% wild origin to be conservative. CITES trade data (Table 1) indicate some 14.7 million *C. crocodilus* skins were exported from Colombia between 1990 and 2015, which suggests some 4+ million illegal skins may have entered trade.

Table 1. CITES Trade Data for *C. crocodilus* skins exported from Colombia. * indicates incomplete data; brackets indicate recent records from Colombia

Year	Number	Year	Number
1990	69,619	2003	552,719
1991	104,087	2004	605,841
1992	198,596	2005	599,527
1993	437,259	2006	969,731
1994	514,792	2007	668,076
1995	764,358	2008	532,394
1996	646,832	2009	405,386
1997	451,307	2010	647,565
1998	669,269	2011	634,461
1999	777,529	2012	625,128
2000	824,303	2013	(820,000)
2001	698,413	2014	(680,000)
2002	540,579	2015	(280,000)*
TOTAL	(1990-2015)		14,717,771
	(2003-2015)		8,020,828

6. The CITES Management Authority of Colombia has consistently indicated its commitment to improving regulation and control, but despite a series of Notifications to the Parties issued by the Secretariat on behalf of the Colombian Management Authority, to counter concerns about illegal trade as they have arisen from time to time, none appears to have resulted in decisive action to halt illegal trade:

1992. Notification 706

1993. Notification 742

1997. Notification 978
2002. Notification 2001/031
2010. Notification 2010/037
2014. Notification 2014/020
2014. Notification 2014/033
2015. Notification 2015/064

7. The review mission to Colombia by the CSG (Larriera et al. 2004) was unaware of the role “ranching” was already playing on some Colombia farms (see 4 above), and was unclear about how the export quotas were derived (see 4 above). Nevertheless, it:
 - a. Emphasised the potential role ranching could play in increasing the conservation benefits of the program.
 - b. Was told that various plans to introduce a legal ranching program were in place (no such program appears to have been implemented).
 - c. Emphasised that: *“Preventing illegal harvesting of wild adult Caiman. c. fuscus should remain a priority”*.
 - d. Discussed frankly that Colombia’s *“ability to trade internationally will be compromised if skins enter trade that have not been acquired in accordance with Colombian laws”*.
 - e. Discussed approaches that could be made to quantifying farm productive potential more accurately.
 - f. Noted that both illegal wild and legal farm-raised skins were mixed together at one tannery they visited on a farm.
8. After the CSG mission, various discussions took place about a marking system for hatchlings produced on farms by captive breeding, that could distinguish legal farm skins from wild harvested skins. Colombia committed to excising the 10th caudal scute (tail scute) of new born hatchlings on farms, which heals and forms a distinctive and permanent “scar button”. This strategy has provided Colombia with another tool for distinguishing between legal farm-raised skins, with a “scar button”, and illegal wild harvested skins, without a healed “scar button”. It should be noted that this strategy does not differentiate between illegally ranched skins and those derived from on-farm captive breeding.
9. Although Colombia introduced the scar button marking system in 2006, there remain problems:

- a. Some remote farms¹ linked to major farms allegedly pursue illegal ranching, in which wild-caught animals have the 10th caudal scute removed, and after it has healed and a “scar button” has formed, the animals are transported to the main captive-breeding farm, where they cannot be readily distinguished from legal animals, produced through captive breeding.
 - b. Traders and some farms have evidently accumulated large stockpiles of large skins (100,000's), without scar buttons. The claim in 2014-15 that these are pre-2006 captive-bred stocks, is questionable. The economics of farming *C. crocodylus*, which produce a relatively low value skin, mean that it is not economically viable to grow large animals, nor to retain them (as skins or live animals) for a decade.
10. CoP15 (Doha, 2010) adopted Decisions 15.52 and 15.53, which required Animals Committee to prepare guidance to the Parties on the correct use of source codes. CoP16 (Bangkok, 2013) adopted Decisions 16.63 to 16.66 on the use of source codes, and TRAFFIC was engaged to review problems associated with the apparent incorrect use of the captive-bred source codes by some Parties, including Colombia [AC27 Doc 17 (Rev.1)].
 11. That misuse of source codes in Colombia was occurring has long been known (eg see 7 above), but the full extent of the potential problem was not revealed until the 2010 Working Meeting of the CSG (Manaus, Brazil). Colombian representatives at the meeting were asked to explain how the removal of Colombia's self-imposed export limit of 600,000 skins (2002-2005 at least), could have resulted in 970,000 skins being exported in 2006 (Caldwell 2013), when no additional legal farm production in Colombia, through captive breeding, was known.
 12. The high 2006 export levels, according to the CITES trade data, was subsequently investigated and confirmed by the Colombian CITES Management Authority, but neither it nor the industry offered any explanation on the source(s) of those skins.
 13. If an estimated 30% of the 600,000 skins exported annually from Colombia were of wild origin (say 180,000 skins), the CSG concluded that in 2006 an additional 350,000 skins, which could not be explained by farm production, were also exported. This equates to potentially more than 500,000 illegal wild skins in one year. It raises many questions, none of which have been answered, about where such a massive volume of skins may have come from. [These concerns were passed on to TRAFFIC (see 13 above) but the incident was not

