

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

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Sixty-fifth meeting of the Standing Committee  
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Interpretation and implementation of the Convention

Ranching operations in Madagascar

REPORT OF MADAGASCAR

1. This document has been submitted by Madagascar\*.

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## **RESUME IN RESPONSE TO THE RECOMMENDATION OF THE WORKING GROUP, STANDING COMMITTEE**

### **I Background**

The population of Nile crocodiles (*Crocodylus niloticus*) in Madagascar was transferred to Appendix II through Resolution Conf. 11.16 (Rev. CoP15) on *Ranching and trade in ranched specimens of species transferred from Appendix I to Appendix II*. At the 22<sup>nd</sup> meeting of the Animals Committee (AC22, Lima, July 2006), global crocodile ranching programmes were reviewed and concerns were expressed that Madagascar's ranching operation could be used to launder adult crocodile skins taken from the wild. Later that year, Madagascar's compliance with the provisions of Resolution Conf. 11.16 was discussed at the 54<sup>th</sup> meeting of the Standing Committee (SC54, Geneva, October 2006) and a visit to Madagascar by the CITES Secretariat to examine ranching operations was endorsed by the Standing Committee.

At the 55<sup>th</sup> meeting of the Standing Committee (SC55, The Hague, June 2007) the Secretariat presented its report (SC55 Doc. 13), which included a list of recommendations (in Annex 1) that Madagascar should implement in order to improve its monitoring and control of Nile crocodile ranching. The Decisions of the Standing Committee at its 55<sup>th</sup> and 56<sup>th</sup> Meetings were circulated to the Parties through Notification 2008/004 (28 January 2008) and included the following:

#### regarding ranching operations

- a) *to request Madagascar to put into effect the recommendations concerning ranching of the Nile crocodile *Crocodylus niloticus* in Madagascar and compliance with Resolution Conf. 11.16 (Rev. CoP14) that are presented in Annex 1 to document SC55 Doc. 13;*
- b) *to recommend that Madagascar, in implementing the annual-reporting recommendations of Resolution Conf. 11.16 (Rev. CoP14), provide well-documented information on progress in implementing the recommendations in Annex 1 to document SC55 Doc. 13;*
- c) *to review the reports of Madagascar at SC57 and SC58; and*
- d) *to recommend that Parties allow the import of specimens of *C. niloticus* from Madagascar only if they are part of an annual export quota published on the CITES website;*

Madagascar responded by incorporating the recommendations from SC55 Doc.13 into a National Action Plan (2007-2010), which was presented to the 57<sup>th</sup> meeting of the Standing Committee (SC57, Geneva, 2008) as the Annex to SC57 Doc. 22. At the SC57 meeting, Madagascar also presented two Information documents: SC57 Inf. 5, comprising Madagascar's narrative report on the application of Resolution Conf. 11.16 through its Crocodile Management Plan [*Rapport d'activités sur la mise en oeuvre du plan de gestion *Crocodylus niloticus**]; and SC57 Inf. 10, comprising a tabulated progress report of the Crocodile Action Plan as well as copies of the Decree regarding creation of the National Crocodile Committee.

At the 58<sup>th</sup> meeting of the Standing Committee (SC58, Geneva, 2009) a Working Group on ranching operations in Madagascar was created (France, Germany, Japan, Madagascar, the United States of America, IUCN, and the Secretariat), which jointly developed a list of priority actions to be completed before 31 December 2009 *in order to avoid a trade ban*. These priority actions were approved by Standing Committee and are as follows:

1. *The following priority actions must be implemented by Madagascar before 31 December 2009 in order to avoid a Standing Committee recommendation to suspend all international trade in specimens of the Nile crocodile originating from Madagascar:*
  - a) *Adopt the Strategy and Management Plan for Crocodiles in Madagascar that was prepared in 2004 (see document SC55 Doc.13, Annex B) and undertake its implementation.*
  - b) *Include crocodile controls within the national priorities which provide direction for the CITES Management Authority and law enforcement authorities located inland and at the border.*
  - c) *Convene a meeting of the National Crocodile Committee to immediately adopt administrative measures for monitoring crocodile ranching operations and artisans (e.g. registers and tagging, notably) and monitor the implementation of these measures by conducting related field controls.*
  - d) *In September 2009 at the latest, and in cooperation with the IUCN-SSC Crocodile Specialist Group, organize a training workshop on techniques for distinguishing wild-taken from ranched or captive-bred Nile crocodile skins and for regulating ranching operations (this workshop is aimed at the Management Authority, Scientific Authority and law enforcement authorities located inland and at the border).*
  - e) *Immediately after the training envisaged in paragraph d), carry out an initial audit of each ranching operation (Reptel's two units of production, Crocoranch's two units of production and eventually a third operation, if this unit intends to produce skins in the short term). These audits shall contain information on the state of the stocks, an estimation of the annual production capacity, an evaluation of stock management (database used for monitoring) and implementation of a tagging scheme.*
  - f) *Require each ranching operation to keep up-to-date two registers for inputs and outputs, respectively:*
    - i) *For living animals (inputs: references for the authorization of each supplier of eggs; outputs: date and place of slaughter).*
    - ii) *For skins (inputs: date and place of slaughter or references for the authorization of the supplier of skins; outputs: date of sale and contact details of the buyer).*
  - g) *Require artisans to keep an up-to-date register of inputs and outputs (inputs: references for the authorization of the supplier of skins; outputs: date of sale and contact details of the buyer).*
  - h) *Improve and implement, without delay, a scheme aimed at guaranteeing that wild-taken (source W) cannot be mixed with ranched or captive-bred (source R or C) skins; this scheme*

