

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



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INFORMATION SUPPORTING PROPOSAL COP18 PROP. 36
TO TRANSFER THE INDIAN STAR TORTOISE (*GEOCHELONE ELEGANS*) TO APPENDIX I

This document has been submitted by India in relation to proposal CoP18 Prop. 36.*

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Information supporting proposal CoP 18 Prop. 36 for transfer of Indian Star Tortoise (*Geochelone elegans*) to Appendix I submitted by India, Bangladesh Senegal and Sri Lanka

Star Tortoise (*Geochelone elegans*) meets the biological criteria for inclusion of a species set out in Res. Conf. 9.24 (Rev CoP17), particularly paragraphs C. i) and ii) of Annex 5. Their biological attributes make them particularly vulnerable to over-exploitation as they are easy to collect from the wild, have a low reproductive rate, potentially occur at low densities, and do not survive or breed readily in captivity.

2. They are heavily threatened by poaching for international live trade as exotic pets and are the single most seized species of tortoise or freshwater turtle worldwide, thought to represent around 11% of the global seizures for these taxa. Even these seizures represent only the tip of the iceberg with one recent study reporting the illegal collection of at least 55,000 (mostly juvenile) specimens from just one location in India over the period of one year.
3. As to the Secretariat's observation that the levels of predicted decline remain below the general guideline level provided in Res. Conf. 9.24 (Rev CoP17), the Resolution clearly states with emphasis that the numerical guidelines cited therein are presented only as examples due to the differences in biology between species.
4. Star tortoise populations are difficult to measure. However, the IUCN estimates that >30% declines are likely to occur if current levels of exploitation continue or expand. As detailed in the proposal, the Indian star tortoise is inferred to have suffered a marked decline in their population sizes in the wild due to high levels of exploitation, decreases in area and quality of habitat, and a high vulnerability to intrinsic factors (low density and low fecundity) and extrinsic factors (high levels of habitat loss, degradation, and fragmentation).
5. Regarding the Secretariat's observation that it is not clear what benefit would result from an Appendix I listing, the Secretariat has itself recognized that the laundering of wild-caught specimens as captive bred appears to be a problem for the species. An Appendix I listing would necessitate the registration of facilities breeding Indian star tortoises for commercial trade in the Secretariat's register in accordance with Res. Conf 12.10 (Rev. CoP15), thereby helping to address this problem.
6. More importantly, an Appendix I listing would result in higher penalties for offences and other controls and protections under national CITES implementing legislations thereby deterring illegal trade, which is the main threat to the species.
7. Paragraph C. ii) of the biological criteria for listing in Annex I of Res. Conf. 9.24 (Rev. CoP17) based on which *Geochelone elegans* be listed, uses the terms "levels or patterns of exploitation" and does not distinguish between legal and illegal trade as the Secretariat has sought to do so in its assessment.
8. Keeping the precautionary principle in mind, paragraph 2 of Res. Conf. 9.24 (Rev. CoP17) categorically asks Parties to act in the best interest of species and adopt measures proportionate to anticipated risks to the species. *Geochelone elegans* is threatened with extinction due to both intrinsic factors as well as unsustainable levels of exploitation for international trade and therefore, should be listed on Appendix I of CITES.