¹ These facilities are often located in areas of *C. crocodylus* nesting habitat where it is logistically an easy matter to harvest neonates and young hatchlings; mark and maintain them for a period of time.

considered in their review, because it fell outside the time-scale they were given].

14. The CSG Working Meeting in Louisiana (May 2014) was well attended by Colombian farmers, tanners and traders, as well as some international importers of Colombian *C. crocodilus* skins, and a representative of the Colombian CITES Management Authority:
 - a. The CSG reported on a detailed morphometric study it had completed in Colombia, in cooperation with the industry, that allowed the size of *C. crocodilus* from which skins, flanks and other pieces of skin (raw, wet-blue, crust and finished) had come, to be predicted accurately (Webb et al. 2012).
 - b. There was open discussion about the problems Colombia was facing over illegal trade and the ongoing misuse of source codes.
 - c. The majority of the farmers expressed the view that they wanted the illegal ranching and harvest of wild skins to discontinue. They wanted a legal, national, ranching program to be implemented, so their farm production could include a legal mixture of captive bred and ranched animals.
 - d. A small minority of farmers and traders were opposed to introducing a legal ranching program, and enforcing size limits on exported skins. One argument they used was that disrupting the current system would have adverse social and economic impacts on the local people employed in the industry.
 - e. Notifications to Parties 2014/020 and 2014/033, issued that same year made no serious contribution to containing the illegal trade through wild harvest and ranching, and essentially ignored the new tools to enforce size limits [see subparagraph a) above].
15. In the wake of the growing source code issue, domestic responsibility for assessing and regulating *C. crocodilus* farms in Colombia was transferred from the Regional Corporations (Provincial authorities) back to the Ministry of Environment (CITES Management Authority). Some immediate actions were taken: 8 farms (17%), which did not have the stock/capacity to produce the skins they were being given export quotas for, were closed (Minambiente 2015).
16. At the Cambodia Working Meeting of the CSG (May 2015), when these farm closures were announced, the Colombian Management Authority also proposed various future actions it was committed to taking, that it believed would reign in illegal trade over the next few years (see also: (Minambiente 2015). Similar intentions to take decisive action have been expressed previously [see summary records of SC29 (March 1993), SC30 (September 1993) and SC31 (March 1994); Jenkins et al.

1994; Jenkins and Pani 1997; Larriera et al 2004], but have proved difficult for Colombia to implement.

17. Although the very recent Notification No. 2015/064 (16 December 2015) attempts to resolve some of the problems of illegal trade referred to above, it also avoids definitive action aimed at stopping illegal trade (as discussed below).
18. Fundamental issues facing the Parties to CITES appear to be:
 - a. A sophisticated *C. crocodilus* farming industry has been developed within Colombia, which has required substantial investment and seen considerable technological development, over many years. It provides wide ranging economic benefits, but like many programs based on commercial captive breeding, it contributes little to conservation of the wild population (Larriera et al. 2004)
 - b. Illegal ranching and wild harvests for skins are significant, although apparently unevenly practiced by different traders and farmers.
 - c. The origins of wild harvested animals and skins are largely unknown. As Colombia does not implement Article IV (production through captive breeding is technically isolated from the wild population(s) and therefore Article IV does not apply), and the ranching and wild harvest are illegal, no data are available to assess the status of the wild population(s) subject to harvest.
 - d. If the Parties allow Colombia to continue trading, while different regulatory and control measures are proposed, developed, implemented and tested, the Parties would need to do so with full knowledge that, in the interim, illegal ranching and wild harvested animals will continue to be exported, with “captive-breeding” source codes.
 - e. Should the Standing Committee decide to recommend that Parties suspend trade for *Caiman crocodilus* parts and derivatives from Colombia until the problems of illegal trade are rectified, then mechanisms and criteria for evaluating which problems need to be solved when, would need to be established. No past efforts, appear to have been successful in achieving compliance.
19. It seems desirable that these matters are resolved expediently, so that:
 - a. The status of wild *C. crocodilus* populations in Colombia be clarified as a matter of urgency:

- i. By resurveying areas that were surveyed in the 1990's (see Jenkins and Pani 1997), which will allow trends over time (status – a relative measure) to be quantified; and,
 - ii. Carrying out surveys in other sites that can provide scientific data on distribution, abundance and size structure in 2016 (from which insights about status can be gleaned).
 - b. Legal operators in Colombia are not adversely affected by actions taken to constrain illegal operators; and
 - c. Legal farming infrastructure is not lost through the inability to trade, while the problems are being rectified.
20. It suggests that a staged response may be appropriate, that allows trade to continue while the flaws in the current management system are rectified:

Stage 1 (implement immediately).

- a. Revise and replace Notification No. 2015/064, as an interim measure, pending revision of Colombia's management program. The revised Notification should reflect complete compliance with Colombian legislation, with no loopholes, whatsoever, through which large oversized illegal skins can be exported legally.
 - i. No *C. crocodylus* skins, flanks or skin parts from animals greater than 1.20m TL to be exported legally from Colombia.
 - ii. The revised Notification should provide clear diagrams of skins, flanks and skin parts that are exported, with definitive endpoints for taking measurements that dictate legal sizes.
 - iii. In addition to size limitations, and tags consistent with Resolution Conf. 11.12 (Rev. CoP15), whole skins and joined flank skins need to be accompanied by a genuine "scar button", as defined in the attachment to Notification No. 2015/064.
 - iv. All skins and skin parts exported from Colombia are to be inspected, and verified by security officers in Colombia, prior to export.
 - v. If Parties detect oversized skins or skin parts in trade, they should be requested to provide the Colombian CITES Management Authority with details prior to them authorising destruction of the illegal skins and skin parts.

- b. Concurrent with effectively implementing the revised Notification, immediate action be taken domestically to:
- i. Re-survey the areas surveyed for *C. crocodilus* in the 1990's and quantify changes in population abundance and size structure.
 - ii. Inspect all stock-piles of skins and confiscate all oversized skins without genuine "scar buttons".
 - iii. In collaboration with industry, establish "experimental" ranching programs, in the areas where ranching is known to take place now, restricting the size of animal taken to <1m TL, and marking them before introduction into farms with the excision of the 8th caudal scute. [That is, the 10th caudal scute would indicate the origin as captive bred and the 8th caudal scute the origin as ranched].
 - iv. To initiate independent studies of rates of growth, aimed at quantifying the real growth rates on farms and providing an independent scientific basis for assessing claims that large skins are being grown legally and economically on some farms.
 - v. Establish an independent DNA study of wild *C. crocodilus* in different parts of Colombia that can be used to verify the origin of ranched animals if required.
 - vi. Liaise with neighbouring countries, particularly Venezuela, Brazil, Ecuador and Peru, with a view to extending the DNA identification of *C. crocodilus* into those places.

Stage 2. (implement in 6 – 12 months)

Develop a new management program, tailored to the local conditions in Colombia, that simplifies management and rectifies the various problems identified to date:

- i. Consolidate a legal ranching program that is sustainable and verifiable. [The results can also be used as an independent index of population status].
- ii. Develop practical monitoring programs that are sufficiently robust to determine whether abundance and the mean size of animals in the wild population(s) are either increasing, decreasing or stable.

- iii. Review the potential role of size limits so that they are effective for enforcement purposes (see below).
- iv. If justifiable, either implement a legal wild harvest program that complies with the requirements of Article IV of the Convention, or take such actions as may be needed to ensure the current illegal wild harvest of *C. crocodilus* ceases.
- v.. Ensures permits to farm and trade in *C. crocodilus* are withdrawn from entities that continue to pursue illegal trade.

Additional Notes

1. Economics of raising crocodilians in captivity.

The Colombian national legislation to regulate farming placed a 1.2m maximum size limit on skins that could be exported. This was theoretically to safeguard against the skins of wild-harvested adults entering trade. It was also consistent with the costs of raising a relatively low value skin in captivity, when feeding costs increase exponentially with size.

2. CSG Assessment (1991)

When the CSG first assessed the Colombian program in 1991 (CSG Steering Committee minutes: 9-11 November 1991), it was concerned about: the extent of illegal trade then reported by the Secretariat (200,000 to 300,000 skins stockpiled in Aruba); the commercial viability of producing a low value skin through captive breeding; and the reasons why ranching had not been integrated into the program. These concerns remain 25 years later.