*will be formalized in a written document under which those responsible for each ranching operation commit to adhere to a list of requirements concerning notably conditions for slaughter, the tagging of skins and the keeping of registers.*

- i) Require, via a note from the Director General of Forests, individuals or enterprises which supply eggs or skins to the ranching operations and/or to artisans to declare without delay, to a local representative of the forest administration, any harvesting of specimens of *Crocodylus niloticus* from the wild; following each declaration, the service concerned shall deliver an authorization which is dated, signed and uniquely numbered.*
- j) Inspect, once every two months on average, each ranching operation and carry out random inspections as well.*
- k) Carry out a random inspection, at least once a year, of each artisan.*
- l) Seize skins that are determined to have been illegally acquired and initiate confiscation procedures, in accordance with applicable legislation.*
- m) In established cases of fraud or if operators do not conform to the provisions laid out in paragraphs f), h) and i) above, immediately suspend exports from the ranching operation concerned.*
- n) For 2010, establish CITES export quotas for each ranching operation. These quotas will be based on the operator's actual production capacities, according to the results of the audit mentioned in paragraph e) above.*
- o) Describe the functioning of the database used to monitor cases of human/crocodile conflicts and present an analysis of the data gathered through this database.*

Subsequently, the French government provided funding support to Madagascar and the IUCN/SSC Crocodile Specialist Group to implement recommendations d) and e) listed above. Although it was anticipated that the training workshop would take place before the end of September 2009, political activities in Madagascar at the end of 2009 thwarted this plan and the workshop and audit finally took place in February 2010. The participants at the Training Workshop - entitled "*Priority Actions from SC58 and other outstanding management issues in the National Crocodile Workplan (2007-2010)*" - included representatives from the national Government (DGF), the Regional Directorates of the Ministry of Environment and Forests, the CITES Scientific Authority, and the Customs Authority. The presence of regional DGF authorities at the training workshop was viewed by the CSG as a 'positive step to engaging regional authorities in crocodile management and conservation' (CSG CITES Workshop Report). Topics covered included:

- Obligations under CITES to demonstrate non-detriment findings (NDF) (Article IV)
- Monitoring ranches/farms (eg egg production/incubation, stock returns, culling) and export tag allocation
- Key elements of management (Regulation, Monitoring, Enforcement, Reporting)
- Establishment and advantages of a dedicated crocodile management unit

- Morphometric relationships and their use in predicting crocodile size from raw skins, tanned skins, products, etc.
- Distinguishing wild skins from ranched skins
- Verification of skin exports against stocks held using growth rates, skin sizes and morphometric relationships
- Marking/tagging of animals (egscute-clipping, webbing tags, microchips) and skins(in-house skin tags, CITES skin tags)

The 2009 field report has been also shared during the workshop and it was about:

- Monitoring and abundance indices of wild populations [eg nests (nesting female size, clutch size, egg size), direct population surveys, wild harvests, catch-per-uniteffort]
- Market chain - possible regulatory mechanisms (eg licensing).

The workshop's duration (one day) was not sufficient enough to assimilate and to apply all the discussed subjects. Prior to the Training Workshop, an audit at each of the 3 crocodile ranches and the two satellite sites in the country was carried out. A report has been provided by CSG members to CITES secretariat and the French government.

In 2010, the Standing Committee held its 59th and 60th meetings (Doha, March 2010). The summary record of the 60th meeting (SC60 Summary Record - <http://www.cites.org/eng/com/sc/60/E60-SumRec.pdf>) noted the Recommendation to suspend trade with Madagascar in Nile crocodile specimens for a period of 6 months (ie until 30 September 2010). The SC also agreed on 9key actions that must be implemented by Madagascar before the SC could consider withdrawal of its recommendation. These are as follows:

- a) *Review, update, adopt and initiate implementation of the Strategy and Management Plan for Crocodiles in Madagascar that was prepared in 2004 (see document SC55 Doc. 13, Annex B). Madagascar shall provide the Secretariat with a copy of the new Strategy and Management Plan signed by the Minister of Environment and Forests.*
- b) *Establish legally-binding size limits with regard to crocodiles harvested from the wild in order to protect breeding stock.*
- c) *Further to the training workshop, develop and implement a system of control of the ranches. In particular, their registers should include the following information:*
  - i) *source of incoming stock (i.e. referenced authorization of each provider of eggs and source from which skins or hatchlings were obtained);*
  - ii) *date and place of slaughter;*
  - iii) *information relating to scute-clipping of hatchlings at the time of hatching, so that captive and ranched specimens can be identified;*
  - iv) *identification of skins according to their origin, that is captive-bred or ranched specimens (through internal tagging system);*
  - v) *captive breeding (eggs and hatchlings produced); and*

vi) if the ranch has a tannery, information on the skins that are processed and converted into products.

d) With regard to the artisanal industry: quantify numbers of artisanal and conventional retail outlets and tanneries; carry out inventories of current stocks (products and skins); develop and make it compulsory for the artisans to keep stock registers. These registers should include the following information:

i) referenced authorization of each provider of live animals, skins and/or products; and

ii) date of sale and details of buyer.

In addition, ensure that all artisans are registered or licensed with the government; and carry out random and regular inspections. Madagascar shall report to the Secretariat on the enforcement measures it has taken.

e) Further to the inventory of stocks and through regular inspections, ensure that skins and products entering the national and international markets are within the established legally-binding size limits; all products and skins not in compliance must be seized and destroyed and perpetrators must be prosecuted in accordance with appropriate national legislation.

f) Ensure that only licensed and authorized egg collectors carry out egg collection for the ranching programme, and that a collection report is submitted to the Direction Générale des Forêts (General Directorate for Forests, the CITES Management Authority for Madagascar).

g) Update all relevant databases relating to crocodile management, including human/crocodile conflicts.

h) Provide the Secretariat with all relevant measures (e.g. law, decrees, 'notes de service', licence conditions for tanneries) affecting harvesting, use of and trade in Nile crocodiles specimens in Madagascar, as well as copies of the minutes of the 'National Crocodile Committee'.

i) On the basis of the audit carried out, establish the 2010 export quotas for ranched specimens (source code 'R') from each ranching operation.

Since 2010, Madagascar has been implementing changes to its crocodile management system, and has sent detailed reports to the Standing Committee explaining the improvements made to crocodile management, as well as the efforts being undertaken to respond to the recommendations of the Standing Committee. At the SC62 meeting (Geneva, July 2012) Madagascar submitted two Information Documents: SC62 Inf. 5, comprising Madagascar's Report 'for the 62<sup>nd</sup> Meeting of the Standing Committee on the Management of *Crocodylus niloticus*'; and SC62 Inf. 15, comprising the Strategy and Management Plan for Crocodiles in Madagascar (2010-2015).

At the SC62 and the SC63 meetings (Thailand, March 2013), the Standing Committee's review of these actions concluded that the progress made by Madagascar was insufficient to recommend lifting the trade suspension, although the Working Group noted in its report (SC62 Com. 5) that Madagascar had achieved most of the recommendations, but that 3 recommendations were particularly insufficiently implemented, namely:

- Recommendation 3 on developing a system of control for ranches;
- Recommendation 4 on quantifying the numbers of artisanal and conventional retail outlets and tanneries (particularly in the provinces), ensuring their registration / licensing, carrying out related stock inventories, monitoring their registers and carrying out random and regular inspections; and
- Recommendation 5 on ensuring that products not complying with established size limits are seized and destroyed and offenders prosecuted.

Section II below comprises the narrative report on the various activities carried out, legislation implemented, management systems put in place and monitoring procedures set-up for the control of crocodile ranching in Madagascar. This report aims to provide information on the systems that are now in place for the control and management of crocodiles in Madagascar and assure the Standing Committee that Madagascar's management regime shows compliance with the requirements specified under Resolution Conf. 11.16 (Rev. CoP14). By lifting the trade ban, Madagascar will be in a position to demonstrate that the control systems put in place can be applied effectively for the sustainable and legal trade in Nile crocodiles.

## II NARRATIVE REPORT

### 2.1 Introduction

This narrative report provides a detailed account of the improvements made to Madagascar's management programme for crocodile ranching, and specifically responds to the three outstanding recommendations noted at the 62<sup>nd</sup> meeting of the Standing Committee in 2013, namely:

- (i) improved monitoring and control of the crocodile ranches in Madagascar (Recommendation 3);
- (ii) control measures for the artisanal crocodile leather industry (Recommendation 4); and
- (iii) how to tackle the seizure and disposal of illegal crocodile products on the local market (Recommendation 5).