3. Previous Standing Committee Concerns

- i. At the 29th and 30th Meetings of the Standing Committee (March and September 1993), Parties from Latin America and Italy reported: *“While the project for breeding caimans in captivity in Colombia had been very successful, illegal trade was flourishing and shipments that had been seized had been found to be covered by legitimate export permits. Skins of captive-bred animals exported from Colombia were supposed to be not more than 1.2m long but illegally obtained skins had been cut to that length.”*
- ii. Colombian representatives at SC29 and SC30 discussed various actions, some implemented and some proposed, to counter illegal trade, and explained anomalies in trade

volumes in various ways. Still, representatives from Latin America and Italy “wondered if the caiman resources in Colombia might not be threatened by such high levels of exploitation.”

- iii. An extensive in-country review was conducted (Jenkins et al. 1994) and reported (Doc. SC31.9.2) to SC31 (March 1994). The review contained 10 major recommendations and 11 supplementary recommendations. A follow-up review (Jenkins and Pani 1997) concluded progress had been made with most recommendations, with more actions proposed by Colombia. It is not clear whether or not this report was considered by the Standing Committee and if so, what, if any, action was decided upon. Neither review detected the extent of ranching and wild harvest that was taking place.
- iv. These reviews contain a great deal of important background information, and noted various matters of concern:
 - a. An intricate tagging system implemented by Colombia was not being implemented fully by any element of the industry, and nor did it conform with the then tagging requirements of Resolution Conf 8.14 on the Universal Tagging System for Crocodilian Skins in Trade².
 - b. Individual farms and tanneries purchasing their own tags was considered a serious impairment of the ability of the Management Authority to control the entry of caiman skins into commercial trade.
 - c. Tanneries and farms both contained large numbers of untagged skins, compounding enforcement problems and providing an avenue for illegal skins to enter the legal trade.
 - d. Excessive numbers of CITES Export Permits were being issued by the Management Authority, and they bore little relationship to the number of caiman skins exported.
 - e. The review team recommended that the size limit of 1.2m for legal export of caiman skins should be maintained until:
 - i) effective, scientifically-based monitoring of the wild population was occurring; and,
 - ii) a secure tagging system...was in place.

² Resolution Conf. 8.14 has since been replaced by Resolution Conf. 11.12 (Rev. CoP15) Universal tagging system for the identification of crocodilian skins

- f. Many farms visited had poor incubation, low hatching success and high hatchling mortalities, which was not consistent with the criteria used to establish quotas.
 - g. The quality of record-keeping on farms visited by the mission was highly variable, casting doubt on the veracity of reports submitted to the Management Authority in order to calculate export quotas.
 - h. A CITES Export Permit was issued on the basis of the applicant simply completing a standard application form and verifying the request fell within the quota approved for the applicant.
- v. When the second follow-up review was conducted (Jenkins and Pani 1997) the number of farms had been reduced from 100+ to 65. Despite some progress, there were ongoing problems:
- a. Tanneries were removing domestic tags from skins being processed “... *which has the potential to create a loop-hole for illegal skins to enter trade.*” Many untagged skins were still seen in tanneries.
 - b. A Colombian field survey program in 1994/95 and 1995/96 (discontinued) indicated “... *populations of all species of crocodilians in Colombia remain seriously depleted from past hunting and/or the removal of animals to stock the network of zoocriaderos.*”
 - c. The manner in which the CITES Management Authority establishes its annual export quota of caiman skins remained problematic because: “*export quotas based on annual production levels, for a variety of reasons, do not appear to be closely correlated to actual exports.*”
 - d. The Ministry of Environment announced it had removed the 1.2m legal maximum size limit for skins derived from captive bred caimans exported from Colombia in CITES Notification to the Parties No.978 of 2 June 1997 [but it is unclear whether the Colombian legislation was actually changed].

4. Future Reviews

The 10 major recommendations (1-10) and 11 supplementary recommendations (a – k) made by Jenkins et al. (1994) and assessed by Jenkins and Pani (1997) would be a good starting point for any future review of *C. crocodilus* farming and trade in Colombia now.