In addition to these three 'outstanding' recommendations, this narrative report also highlights the activities carried out and efforts made to address all of the 9 priority action points made by the Standing Committee at its 60<sup>th</sup> meeting in 2010, and refers to the attached comprehensive Report (*Rapport Final Projet Crocodiles Madagascar, Novembre 2013*) for further details and specific texts of legislation being developed for improved management and control of Nile Crocodiles in Madagascar. The attached comprehensive Report provides a detailed account of the activities that Madagascar has been carrying out in terms of a CITES Secretariat-funded project (decided at the CITES CoP16 in Thailand, March 2013).

#### 2.1.1 Progress Report on the 9 Priority Actions

- a) Review, update, adopt and initiate implementation of the Strategy and Management Plan for Crocodiles in Madagascar that was prepared in 2004 (see document SC55 Doc. 13, Annex B). Madagascar shall provide the Secretariat with a copy of the new Strategy and Management Plan signed by the Minister of Environment and Forests.



The Strategy and Management Plan for Crocodiles in Madagascar (SMPCM) [*Stratégie et Plan de Gestion des Crocodiles à Madagascar 2010-2015*] was revised, updated and adopted by the National Crocodile Committee in July 2010. The revised SMPCM incorporated the recommendations made by the SC at its 60<sup>th</sup> meeting and included actions to be undertaken in order to put them into effect. Madagascar provided a copy of the revised SMPCM to the Standing Committee at its 62<sup>nd</sup> meeting in 2012 as SC62 Inf. 15 (available online at <http://www.cites.org/fra/com/sc/62/inf/F62i-15.pdf>).

The Government policy on wildlife trade recognises the valorisation of biodiversity to ensure sustainable management of natural resources. The overall strategy aims to share the costs and benefits of the different actors along the crocodile trade chain in order to ensure that the environmental and economic values are incorporated into a framework suited to the needs of local communities.

The Strategy is focused mainly on regulating industry players and integrating different areas for conservation and value-added through crocodile egg collection and hunting. This management plan is considered to be an evolving document, which will continue to be improved based on new research findings from field work and progress with the crocodile management programme; the Strategy will serve as a baseline for the identification of further issues to consider and put-in-action for improved crocodile management.

The revised Strategy will be reviewed during 2014 in order that a new 5-year Strategy and Management Plan can be drafted and subsequently approved and endorsed for implementation when the current Strategy expires in 2015.

**b) Establish legally-binding size limits with regard to crocodiles harvested from the wild in order to protect breeding stock.**

Following the National Crocodile Committee's meeting of 15 April 2010, Madagascar set the size limit for crocodile hunting in order to protect the breeding stock in the wild. Belly width was restricted to between 20-50cm and hornback width restricted to 27-70cm. This decision has been further institutionalised through the proposed Decree regarding Protection of the Nile Crocodile in Madagascar (available in Annex IV of the attached comprehensive Report - *Rapport Final Projet Crocodiles Madagascar, Novembre 2013*), specifically in Article 11, as follows:

***Article 11 - Toutefois, en vue de la protection du cheptel reproducteur, l'abattage ou la capture de l'animal au-delà de la mensuration comprise entre individu au minimum de 1m et de 2.50 m de long au maximum, équivalent à une mesure ventrale de 20 à 50 cm et dorsale de 27 à 70 cm au niveau des 3<sup>ème</sup> boutons même en possession d'une autorisation de chasse ou de capture est strictement interdit et passible de poursuite judiciaire.***

During the CITES-Secretariat funded Nile Crocodile Project in 2013, several field visits were carried out and at each destination, a local steering committee was set up in crocodile hunting areas with the remit to carry out local community awareness campaigns on the importance of long-term management of the crocodile resource in the area. During these awareness-raising meetings, a series of critical points were noted and the following items were adopted:



- The norm on the minimum and maximum size of individuals to drive in accordance with legislation in force , is 20 to 50 cm for the belly skin and from 27 to 70 cm horn back skin
- Hunting and crocodile egg collection are regulated by a hunting or collection permit issued by the Forestry Administration
- Only licensed hunters and collectors can perform crocodile-related activities
- A dividend must be paid for hunting and/or collecting skins and eggs
- A system of traceability is established
- In case of accident resulting from crocodile attack, the community, with the support Fokontany (the smallest territorial division), should notify the decentralized forestry administration so that it can issue a crocodile hunting permit in the conflict zone
- The laws should be applied whatever the problems caused by crocodiles, even in places where hunting is prohibited because of "Fady " (taboo)

A copy of the minutes of each meeting was filed at the Forest Cantonment and at the Fokontany in charge of the areas where hunting takes place.

Madagascar will not approve the export of any wild-taken crocodile skins. The lack of identification techniques about exported skins origin of monitoring agents and the management (Management authority and scientific authority) has led to confusion between ranch and wild skins. And it was from those facts that the workshop has been given by CSG members (see ...). Otherwise, collected data about human and crocodile conflicts was not sufficient to provide a wild export quota due to communication and information gathering issues from the concerned localities.

Therefore, the management system for problem crocodiles in Madagascar is under review and new procedures are being implemented at the grassroots levels to ensure that wild populations of Nile crocodiles are not threatened by hunting or other types of offtake. Madagascar will continue to keep the CITES Secretariat informed of all improvements and any new data that may warrant a special request to the Secretariat for a future wild quota, as outlined in Resolution Conf. 11.16 (Rev.CoP16) and as reviewed and approved by the CITES Animals Committee.

*c) Further to the training workshop, develop and implement a system of control of the ranches. In particular, their registers should include the following information: i) source of incoming stock (i.e. referenced authorization of each provider of eggs and source from which skins or hatchlings were obtained); ii) date and place of slaughter; iii) information relating to scute-clipping of hatchlings at the time of hatching, so that captive and ranched specimens can be identified; iv) identification of skins according to their origin, that is captive-bred or ranched specimens (through internal tagging system); v) captive breeding (eggs and hatchlings produced); and vi) if the ranch has a tannery, information on the skins that are processed and converted into products.*

Having found an ambiguity in distinguishing the origin of crocodile skins from Madagascar, in February 2010 the IUCN/SSCCrocodile Specialist Group carried out a training workshop on the identification of skins. Inspections were also carried out at the three crocodile ranches and their satellite sites as part of the capacity-building process in 2010. Since 2008, Madagascar has put in place a more effective monitoring system for the crocodile ranches, specifically:

*i) source of incoming stock (i.e. referenced authorization of each provider of eggs and source from which skins or hatchlings were obtained) - A system for monitoring stocks on crocodile ranches in*

Madagascar has always been in place through the Cahier de Charge for crocodile ranching, with the crocodile ranches obliged to report on the origin of crocodile eggs collected for the ranching programme. Since 2008, this system has been improved and the source of eggs, skins, hatchlings is strictly administered by the DGF. Egg collection is tracked from collection to hatching on the ranches, thus providing information on population dynamics at the egg collection site, through to hatching survival rates, which can be correlated back to the origin of the eggs.

Egg collection in the wild has not been authorised in Madagascar since 2009. Since the audit of the crocodile ranches that took place in 2009, and the continued imposition of the crocodile trade ban through CITES Notification 2010/15 of June 2010, the CrocoRanching II operation has been subject to a zero quota as the conclusion of the audit was that the standard of the infrastructure and the current stock levels at this ranch did not warrant an export quota allocation. The other crocodile ranch, Croc Farm/Reptel, continues to harvest crocodile eggs from its captive breeding operation; stock records are completed by the ranch and submitted to the DGF.

*ii) date and place of slaughter*- Ranch owners were informed by the Ministry of the requirement that representatives of the Directorate of Control (in the DGF) and the CITES Scientific Authority must be present during slaughter of crocodiles. Reports will be produced by the DGF and SA noting the precise date and place of slaughter, as well as morphometric data and origin of the crocodiles (ranch vs captive bred). These reports will be recorded electronically and be incorporated into the annual reports submitted by Madagascar to CITES in terms of Resolution Conf. 11.16 (Rev. CoP15).

*iii) information relating to scute-clipping of hatchlings at the time of hatching, so that captive and ranch specimens can be identified* Marking crocodiles on the ranches is an important aspect of crocodile management to enable a system of monitoring the origin and growth of hatchling crocodiles. A marking system is required in terms of the new set of management specifications (included as Annex V of the November 2013 Final Report to the CITES Secretariat<sup>1</sup>) is of three types: i) Micro-chip; ii) "Tail-Scuting"; iii) Labelling.

*iv) identification of skins according to their origin, that is captive-bred or ranch specimens (through internal tagging system)* - the DGF authority makes two types of skins labeling at slaughter: (a) the first type of label is intended for internal identification of skins and is the same as those used for the tanneries; (b) for skins intended to export, a second label to CITES standards purchased at approved international companies will be placed on the skins.

Microchips and "tail-scuting"<sup>2</sup> are designed for live animals. Croc Farm/Reptel attempted to cut the tail scutes of its hatchlings in 2010, but found that the scutes re-grew after one year, making it difficult to identify the crocodiles by this method. Croc Farm/Reptel, with the DGF's approval, will utilise micro-chips to tag its stock of crocodiles and identify captive-bred hatchlings from ranch hatchlings from hatching to slaughter.

*v) captive breeding (eggs and hatchlings produced)*- The only crocodile ranch that is carrying out captive breeding is Croc Farm/Reptel, at its main site in Ivato, Antananarivo. Croc Farm/Reptel has

<sup>1</sup>Submitted in terms of the Project No. S-423 of 14 March 2013 SSFA/2013/TDM-MDY

<sup>2</sup>The system of cutting raised scutes on the tail was described by Webb in 1977, where scutes are cut off at the base with a very sharp blade, making a small wound which bleeds but heals quickly. The cut must be made very low down at the base of the scute in order that it will not grow again, leaving a permanent mark – described in <http://www.fao.org/docrep/006/t0226e/t0226e08.htm>

consistently provided completed stock returns of the eggs collected from its breeding ponds, the number of eggs incubated and the number of hatchlings produced. Table 31 on page 76 of the attached comprehensive Report provides a summary of the number of eggs collected as well as the number of eggs incubated.