5. Ongoing CSG Concerns

Concerns about undisclosed ranching and wild harvest of *C. crocodilus* in Colombia have been raised continually at CSG Working Meetings (Cambodia (2015), Louisiana (2014), Sri Lanka (2013), Philippines (2012), Manaus (2010), Bolivia (2008), France (2006) and Australia (2004) <http://www.iucncsg.org/pages/Publications.html>)

6. Sustainability

Despite *C. crocodilus* being considered a highly productive species of crocodylian (Gorzula, 1978, 1987; Jenkins et al. 1994; Velasco et al. 2003), with high potential for sustainable use through ranching and controlled wild harvest, the degree to which the wild populations in Colombia have been able to sustain ranching and wild harvest over the last 20 years is unknown. Indeed, particularly in light of the results of the 1994-96 field surveys, it is not clear where the wild harvested skins and flanks exported from Colombia have been coming from.

7. Skin size as a Regulatory and Enforcement Tool.

The majority of *C. crocodilus* farm-produced skins exported from Colombia are whole skins, that are either “belly skins” (Figure 1), in which the opening cut is down the back, or “hornback skins” (Figure 2), in which the opening cut is down the belly.

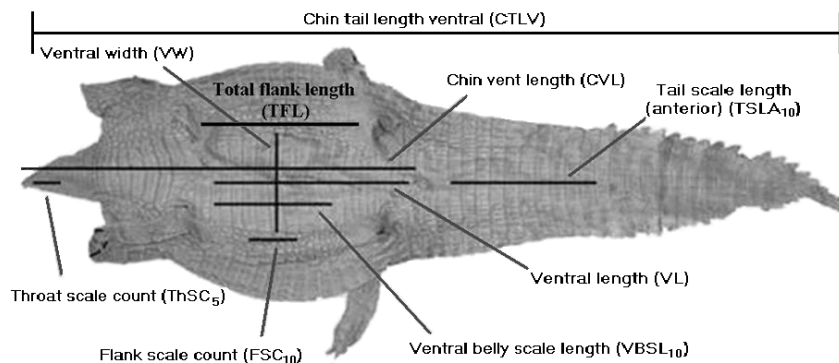


Figure 1. Belly skin of *C. crocodilus* with various measures used in the morphometric assessment by Webb et al. (2012).

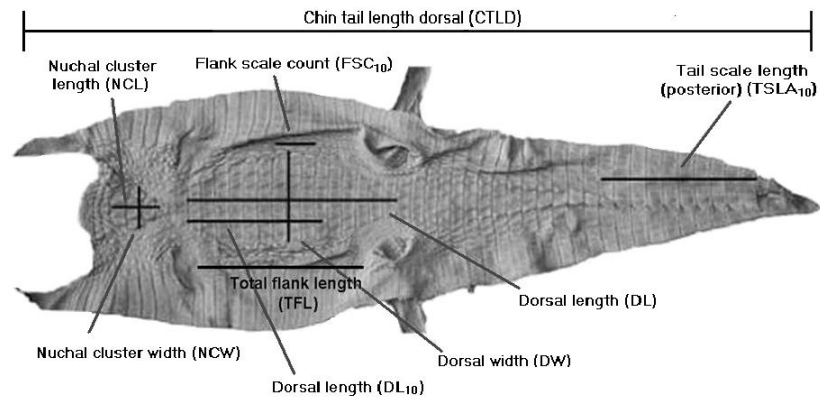


Figure 2. Hornback skin of *C. crocodilus* with various measures used in the morphometric assessment by Webb et al. (2012).

However, different sections of skin, essentially drawn from belly and hornback skins (Figures 3 and 4), are also exported. Amongst these sections, the flanks are particularly important, because they are the main useable part of illegally harvested large wild animals, because the scales are not heavily ossified. They can be traded as left and right flanks, or when joined, with the throat skin (*chalecos*).

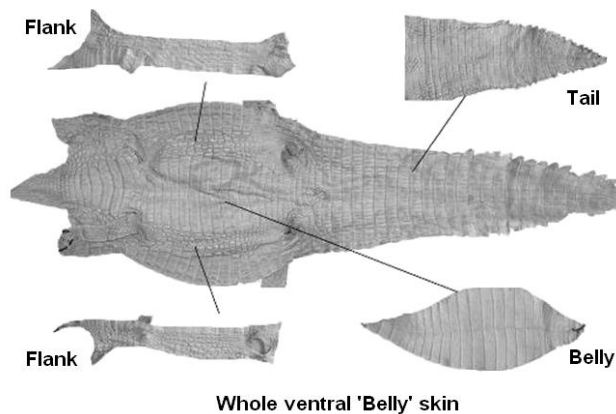


Figure 3. Skin parts obtained by sectioning a *C. crocodilus* belly skin (Webb et al. 2012).