*vi)if the ranch has a tannery, information on the skins that are processed and converted into products-* The new Decree on crocodiles (Annex V of the attached comprehensive Report) includes a specific instruction to crocodile ranches possessing their own tannery that they must:

- *Si le ranch possède une tannerie, les informations sur les peaux traitées et transformées en produits doivent être livrées à chaque contrôle*
- *Pour les tanneries, elles doivent fournir toutes les preuves que les produits dérivés de crocodiles transformés dans la tannerie ne proviennent pas des animaux prélevés de l'extérieur*
- *L'existence des procédures prévoyant la possession obligatoire de carte professionnelle de tous les acteurs de la filière avant la délivrance de l'agrément pour éviter la propagation des secteurs informels rendant difficile la réalisation de l'opérations de contrôle. Les acteurs de la filière comme les artisans confectionneur, les tanneurs doivent également s'assurer que les peaux et produits dérivés circulant sur le marché national doivent correspondre aux limites de taille conformément aux réglementations en vigueur.*

*d) With regard to the artisanal industry: quantify numbers of artisanal and conventional retail outlets and tanneries; carry out inventories of current stocks (products and skins); develop and make it compulsory for the artisans to keep stock registers. These registers should include the following information: i) referenced authorization of each provider of live animals, skins and/or products; and ii)date of sale and details of buyer.*

*In addition, ensure that all artisans are registered or licensed with the government; and carry out random and regular inspections. Madagascar shall report to the Secretariat on the enforcement measures it has taken.*

In 2010, a call for 'expressions of interest' was launched to identify craftsmen using crocodile products. In the first instance, the craftsmen practicing their trade in-and-around Antananarivo responded to the call and a register of these individuals was created.

The attached comprehensive Report highlights the national regulations that govern the handicraft sector in Madagascar:

*En étant un agent économique à part entière, les acteurs de la filière sont soumis aux obligations fixées par la législation fiscale et celle du secteur régissant les matières premières qu'ils utilisent entre autre le Ministère de l'environnement et des forêts. Mais le secteur artisanal est dominé par le secteur informel (INSTAT, 2012) dû au non compréhension de texte en vigueur ou l'importance de charge fiscale sur la chaine de valeur. Plusieurs facteurs ont été à l'origine de la prolifération de ce secteur. En effet, dans la chaine de valeur, les vendeurs sont les plus dominants du marché et ont de ce fait le maximum de bénéfice, ceux qui font la confection sont les plus touchés par la valeur de la charge fiscale. Il en résulte que ce sont en majorité les points de vente qui ont les licences par rapport à la vente. La plupart des chasseurs, des confectionneurs et des tanneurs n'ont pas la régularisation de leur activité au niveau de la fiscalité. Ainsi, à partir de ces*

*recensements, la première étape que l'Administration a à effectuer concerne la sensibilisation des acteurs sur l'importance de cette régularisation avant l'octroi de l'agrément final. En outre, le Ministère de l'environnement et des forêts a entamé les discussions au niveau des Ministères responsables afin de voir ensemble le système pour appuyer l'artisanat dans l'objectif d'alléger les charges fiscales tout en tenant compte de la taille des entreprises artisanales*

In June 2010, November 2012 and February 2013, censuses were carried out of the market stalls and shops selling handicrafts made from crocodile products. The results of these censuses and inspections provided an estimate of the number and types of products on the market. As a result of the international trade ban in crocodile products from Madagascar, a number of artisanal crocodile leather craftsmen stopped using crocodile products and focused on other products, such as snake-skin, cow-hide and wild silks.

A labelling system was developed whereby all products along the value chain can be easily referenced, ranging from numbered aluminium labels for use by the tanners and numbered cardboard label for every product available on the shelves at each market stall or shop. Each operator must maintain a register and the numbered labels must be listed therein so that all of the products can be identified. In addition, each operator must maintain a stock register and all of the numbered labels are recorded in a database held at the CITES Management Authority, the DGF. The attached comprehensive Report notes:

*En ce qui concerne les confectionneurs, comme les produits ne font que transiter à leur niveau, le cahier de registre indique le nombre de peaux entrant avec référence du fournisseur ainsi que les produits finis issus de chaque peau et les points de vente récepteurs. En plus, les étiquettes placées sur les peaux au niveau des tanneurs seront récupérées à leur niveau. Toutes ces étiquettes sont référencées dans la base de données de l'Organe de Gestion CITES. Ce système de traçabilité des produits constitue le point de départ vers la légalisation des artisans. Il convient de faire remarquer que seuls les produits ayant les normes exigées sont étiquetés et référencés dans la base de données.*

*e) Further to the inventory of stocks and through regular inspections, ensure that skins and products entering the national and international markets are within the established legally-binding size limits; all products and skins not in compliance must be seized and destroyed and perpetrators must be prosecuted in accordance with appropriate national legislation.*

The review of regulations managing Madagascar's Nile crocodile protection (see Annex IV of the attached comprehensive Report) and the implementation of a more stringent monitoring system of the products and specimens' marketing are the main basis for the sector's reconstruction.

An update of the Decree establishing Madagascar's Nile Crocodile protection regime and the specimens and derivatives marketing conditions was performed (the Decree is attached hereto - and can be found on pages 130-135 in the attached comprehensive Report to the CITES Secretariat). It should also be noted that the setting of legally-binding size of animals that can be slaughtered is discussed in more detail in this part.

With regard to the recommendation that products that do not meet the size limits are seized and destroyed, and offenders prosecuted, it is important to underline the legislation in effect in

Madagascar for the penalization of infringements of this sort. Madagascar's legislation stipulates that all in fringements relating to hunting and wildlife protection, including crocodiles, are reprehensible acts under the laws in force in Madagascar. Therefore, the prosecution of offenders at court, under the prerogative of the Malagasy Justice, can be done without difficulty (Article 24 of the abovementioned Decree).

However, the destruction of the products that do not meet the imposed standards is virtually impossible in Madagascar because the various legal texts in force in Madagascar on a) Wildlife, b) International Trade in Endangered Species of Wild Fauna and Flora, c) repression of breaches of the forest law governing hunting, fishing and conservation do not provide for this type of sanction. It is, however, possible to confiscate and auction the seized products in accordance with limits laid down by the Law. This method of disposal of confiscated items complies with paragraph f) of Resolution Conf. 9.10 (Rev. CoP15), in that Madagascar has disposed of the 'confiscated dead specimens, including parts and derivatives, of Appendix-II' species 'in the best manner possible to achieve the purposes of the Convention'.

As the attached comprehensive Report notes in Section III.7:

*Madagascar a été secoué depuis l'année 2009 par une crise politique qui a amené à la fermeture de différentes sociétés et à la perte d'emploi. Il en résulte une crise sociale et économique sans précédent. Suite à cette crise et d'après les données de la banque mondiale, plus de 90% de la population s'est appauvri. En plus, le moratoire prévu pour 06mois a été prolongé, alors l'Administration forestière s'est focalisée sur l'aspect de la sensibilisation afin de contraindre les acteurs à effectuer leur régularisation.*

Thus, the formalisation of the informal and local handicraft sector is deemed to be more relevant and the Management Protocol for stakeholders involved in the crocodile trade chain provides a set of specifications to be followed (the '*Cahier de charges pour les opérateurs en Crocodiles*' can be found in Annex VI, page 137, of the attached comprehensive Report).

*f) Ensure that only licensed and authorized egg collectors carry out egg collection for the ranching programme, and that a collection report is submitted to the Direction Générale des Forêts (General Directorate for Forests, the CITES Management Authority for Madagascar).*

The collection of crocodile eggs in Madagascar is solely for the purpose of supplying the crocodile ranches with a stock of hatchlings for rearing through ranching. Egg collection for the ranches can only be carried out by licensed and approved egg collectors, who have to pay for the collection permit and submit completed egg collection sheets to the DGF. As the egg collectors are contracted by the ranches, the crocodile ranches also submit an egg incubation stock register, which provides a double-check of the numbers of eggs collected, their locality, the number of eggs rejected at the collection site, and the numbers successfully incubated at the main ranch site.

*g) Update all relevant databases relating to crocodile management, including human/crocodile conflicts.*

The importance of identifying factors influencing human-crocodile conflicts (HCC) provides a baseline for future monitoring efforts in the years to come and also assists with the development of mitigation measures. Studies of the natural habitat and especially the evolution of the environment

and number of anthropogenic activities are essential in order to monitor the changes that a site has undergone in order to determine the impact of these changes on the biology and ecology of the Nile crocodile population. During the field visits carried out in terms of the CITES Secretariat-funded Crocodile Project, riparian communities and local authorities were questioned about crocodile attacks in their area (field visit findings are documented in Section IV.3 of the attached comprehensive Report) with most of the attacks taking place in areas with the greatest anthropogenic and traditional fishing activities. In addition, human error and meteorological phenomena (eg, flooding during the cyclone season) are also responsible for human-crocodile conflicts.

A Crocodile Commission is being set up in Madagascar as an inter-ministerial body, designed to facilitate the collection of HCC incidences from the regions. At present, such incidences are being collated at the Cantonment level. In order to rectify the limited coordination of data from this level to the national DGF offices, local crocodile committees are being set up, not only to manage information on the levels of HCC, but also to monitor the collection of crocodile eggs and other aspects of the crocodile trade chain. The objectives of the local crocodile committees will include collaboration with local authorities and decentralised traditional leaders in an effort to combat illegal exploitation of wild crocodiles (further information on the crocodile conservation and management objectives of these local committees can be found on page 47 of the attached comprehensive Report).