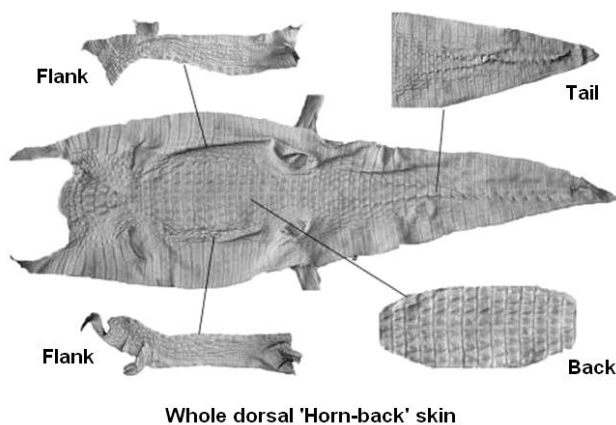


Figure 4. Skin parts obtained by sectioning a *C. crocodilus* hornback skin (Webb et al. 2012).

Although it is now possible to estimate the size of the live *C. crocodilus* accurately, from which these skins or skin pieces have been derived, in raw, wet-blue, crust or finished form (Webb et al. 2012), prior to export, there remain problems.

It is our understanding that the Colombian legislation refers to *skins* no longer than 1.2m TL, which allows large wild skins to be exported by trimming of pieces of skin such as the tail. This activity continues, despite the CITES Standing Committee clearly expressing concerns long ago: *Skins of captive-bred animals exported from Colombia were supposed to be not more than 1.2m long but illegally obtained skins had been cut to that length. The Secretariat said that importers should check to see whether skins imported were actually what they were claimed to be, and that Colombia needed to enforce its own controls* (summary record SC29; March 1993).

A central problem with the 1.2m size limit is that the most valuable part of the skin (belly and flanks) can be retained, while less valuable parts (throat, tail) are trimmed.

If size limits are to be used as an enforcement tool in Colombia to stop large wild adults being harvested illegally, then consideration needs to be given to measures across the most valuable party of the skin, which cannot be trimmed without reducing the value of the commodity. For example, Indonesia and Papua New Guinea both have size limits based on belly skin width, and prohibit the export of wild harvested or farm produced skins (mixed captive breeding and ranched), that exceed specified belly skin limits. These size limits do function to reduce harvest pressure on wild adults, and play a key role in sustaining the ranching program.

8. Comments on Notification to the Parties No. 2015/064 of 16 December 2015, Concerning: COLOMBIA Export of skins of *Caiman crocodilus*

- a. Notification No. 2015/064 of 16 December 2015 ignores the issue of *C. crocodilus* size limits altogether, without clarifying whether the 1.2m size restriction is still contained within the Colombian legislation.
- b. Notification No. 2015/064 relies completely on the hatchling scar on the 10th caudal (tail) scute as the criterion for legality of skins (ignoring size completely). It makes no attempt to differentiate whether the scar is the result of a legally excised scute on a captive-bred hatchling, or a scar from an excised scute on an illegally ranched hatchling, juvenile or adult, that has had time to heal.

- c. The claim in Notification No. 2015/064 that the hatchling scar in isolation allows traceability of the legal origin of specimens is incorrect. At best it may allow illegally harvested wild skins (with no scar) to be differentiated from legal skins coming from captive bred and illegal skins originating from ranching with healed scars (see 12 (a) above).
- d. Given that there is no practical means of differentiating illegal ranching from legal captive-bred specimens, if both have the 10th caudal scute excised, the only practical way of overcoming illegal ranching, may be to legalise ranching as an additional form of management. Ranching could be expected to have minimal impact on the wild populations (Jenkins et al. 2006), while at the same time providing important insights into population abundance and size structure required to satisfy Article IV of the Convention.
- e. Any skin without a scar (wild harvested), no matter how large, if tanned and sectioned, or manufactured into products, can theoretically still be exported legally as *subdivided segments* or *irregular-shaped pieces*. Consequently, large wild skins could still be traded illegally rather than confiscated.
- f. Implementation of Notification No 2015/064 would be facilitated significantly if it was accompanied by clear diagrams and photos that explained exactly what products Colombia exported and what exactly they would like other Parties to measure and/or check.
- g. It would be useful if Notification No 2015/064 elaborated the nature of the strict internal control measures that will be applied to “monitor the traceability”.

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