The new Decree that has been drafted takes into consideration the management of HCC, where page 87 of the attached comprehensive Report notes:

- La mise en place de dispositif qui doit cerner la question conflit homme- crocodile pur qu'il ne puisse pas constituer la source de blanchiment de peaux mise à part la prise de mesure tendant à la sécurisation de la vie et des biens de la personne ;
- L'établissement des limites de taille juridiquement contraignantes techniquement plus détaillées pour l'abattage et la capture des crocodiles afin de protéger le cheptel reproducteur ;

The HCC database is located at the CITES Management Authority (the DGF) in Antananarivo and has been updated based on the information collected during the field visits in 2013. This database will be managed and updated by the newly-nominated CITES Scientific Authority specifically focused on Crocodiles. As Madagascar does not propose an export quota for wild-caught crocodile skins for 2014, any crocodile products resulting from the capture of nuisance crocodiles (based on the conditions inherent in the legislation in force) will be used solely for the local market's requirements.

*h) Provide the Secretariat with all relevant measures (e.g. law, decrees, 'notes de service', licence conditions for tanneries) affecting harvesting, use of and trade in Nile crocodiles specimens in Madagascar, as well as copies of the minutes of the 'National Crocodile Committee'.*

Madagascar's legislation regarding Nile crocodile management is subject to regular review and several decrees, licence arrangements and laws have been drafted, approved, ratified, and implemented since 2010. Copies of the relevant texts have been forwarded to the Standing Committee in the past, but new texts have been drafted during 2013, which await finalisation by the newly-elected Malagasy Government, that will further enhance the control and monitoring of the crocodile industry. The text of the Draft Decree can be found on Pages 129-134 (Annex IV) of the attached comprehensive Report, together with the associated *Arrêté Ministeriel portant approbation*

*des cahiers de charges* (pages 135-136 in Annex V of the same attached comprehensive Report). Furthermore, a draft '*Cahier de Charges des Acteurs de la Filière*' is available in Annex VI of the November 2013 Report (Pages 137-147). All of these texts are being applied to the extent possible while there is an export trade ban in place. Once the ban is lifted and the crocodile ranching industry resumes its activities, albeit at a much-reduced pace, the precise monitoring and application of regulations will become more evident as the ranchers and the management authority comply with the prevailing texts. Madagascar proposes to provide progress reports on the implementation of the Strategy document, and the associated Action Plan, on an annual basis. In addition, Madagascar welcomes external review by the CITES Secretariat and the IUCN/SSC Crocodile Specialist Group of the implementation of its revised Strategy.

*i) On the basis of the audit carried out, establish the 2010 export quotas for ranched specimens (source code 'R') from each ranching operation.*

Following the audit that was carried out in February 2010, Madagascar's DGF established export quotas for ranched specimens from each ranching operation based on the actual production capacity at each ranch. One of the crocodile ranches, Domaine St Christophe, decided to close its business in 2010, leaving just two ranches in existence: CrocoRanching II and Croc Farm/Reptel. In 2010, export quotas of ZERO for CrocoRanching II and 451 for Croc Farm/Reptel were forwarded to the CITES Secretariat. Since 2010, the trade moratorium has been in place and an effective zero quota has been in place.

During the period of the trade ban, the DGF did not issue any egg collection permits to the crocodile ranches to supply new ranching stock; consequently, the ranches have not had any ranched stock since 2011, although the larger Croc Farm/Reptel has continued with its captive breeding operation and does have a stock of farmed crocodiles. This ranch has continued to provide quarterly stock returns to the DGF as well as completed forms on the slaughter of crocodiles and their processing through their own tannery. Page 76 of the attached comprehensive Report gives the latest stock report from Croc Farm/Reptel, with 3,497 captive-bred eggs incubated during the September 2013 nesting season. The CrocoRanching II ranch does not have the necessary facilities to incubate eggs and has not collected any eggs from any source during the 2013 season.

For 2014, the DGF proposes a zero quota for both of the crocodile ranches; this is based on the actual production capacity at both ranches. As the DGF also proposes a zero quota for the export of wild skins taken in terms of its Problem Crocodile Management plan, there will be no exports of crocodile skins from Madagascar during 2014. The situation at each ranch will be reviewed later in 2014, particularly in the event that: 1) the trade ban is lifted; and 2) the ranching of eggs from the wild takes place during the 2014 breeding season. Under the terms of the Nile Crocodile Management Plan, each ranch will be required to submit egg collection forms, egg incubation data, hatching success reports and ranch stock returns – upon which their export quotas will be calculated.